Burbank Housing and Safety Element Update

Final Environmental Impact Report

SCH# 2021020393

prepared by

City of Burbank
Community Development Department
150 North Third Street
Burbank, California 91502
Contact: Shipra Rajesh, Senior Planner

prepared with the assistance of

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

September 2022

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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1 Introduction

This Final Environmental Impact Report (EIR) has been prepared by the City of Burbank (City) for the Burbank Housing and Safety Element Update (hereafter referred to as the "Housing and Safety Element Update" or "Project"). This Final EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statues (California Public Resources Code, Section 21000 et. seq., as amended) and implementing guidelines (California Code Regs., Title14, Section 15000 et. seq.).

Before approving a project, CEQA requires the lead agency to prepare and certify a Final EIR. The City has the principal responsibility for approval of the proposed Project and is therefore considered the lead agency under CEQA Section 21067. According to the *CEQA Guidelines*, Section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the Draft EIR
- Comments and recommendations received on the Draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The responses of the lead agency to significant environmental points raised in the review and consultation process
- Any other information added by the lead agency

The Draft EIR was circulated for a 65-day public review period that began on January 26, 2022, and ended on March 31, 2022. In addition, the Project Description, Biological Resources, and Utilities/Service Systems sections of the Draft EIR were recirculated for a public review period that began on July 22, 2022 and ended on September 6, 2022.

Format of the Final EIR

The Final EIR consists of the following four chapters:

- **Introduction.** This chapter summarizes the contents of the Final EIR, the environmental review process, and provides a summary of the Project characteristics and the alternatives that were analyzed.
- **Response to Comments**. During the public review period for the Draft EIR, written comment letters were received by the City and oral testimony was provided at public meetings. Chapters 2 and 3 of the Final EIR contain the comment letters for the Draft EIR and Recirculated Draft EIR, respectively, a summary of the oral testimony, and the City's responses to the comments.
- **Errata to the Draft EIR.** Several of the comments that are addressed in the Response to Comments resulted in minor revisions to the information contained in the January 2022 Draft EIR. Several other revisions have been made to correct typographical errors. These revisions are shown in strikeout and underline text in this chapter.
- **Mitigation Monitoring and Reporting Program.** This section of the Final EIR provides the mitigation monitoring and reporting program (MMRP) for the proposed Project. The MMRP is presented in table format and identifies mitigation measures for the proposed Project, the implementation period for each measure, the monitoring period for each measure, and the enforcing agency. The MMRP also provides a section for recordation of mitigation reporting.

Environmental Review Process

Notice of Preparation

The City of Burbank distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on February 22, 2021 and ending on March 23, 2021. In addition, the City held an online EIR Scoping Meeting on February 27, 2021. The meeting, held from 11:00 AM from 12:30 PM, was aimed at providing information about the proposed Project to members of public agencies, interested stakeholders and residents/community members. Due to COVID19 regulation the meeting was held online via zoom and additionally was live streamed on the City of Burbank YouTube channel.

In addition, the City of Burbank distributed a recirculated NOP of the EIR for an extended 30-day agency and public review period concluding on April 15, 2021. The original NOP stated that the EIR would analyze the addition of 8,800 units under the Regional Housing Needs Assessment (RHNA) that was conducted for the Housing Element Update. However, it was determined that the EIR would analyze 10,088 units to account for a 15 percent buffer for the RHNA. Therefore, the NOP was recirculated on March 17, 2021, with the higher number. In addition, the City held a second EIR Scoping Meeting on March 31, 2021. The meeting, held from 6:00 PM to 7:00 PM, was aimed at providing information about the proposed Project to members of public agencies, interested stakeholders and residents/community members. The meeting was conducted online via zoom.

The City received letters from five agencies in response to the NOP and recirculated NOP during the public review period, as well as various verbal comments during the two EIR Scoping Meetings. The NOP and recirculated NOP are presented in Appendix A of the Draft EIR, along with the NOP responses received for both notices, and the Initial Study that was prepared for the Project is included in Appendix B of the Draft EIR. Table 1-1 in Section 1, *Introduction,* of the Draft EIR, summarizes the content of the letters and Scoping Meeting comments, and identifies where the issues are addressed in the Draft EIR or the Initial Study.

The NOP that was circulated on March 17, 2021 for the proposed Project included an estimated growth of 10,088 housing units based on the City's RHNA allocation and 15 percent buffer.[1] However, the estimated growth for the purpose of the Draft EIR analysis was changed to 10,456 housing units to account for the 2029 interpolated housing growth assumed under the two Specific Plans along with the City's RHNA allocation.

Noticing and Availability of the Draft EIR

The Draft EIR was made available for public review and comment pursuant to *CEQA Guidelines* Section 15087. The public review period for the Draft EIR started on January 26, 2022, and ended on March 31, 2022. At the beginning of the public review period, the Draft EIR and one copy of the Notice of Completion (NOC) were submitted to the State Clearinghouse.

A Notice of Availability (NOA) of the Draft EIR was mailed to 40 agencies and organizations. An NOA was also sent to individuals who had previously requested such notice in writing. The NOA was filed with the Los Angeles County Clerk and published in the Los Angeles Times on January 26, 2022. The NOA described where the document is available for public review and how to submit comments on

[1] Since circulation of the Recirculated Draft EIR on July 22, 2022, the site capacity in the revised version of the Housing Element is 10,011 housing units, which now includes a 14 percent buffer. The Project details in the *Summary of Project and Alternatives* reflect the revised version of the Housing Element. However, the EIR analysis maintains a conservative analysis using 10,456 housing units as the estimated growth to account for the 2029 interpolated housing growth assumed under the two Specific Plans along with the City's RHNA allocation.

the Draft EIR. The NOA and Draft EIR were also made available for public review at the City of Burbank, Community Services Building, 1st Floor Community Development Department, at 150 North Third Street, Burbank; the Burbank Central Library at 110 North Glenoaks Boulevard, Burbank; the Buena Vista Branch Library at 300 North Buena Vista Street, Burbank; the Northwest Branch Library at 3323 West Victory Boulevard, Burbank; and on the City's website. The public review period provided interested public agencies, groups, and individuals the opportunity to comment on the contents of the Draft EIR. During the public review period, oral comments were received during the Planning Commission meeting held on March 14, 2022.

Noticing and Availability of the Recirculated Draft EIR

The Recirculated Draft EIR was made available for public review and comment pursuant to CEQA Guidelines Section 15087. The Recirculated Draft EIR included revisions to the Project Description, the Biological Resources section and the Utilities/Service Systems section. The public review period for the Recirculated Draft EIR started on July 22, 2022 and ended on September 6, 2022. At the beginning of the public review period, the Recirculated Draft EIR and the Notice of Completion (NOC) were submitted to the State Clearinghouse. A NOA and an electronic copy of the Recirculated Draft EIR was mailed to 40 agencies and organizations. Relevant agencies were sent electronic copies of the documents. An NOA was also sent to individuals who had previously requested such notice in writing. The NOA was filed at the Los Angeles County Clerk and published in the Los Angeles Times on July 22, 2022. The NOA described where the document is available for public review and how to submit comments on the Recirculated Draft EIR. The NOA and Recirculated Draft EIR were also made available for public review at the City of Burbank, Community Services Building, 1st Floor Community Development Department, at 150 North Third Street, Burbank; the Burbank Central Library at 110 North Glenoaks Boulevard, Burbank; the Buena Vista Branch Library at 300 North Buena Vista Street, Burbank; the Northwest Branch Library at 3323 West Victory Boulevard, Burbank; and on the City's website. The public review period provided interested public agencies, groups, and individuals the opportunity to comment on the contents of the Recirculated Draft EIR. During the public review period, oral comments were received during the Planning Commission meeting held on August 22, 2022.

Final EIR

The Final EIR addresses the comments received during the public review period and includes minor changes to the text of the Draft EIR in accordance with comments that necessitated revisions. This Final EIR will be presented to the Planning Board and City Council for potential certification as the environmental document for the proposed Project. All persons who commented on the Draft EIR will be notified of the availability of the Final EIR prior to the public hearings, and all agencies who commented on the Draft EIR will be provided with a copy of the Final EIR at least 10 days before EIR certification, pursuant to *CEQA Guidelines* Section 15088(b). The Final EIR will also be posted on the City's website.

Pursuant to *CEQA Guidelines* Section 15091, the City shall make findings for each of the significant effects identified in this EIR and shall support the findings with substantial evidence in the record. After considering the EIR in conjunction with making findings under Section 15091, the lead agency may decide whether or how to approve or carry out the Project. Although the City finds that the inclusion of mitigation measures as part of Project approval will reduce most of the potentially significant effects to less than significant, one transportation impact related to vehicle miles traveled (VMT), and one utilities/service systems impact related to wastewater will remain

significant and unavoidable after implementation of mitigation. As such, the City the prepared a statement of overriding considerations pursuant to *CEQA Guidelines* Section 15093 for consideration by the City Council.

In addition, when approving a project, public agencies must also adopt a MMRP describing the changes that were incorporated into the proposed Project or made a condition of Project approval to mitigate or avoid significant effects on the environment (*CEQA Guidelines* Section 15097). The MMRP is adopted at the time of Project approval and is designed to ensure compliance during Project implementation. Upon approval of the proposed Project, the City will be responsible for implementation of the Project's MMRP.

Revisions to the Draft EIR

The comments received during the public review period for the Draft EIR resulted in several minor clarifications and modifications in the text of the January 2022 Draft EIR. These changes are included in Section 4, *Errata to the Draft EIR*, of the Final EIR, to be presented to City decision makers for certification and Project approval.

CEQA Guidelines Section 15088.5 sets forth requirements for why a lead agency must recirculate an EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. New information may include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered significant unless the EIR is changed in a way 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) that the project's proponents have declined to implement. As defined in *CEQA Guidelines* Section 15088.5(a), significant new information requiring recirculation includes the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A 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 environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The minor clarifications and modifications that were made to the Draft EIR are shown in the Errata of this Final EIR. None of the revisions that have been made to the EIR resulted in new significant impacts; none of the revisions resulted in a substantial increase in the severity of an environmental impact identified in the Draft EIR; and none of the revisions introduced a feasible Project alternative or mitigation measure that is considerably different from those set forth in the Draft EIR. Furthermore, the revisions do not cause the Draft EIR to be so fundamentally flawed that it precludes meaningful public review. As none of the CEQA criteria for recirculation have been met, recirculation of the EIR is not warranted. As stated in *CEQA Guidelines* Section 15088.5(b), "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

Summary of the Project and Alternatives

The following is a summary of the full Project description, which can be found in Section 2, *Project Description,* of the Draft EIR.

The proposed Project would involve an update to the Housing Element of the City's Burbank2035 General Plan for the 2021-2029 planning period, along with minor updates to the Safety, Land Use, Open Space and Conservation, Air Quality and Climate Change, Noise, and Mobility Elements, and the incorporation of environmental justice goals, policies and objectives into the Burbank2035 General Plan. The proposed Housing and Safety Element Update establishes programs, policies and actions to further the goal of meeting the existing and projected housing needs of all household income levels of the community; provides evidence of the City's ability to accommodate the RHNA allocation through the year 2029, as established by the Southern California Association of Governments (SCAG), and identifies any rezoning program needed to reach the required housing capacity. The Safety Element update is triggered by various new provisions of State law, the Mobility Element update would incorporate VMT metrics per Senate Bill (SB) 743, and the environmental justice policies would be added pursuant to the requirements of SB 1000 which requires that revisions or adoption of two or more elements of a general plan on or after January 1, 2018 "adopt or review the Environmental Justice Element, or the environmental justice goals, policies, and objectives in other elements" to focus on the inclusion of disadvantaged communities (DACs) in decision making procedures as well as increasing protections for these communities.

The Project would require the following discretionary approvals:

- Certification of this EIR prepared for the proposed Project
- Adoption of the Housing Element Update for the 2021-2029 planning period
- Adoption of updates to the Safety Element
- Adoption of updates to other Burbank2035 General Plan elements to incorporate environmental justice policies
- Rezoning of opportunity sites within the Specific Plan areas

After adoption by the City Council, the updated Housing Element will be submitted to the California Department of Housing and Community Development for certification. The Safety Element updates will be submitted to CalFire for their review and approval.

Project Characteristics

The Housing and Safety Element Update would apply to the entire geographic area located within the boundaries of the City of Burbank, which encompasses 17.1 square miles. The Project would involve an update to the Housing Element of the City's 2035General Plan for the 2021-2029 planning period, along with minor updates to the Safety, Land Use, Open Space and Conservation, Air Quality and Climate Change, Noise, and Mobility Elements, and the incorporation of environmental justice goals, policies and objectives into the 2035 General Plan. The proposed Housing Element Update establishes programs, policies and actions to further the goal of meeting the existing and projected housing needs of all household income levels of the community; provides evidence of the City's ability to accommodate the RHNA allocation through the year 2029, as established by SCAG; and identifies any rezoning program needed to reach the required housing capacity.

Housing Element

The Housing Element is comprised of the following major components:

- Review of effectiveness of existing Housing Element
- Assessment of existing and projected housing needs
- Identification of resources – financial, land, administrative
- Evaluation of constraints to the development of housing
- Housing Plan – goals, policies, and programs including programs 10 and 11 that provide for updates to local density bonus and inclusionary housing regulations that includes an economic feasibility analysis to evaluate the potential impact of adding prevailing wage and workforce training requirements to new housing developments

The Housing Element Update would provide a framework for accommodating new housing at all levels of affordability that is within access to transit, Downtown jobs, services, and open spaces within the 8-year planning period of October 2021-October 2029. New housing units may occur anywhere in the City where residential uses are permitted, as well as in areas that may be rezoned in the future to allow for multi-family residential and mixed-use residential of adequate density to meet State-required housing production and affordability targets as discussed below.

RHNA Allocation

SCAG has allocated the region's 1,341,827 housing unit growth needs to each city and county through a process called the RHNA. The RHNA represents the minimum number of housing units that the City is required to plan for in its housing element by providing "adequate sites" through the Burbank2035 General Plan and zoning residential capacity. As shown in Table 1-1, Burbank's RHNA allocation for the 2021-2029 planning period (6th RHNA cycle) is 8,772 units, which is distributed among four income categories. Additionally, the City is required to provide a sufficient buffer beyond that required by the RHNA to ensure that adequate site capacity exists throughout the eight-year planning period.

Table 1-1 RHNA Percentage of Income Distribution

Income Level	Percent of Area Median Income (AMI)	Units	Percent
Very Low	0-50%	2,553	29%
Low	51-80%	1,418	16%
Moderate	81-120%	1,409	16%
Above Moderate	>120%	3,392	39%
Total	**–**	**8,772**	**100%**

The RHNA represents the minimum number of housing units that the City is required to plan for in its housing element by providing "adequate sites" through the 2035General Plan and zoning.

Table 1-2 shows the estimated number and affordability level of housing units to accommodate the City's RHNA under the existing General Plan and zoning, including projects that are entitled and pending entitlement, specified housing opportunity sites, Accessory Dwelling Units (ADUs) expected to be developed over the course of the planning period, and the units produced through the City's committed assistance program. As shown in Table 1-2, these sources total 7,569, which falls short of the RHNA allocation by 1,203 units.

Table 1-2 Estimated Net Housing Units for the City of Burbank

Sites/Projects	Total Net Units	Income Distribution			
		Very Low	Low	Moderate	Above Moderate
2021 – 2029 RHNA Targets	**8,772**	**2,553**	**1,418**	**1,409**	**3,392**
Entitled Projects	1,845	91	6	83	1,665
Pending Entitlement	490	27	138	29	296
Opportunity Sites (Zoning in place)	3,624	1,995	1,072	280	277
Accessory Dwelling Units (ADUs)[1]	1,600	384	704	32	480
Committed Assistance[2]	10	10	0	0	0
Total Site Capacity	**7,569**	**4,427**		**424**	**2,718**
RHNA Surplus/(Shortfall)	**(1,203)**	**+456**		**(985)**	**(674)**

[1] ADUs are small backyard units that are either attached or detached from a single-family home.

[2] Committed Assistance units are units that the City has provided a legally enforceable agreement to provide. This is through an ongoing partnership with the Burbank Housing Corporation. See the Housing Element for further discussion.

To make up for this shortfall of 1,203 units, the Housing Element includes a housing program to rezone additional opportunity sites through adoption of two specific plan projects: the Downtown Transit-Oriented-Development Specific Plan (Downtown TOD) and the Golden State Specific Plan (GSSP) (see Figure 2-3 in Section 2, *Project Description,* of the Draft EIR for the Specific Plan locations and opportunity sites). Adoption of these Specific Plans will provide the necessary zoning, development standards, and processing procedures to facilitate the production of the shortfall of housing units required to accommodate the City's RHNA during the Housing Element planning period. The zone changes required by these Specific Plans will be adopted in 2022-2023, or within three years of the start of the planning period as required by State law.

Table 1-3 shows the number of units expected from the rezoning of the Specific Plan areas. With the additional rezone sites the City would exceed the RHNA requirement by 1,239 units with an additional 2,442 units accommodated. The State requires jurisdictions to create a sufficient buffer in the Housing Element sites inventory beyond that required by the RHNA to ensure that adequate site capacity exists throughout the eight-year planning period. The NOP that was circulated on March 17, 2021 for the proposed Project included an estimated growth of 10,088 housing units based on the City's RHNA allocation and 15 percent buffer. However, the estimated growth for the purpose of this analysis was changed to 10,456 housing units to account for the 2029 interpolated housing growth assumed under the two Specific Plans along with the City's RHNA allocation.

Table 1-3 Projected Specific Plan Units

Specific Plan	Total Net Units
Downtown TOD rezone sites	627
Golden State Specific Plan rezone sites	1,815
Total	**2,442**
Existing GP Units (from Table 1-2)	7,569
New Total with Specific Plans, Entitled/Pending Projects and ADUs	**10,011**
RHNA Surplus/(Shortfall)	**1,239**

Housing Opportunity Sites

The opportunity sites include 19 locations that have the greatest potential to accommodate the RHNA's housing growth allocated for Burbank. Twelve of the opportunity sites are located in the proposed Downtown TOD Specific Plan area and seven sites are located in the proposed Golden State Specific Plan area. The locations of these sites of shown in Figure 2-3 of Section 2, *Project Description,* of the Recirculated Draft EIR.

Safety Element Update

The Safety Element update will ensure consistency with the Housing Element Update and will comply with recent State legislation and guidelines (including Assembly Bill 162, SB 1241, SB 99, Assembly Bill 747, SB 1035 and SB 379). Amendments incorporate data and maps, address vulnerability to climate change; incorporate policies and programs from the City's Hazard Mitigation Plan and the Greenhouse Gas Reduction Plan, as well as partial or full integration of other City documents and programs (including but not limited to: Ready Burbank and the Emergency Survival Program). Key areas of the Burbank Safety Element update include updated flooding and fire hazard maps, emergency response and preparedness, especially as they relate to the City's projected climate change exposure, and vulnerability. The Safety Element amendments were submitted to the California State Board of Forestry and Fire Protection (CalFire) for review on August 16, 2022, and the document was revised to incorporate the revisions recommended by the CalFire. The Safety Element will be presented to the CalFire Board on September 20, 2022, for final approval.

Environmental Justice Update

SB 1000 states that revisions or adoption of two or more elements of a general plan on or after January 1, 2018, trigger a requirement to "adopt or review the Environmental Justice Element, or the environmental justice goals, policies, and objectives in other elements." Environmental justice goals, policies, and objectives must aim to reduce health risks to DACs, promote civil engagement, and prioritize the needs of these communities. Environmental justice goals, policies, and objectives must aim to reduce health risks to DACs, promote civic engagement, and prioritize the needs of these communities. Appendix B of the Draft EIR includes a list of the updates to policies and implementation measures for the Safety, Land Use, Open Space and Conservation, Air Quality and Climate Change, Noise, and Mobility Elements of the Burbank2035 General Plan. These updates focus on the inclusion of disadvantaged communities in decision making procedures as well as increasing protections for these communities.

Mobility Element Update

SB 743 requires the Governor's Office of Planning and Research (OPR) to establish new metrics for determining the significance of transportation impacts of projects within transit priority areas (TPAs) and allows OPR to extend use of the metrics beyond TPAs. OPR selected VMT as the preferred transportation impact metric and applied their discretion to require its use statewide. In order to comply with this requirement, the Mobility Element would be updated to require the use of VMT analysis according to OPR guidelines.

Project Objectives

- Meet the City's fair share, plus a reasonable buffer, of the regional housing need to accommodate projected population growth within the City and region consistent with the Regional Housing Needs Assessment (RHNA) allocation
- Conserve and enhance the quality of existing housing and neighborhoods
- Provide housing sites that accommodate a range of housing types to meet the diverse needs of existing and future residents
- Continue to facilitate the development of housing affordable for all economic segments of the community and make inroads in addressing the City's jobs-to-housing imbalance
- Focus on removing governmental constraints to the maintenance, improvement, and development of housing
- Promote non-discrimination and fair and equal housing opportunities for all persons

Alternatives

As required by CEQA, the EIR examines alternatives to the proposed Project. Studied alternatives include the following two alternatives discussed below. Alternative 1 would be the environmentally superior alternative.

Alternative 1: No Project

The "No Project" Alternative involves continued implementation of the existing 2013-2021 Housing Element and a continued growth rate predicted by SCAG to yield 3,591 units by 2029. The No Project Alternative assumes that the City's existing plan and policies would continue to accommodate development in accordance with existing land use designations. Ultimately, this alternative would not fulfill the State requirements regarding updates to the Housing Element and SCAG's RHNA allocation.

Due to the limitation placed on development in the city under existing plans and policies, the No Project Alternative would not be consistent with Objective 1, which aims to accommodate employment, housing, and population growth projections forecasted through the planning horizon year of 2029 and Objective 4, which aims to facilitate affordable housing options throughout the city.

Alternative 1 (*No Project)* assumes continued implementation of the existing 2013-2021 Housing Element and a continued growth rate predicted by SCAG to yield 3,591 units by 2029. Alternative 1 also assumes that the City's existing plan and policies would continue to accommodate development in accordance with existing land use designations. This alternative would result in less impacts to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, population and housing, public services, recreation, and utilities and service systems due to the decrease in residential units developed. However, impacts relating to transportation and traffic would be greater than under the Project as the VMT for the City would not be reduced by the 15 percent required for each of the three service populations because there would not be sufficient population added to the area surrounding the transit corridors and employment areas to reduce driving distances. Furthermore, Alternative 1 would not fulfill Project Objective 1 because the continued implementation of the existing 2013-2021 Housing Element would result in the development of fewer residential units and therefore, would be unable to accommodate employment, housing, and population growth projections

forecasted through the planning horizon year of 2029. In addition, Alternative 1 would not fulfill Project Objective 4 because continued implementation of the existing 2013-2021 Housing Element would limit additional affordable housing options throughout the City.

Alternative 2: City Build-Out

Alternative 2 (*City Build-Out*) would involve the buildout of 18,600 units, which would result in 8,144 additional units and bring the City residential units up to the limit established by Measure One. This alternative would increase density throughout the City by accommodating the additional units in the Medium Density, High Density and Various Commercial zone districts. Alternative 2 would result in less impacts to transportation and traffic as the reduction in VMT over the SCAG region would be greater than that of the proposed Project. However, impacts relating to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, population and housing, public services, and recreation would be higher than under the Project due to the 78 percent increase in residential units developed. In addition, the increase in residential units would require new connections for water supply, wastewater conveyance and sufficient capacity for wastewater treatment, electricity use, solid waste disposal, and telecommunications and would likely result in the construction of new water, wastewater, electricity, solid waste and telecommunications facilities to serve the expanded population. Therefore, impacts relating to utilities and service systems under this alternative would be significant and unavoidable, resulting in greater impacts than under the Project. Furthermore, Alternative 2 would not fulfill Objective 2 as it would change the character of existing neighborhoods by increasing the density.

2 Responses to Comments on the Draft EIR

This section includes comments received during the circulation of the Draft Environmental Impact Report (EIR) prepared for the Burbank Housing and Safety Element Update (hereafter referred to as the "Housing and Safety Element Update" or "Project").

The Draft EIR was circulated for a 65-day public review period that began on January 26, 2022, and ended on March 31, 2022. The City of Burbank received 143 comment letters on the Draft EIR. The commenters and the page number on which each commenter's letter appear are listed below. Responses to oral comments received during the Planning Board meeting held on March 14, 2022, are provided under the Planning Board (P) and Speaker (S) sections as identified below.

The comments are typically presented chronologically based on the date received. However, among the letters received by Organizations, one separate commenter (Letter O-1) raised specific concerns regarding the adequacy of the Draft EIR whereas the remaining commenters raise non-CEQA issues pertaining solely to the proposed Project and/or other topics unrelated to the Draft EIR. Therefore, this letter is addressed first to maintain the focus on the Draft EIR prepared for the proposed Project, and the exhibits to the letter are included as Appendix H of this EIR.

In addition, the Project Description, Biological Resources, and Utilities/Service Systems sections of the Draft EIR were recirculated for a 47-day review period that began on July 22, 2022. Responses to comments received on the Recirculated Draft EIR, including oral comments during the Planning Board meeting held on August 22, 2022, are provided in Section 3 of the Final EIR.

Table 2-1 List of Commenters on the Draft EIR

The comment letters and responses follow. The comment letters have been 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 A-1.1, for example, indicates that the response is for the first issue raised in Comment Letter A-1).

Any changes made to the text of the Draft EIR correcting information, data, or intent, other than minor typographical corrections or minor working changes, are noted in the Final EIR as changes from the Draft EIR. Where a comment results 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 strikeouts (~~strikeouts~~) where text is removed and by underlined font (<u>underlined font</u>) where text is added. All revisions to the Draft EIR can be found in Section 4, *Errata*, of the Final EIR.

Letter A-1

GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

January 31, 2022

Project Name: Burbank Housing and Safety Element Update

Thank you for your letter regarding the project above. This is to concur that we are in agreement with the Housing Element Update. However, our Tribal government would like to request consultation for any and all future projects when ground disturbance will be occurring within this location. 1

Sincerely,

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
1(844)390-0787

PO Box 393 Covina, CA 91723 www.gabrielenoindians.org admin@gabrielenoindians.org

Letter A-1

COMMENTER: Andrew Salas, Chairman, Gabrieleno Band of Mission Indians – Kizh Nation

DATE: January 31, 2022

Response A-1.1

The commenter states that the Gabrieleno Band of Mission Indians – Kizh Nation are in agreement with the Housing Element Update and requests consultation for any and all future projects within Burbank that include ground disturbance.

The comment is noted, but does not raise specific concerns that pertain to the adequacy of the EIR. All future projects requiring ground disturbance within Burbank will provide a request for consultation to the Gabrieleno Band of Mission Indians – Kizh Nation.

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-2

Making Conservation a California Way of Life

March 16, 2022

Shipra Rajesh, Associate Planner
City of Burbank
Community Development Department-Planning Division
150 North Third Street
Burbank, CA 91502

RE: Burbank Housing and Safety Element Update
SCH # 2021020393
Vic. LA-134 & LA-05 Citywide
GTS # LA-2021-03840-DEIR

Dear Shipra Rajesh:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The Burbank Housing Element Update and Associated General Plan Updates involves an update to the Housing Element for the 2021-2029 planning period, along with minor updates to the Safety and Mobility Elements, and incorporates environmental justice goals, policies and objectives to the City of Burbank's 2035 General Plan. The updated Housing Element will lay the foundation for achievement of the City's fair share housing needs for approximately 10,456 additional units.

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: 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.

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 2

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.

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. 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. 2 cont.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at: 3

http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review these resources at the following links:

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf

Caltrans encourages lead agencies to prepare traffic safety impact analysis for all developments in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050. 4

Caltrans acknowledges from the DEIR that "As shown in Table 4.11-1, full buildout of the 2029 Housing Element Update would result in 3 percent less average total VMT per service population, 39 percent less average VMT per capita, and 7 percent less average VMT per employee compared to the 2021 SCAG region baseline. This result exceeds the thresholds of significance for average total VMT per service population and average VMT per employee and does not exceed the threshold of significance for average VMT per capita. The analysis shows that the addition of new housing to the City in conformance with the goals and policies of the Housing Element provides a large reduction in VMT per capita because the Project improves the jobs-to-housing balance in Burbank, allowing more residents to live closer to their work location. The goals and policies of the Housing Element also reduce VMT per employee. However, since a large proportion of employees who work in Burbank live outside of Burbank, the reduction in VMT per employee due to the Project is not as large as the reduction in VMT per capita. In other words, adding housing supply affects resident travel behavior more so than employee travel behavior. Similarly, the Project provides a reduction in total VMT per service population, but to a lesser extent than VMT per capita. This is because total VMT per service population includes non-home-based trips, such as heavy truck delivery trips (i.e., adding housing supply does not directly affect freight/logistics operations in the City). Therefore, while the Housing Element would reduce VMT for all three metrics, it would not reduce them beyond the threshold of 15 percent for two of the metrics. Since the Housing Element Update would exceed two of the three thresholds of significance, the project results in a significant impact." 5

Potential mitigation measures that would reduce the average total VMT per service population and average VMT per employee are generally project specific mitigation measures such as:

- Provide bicycle parking at employer locations
- Provide parking cash-out programs
- Provide car-sharing, bike sharing, and ride-sharing programs at employer locations
- Provide transit passes to employees
- Improve or increase transit accessibility to employer locations
- Improve pedestrian or bicycle networks, or transit service
- Provide traffic calming features on City roadways

These mitigation measures can be applied at the project specific level but are not feasible at the program level for a housing element as they are beyond the scope of the document. Therefore, there is no feasible mitigation available to reduce the impacts. 5 cont.

Given the above finding, Caltrans recommends a post-development VMT analysis for each development project with all mitigation measures be prepared for monitoring purpose and for future project thresholds in the area. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact. 6

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03840-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse

Letter A-2

COMMENTER: Miya Edmonson, LDR/CEQA Branch Chief, California Department of Transportation

DATE: March 16, 2022

Response A-2.1

The commenter provides a description of the Project and states that vehicle miles traveled (VMT) is the primary metric in identifying transportation impacts for all future development projects.

The Project complies with CEQA's requirements for transportation analyses because VMT was used as the primary metric in identifying the Project's potential transportation impacts in Section 4.11, *Transportation*, of the Draft EIR.

Response A-2.2

The commenter states that the California Department of Transportation (Caltrans) supports the implementation of complete streets and pedestrian safety measures and that the EIR should ensure all modes of travel are served well by planning and development activities.

Caltrans' support for implementation of complete streets and pedestrian safety measures is noted. As discussed under Impact TRA-3 in Section 4.11, *Transportation*, of the Draft EIR, reasonably foreseeable development accommodated under the Housing Element Update would be reviewed by the appropriate City staff to ensure consistency with all applicable City and State design standards, including standards for project access points, location, and design, sight lines, roadway modifications, and provisions for bicycle and pedestrian transportation connections.

Response A-2.3

The commenter encourages the City to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

As discussed in Section 4.11, *Transportation*, of the Draft EIR, the City of Burbank has an ITS that allows the monitoring and control of traffic signals from a central operations center. City staff can manually adjust traffic signals remotely from the central operations center to respond to collisions, weather, special events, and other major incidents. The City's ITS is interconnected with the Los Angeles County traffic signal Information Exchange Network and shares information with Los Angeles City and County, and the cities of Glendale and Pasadena. In addition, traffic signal timing is also coordinated with Caltrans.

The Draft EIR discusses potential TDM strategies in Section 4.11, *Transportation*, to address the VMT per employee and VMT per service population impacts but concludes that enacting TDM measures at an employer location or to address service population impacts is generally beyond the scope of the Housing Element. Therefore, it is infeasible to mitigate the VMT per employee and VMT per service population impacts. However, as each individual project is processed through the entitlement process, VMT impacts will be addressed and mitigated where feasible.

Response A-2.4

The commenter encourages the preparation of traffic safety impact analysis for all developments in the CEQA review process.

The comment is noted, but does not raise specific concerns that pertain to the adequacy of the EIR. The Housing Element is a land use plan and as such does not grant entitlement for any specific project or future development. All development projects under the CEQA review process would be required to assess the project's impacts on transportation, including whether the project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; conflict or be inconsistent with CEQA Guidelines Section 15064.3(b); or substantially increase hazards due to a geometric design feature or incompatible use. The Draft EIR also discusses both bicycle and pedestrian safety at a citywide level from a plan/policy consistency perspective.

Response A-2.5

The commenter replicates the information provided in the Draft EIR on page 4.11-16, acknowledging that the information provided in the Draft EIR is correct.

The comment is noted. No further response is required.

Response A-2.6

The commenter recommends preparation of a post-development VMT analysis for each individual development project within the Plan Area that includes mitigation measures to reduce any significant traffic impacts.

Implementation of the requirement to conduct a post development VMT analysis for each development project in the Housing Element plan area (which is the entire City) is beyond the scope of the EIR, is not a requirement of CEQA, and is not currently required as a process that has been adopted by the City of Burbank. Requiring a post development VMT analysis as described in the comment would be unduly burdensome to housing developers and the City of Burbank, and could add an additional impediment to housing production. Projects requiring subsequent environmental analysis where that analysis identifies a VMT impact, and proposes VMT mitigation measures, would be required by the City to adhere to a Mitigation Monitoring and Reporting Program to ensure that when mitigation measures are implemented, they can demonstrate the ability to reduce the project's VMT impact to less than significant.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Letter A-3

SENT BY EMAIL ONLY

March 18, 2022

Shipra Rajesh
City of Burbank
150 North Third Street
Burbank, CA 91502
SRajesh@burbankca.gov

Subject: Burbank Housing Element Update and Associated General Plan Updates, Draft Environmental Impact Report, SCH #2021020393, City of Burbank, Los Angeles County

Dear Mr. Rajesh:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) from the City of Burbank (City; Lead Agency) for the Burbank Housing Element Update and Associated General Plan Updates (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. 1

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources. 2

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq*.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA;

Fish & G. Code, § 1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code. 2 cont.

Project Description and Summary

Objective: The Project proposes an update to the Housing Element outlined in the City of Burbank 2035 General Plan for the 2021-2029 planning period. The HEU sets reasonable goals, objectives, policies, and programs to achieve future housing needs for the City. The Southern California Association of Governments (SCAG) Regional Housing Needs Assessment (RHNA) allocation for the City identified a housing need of 8,772 units. The 8,772 units allocated to the City will be divided into the following categories: 2,553 very low-income units; 1,418 low-income units; 1,409 moderate-income units; and 3,392 above moderate-income units. The City intends to utilize entitled projects, accessory dwelling units (ADUs), and committed assistance to accommodate the RHNA allocation. The City also intends to adopt the Downtown Transit-Oriented Development Specific Plan and the Golden State Specific Plan to achieve the RHNA allocation. Within these two specific plan projects, there are 19 specified housing opportunity sites that can accommodate approximately 2,442 units. In addition to the housing element update, the City proposes minor updates to the Safety and Mobility Elements. The City of Burbank 2035 General Plan will also be updated to incorporate environmental justice policies required by State law. Lastly, there is no physical development, construction, or other ground disturbance activity proposed in the HEU. Adoption of the HEU does not approve any future housing developments. 3

Location: The Project site encompasses the entire City of Burbank, which stretches 17.1 square miles throughout the central portion of Los Angeles County. The City is bounded by the Verdugo Mountains to the northeast, the City of Glendale to the southeast, and the City of Los Angeles to the south and west. The City is bisected by the Interstate 5 Freeway and the Metrolink Commuter Rail.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately avoiding and/or mitigating the Project's impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Specific Comments

Comment #1: Impacts on least Bell's vireo

Issue: The Project may impact least Bell's vireo (*Vireo bellii pusillus*), an Endangered Species Act (ESA)-listed and CESA-listed species. The DEIR does not provide discussion or avoidance measures to reduce impacts to least Bell's vireo within the Project site. 4

Specific Impacts: Future housing development during least Bell's vireo breeding and nesting season could result in nest abandonment, reproductive suppression, or incidental loss of fertile eggs or nestlings.

Why impacts would occur: Least Bell's vireo habitat requirements include dense shrubs, small trees, and a water source such as a river or stream. There are various locations throughout the Project site that may provide potential habitat for this species. Additionally, the California Natural Diversity Database (CNDDB) has recorded observations of least Bell's vireo within the Project site (CDFW 2022a). Future housing development could result in temporary or long-term loss of suitable nesting and foraging habitat. Future construction activities could create elevated levels of noise, human activity, dust, and ground vibrations. These disturbances and stressors occurring near potential nests could cause least Bell's vireos to abandon their nests, resulting in the loss of fertile eggs or nestlings. Removal of trees and shrubs within a future project site may also result in direct loss of breeding habitat for least Bell's vireo.

Evidence impact would be significant: There are only a few populations and breeding pairs of least Bell's vireo remaining in Los Angeles County. Project construction and activities resulting in loss of breeding pairs or nestlings or habitat supporting least Bell's vireo may result in the Project potentially causing a wildlife population to drop below self-sustaining levels; threaten to eliminate an animal community; or substantially reduce the number of restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, § 15065). Accordingly, impacts on least Bell's vireo may require a mandatory finding of significance (CEQA Guidelines, § 15065). 4 cont.

CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. Inadequate avoidance, minimization, and mitigation measures for impacts on the least Bell's vireo will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on a wildlife species identified as special status by CDFW and USFWS.

As to CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #1: If future housing developments will impact least Bell's vireo, early consultation with CDFW is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Appropriate authorization from CDFW may include an Incidental Take Permit or a Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)].

Recommendation #2: Take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. CDFW recommends consultation with the USFWS, in order to comply with ESA, well in advance of any ground-disturbing activities and/or vegetation removal that may impact least Bell's vireo.

Mitigation Measure #1: CDFW recommends the DEIR include a measure whereby future housing development sites that may provide potential habitat conduct least Bell's vireo surveys to determine presence/absence. Future project proponents should retain a qualified biologist to

conduct protocol surveys for least Bell's vireo. The qualified biologist should conduct surveys according to USFWS Least Bell's Vireo Survey Guidelines (USFWS 2001). All potential least Bell's vireo habitat should be surveyed at least eight times during the period from April 10 through July 31. CDFW recommends CDFW and USFWS should be notified of survey findings, including negative findings, within 45 calendar days following the completion of protocol-level surveys.

Mitigation Measure #2: CDFW recommends all future housing developments avoid any construction activity during nesting season. If not feasible, CDFW recommends that if future housing development occurs between January 1 through September 15, a nesting bird and raptor survey should be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the project site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the DEIR require future housing project proponents to retain a qualified biologist to conduct surveys no more than 7 days prior to the beginning of any project-related activity likely to impact raptors and migratory songbirds, for the entire project site. If project activities are delayed or suspended for more than 7 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. 4 cont.

It should be noted that the temporary halt of project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the project site based on acreage of impact and vegetation composition. Mitigation ratios should increase with the occurrence of a SSC and should further increase with the occurrence of a CESA-listed species.

Comment #2: Impacts on Bats

Issue: The Project could impact bat species, including pallid bat (*Antrozous pallidus*), big free tailed bat (*Nyctinomops macrotis*), and hoary bat (*Lasiurus cinereus*), which are designated as a Species of Special Concern (SSC). The DEIR does not provide avoidance or mitigation measures to reduce impacts to bat species within the Project site.

Specific impacts: Future housing developments may have direct impacts that involves removal of trees, vegetation, and/or structures. These trees, vegetation, and/or structures may provide roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts from future housing developments may result from increased noise disturbances, human activity, dust, ground disturbing activities (e.g., staging, access, grading, excavating, drilling), and vibrations caused by heavy equipment. 5

Why impact would occur: According to CNDDB, all three bat species have been historically observed within and adjacent to the Project site (CDFW 2022a). Additionally, a bat observation within the Project site was recorded through iNaturalist (iNaturalist 2019). The DEIR does not

provide biological surveys associated with the presence/absence of bat species within the Project site. Without focused surveys for bat detection, future housing development facilitated by the HEU may impact unidentified bat species within the Project site. In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts (Avila-Flores and Fenton 2005; Oprea et al. 2009; Remington and Cooper 2014). Trees and crevices in buildings in and adjacent to the Project site could provide roosting habitat for bats. Bats can fit into very small seams, as small as a ¼ inch. 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 & G. Code, § 4150; Cal. Code of Regs, § 251.1). Additionally, several bat species are considered Species of Special Concern and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

5 cont.

Mitigation Measure #3: For any future housing development that may occur near potential bat roosting habitat, CDFW recommends the DEIR require a qualified bat specialist to conduct bat surveys within these areas (plus a 100-foot buffer as access allows). These surveys should identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats. A discussion of survey results, including negative findings should be provided to the City. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the City prior to any project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

Mitigation Measure #4: CDFW recommends the City include the following tree removal process as measure in the DEIR for future housing developments. "If bats are not detected, but the bat specialist determines that roosting bats may be present, trees should be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is 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 preferable 48 hours, should elapse prior to such operations to allow bats to escape."

Mitigation Measure #5: CDFW also recommends the City include the following maternity roost measure in the event that maternity roosts are found during surveys for future housing

developments. “If maternity roosts are found, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are ready to fly out of the roost (March 1 to September 30). If tree removal occurs during maternity season, trees identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist. Inspection of each tree should be no more than 7 days prior to tree disturbance to determine the presence or absence of roosting bats more precisely. Trees determined to be maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise.”

5 cont.

Comment #3: Impact to Monarch Butterfly

Issue: The Project may impact monarch butterfly (*Danaus plexippus*) and monarch butterfly overwintering habitat.

Specific impacts: Future housing developments may result in direct impact to monarch butterflies through vegetation removal and tree trimming. Permanent or temporary impacts to overwintering habitat could result in local population decline or local extirpation of monarch butterflies.

Why impact would occur: According to iNaturalist, there are 65 observations of monarch butterflies within the City of Burbank (iNaturalist 2022). In addition, there are numerous eucalyptus trees within the Project site that could provide potential habitat for overwintering monarch butterfly. Furthermore, the future housing developments may require trees and other vegetation to be removed or trimmed in order to facilitate building construction. Removing trees during the overwintering period could have direct impacts on monarch butterflies, potentially resulting in injury or mortality; reduced health and vigor; and reduced success during spring and summer migration to breeding sites. Lastly, the DEIR does not discuss or analyze the Project’s potential impacts on monarch butterflies and potential overwintering habitat within the Project site.

6

Evidence impact would be significant: Monarch numbers have dropped by 99 percent from an estimated four million butterflies just twenty years ago (CDFW 2022b). Given the precipitous decline of monarch butterflies, the monarch butterfly is currently slated to be listed in 2024 under the Endangered Species Act (CDFW 2022c). The monarch butterfly is included on CDFW’s Terrestrial and Vernal Pool Invertebrates of Conservation Priority list and identified as a Species of Greatest Conservation Need in California's State Wildlife Action Plan (CDFW 2017; CDFW 2015). Additionally, Fish and Game Code section 1002 prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit issued by CDFW. This applies to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes, including captive rearing. Fish and Game Code section 1021 directs CDFW to take feasible actions to conserve monarch butterflies and the habitats they depend upon for successful migration. Lastly, Fish and Game Code section 1374 directs the Monarch Butterfly and Pollinator Rescue Program, administered by the Wildlife Conservation Board, to recover and sustain populations of monarch butterflies.

The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on the monarch butterfly may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or

animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065). The reduction in the number of monarch butterflies, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and/or U.S. Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #3: CDFW recommends the following resources for information on management a monarch overwintering habitat/population:

- Western Monarch Butterfly Conservation Plan (WAFWA 2019);
- Overwintering Site Management and Protection (Western Monarch Count 2022);
- Protecting California's Butterfly Groves (Xerces Society 2017);
- Managing Monarch Habitat in the West (Xerces Society 2021a);
- Pollinator-Friendly Native Plant Lists (Xerces Society 2021b);
- Monarch Butterfly Nectar Plant Lists for Conservation Plantings (Xerces Society 2018);
- Tropical Milkweed (Wheeler 2018); and,
- CDFW's Monarch Butterfly webpage (CDFW 2022b).

6 cont.

Mitigation Measure #6: CDFW recommends the DEIR require future project proponents to retain a qualified biologist to assess the future housing development sites for monarch presence and overwintering habitat. A qualified biologist should survey any eucalyptus groves and other trees within the project site that are suitable for overwintering monarchs. A qualified biologist should conduct multiple surveys for overwintering monarchs where potential overwintering habitat has been identified. Monitoring should be done as frequently as possible during the overwintering season (typically September 15 through March 11) to capture changing distributions through the season and in response to storm events.

Mitigation Measure #7: If future housing development sites support an overwintering habitat/population of monarchs, CDFW recommends the DEIR require future project proponents to protect, manage, enhance, and restore potential overwintering habitat. The City should require future project proponents to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan should be submitted to the City. At a minimum, the Monarch Butterfly Overwintering Habitat Management Plan should include:

- Protect: Trees should not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal should be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs should not be removed in overwintering groves. Shrubs should be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.
- Manage: Management activities, such as tree trimming and mowing, should be conducted in groves from March 15 through September 15 outside of the estimated

timeframe when monarchs are likely present in the southern California coast.

- Enhance: Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves.
- Restore: Any trees removed as part of the project should be replaced with trees at no less than 2:1. Native insecticide-free trees should be planted such as Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), Coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menzesii*), Torrey pine (*Pinus torreyana*), western sycamore (*Platanus racemosa*), bishop pine (*Pinus radiata*) and others, as appropriate for location.
- Pesticides: Use of pesticides should be avoided, particularly when monarchs may be present. If pesticides are used, applications should be conducted from March 15 through September 15, when possible. Herbicide should not be applied on blooming flowers. Herbicide should be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be on the plants. Whenever possible, targeted application herbicide methods should be used, large-scale broadcast applications should be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, should not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants should not be used. Non-chemical weed control techniques should be used when possible.
- Tropical milkweed and pathogens: Non-native tropical milkweed should not be planted in order to minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed should be removed and replaced with native, insecticide-free nectar plants suitable for the location.

6 cont.

Mitigation Measure #8: If the future housing development sites do not support overwintering habitat, CDFW recommends the DEIR require future project proponents to avoid a and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.

Additional Recommendations

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDB Online Field Survey Form (CDFW 2022d). The City should ensure that the project applicant has submitted data properly, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The project applicant should provide CDFW with confirmation of data submittal.

7

Mitigation and Monitoring Reporting Plan. CDFW recommends updating the DEIR's proposed Biological Resources Mitigation Measures to include mitigation measures

8

recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [(Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

8 cont.

Filing Fees

The Project, as proposed, could 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 City of Burbank and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

9

Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Burbank in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City of Burbank 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 Julisa Portugal, Environmental Scientist, at Julisa.Portugal@wildlife.ca.gov or (562) 330-7563.

10

Sincerely,

DocuSigned by:
5991E19EF8094C3...
Victoria Tang signing for

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW
Erinn Wilson-Olgin, Los Alamitos – Erinn.Wison-Olgin@wildlife.ca.gov
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South Coast Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		**Timing**	**Responsible Party**
MM-BIO-1 – Least Bell's Vireo Survey	Future housing development sites that may provide potential habitat shall conduct least Bell's vireo surveys to determine presence/absence. Future project proponents shall retain a qualified biologist to conduct protocol surveys for least Bell's vireo. The qualified biologist shall conduct surveys according to USFWS Least Bell's Vireo Survey Guidelines (USFWS 2001). All potential least Bell's vireo habitat shall be surveyed at least eight times during the period from April 10 through July 31. CDFW and USFWS shall be notified of survey findings, including negative findings, within 45 calendar days following the completion of protocol-level surveys.	Prior to construction activities and vegetation removal	Project-level lead agency/ Designated Biologist
MM-BIO-2 – Nesting Bird Survey	All future housing developments shall avoid any construction activity during nesting season. If not feasible, future housing development occurs between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the project site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. The DEIR shall require future housing project proponents to retain a qualified biologist to conduct surveys no more than 7 days prior to the beginning of any project-related activity likely to impact raptors and migratory songbirds, for the entire project site. If project activities are delayed or suspended for more than 7 days	Prior to and during construction activities and vegetation removal	Project-level lead agency/ Designated Biologist

	during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests. These buffers shall be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.		
MM-BIO-3 – Bat Survey	For any future housing development that may occur near potential bat roosting habitat, the DEIR shall require a qualified bat specialist to conduct bat surveys within these areas (plus a 100-foot buffer as access allows). These surveys shall identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. The bat specialist shall use acoustic recognition technology to maximize detection of bats. A discussion of survey results, including negative findings shall be provided to the City. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the project on bats and include species specific mitigation measures to reduce impacts to below a level of significance. Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to the City prior to any project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.	Prior to construction activities and vegetation removal	Project-level lead agency/ Bat Specialist
MM-BIO-4 – Tree Removal Process	The City include the following tree removal process as measure in the DEIR for future housing developments. “If bats are not detected, but the bat specialist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of	Prior to and during any construction activities.	Bat Specialist

	approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, shall elapse prior to such operations to allow bats to escape."		
MM-BIO-5 – Bat Maternity Roosts	The City shall include the following maternity roost measure in the event that maternity roosts are found during surveys for future housing development projects. "If maternity roosts are found, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are ready to fly out of the roost (March 1 to September 30). If tree removal occurs during maternity season, trees identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist. Inspection of each tree shall be no more than 7 days prior to tree disturbance to determine the presence or absence of roosting bats more precisely. Trees determined to be maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise."	Prior to and during any construction activities.	Bat Specialist
MM-BIO-6 – Monarch Butterfly Survey	The DEIR shall require future project proponents to retain a qualified biologist to assess the future housing development sites for monarch presence and overwintering habitat. A qualified biologist shall survey any eucalyptus groves and other trees within the project site that are suitable for overwintering monarchs. A qualified biologist shall conduct multiple surveys for overwintering monarchs where potential overwintering habitat has been identified. Monitoring shall be done as frequently as possible during the overwintering season (typically September 15 through March 11) to capture changing	Prior to construction activities and vegetation removal	Project-level lead agency/ Designated Biologist

	distributions through the season and in response to storm events.		
MM-BIO-7 – Monarch Butterfly Overwintering Habitat Management Plan	If future housing development sites support an overwintering habitat/population of monarchs, the DEIR shall require future project proponents to protect, manage, enhance, and restore potential overwintering habitat. The City shall require future project proponents to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan shall be submitted to the City. At a minimum, the Monarch Butterfly Overwintering Habitat Management Plan shall include: • Protect: Trees shall not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal shall be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs shall not be removed in overwintering groves. Shrubs shall be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat. • Manage: Management activities, such as tree trimming and mowing, shall be conducted in groves from March 15 through September 15 outside of the estimated timeframe when monarchs are likely present in the southern California coast. • Enhance: Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves. • Restore: Any trees removed as part of the project shall be replaced with trees at no less than 2:1. Native insecticide-free trees shall be planted such as Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus*	Prior to construction activities and vegetation removal	Project Proponent/ Designated Biologist

	macrocarpa), Coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menzesii*), Torrey pine (*Pinus torreyana*), western sycamore (*Platanus racemosa*), bishop pine (*Pinus radiata*) and others, as appropriate for location. • Pesticides: Use of pesticides shall be avoided, particularly when monarchs may be present. If pesticides are used, applications shall be conducted from March 15 through September 15, when possible. Herbicide shall not be applied on blooming flowers. Herbicide shall be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be on the plants. Whenever possible, targeted application herbicide methods shall be used, large-scale broadcast applications shall be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, shall not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants shall not be used. Non-chemical weed control techniques shall be used when possible. • Tropical milkweed and pathogens: Non-native tropical milkweed shall not be planted in order to minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed shall be removed and replaced with native, insecticide-free nectar plants suitable for the location.		

MM-BIO-8 – Monarch Butterfly Landscape	If the future housing development sites do not support overwintering habitat, the DEIR shall require future project proponents to avoid a and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.	Prior to finalizing Project-level CEQA document	Project-level lead agency/ Project Proponent
REC 1 – CDFW Consultation	If future housing developments will impact least Bell's vireo, early consultation with CDFW is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Appropriate authorization from CDFW may include an Incidental Take Permit or a Consistency Determination in certain circumstances, among other options.	Prior to finalizing Project-level CEQA document	Project-level lead agency/Project Proponent
REC 2 – USFWS Consultation	Take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. CDFW recommends consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground-disturbing activities and/or vegetation removal that may impact least Bell's vireo.	Prior to finalizing Project-level CEQA document	Project-level lead agency/ Project Proponent
REC 3 – Monarch Resources	CDFW recommends the following resources for information on management a monarch overwintering habitat/population: • Western Monarch Butterfly Conservation Plan • Overwintering Site Management and Protection • Protecting California's Butterfly Groves • Managing Monarch Habitat in the West • Pollinator-Friendly Native Plant Lists • Monarch Butterfly Nectar Plant Lists for Conservation Plantings • Tropical Milkweed • CDFW's Monarch Butterfly webpage	Prior to finalizing Project-level CEQA document and during Project activities	Project-level lead agency/ Designated Biologist
REC 4 – Data	Please report any special status species detected by completing and submitting CNDDB Online Field Survey Form. The City	Prior to finalizing CEQA document	Project-level lead

	should ensure that the project applicant has submitted the data properly, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The project Applicant should provide CDFW with confirmation of data submittal.		agency/Project Proponent
REC 5 - MMRP	The DEIR's proposed Biological Resources Mitigation Measures should be updated and conditioned to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. The City is welcome to coordinate with CDFW to further review and refine the project's mitigation measures.	Prior to finalizing CEQA document	Project-level lead agency

Letter A-3

COMMENTER: Erinn Wilson-Olgin, Environmental Program Manager I – South Coast Region, California Department of Fish and Wildlife (CDFW)

DATE: March 18, 2022

Response A-3.1

CDFW thanked the City for the opportunity to provide comments and recommendations regarding those activities involved in the project that may affect fish and wildlife and actions for which they may have regulatory authority.

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

Response A-3.2

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

This comment indicates that the CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including Section 1600 et. seq. (lake and streambed alteration regulatory authority), Section 2050 et. seq. ("take" of species protected under the California Endangered Species Act [CESA]), and Section 1900 et. seq. (CESA-listed rare plants pursuant to the Native Plant Protection Act). The comment recommends that the Project proponent obtain appropriate authorization under the Fish and Game Code.

The comments and recommendations for species protected under CESA have been incorporated as stated in Response A-3.3, below, and in the Biological Resources section of the Recirculated Draft EIR. With the modification to Mitigation Measure BIO-1, we do not anticipate "take" or need for a lake and streambed alteration agreement for development under the Housing Element Update.

Response A-3.3

The comment provides a summary of the proposed project and summarizes 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 resources. In addition, the comment suggests recommended measures or revisions in later 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).

Individual responses regarding the CDFW's concerns on environmental impacts are addressed below in Responses A-3.4 through A-3.10. 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 the Recirculated Draft EIR. No revisions are necessary relative to this comment.

Response A-3.4

The comment suggests that the Project may result in adverse impacts to least Bell's vireo (*Vireo bellii pusillus*), a federally and State-listed Endangered species, by causing nest abandonment, reproductive suppression, or incidental loss of fertile eggs or nestlings.

On April 20, 2022, City staff had a call with CDFW staff to discuss the March 18, 2022 comment letter. Based on the discussion, the following revisions have been made to Section 4.2, *Biological Resources*, of the Draft EIR, which has been included in the Recirculated Draft EIR that was released for a 47-day public review period on July 22, 2022.

The revisions to Mitigation Measure BIO-1 addresses CDFW's concerns regarding potential impacts to least Bell's vireo, bat species, or monarch butterflies. Related edits to the biological resources analysis are also shown in the Recirculated Draft EIR.

BIO-1 Biological Resources Avoidance

For individual housing developments that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment that will include review of the California Natural Diversity Database (CNDDB) and iNaturalist maps to determine where sightings have occurred or habitats for the least Bell's vireo, bat species, or monarch butterflies have previously been identified.

If construction activities or other disturbances occur in areas within 500 feet of a previously identified habitat or observation according to CNDDB or iNaturalist, the following measures shall be implemented:

- Prior to the issuance of a grading permit, a qualified biologist shall be retained by the project applicant to conduct a biological resources reconnaissance of the site. The qualified biologist shall thoroughly report on the biological resources present on a project site and submitted to the City.
- If the biologist determines that special-status species may occur, focused surveys for special-status plants shall be completed in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (California Department of Fish and Wildlife [CDFW], March 20, 2018) and Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants (USFWS, September 23, 1996). If it is determined that the project site has suitable habitat for special-status wildlife, focused surveys shall be conducted to determined presence/absence including species-specific surveys in accordance with CDFW or United States Fish and Wildlife Service (USFWS) protocols for State or federally listed species, respectively, that may occur.
- If it is determined that a special-status species may be impacted by a specific project, consultation with USFWS and/or CDFW shall occur prior to issuance of a development permit from the City to determine measures to address impacts, such as avoidance, minimization, or take authorization and mitigation. The report shall include a list of special-status plants and wildlife that may occur on the project site and/or adjacent area.

  If construction activities or other disturbances occur during the bird nesting season (February 1 through August 31), prior to issuance of grading permits for individual housing developments that will include disturbance of vegetation, structures, or other areas where bird nests could be present, the following requirements shall be implemented:
- Applicant shall submit a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of grading or construction activities. The nesting bird pre-construction survey shall be conducted on foot on the construction site, including a 100-foot buffer, and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a qualified biologist familiar with the

identification of avian species known to occur in southern California and a copy of the study shall be submitted to the Community Development Department and Building and Safety Division. The cost to hire a qualified biologist shall be borne entirely by the developer/project applicant.

- If nests are found, an avoidance buffer shall be demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this 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.
- A survey report shall be prepared by the qualified biologist documenting and verifying compliance with the above requirements and applicable State and Federal regulations protecting birds that shall be submitted to the City of Burbank. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

The full text of the Recirculated Draft EIR is available on the City's website at the following link: https://www.burbankhousingelement.com/wp-content/uploads/2022/07/Burbank-Housing-and-Safety-Element-Update-Recirculated-DEIR.pdf

Response A-3.5

The comment states that the Project may result in impacts to bat species, such as pallid bat (*Antrozous pallidus*), big free tailed bat (*Nyctinomops macrotis*), and hoary bat (*Lasiurus cinereus*), which are designated as Species of Special Concern (SSC). The Draft EIR does not provide avoidance or mitigation measures to reduce impacts to bat species within the Project site. The comment suggests that the Project may result in direct impacts to bat species, including removal of trees, vegetation, and/or structures that provide roosting habitat, and therefore has the potential for the direct loss of bats. The comment also suggests that indirect impacts from future housing developments may result from increased noise disturbances, human activity, dust, ground disturbing activities, and vibrations caused by heavy equipment.

The comment states that bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish and Game Code Section 4150; California Code of Regulations Section 251.1). In addition, the comment noted that several bat species known to occur within the Project vicinity are considered SSC and take would be considered a significant impact.

The revisions to Section 4.2, *Biological Resources*, of the Draft EIR address CDFW's concerns regarding potential impacts to least bat species. Refer to Response A-3.4.

Response A-3.6

The comment states that the Project may result in impacts to monarch butterflies (*Danaus plexippus*) and monarch butterfly overwintering habitat through vegetation removal and tree trimming associated with future housing development. The agency states that there are 65 observations of monarch butterflies within the city recorded in iNaturalist and that there are numerous eucalyptus trees within the Project site that potentially provide overwintering habitat for the species. If eucalyptus trees are removed during the overwintering period, direct impacts such as

injury or mortality, reduced health and vigor, and reduced success during spring and summer migration may occur. The comment states that the Draft EIR does not provide avoidance or mitigation measures to reduce impacts to the monarch butterfly within the Project site.

The comment states that monarch butterflies are a federal candidate for listing under the Endangered Species Act, is included on CDFW's *Terrestrial and Vernal Pool Invertebrates of Conservation Priority* list, and identified as a Species of Greatest Conservation Need in California's *State Wildlife Action Plan*. In addition, Fish and Game Code Section 1002 prohibits the take or possession of wildlife without a valid Scientific Collection Permit issued by CDFW, which applied to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes. Lastly, the comment states that Fish and Game Code Section 1374 directs the Monarch Butterfly and Pollinator Rescue Program to recover and sustain populations of monarch butterflies. The comment states that impacts to the monarch butterfly may require a mandatory finding of significance because the Project would potentially directly or indirectly reduce the number of monarch butterflies through habitat loss. The comment includes recommendations that the Draft EIR require future project proponents to avoid and minimize impacts to monarch butterflies by enhancing native, insecticide-free nectar sources, avoid planting additional tropical milkweeds, and avoid using pesticides, insecticides, and soils fumigants.

The revisions to Section 4.2, *Biological Resources*, of the Draft EIR address CDFW's concerns regarding potential impacts to monarch butterflies. Refer to Response A-3.4.

Response A-3.7

The comment requests that all occurrences of special status species on the project site be documented via the California Natural Diversity Database (CNDDB) Field Survey Forms and that the Final EIR include measures where lead agencies of individual projects tiering from the Final EIR report any special status species detected during preparation of project-level environmental impact analyses/environmental documents.

The revisions to Section 4.2, *Biological Resources*, of the Draft EIR address CDFW's concerns regarding potential impacts to special status species. Refer to Response A-3.4.

Response A-3.8

The comment includes recommendations that the City update the Project's proposed biological mitigation measures and condition the environmental document to include mitigation measures recommended in their letter. This comment reiterates comments provided in the letter.

Field surveys will be conducted as necessary and in conjunction with a proposed specific development project under the Housing Element Update. The mitigation measures and recommendations provided by the agency are addressed in Response A-3.4. Section 5, *Mitigation Monitoring and Reporting Program*, of the Final EIR incorporates the revised mitigation measure outlined in Response A-3.4. The MMRP is intended to track and ensure compliance with adopted mitigation measures during the Burbank Housing and Safety Element Update implementation phase. For each mitigation measure recommended in the Final EIR for the Project, specifications are made in the MMRP that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

Response A-3.9

The commenter summarizes the CDFW filing fee requirements.

Comment noted. The CDFW filing fee will be paid along with the County fee for the filing of the Notice of Determination.

Response A-3.10

The commenter appreciates the opportunity to comment on the Project to assist the City of Burbank in adequately analyzing and minimizing/mitigating impacts to biological resources. The comment requests an opportunity to review and comment on any response that the City has to their comments and to receive notification of any forthcoming hearing date(s) for the project.

As required under CEQA, the agency will be provided notice of the Final EIR and any forthcoming hearing date(s) for the project.

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

Letter A-4

March 30, 2022 **Via Electronic Mail**

Shipra Rajesh, Associate Planner
Community Development Department
Planning Division
150 North Third Street
Burbank, California 91502

Dear Shipra Rajesh:

Notice of Availability of a
Draft Environmental Impact Report for the City of Burbank Housing & Safety Element Update

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Availability of a Draft Environmental Impact Report for the City of Burbank Housing and Safety Element Update (Project) and Draft Environmental Impact Report (DEIR). The City of Burbank is acting as the Lead Agency under the California Environmental Quality Act (CEQA). The Project proposes to update the Housing Element of the Burbank2035 General Plan. In addition, the project will include minor updates to the Safety, Land Use, Open Space and Conservation, Air Quality and Climate Change, Noise, and Mobility Elements, as well as incorporate environmental justice policies into the Burbank2035 General Plan, per State law. This letter contains Metropolitan's response to the public notice as a potentially affected public agency. 1

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies, serving approximately 19 million people in portions of six counties in Southern California. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Our review of the DEIR indicates that Metropolitan owns and operates the Santa Monica Feeder and East Valley Feeder pipelines and appurtenant facilities in the project area. The aforementioned pipelines deliver treated water to Metropolitan Member Agencies. Metropolitan is concerned with potential impacts to pipelines and appurtenant facilities, and potential for obstructed access that may result from implementation of the proposed Project. The enclosed map shows Metropolitan facilities in relation to the Project. It will be necessary for the City to consider these facilities in its project planning. 2

Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipeline to excessive vehicle, impact or vibratory loads. Any future design plans associated with this project should be submitted to Metropolitan's Substructures Team. Approval of the project should be contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities. 3

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-7663 or via email at EngineeringSubstructures@mwdh2o.com. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, attached are the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

Additionally, Metropolitan encourages projects within its service area to include water conservation measures. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project. 4

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Jolene Ditmar at (213) 217-6184 or jditmar@mwdh2o.com. 5

Very truly yours,

Diane Doesserich

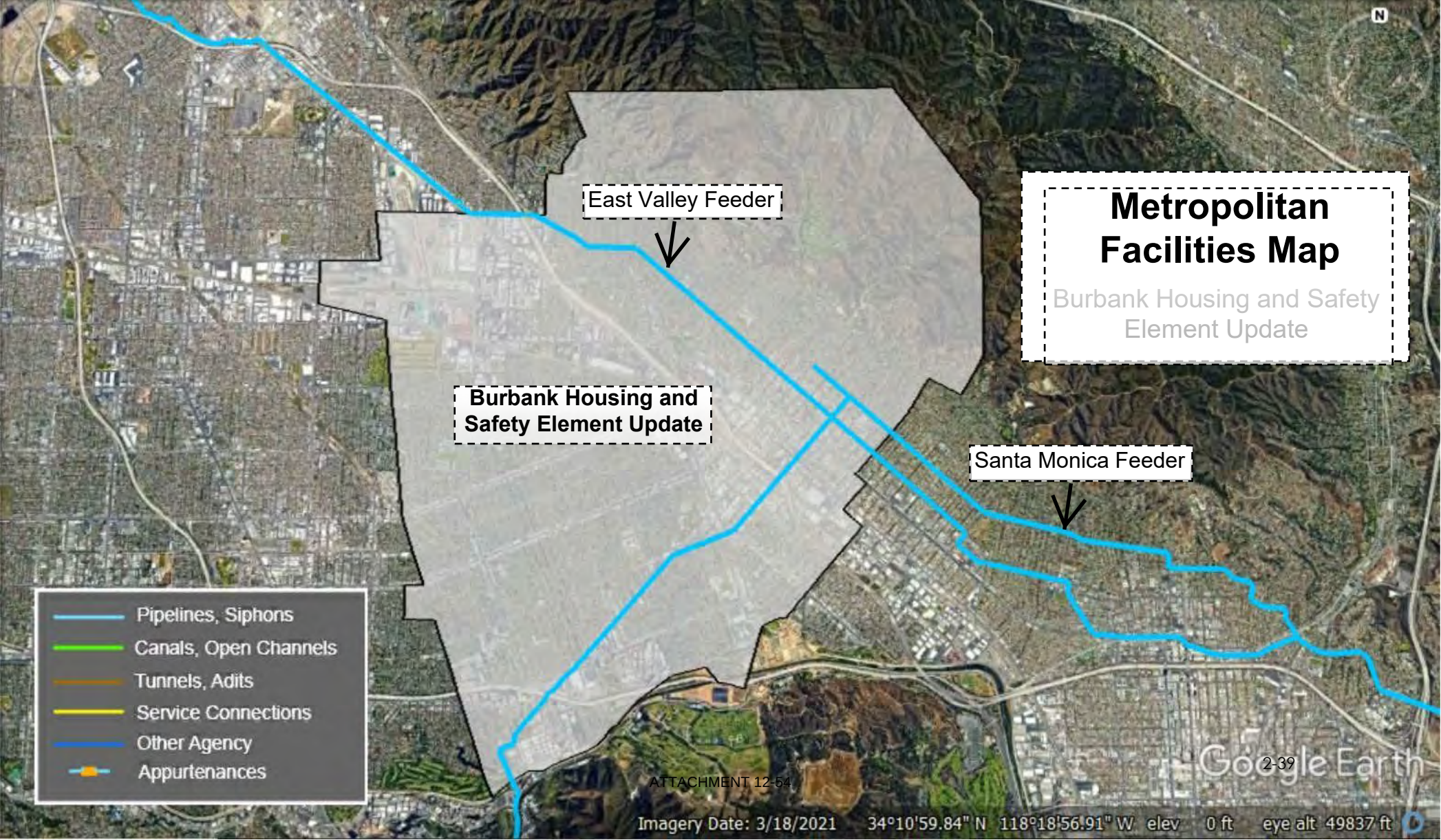
Digitally signed by Diane Doesserich
DN: cn=Diane Doesserich, o=Metropolitan Water District, ou, email=ddoesserich@mwdh2o.com, c=US
Date: 2022.03.30 14:41:20 -07'00'

Diane Doesserich
Team Manager, Environmental Planning Section

JD:rdl
Sharepoint\Burbank\ Housing and Safety Element Update

Enclosures:

(1) Map
(2) Planning Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way



ATTACHMENT 12-54

Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way

July 2018

Prepared By:
The Metropolitan Water District of Southern California
Substructures Team, Engineering Services
700 North Alameda Street
Los Angeles, California 90012

Additional Copies: To obtain a copy of this document, please contact the Engineering Services Group, Substructures Team.

Disclaimer

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as deemed prudent, to assure that project plans are correct. The appropriate representative from Metropolitan must be contacted at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

PUBLICATION HISTORY:

Initial Release	*July 2018*

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1.0 GENERAL INFORMATION

Note: Underground Service Alert at 811 must be notified at least two working days before excavating in proximity to Metropolitan's facilities.

1.1 Introduction

These guidelines provide minimum design and construction requirements for any utilities, facilities, developments, and improvements, or any other projects or activities, proposed in or near Metropolitan Water District of Southern California (Metropolitan) facilities and rights-of-way. Additional conditions and stipulations may also be required depending on project and site specific conditions. Any adverse impacts to Metropolitan's conveyance system, as determined by Metropolitan, will need to be mitigated to its satisfaction.

All improvements and activities must be designed so as to allow for removal or relocation at builder or developer expense, as set forth in the paramount rights provisions of Section 20.0. Metropolitan shall not be responsible for repair or replacement of improvements, landscaping or vegetation in the event Metropolitan exercises its paramount rights powers.

1.2 Submittal and Review of Project Plans/Utilities and Maps

Metropolitan requires project plans/utilities be submitted for all proposed activities that may impact Metropolitan's facilities or rights-of-way. Project plans shall include copies of all pertinent utilities, sewer line, storm drain, street improvement, grading, site development, landscaping, irrigation and other plans, all tract and parcel maps, and all necessary state and federal environmental documentation. Metropolitan will review the project plans and provide written approval, as it pertains to Metropolitan's facilities and rights-of-way. Written approval from Metropolitan must be obtained, prior to the start of any activity or construction in the area of Metropolitan's facilities or rights-of-way. Once complete project plans and supporting documents are submitted to Metropolitan, it generally takes 30 days to review and to prepare a detailed written response. Complex engineering plans that have the potential for significant impacts on Metropolitan's facilities or rights-of-way may require a longer review time.

Project plans, maps, or any other information should be submitted to Metropolitan's Substructures Team at the following mailing address:

Attn: Substructures Team
The Metropolitan Water District of Southern California
700 North Alameda St.
Los Angeles, CA 90012

General Mailing Address: P.O. Box 54153
Los Angeles, CA 90054-0153

Email: EngineeringSubstructures@mwdh2o.com

For additional information, or to request prints of detailed drawings for Metropolitan's facilities and rights-of-way, please contact Metropolitan's Substructures Team at 213-217-7663 or EngineeringSubstructures@mwdh2o.com.

1.3 Identification of Metropolitan's Facilities and Rights-of-Way

Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's, with official recording data, on the following:

A. All applicable plans

B. All applicable tract and parcel maps

Metropolitan's rights-of-ways and existing survey monuments must be tied dimensionally to the tract or parcel boundaries. Metropolitan's Records of Survey must be referenced on the tract and parcel maps with the appropriate Book and Page.

2.0 General Requirements

2.1 Vehicular Access

Metropolitan must have vehicular access along its rights-of-way at all times for routine inspection, patrolling, operations, and maintenance of its facilities and construction activities. All proposed improvements and activities must be designed so as to accommodate such vehicular access.

2.2 Fences

Fences installed across Metropolitan's rights-of-way must include a 16-foot-wide gate to accommodate vehicular access by Metropolitan. Additionally, gates may be required at other specified locations to prevent unauthorized entry into Metropolitan's rights-of-way.

All gates must accommodate a Metropolitan lock or Knox-Box with override switch to allow Metropolitan unrestricted access. There should be a minimum 20-foot setback for gates from the street at the driveway approach. The setback is necessary to allow Metropolitan vehicles to safely pull off the road prior to opening the gate.

2.3 Driveways and Ramps

Construction of 16-foot-wide commercial-type driveway approaches is required on both sides of all streets that cross Metropolitan's rights-of-way. Access ramps, if necessary, must be a minimum of 16 feet wide.

There should be a minimum 20-foot setback for gates from the street at the driveway approach. Grades of ramps and access roads must not exceed 10 percent; if the slope of an access ramp or road must exceed 10 percent due to topography, then the ramp or road must be paved.

2.4 Walks, Bike Paths, and Trails

All walkways, bike paths, and trails along Metropolitan's rights-of-way must be a minimum 12-foot wide and have a 50-foot or greater radius on all horizontal curves if also used as Metropolitan's access roads. Metropolitan's access routes, including all walks and drainage facilities crossing the access routes, must be constructed to American Association of State Highway and Transportation Officials (AASHTO) H-20 loading standards (see Figure 1). Additional requirements will be placed on equestrian trails to protect the water quality of Metropolitan's pipelines and facilities.

2.5 Clear Zones

A 20-foot-wide clear zone is required to be maintained around Metropolitan's manholes and other above-ground facilities to accommodate vehicular access and maintenance. The clear zone should slope away from Metropolitan's facilities on a grade not to exceed 2 percent.

2.6 Slopes

Cut or fill slopes proposed within Metropolitan's rights-of-way must not exceed 10 percent. The proposed grade must not worsen the existing condition. This restriction is required to facilitate Metropolitan use of construction and maintenance equipment and allow uninhibited access to above-ground and below-ground facilities.

2.7 Structures

Construction of structures of any type is not allowed within the limits of Metropolitan's rights-of-way to avoid interference with the operation and maintenance of Metropolitan's facilities and possible construction of future facilities.

Footings and roof eaves of any proposed buildings adjacent to Metropolitan's rights-of-way must meet the following criteria:

A. Footings and roof eaves must not encroach onto Metropolitan's rights-of-way.

B. Footings must not impose any additional loading on Metropolitan's facilities.

C. Roof eaves must not overhang onto Metropolitan's rights-of-way.

Detailed plans of footings and roof eaves adjacent to Metropolitan's rights-of-way must be submitted for Metropolitan's review and written approval, as pertains to Metropolitan's facilities.

2.8 Protection of Metropolitan Facilities

Metropolitan facilities within its rights-of-way, including pipelines, structures, manholes, survey monuments, etc., must be protected from damage by the project proponent or property owner, at no expense to Metropolitan. The exact location, description and method of protection must be shown on the project plans.

2.9 Potholing of Metropolitan Pipelines

Metropolitan's pipelines must be potholed in advance, if the vertical clearance between a proposed utility and Metropolitan's pipeline is indicated to be 4 feet or less. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipeline. Notice is required, a minimum of three working days, prior to any potholing activity.

2.10 Jacked Casings or Tunnels

A. General Requirements

Utility crossings installed by jacking, or in a jacked casing or tunnel under/over a Metropolitan pipeline, must have at least 3 feet of vertical clearance between the outside diameter of the pipelines and the jacked pipe, casing, or tunnel. The actual

cover over Metropolitan's pipeline shall be determined by potholing, under Metropolitan's supervision.

Utilities installed in a jacked casing or tunnel must have the annular space between the utility and the jacked casing or tunnel filled with grout. Provisions must be made for grouting any voids around the exterior of the jacked pipe, casing, or tunnel.

B. Jacking or Tunneling Procedures

Detailed jacking, tunneling, or directional boring procedures must be submitted to Metropolitan for review and approval. The procedures must cover all aspects of operation, including, but not limited to, dewatering, ground control, alignment control, and grouting pressure. The submittal must also include procedures to be used to control sloughing, running, or wet ground, if encountered. A minimum 10-foot clearance must be maintained between the face of the tunneling or receiving pits and outside edges of Metropolitan's facility.

C. Shoring

Detailed drawings of shoring for jacking or receiving pits must be submitted to Metropolitan for review and written-approval. (See Section 10 for shoring requirements).

D. Temporary Support

Temporary support of Metropolitan's pipelines may be required when a utility crosses under a Metropolitan pipeline and is installed by means of an open trench. Plans for temporary support must be reviewed and approved in writing by Metropolitan. (See Section 11, Supports of Metropolitan Facilities).

3.0 Landscaping

3.1 Plans

All landscape plans must show the location and limits of Metropolitan's right-of-way and the location and size of Metropolitan's pipeline and related facilities therein. All landscaping and vegetation shall be subject to removal without notice, as may be required by Metropolitan for ongoing maintenance, access, repair, and construction activities. Metropolitan will not be financially responsible for the removal of any landscaping and vegetation.

3.2 Drought-Tolerant Native and California Friendly Plants

Metropolitan recommends use of drought-tolerant native and California Friendly® plants (excluding sensitive plants) on proposed projects. For more information regarding California Friendly® plants refer to www.bewaterwise.com.

3.3 Trees

Trees are generally prohibited within Metropolitan's rights-of-way as they restrict Metropolitan's ability to operate, maintain and/or install new pipeline(s) located within these rights-of-way. Metropolitan will not be financially responsible for the removal and replacement of any existing trees should they interfere with access and any current or future Metropolitan project located within the right-of-way.

3.4 Other Vegetation

Shrubs, bushes, vines, and groundcover are generally allowed within Metropolitan's rights-of-way. Larger shrubs are not allowed on Metropolitan fee properties; however, they may be allowed within its easements if planted no closer than 15 feet from the outside edges of existing or future Metropolitan facilities. Only groundcover is allowed to be planted directly over Metropolitan pipeline, turf blocks or similar is recommended to accommodate our utility vehicle access. Metropolitan will not be financially responsible for the removal and replacement of the vegetation should it interfere with access and any current or future Metropolitan project.

3.5 Irrigation

Irrigation systems are acceptable within Metropolitan's rights-of-way, provided valves and controllers are located near the edges of the right-of-way and do not interfere with Metropolitan vehicular access. A shutoff valve should also be located along the edge of the right-of-way that will allow the shutdown of the system within the right-of-way should Metropolitan need to do any excavation. No pooling or saturation of water above Metropolitan's pipeline and right-of-way is allowed. Additional restrictions apply to non-potable water such as Recycled Water and are covered on Table 3 of Page 20.

3.6 Metropolitan Vehicular Access

Landscape plans must show Metropolitan vehicular access to Metropolitan's facilities and rights-of-way and must be maintained by the property owner or manager or homeowners association at all times. Walkways, bike paths, and trails within Metropolitan's rights-of-way may be used as Metropolitan access routes. (See Section 2.4, Walks, Bike Paths, and Trails).

4.0 General Utilities

Note: For non-potable piping like sewer, hazardous fluid, storm drain, disinfected tertiary recycled water and recycled water irrigation see Table 1 through Table 3.

4.1 Utility Structures

Permanent utility structures (e.g., manholes, power poles, pull boxes, electrical vaults, etc.) are not allowed within Metropolitan's rights-of-way. Metropolitan requests that all permanent utility structures within public streets be placed as far from its pipelines and facilities as practical, but not closer than 5 feet from the outside edges of Metropolitan facilities.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation.

4.2 Utility Crossings

Metropolitan requests a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and any utility crossing the pipeline. Utility lines crossing Metropolitan's pipelines must be as perpendicular to the pipeline as possible. Cross-section drawings, showing proposed locations and elevations of utility lines and locations of Metropolitan's pipelines and limits of rights-of-way, must be submitted with utility plans, for all

crossings. Metropolitan's pipeline must be potholed under Metropolitan's supervision at the crossings (See Section 2.9).

4.3 Longitudinal Utilities

Installation of longitudinal utilities is generally not allowed along Metropolitan's rights-of-way. Within public streets, Metropolitan requests that all utilities parallel to Metropolitan's pipelines and appurtenant structures (facilities) be located as far from the facilities as possible, with a minimum clearance of 5 feet from the outside edges of the pipeline.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation (for more information See Table 1 on Page 18).

4.4 Underground Electrical Lines

Underground electrical conduits (110 volts or greater) which cross a Metropolitan's pipeline must have a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and the electrical lines. Longitudinal electrical lines, including pull boxes and vaults, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipeline or structures.

4.5 Fiber Optic Lines

Fiber optic lines installed by directional boring require a minimum of 3 feet of vertical clearance when boring is over Metropolitan's pipelines and a minimum of 5 feet of vertical clearance when boring is under Metropolitan's pipelines. Longitudinal fiber optic lines, including pull boxes, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipelines or structures. Potholing must be performed, under Metropolitan's supervision, to verify the vertical clearances are maintained.

4.6 Overhead Electrical and Telephone Lines

Overhead electrical and telephone lines, where they cross Metropolitan's rights-of-way, must have a minimum 35 feet of clearance, as measured from the ground to the lowest point of the overhead line. Overhead electrical lines poles must be located at least 30 feet laterally from the edges of Metropolitan's facilities or outside Metropolitan's right-of-way, whichever is greater.

Longitudinal overhead electrical and or telephone lines in public streets should have a minimum separation of 10 feet from the edge of a Metropolitan pipelines or structures where possible.

4.7 Sewage Disposal Systems

Sewage disposal systems, including leach lines and septic tanks, must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or the edge of its facilities, whichever is greater. If soil conditions are poor, or other adverse site-specific conditions exist, a minimum distance of 150 feet is required. They must also comply with local and state health code requirements as they relate to sewage disposal systems in proximity to major drinking water supply pipelines.

4.8 Underground Tanks

Underground tanks containing hazardous materials must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or edge of its facilities, whichever is greater. In addition, groundwater flow should be considered with the placement of underground tanks down-gradient of Metropolitan's facilities.

5.0 Specific Utilities: Non-Potable Utility Pipelines

In addition to Metropolitan's general requirements, installation of non-potable utility pipelines (e.g., storm drains, sewers, and hazardous fluids pipelines) in Metropolitan's rights-of-way and public street rights-of-way must also conform to the State Water Resources Control Board's Division of Drinking Water (DDW) regulation (Waterworks Standards) and guidance for separation of water mains and non-potable pipelines and to applicable local county health code requirements. Written approval is required from DDW for the implementation of alternatives to the Waterworks Standards and, effective December 14, 2017, requests for alternatives to the Waterworks Standards must include information consistent with: DDW's Waterworks Standards Main Separation Alternative Request Checklist.

In addition to the following general guidelines, further review of the proposed project must be evaluated by Metropolitan and requirements may vary based on site specific conditions.

A. Sanitary Sewer and Hazardous Fluids (General Guideline See Table 1 on Page 18)

B. Storm Drain and Recycled Water (General Guideline See Table 2 on Page 19)

C. Irrigation with Recycled Water (General Guideline See Table 3 on Page 20)

D. Metropolitan generally does not allow Irrigation with recycled water to be applied directly above its treated water pipelines

E. Metropolitan requests copies of project correspondence with regulating agencies (e.g., Regional Water Quality Control Board, DDW); regarding the application of recycled water for all projects located on Metropolitan's rights-of-way

6.0 Cathodic Protection/Electrolysis Test Stations

6.1 Metropolitan Cathodic Protection

Metropolitan's existing cathodic protection facilities in the vicinity of any proposed work must be identified prior to any grading or excavation. The exact location, description, and type of protection must be shown on all project plans. Please contact Metropolitan for the location of its cathodic protection stations.

6.2 Review of Cathodic Protection Systems

Metropolitan must review any proposed installation of impressed-current cathodic protection systems on pipelines crossing or paralleling Metropolitan's pipelines to determine any potential conflicts with Metropolitan's existing cathodic protection system.

7.0 Drainage

7.1 Drainage Changes Affecting Metropolitan Rights-of-Way

Changes to existing drainage that could affect Metropolitan's rights-of-way require Metropolitan's approval. The project proponent must provide acceptable solutions to ensure Metropolitan's rights-of-way are not negatively affected by changes in the drainage conditions. Plans showing the changes, with a copy of a supporting hydrology report and hydraulic calculations, must be submitted to Metropolitan for review and approval. Long term maintenance of any proposed drainage facilities must be the responsibility of the project proponent, City, County, homeowner's association, etc., with a clear understanding of where this responsibility lies. If drainage must be discharged across Metropolitan's rights-of-way, it must be carried across by closed conduit or lined open channel and must be shown on the plans.

7.2 Metropolitan's Blowoff and Pumpwell Structures

Any changes to the existing local watercourse systems will need to be designed to accommodate Metropolitan's blowoff and pumpwell structures, which periodically convey discharged water from Metropolitan's blowoff and pumping well structures during pipeline dewatering. The project proponents' plans should include details of how these discharges are accommodated within the proposed development and must be submitted to Metropolitan for review and approval. Any blowoff discharge lines impacted must be modified accordingly at the expense of the project proponent.

8.0 Grading and Settlement

8.1 Changes in Cover over Metropolitan Pipelines

The existing cover over Metropolitan's pipelines must be maintained unless Metropolitan determines that proposed changes in grade and cover do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance capability. Load and settlement or rebound due to change in cover over a Metropolitan pipeline or ground in the area of Metropolitan's rights-of-way will be factors considered by Metropolitan during project review.

In general, the minimum cover over a Metropolitan pipeline is 4 feet and the maximum cover varies per different pipeline. Any changes to the existing grade may require that Metropolitan's pipeline be potholed under Metropolitan's supervision to verify the existing cover.

8.2 Settlement

Any changes to the existing topography in the area of Metropolitan's pipeline or right-of-way that result in significant settlement or lateral displacement of Metropolitan's pipelines are not acceptable. Metropolitan may require submittal of a soils report showing the predicted settlement of the pipeline at 10-foot intervals for review. The data must be carried past the point of zero change in each direction and the actual size and varying depth of the fill must be considered when determining the settlement. Possible settlement due to soil collapse, rebound and lateral displacement must also be included.

In general, the typical maximum allowed deflection for Metropolitan's pipelines must not exceed a deflection of 1/4-inch for every 100 feet of pipe length. Metropolitan may require additional information per its Geotechnical Guidelines. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

9.0 Construction Equipment

9.1 Review of Proposed Equipment

Use of equipment across or adjacent to Metropolitan's facilities is subject to prior review and written approval by Metropolitan. Excavation, backfill, and other work in the vicinity of Metropolitan's facilities must be performed only by methods and with equipment approved by Metropolitan. A list of all equipment to be used must be submitted to Metropolitan a minimum of 30 days before the start of work.

A. For equipment operating within paved public roadways, equipment that imposes loads not greater than that of an AASHTO H-20 vehicle (see Figure 1 on Page 21) may operate across or adjacent to Metropolitan's pipelines provided the equipment operates in non-vibratory mode and the road remains continuously paved.

B. For equipment operating within unpaved public roadways, when the total cover over Metropolitan's pipeline is 10 feet or greater, equipment imposing loads no greater than those imposed by an AASHTO H-20 vehicle may operate over or adjacent to the pipeline provided the equipment is operated in non-vibratory mode. For crossings, vehicle path shall be maintained in a smooth condition, with no breaks in grade for 3 vehicle lengths on each side of the pipeline.

9.2 Equipment Restrictions

In general, no equipment may be used closer than 20 feet from all Metropolitan above-ground structures. The area around the structures should be flagged to prevent equipment encroaching into this zone.

9.3 Vibratory Compaction Equipment

Vibratory compaction equipment may not be used in vibratory mode within 20 feet of the edge of Metropolitan's pipelines.

9.4 Equipment Descriptions

The following information/specifications for each piece of equipment should be included on the list:

A. A description of the equipment, including the type, manufacturer, model year, and model number. For example, wheel tractor-scraper, 1990 Caterpillar 627E.

B. The empty and loaded total weight and the corresponding weight distribution. If equipment will be used empty only, it should be clearly stated.

C. The wheel base (for each axle), tread width (for each axle), and tire footprint (width and length) or the track ground contact (width and length), and track gauge (center to center of track).

10.0 Excavations Close to Metropolitan Facilities

10.1 Shoring Design Submittal

Excavation that impacts Metropolitan's facilities requires that the contractor submit an engineered shoring design to Metropolitan for review and acceptance a minimum of 30 days before the scheduled start of excavation. Excavation may not begin until the shoring design is accepted in writing by Metropolitan.

Shoring design submittals must include all required trenches, pits, and tunnel or jacking operations and related calculations. Before starting the shoring design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements, particularly as to any special procedures that may be required.

10.2 Shoring Design Requirements

Shoring design submittals must be stamped and signed by a California registered civil or structural engineer. The following requirements apply:

A. The submitted shoring must provide appropriate support for soil adjacent to and under Metropolitan's facilities.

B. Shoring submittals must include detailed procedures for the installation and removal of the shoring.

C. Design calculations must follow the Title 8, Chapter 4, Article 6 of the California Code of Regulations (CCR) guidelines. Accepted methods of analysis must be used.

D. Loads must be in accordance with the CCR guidelines or a soils report by a geotechnical consultant.

E. All members must be secured to prevent sliding, falling, or kickouts.

Metropolitan's pipelines must be located by potholing under Metropolitan's supervision before the beginning construction. Use of driven piles within 20 feet of the centerline of Metropolitan's pipeline is not allowed. Piles installed in drilled holes must have a minimum 2-foot clearance between Metropolitan's pipeline and the edge of the drilled hole, and a minimum of 1-foot clearance between any part of the shoring and Metropolitan's pipeline.

11.0 Support of Metropolitan Facilities

11.1 Support Design Submittal

If temporary support of a Metropolitan facility is required, the contractor shall submit a support design plan to Metropolitan for review and approval a minimum of 30 days before the scheduled start of work. Work may not begin until the support design is approved in writing by Metropolitan. Before starting design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements.

11.2 Support Design Requirements

Support design submittals must be prepared, stamped, and signed by a California registered civil or structural engineer. The following requirements apply:

A. Support drawings must include detailed procedures for the installation and removal of the support system.

B. Design calculations must follow accepted practices, and accepted methods of analysis must be used.

C. Support designs must show uniform support of Metropolitan's facilities with minimal deflection.

D. The total weight of the facility must be transferred to the support system before supporting soil is fully excavated.

E. All members must be secured to prevent sliding, falling, or kickouts.

12.0 Backfill

12.1 Metropolitan Pipeline Not Supported

In areas where a portion of Metropolitan pipeline is not supported during construction, the backfill under and to an elevation of 6 inches above the top of the pipeline must be one-sack minimum cement sand slurry. To prevent adhesion of the slurry to Metropolitan's pipeline, a minimum 6-mil-thick layer of polyethylene sheeting or similar approved sheeting must be placed between the concrete support and the pipeline.

12.2 Metropolitan Pipeline Partially Exposed

In areas where a Metropolitan pipeline is partially exposed during construction, the backfill must be a minimum of 6 inches above the top of the pipeline with sand compacted to minimum 90 percent compaction.

12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA)

In areas where a Metropolitan cut and cover conduit is exposed, the following guidelines apply:

A. No vehicle or equipment shall operate over or cross the conduit when the cover is less than 3 feet.

B. Track-type dozer with a gross vehicle weight of 12,000 lbs or less may be used over the conduit when the cover is a minimum of 3 feet.

C. Wheeled vehicles with a gross vehicle weight of 8,000 lbs or less may operate over the conduit when the cover is a minimum of 4 feet.

D. Tracked dozer or wheeled vehicle should be used to push material over the conduit from the side.

E. Tracked dozer or wheeled vehicle should gradually increase cover on one side of the conduit and then cross the conduit and increase cover on the other side of the conduit. The cover should be increased on one side of the conduit until a maximum of 2 feet of fill has been placed. The cover over the conduit is not allowed to be more than 2 feet higher on one side of the conduit than on the other side.

F. The cover should be gradually increased over the conduit until the grade elevations have been restored.

13.0 Piles

13.1 Impacts on Metropolitan Pipelines

Pile support for structures could impose lateral, vertical and seismic loads on Metropolitan's pipelines. Since the installation of piles could also cause settlement of Metropolitan pipelines, a settlement and/or lateral deformation study may be required for pile installations within 50 feet of Metropolitan's pipelines. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

13.2 Permanent Cast-in-place Piles

Permanent cast-in-place piles must be constructed so that down drag forces of the pile do not act on Metropolitan's pipeline. The pile must be designed so that down drag forces are not developed from the ground surface to springline of Metropolitan's pipeline.

Permanent cast-in-place piles shall not be placed closer than 5 feet from the edge of Metropolitan's pipeline. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines

Protective slabs must be permanent cast-in-place concrete protective slabs configured in accordance with Drawing SK-1 (See Figure 2 on Page 22).

The moments and shear for the protective slab may be derived from the American Association of State Highway and Transportation Officials (AASHTO). The following requirements apply:

A. The concrete must be designed to meet the requirements of AASHTO

B. Load and impact factors must be in accordance with AASHTO. Accepted methods of analysis must be used.

C. The protective slab design must be stamped and signed by a California registered civil or structural engineer and submitted to Metropolitan with supporting calculations for review and approval.

Existing protective slabs that need to be lengthened can be lengthened without modification, provided the cover and other loading have not been increased.

15.0 Blasting

At least 90 days prior to the start of any drilling for rock excavation blasting, or any blasting in the vicinity of Metropolitan's facilities, a site-specific blasting plan must be submitted to Metropolitan for review and approval. The plan must consist of, but not be limited to, hole diameters, timing sequences, explosive weights, peak particle velocities (PPV) at Metropolitan pipelines/structures, and their distances to blast locations. The PPV must be estimated based on a site-specific power law equation. The power law equation provides the peak particle velocity versus the scaled distance and must be calibrated based on measured values at the site.

16.0 Metropolitan Plan Review Costs, Construction Costs and Billing

16.1 Plan Review Costs

Metropolitan plan reviews requiring 8 labor hours or less are generally performed at no cost to the project proponent. Metropolitan plan reviews requiring more than 8 labor hours must be paid by the project proponent, unless the project proponent has superior rights at the project area. The plan review will include a written response detailing Metropolitan's comments, requirements, and/or approval.

A deposit of funds in the amount of the estimated cost and a signed letter agreement will be required from the project proponent before Metropolitan begins or continues a detailed engineering plan review that exceeds 8 labor hours.

16.2 Cost of Modification of Facilities Performed by Metropolitan

Cost of modification work conducted by Metropolitan will be borne by the project proponent, when Metropolitan has paramount/prior rights at the subject location.

Metropolitan will transmit a cost estimate for the modification work to be performed (when it has paramount/prior rights) and will require that a deposit, in the amount of the estimate, be received before the work will be performed.

16.3 Final Billing

Final billing will be based on the actual costs incurred, including engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the total cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice for the additional amount will be forwarded for payment.

17.0 Street Vacations and Reservation of Easements for Metropolitan

A reservation of an easement is required when all or a portion of a public street where Metropolitan facilities are located is to be vacated. The easement must be equal to the street width being vacated or a minimum 40 feet. The reservation must identify Metropolitan as a "public entity" and not a "public utility," prior to recordation of the vacation or tract map. The reservation of an easement must be submitted to Metropolitan for review prior to final approval.

18.0 Metropolitan Land Use Guidelines

If you are interested in obtaining permission to use Metropolitan land (temporary or long term), a Land Use Form must be completed and submitted to Metropolitan for review and consideration. A nonrefundable processing fee is required to cover Metropolitan's costs for reviewing your request. Land Use Request Forms can be found at:

http://mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Land_Use_Request_form_revised.pdf

The request should be emailed to RealEstateServices@mwdh2o.com,or contact the Real Property Development and Management (RPDM) Group at (213) 217-7750.

After the initial application form has been submitted, Metropolitan may require the following in order to process your request:

A. A map indicating the location(s) where access is needed, and the location & size (height, width and depth) of any invasive subsurface activity (boreholes, trenches, etc.).

B. The California Environmental Quality Act (CEQA) document(s) or studies that have been prepared for the project (e.g., initial study, notice of exemption, Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), etc.).

C. A copy of an ACORD insurance certification naming Metropolitan as an additional insured, or a current copy of a statement of self-insurance.

D. Confirmation of the legal name of the person(s) or entity(ies) that are to be named as the permittee(s) in the entry permit.

E. Confirmation of the purpose of the land use.

F. The name of the person(s) with the authority to sign the documents and any specific signature title block requirements for that person or any other persons required to sign the document (i.e., legal counsel, Board Secretary/Clerk, etc.).

G. A description of any vehicles that will have access to the property. The exact make or model information is not necessary; however, the general vehicle type, expected maximum dimensions (height, length, width), and a specific maximum weight must be provided.

Land use applications and proposed use of the property must be compatible with Metropolitan's present and/or future use of the property. Any preliminary review of your request by Metropolitan shall not be construed as a promise to grant any property rights for the use of Metropolitan's property.

19.0 Compliance with Environmental Laws and Regulations

As a public agency, Metropolitan is required to comply with all applicable environmental laws and regulations related to the activities it carries out or approves. Consequently, project plans, maps, and other information must be reviewed to determine Metropolitan's obligations pursuant to state and federal environmental laws and regulations, including, but not limited to:

A. California Environmental Quality Act (CEQA) (Public Resources Code 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500-15387)

B. Federal Endangered Species Act (ESA) of 1973, 16 U.S.C. §§ 1531, et seq.

C. California Fish and Game Code Sections 2050-2069 (California ESA)

D. California Fish and Game Code Section 1602

E. California Fish and Game Code Sections 3511, 4700, 5050 and 5515 (California fully protected species)

F. Federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§ 703-712

G. Federal Clean Water Act (including but not limited to Sections 404 and 401) 33 U.S.C. §§ 1342, 1344)

H. Porter Cologne Water Quality Control Act of 1969, California Water Code §§ 13000-14076.

I. Title 22, California Code of Regulations, Chapter 16 (California Waterworks Standards), Section 64572 (Water Main Separation)

Metropolitan may require the project applicant to pay for any environmental review, compliance and/or mitigation costs incurred to satisfy such legal obligations.

20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way

Facilities constructed within Metropolitan's rights-of-way shall be subject to the paramount right of Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove or relocate any facilities from its rights-of-way, such removal and replacement or relocation shall be at the expense of the owner of the facility.

21.0 Disclaimer and Information Accuracy

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as you may deem prudent, to assure that your project plans are correct. The relevant representative from Metropolitan must be called at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

Table 1: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Sanitary Sewer[2] or Hazardous Fluid Pipeline[3]

Pipeline Crossings	Metropolitan requires that sanitary sewer and hazardous fluid pipelines that cross Metropolitan's pipelines have special pipe construction (no joints) **and** secondary containment[4]. This is required for the full width of Metropolitan's rights-of-way or within 10 feet tangent to the outer edges of Metropolitan's pipeline within public streets. Additionally, sanitary sewer and hazardous fluid pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance between the top and the bottom of Metropolitan's pipeline and the pipe casing. These requirements apply to all sanitary sewer crossings regardless if the sanitary sewer main is located below or above Metropolitan's pipeline.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requires that all parallel sanitary sewer, hazardous fluid pipelines and/or non-potable utilities be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, longitudinal pipelines require special pipe construction (no joints) **and** secondary containment[4].
Sewer Manhole	Sanitary sewer manholes are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests manholes parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[5].

Notes:

[1] Separation distances are measured from the outer edges of each pipe.

[2] Sanitary sewer requirements apply to all recycled water treated to less than disinfected tertiary recycled water (disinfected secondary recycled water or less). Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

[3] Hazardous fluids include e.g., oil, fuels, chemicals, industrial wastes, wastewater sludge, etc.

[4] Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

[5] Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.

Table 2: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Storm Drain and/or Disinfected Tertiary Recycled Water[2]

Pipeline Crossings	Metropolitan requires crossing pipelines to be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. Additionally, pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requests that all parallel pipelines be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, special pipe construction (no joints) or secondary containment[3] are required.
Storm Drain Manhole	Permanent utility structures (e.g., manhole. catch basin, inlets) are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests all structures parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[4].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Disinfected tertiary recycled water as defined* in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[4] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 3: General Guidelines for Pipeline Separation[1] between Metropolitan's Pipeline and Recycled Water[2,4] Irrigations

Pressurized recycled irrigation mainlines	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing pressurized recycled irrigation mainlines must be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. • Longitudinal - must maintain a minimum 10-foot horizontal separation and route along the perimeter of Metropolitan's rights-of-way where possible.
Intermittently Energized Recycled Water Irrigation System Components	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3]. • Longitudinal – must maintain a minimum 5-foot horizontal separation between all intermittently energized recycled water irrigation system components (e.g. irrigation lateral lines, control valves, rotors) and the outer edges of Metropolitan's pipeline. Longitudinal irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3].
Irrigation Structures	Irrigation structures such as meters, pumps, control valves, etc. must be located outside of Metropolitan's rights-of-way.
Irrigation spray rotors near Metropolitan's aboveground facilities	Irrigation spray rotors must be located a minimum of 20-foot from any Metropolitan above ground structures with the spray direction away from these structures. These rotors should be routinely maintained and adjusted as necessary to ensure no over-spray into 20-foot clear zones.
Irrigations near open canals and aqueducts	Irrigation with recycled water near open canals and aqueducts will require a setback distance to be determined based on site-specific conditions. Runoff of recycled water must be contained within an approved use area and not impact Metropolitan facilities. Appropriate setbacks must also be in place to prevent overspray of recycled water impacting Metropolitan's facilities.

Notes:

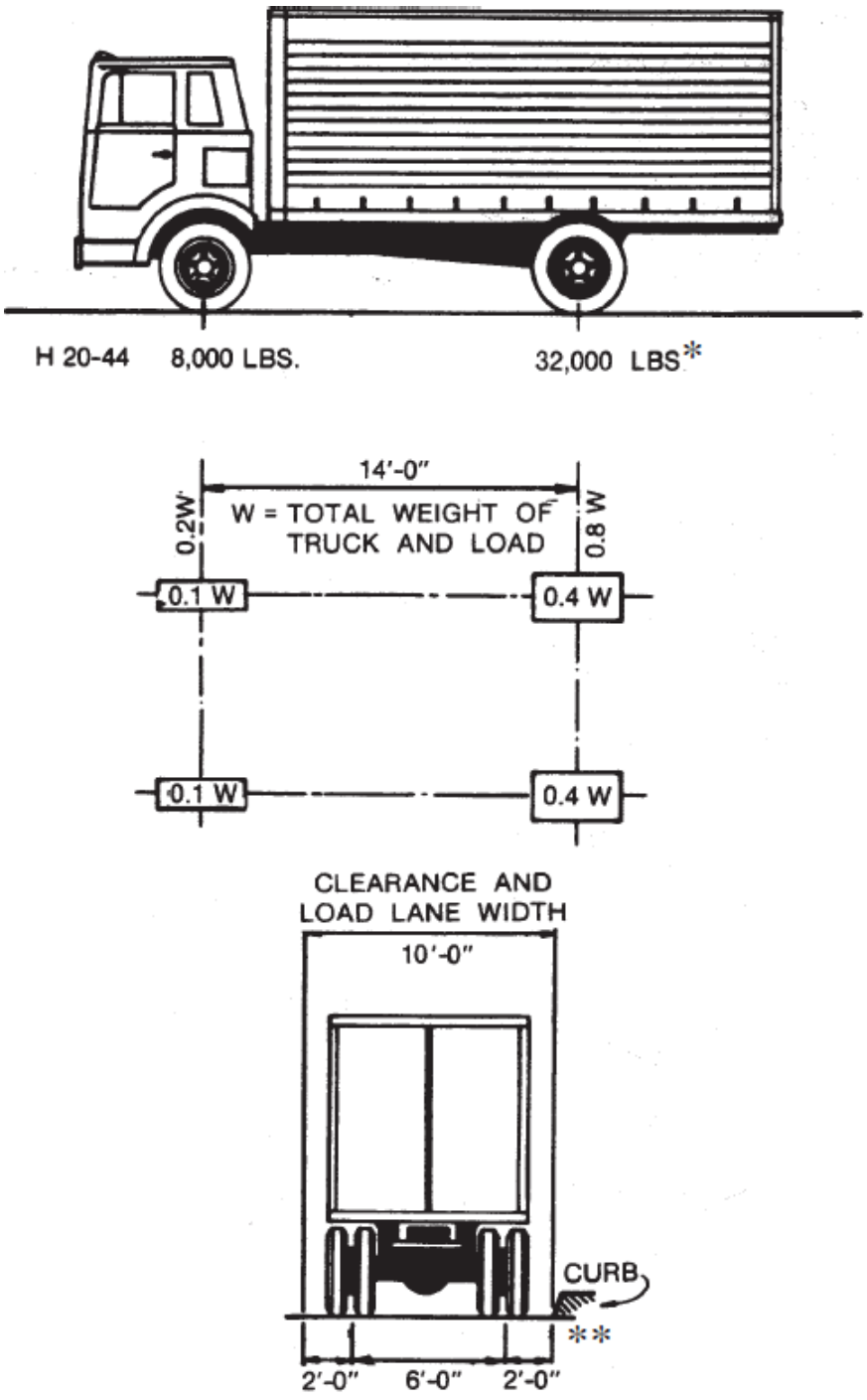
[1] Separation distances are measured from the outer edges of each pipe.

[2] Requirements for recycled water irrigation apply to all levels of treatment of recycled water for non-potable uses. Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

[3] Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

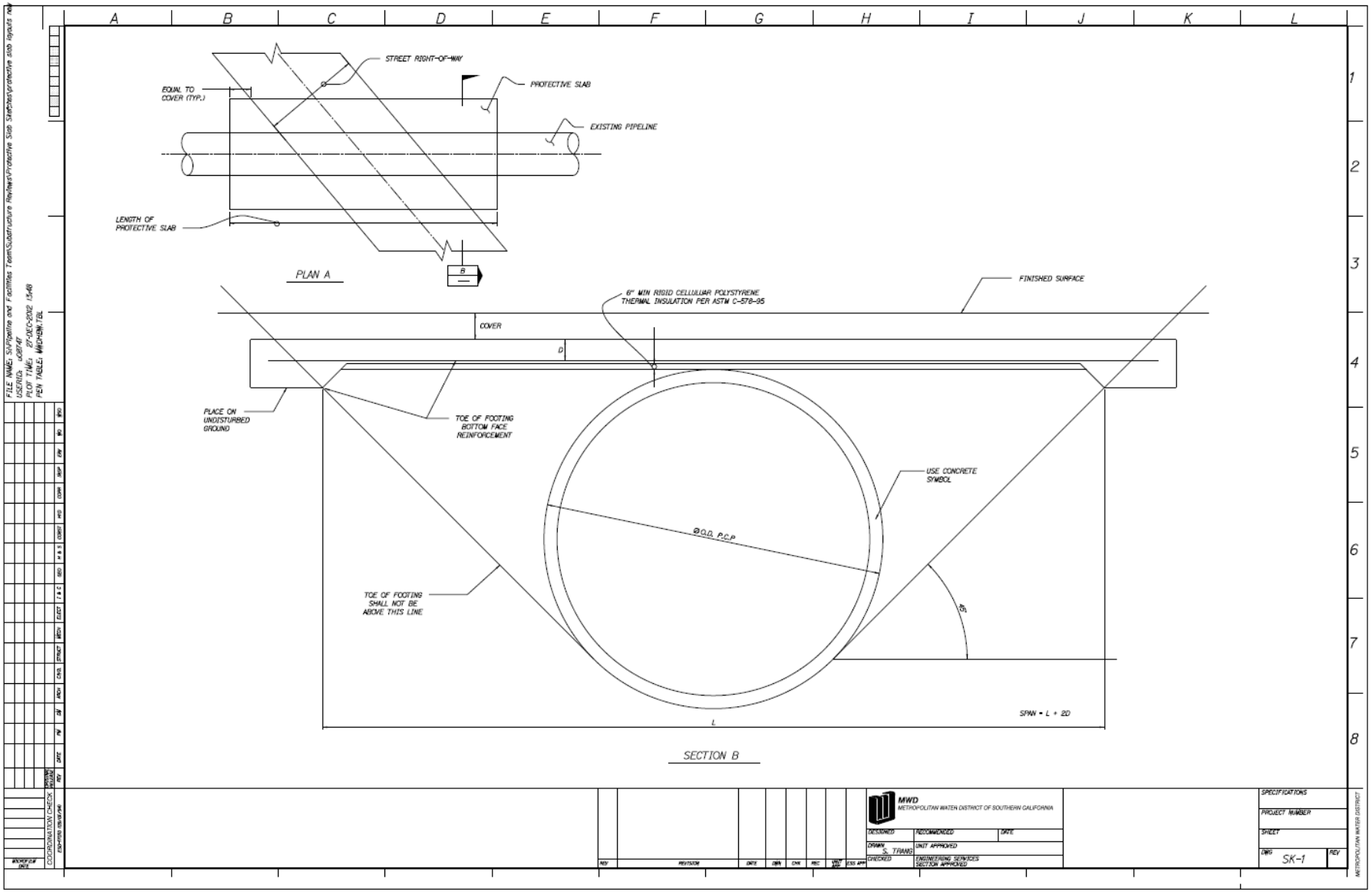
[4] Irrigation with recycled water shall not be applied directly above Metropolitan's treated water pipelines.

Figure 1: AASHTO H-20 Loading



Note: The H loadings consist of a two-axle truck or the corresponding lane loadings as illustrated above. The H loadings are designated "H" followed by a number indicating the gross weight in tons of the standard truck.

Figure 2: Drawing SK-1



Letter A-4

COMMENTER: Dianne Doesserich, Team Manager, Environmental Planning Section, Metropolitan Water District of Southern California

DATE: March 30, 2022

Response A-4.1

The commenter provides a description of the Project and provides background information on the Metropolitan Water District of Southern California (Metropolitan).

The comment is noted. Individual responses to Metropolitan's comments are provided below.

Response A-4.2

The commenter states that implementation of the Project could result in potential impacts to Metropolitan's Santa Monica Feeder and East Valley Feeder pipelines and appurtenant. The comment also notes a map of the facilities in relation to the Project has been attached to the letter and states that it will be necessary for the City to consider these facilities in its project planning.

The comment is noted, but does not raise specific concerns that pertain to the adequacy of the EIR. Individual development projects accommodated under the Housing Element Update will be evaluated to determine proximity to these facilities and whether the proposed projects could result in potential impacts to these facilities.

Response A-4.3

The commenter states that Metropolitan requires that any future design plans for development accommodated under the Project that are located in the area of Metropolitan's pipelines be submitted to Metropolitan for review and written approval. The comment also provides information to assist applicants with preparing project plans that are compatible with Metropolitan's facilities and easements, including the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way," which is attached to the letter.

The comment is noted, but does not raise specific concerns that pertain to the adequacy of the EIR. Metropolitan is currently on the City's list of agencies to contact for all CEQA documents and therefore, will have the opportunity to review all future projects going through the CEQA process. The attachment detailing information to assist applicants with preparing project plans that are compatible with Metropolitan's facilities and easements is acknowledged but is not relevant to the adequacy of the Draft EIR.

Response A-4.4

The commenter encourages individual projects under the Housing Element Update to use mitigation measures, such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water, to offset any increase in water use associated with the project.

Policy 3.9 of the Housing Element encourages the use of sustainable and green building design features in new and existing housing, such as working with Burbank Water and Power, and other partners, on energy retrofit programs.

Response A-4.5

The commenter notes their appreciation to provide input in the planning process and looks forward to receiving future documentation and plans for this project.

This comment does not pertain to the analysis and findings of the Draft EIR. As required under CEQA, the agency will be provided notice of the Final EIR and any forthcoming hearing date(s) for the project.

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

Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

Letter O-1

March 14, 2022

Shipra Rajesh, Associate Planner
City of Burbank
275 East Olive Avenue, P.O. Box 6459
Burbank, CA 91510-6459
Em: srajesh@burbankca.gov

Zizette Mullins, City Clerk
City of Burbank
275 East Olive Avenue, P.O. Box 6459
Burbank, CA 91510-6459
Em: zmullins@burbankca.gov

RE: City of Burbank's 6th Cycle Housing Element Update (SCH#: 2021020393).

Dear Shipra Rajesh and Zizette Mullins,

On behalf of the Southwest Regional Council of Carpenters ("**Southwest Carpenter**" or "**SWRCC**"), my Office is submitting these comments for the City of Burbank's ("**City**") March 14, 2022 Planning Board Meeting for its draft 2021-2029 update to the City's General Plan Housing Element ("**Project**").

The Southwest Carpenters is a labor union representing 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. 1

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

SWRCC expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens*

for Local Control v. Bakersfield (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

SWRCC incorporates by reference all comments raising issues regarding the 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).

1 cont.

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

The City should require the use of a local skilled and trained workforce to benefit the community's economic development and environment. 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:

2

> [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.

2 cont.

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

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

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

3

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area's jobs-housing balance, decreasing the amount of and length of job commutes and their associated greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component" can result in air pollutant reductions.[2]

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to "promote local hiring . . . to help

4

[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

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 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]

4 cont.

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]

5

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

[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.
[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.

trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

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

5 cont.

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.

6

Sincerely,

Mitchell M. Tsai
Attorneys for Southwest Regional
Council of Carpenters

Attached:

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

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

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

Letter O-1

COMMENTER: Mitchell M. Tsai, Attorney, on behalf of Southwest Regional Council of Carpenters (SWRCC)

DATE: March 14, 2022

Response O-1.1

The commenter offers an introduction to the labor union that is submitting the comment and notes the legal precedents for commenting on an EIR under CEQA during the approval process. The commenter requests that the City of Burbank send all notices referring or related to the Project to SWRCC.

SWRCC has been added to the Project mailing list. Individual responses to each comment are provided below.

Response O-1.2

The commenter states that the City should require the use of a local skilled and trained workforce to benefit the community's economic development and environment. The commenter provides supporting statements and notes that local hire and skilled and trained workforce requirements would assist with reducing environmental impacts and improving the Project's economic impact as the length of vendor trips would likely be reduced due to workers residing within 10 miles or less of the project sites, resulting in a reduction in greenhouse gas (GHG) emissions as well as localized economic benefits.

Implementation of the requirement to use a local skilled and trained workforce is beyond the scope of the Draft EIR since labor and employment is not a required topic under CEQA. Nonetheless, the commenter's recommendations are noted for review and consideration by the City's decision-makers. In addition, as discussed in Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR, the Project's impacts to GHG emissions would be less than significant because the Housing Element Update would be consistent with measures from the State Scoping Plan and GHG emission would not exceed per capita emissions levels identified in the State Scoping Plan. The Housing Element Update would also be consistent with the goals of the 2020-2045 SCS/RTP and the Burbank2035 Greenhouse Gas Reduction Plan.

Response O-1.3

The commenter quotes statements from the GHG technical report attached to the letter and notes that skilled and trained workforce requirements and policies have significant environmental benefits as they improve an area's jobs-housing balance, decreasing the amount of and length of job commutes and their associated GHG emissions.

Refer to Response O-1.2 regarding skilled and trained workforce requirements and policies and associated GHG emissions.

Response O-1.4

The commenter notes that cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes and provides the City of Hayward as an example.

The comment is noted, but does not raise specific concerns that pertain to the adequacy of the Draft EIR. The comment will be provided to the City's decisionmakers for their consideration. No further response is required.

Response O-1.5

The commenter provides supporting statements and notes that local hire mandates and skill training are critical facets of a strategy to reduce VMT and that placing jobs near housing is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents. The commenter also provides supporting statements and notes that some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues.

Refer to Response O-1.2 regarding skilled and trained workforce requirements and policies and associated GHG emissions.

Response O-1.6

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

Refer to Response O-1.2 regarding skilled and trained workforce requirements and policies and associated GHG emissions.

Letter O-2

From: Enrique Apodaca
Sent: Sunday, March 13, 2022 6:56 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Email: srajesh@burbankca.gov

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Enrique Apodaca, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
Enrique Apodaca

Letter O-3

From: Shaun M
Sent: Sunday, March 13, 2022 6:59 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Shaun Mieure, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Shaun Mieure

Letter O-4

From: Herbert Hardy
Sent: Sunday, March 13, 2022 7:00 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Herbert Hardy, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:
The construction workforce should require;
-Full family health plans
-Skilled and trained workforce standards through certified apprenticeship
-Paid sick leave. Pension, and vacation-holiday pay.

High quality responsible bidder standards should be established to ensure high quality construction performance;
-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Herbert Hardy

Letter O-5

From: Joel Perez
Sent: Sunday, March 13, 2022 7:00 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Joel Perez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Joel Perez

Sent from my iPhone

Letter O-6

From: Ivan Burgara
Sent: Sunday, March 13, 2022 7:01 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,

Hi, my name is Ivan Burgara, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Ivan Burgara

Letter O-7

From: Eric Valles
Sent: Sunday, March 13, 2022 7:03 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is EricValles , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Eric Valles

Letter O-8

From: Adrian Gudino
Sent: Sunday, March 13, 2022 7:08 PM
To: Rajesh, Shipra
Subject: Item no 1 Burbank housing element

Associate Planner Rajesh,
Hi, my name is Adrian Gudino, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Adrian Gudino

Letter O-9

From: Blake E Powell
Sent: Sunday, March 13, 2022 7:17 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Blake Powell , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Blake Powell
--
Blake E. Powell
Carpenter / NFS CPFC Services
Cell: 805-796-0291

“A team isn’t a bunch of kids out to win.
A team is something you belong to,
something you feel,
something you have to earn.”

- - - Coach Gordon Bombay.

Letter O-10

From: Peter Rodriguez
Sent: Sunday, March 13, 2022 7:21 PM
To: Rajesh, Shipra
Cc: Carpentersunion661@gmail.com
Subject: Email: srajesh@burbankca.gov Subject: Item No. 1- Burbank Housing Element Associate Planner Rajesh, Hi, my name is _____,Peter Rodriguez I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 wor...

Sent from my iPhone

Letter O-11

From: Steven McClenthen
Sent: Sunday, March 13, 2022 7:29 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is _____, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Your name here

Letter O-12

From: Dan Langford

Sent: Sunday, March 13, 2022 8:27 PM

To: Rajesh, Shipra

Subject: Item No. 1- Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,

Hi, my name is Dan Langford, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather than simply accepng pr ojects founded on low costs and low wages. Specifically:

The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self-perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Dan Langford
Vice President - Western District
Mobile: 213.216.5134
Office: 702.407.1007

United Brotherhood of Carpenters and Joiners of America
carpenters.org

Letter O-13

From: VICTOR CAMPOSECO
Sent: Sunday, March 13, 2022 8:57 PM
To: Rajesh, Shipra
Subject: No. 1- Burbank Housing Element

A enon: Associate Planner Rajesh,

Hi, my name is Victor Camposeco, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which includes members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family-supporng w ages, skills training, and job access to the community members rather than simply accepng pr ojects founded on low costs and low wages. Specifically:

The construcon w orkforce should require;
-Full family health plans.
-Skilled and trained workforce standards through cerfied appr enceship.
-Paid sick leave. Pension, and vacaon hol iday pay.

High-quality responsible bidder standards should be established to ensure high-quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aftwork for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Victor Camposeco

Letter O-14

From: Danny Ayala
Sent: Sunday, March 13, 2022 9:17 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Daniel Ayala, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Daniel Ayala

Letter O-15

From: tomcummings1829@gmail.com
Sent: Sunday, March 13, 2022 9:24 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Thomas Cummings, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Tom Cummings

Sent from my iPhone

Letter O-16

From: Jose Salcedo
Sent: Sunday, March 13, 2022 9:26 PM
To: Rajesh, Shipra
Subject: Item No.1-Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Hi, my name is Jose Salcedo _____, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Jose Salcedo

Letter O-17

From: Leonel Serrano
Sent: Sunday, March 13, 2022 9:48 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Leo Serrano, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Leo Serrano

Sent from my iPhone

Letter O-18

From: david benzie
Sent: Monday, March 14, 2022 12:03 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is _____David A Benzie_____, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

David A Benzie

Sent from Yahoo Mail on Android

Letter O-19

From: ALBERTO GARCIA
Sent: Monday, March 14, 2022 5:15 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Alberto Garcia,I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
Alberto Garcia

Letter O-20

From: Josue Solis
Sent: Monday, March 14, 2022 6:14 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Josue Solis Quinones I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
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- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Josue solis Quinones

Letter O-21

From: Daniel Hackler
Sent: Monday, March 14, 2022 6:27 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Daniel Hackler, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
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-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Daniel Hackler

Letter O-22

From: marco saucedo
Sent: Monday, March 14, 2022 6:29 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Marco Saucedo , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Marco Saucedo Sent from Yahoo Mail for iPhone

Letter O-23

From: Nicolas Reyes <nreyes456@gmail.com>
Sent: Monday, March 14, 2022 7:24 AM
To: Rajesh, Shipra
Subject: Item No 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Nicolas , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require; -Full family health plans -Skilled and trained workforce standards through cerfied appr enceship -P aid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance; -Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a Minimum of 5% of all construcon cr a. work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Nicolás Reyes

Sent from my iPhone

Letter O-24

From: Sean Mann
Sent: Monday, March 14, 2022 7:45 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,

Hi, my name is Sean Mann, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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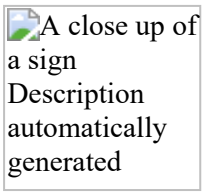
We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.



Thank You,
Sean Mann
Special Representative
Mobile: 213.817.0642

Southwest Regional Council of Carpenters
swcarpenters.org

Download our app:
Google Play iTunes App Store

Letter O-25

From: Brandon Solorzano
Sent: Monday, March 14, 2022 7:46 AM
To: Rajesh, Shipra
Subject: Item No. 1 - Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Brandon Alexander Solorzano. I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Brandon Alexander Solorzano

Sent from my iPhone

Letter O-26

From: Michael Zamora
Sent: Monday, March 14, 2022 8:00 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Michael Zamora I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
Specifically:
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Local 661 Carpenters Union Member,

Michael Zamora

Sent from my iPhone

Letter O-27

From: Jason Green
Sent: Monday, March 14, 2022 8:06 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hello, my name is Jason Green, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

The construcon w orkforce should require;

-Full family health plans

-Skilled and trained workforce standards through cerfied appr enceship

-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

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- General Contractors should be required to self perform a

Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Jason Green

Get Outlook for iOS

Letter O-28

From: Alejandro Casillas
Sent: Monday, March 14, 2022 8:24 AM
To: Rajesh, Shipra
Subject: Associate Planner Rajesh Burbank Housing Element

Hi, my name is Alejandro Casillas , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters

Alejandro Casillas

Letter O-29

From: Daniel Velarde
Sent: Monday, March 14, 2022 8:25 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Daniel Velarde, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Sent from my iPhone

Letter O-30

From: Erick Villavicencio
Sent: Monday, March 14, 2022 8:25 AM
To: Rajesh, Shipra
Subject: Subject: Item No. 1- Burbank Housing Element Associate Planner Rajesh, Hi, my name is Erick Villavicencio , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which includ...

Sent from my iPhone

Letter O-31

From: Michael Zamora
Sent: Monday, March 14, 2022 8:25 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Michael Zamora I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Michael Zamora

Sent from my iPhone

Letter O-32

From: Harm Veen
Sent: Monday, March 14, 2022 8:26 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Harm Veen , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Harm Veen

Letter O-33

From: Edgardo Franco
Sent: Monday, March 14, 2022 8:27 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Edgardo Franco , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Edgardo Franco

Letter O-34

From: adam abdalla
Sent: Monday, March 14, 2022 8:28 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Hi, my name is Adam Abdalla, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,
Adam Abdalla

Letter O-35

From: Eliezer Roldan
Sent: Monday, March 14, 2022 8:28 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Eliezer Roldan, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Eliezer Roldan

Sent from my iPhone

Letter O-36

From: Kamran Sepanlou
Sent: Monday, March 14, 2022 8:28 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Kamran Sepanlou, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Kamran S Sepanlou

Letter O-37

From: Alberto Sandobal
Sent: Monday, March 14, 2022 8:31 AM
To: Rajesh, Shipra
Subject: Burbank housing element

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Alberto Sandobal Ruiz , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Alberto Sandobal Ruiz

Sent from my iPhone

Letter O-38

From: luisochoa458@aol.com
Sent: Monday, March 14, 2022 8:31 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Luis Ochoa , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Luis Ochoa

Sent from the all new AOL app for iOS

Letter O-39

From: Michael Alfaro
Sent: Monday, March 14, 2022 8:31 AM
To: Rajesh, Shipra
Subject: Quality work

Email: srajesh@burbankca.gov

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Michael Alfaro I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
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Local 661 Carpenters Union Member,
Michael Alfaro

Sent from my iPhone

Letter O-40

From: dra Med
Sent: Monday, March 14, 2022 8:32 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is _____, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Letter O-41

From: Celesno R odriguez
Sent: Monday, March 14, 2022 8:33 AM
To: Rajesh, Shipra
Subject: Ítem no 1_ Burbank housing Element

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Email: srajesh@burbankca.gov

Associate Planner Rajesh,
Hi, my name is celesno I am a loc al union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Minimum of 5% of all construcon cr aft work for which they are responsible.

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Local 661 Carpenters Union Member,
Celesno R odríguez

Letter O-42

From: Gustavo Ramirez
Sent: Monday, March 14, 2022 8:39 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Gustavo Ramirez Guerrero, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Gustavo Ramirez Guerrero.

Letter O-43

Associate Planner Rajesh,

Hi, my name is Matthew Rodriguez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:

The construction workforce should require;
-Full family health plans
-Skilled and trained workforce standards through certified apprenticeship
-Paid sick leave. Pension, and vacation-holiday pay.

High quality responsible bidder standards should be established to ensure high quality construction performance;
-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Matthew Rodriguez

Letter O-44

From: salvador camacho
Sent: Monday, March 14, 2022 8:39 AM
To: Rajesh, Shipra
Subject: Item No.1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Salvador Camacho, i am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
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-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Salvador Camacho

Letter O-45

From: Abdul Rehman Ashfaq
Sent: Monday, March 14, 2022 8:46 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Abdul Ashfaq , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Minimum of 5% of all construcon cr aft work for which they are responsible.

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Local 661 Carpenters Union Member,
Abdul Ashfaq

Letter O-46

From: alejandro porcayo
Sent: Monday, March 14, 2022 8:54 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Alejandro Porcayo, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Minimum of 5% of all construcon cr aft work for which they are responsible.

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Local 661 Carpenters Union Member,

Alejandro Porcayo

Sent from my iPhone

Letter O-47

From: Carlos Perez
Sent: Monday, March 14, 2022 8:54 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Carlos Perez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Carlos Perez

Sent from Yahoo Mail for iPhone

Letter O-48

From: diazjeremy15@hotmail.com
Sent: Monday, March 14, 2022 8:54 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Jeremy Diaz, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Jeremy Diaz

Letter O-49

From: Freddy Fernandez
Sent: Monday, March 14, 2022 8:55 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Freddy Fernandez , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Freddy Fernandez

Letter O-50

From: Kevin Jimenez
Sent: Monday, March 14, 2022 8:55 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Kevin Jimenez I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Kevin Jimenez

Letter O-51

From: william galindo
Sent: Monday, March 14, 2022 8:55 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is William Galindo , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

William Galindo

Letter O-52

From: Magdalenomarneąz Marneąz
Sent: Monday, March 14, 2022 8:56 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Magdaleno Marneąz, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Your name here

Letter O-53

From: Anthony Tamayo
Sent: Monday, March 14, 2022 8:57 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is anthony tamayo i am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Anthony tamayo

Letter O-54

From: Jonathan Cordova
Sent: Monday, March 14, 2022 8:58 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Jonathan, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Jonathan Cordova

Letter O-55

From: manuelaguirre633
Sent: Monday, March 14, 2022 8:58 AM
To: Rajesh, Shipra
Subject: Ítem no 1 burbank housing element

Associate Planner Rajesh,
Hi, my name is manuel benjamin Aguirre duarte, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Manuel aguirre

Sent from my T-Mobile 4G LTE Device

Letter O-56

From: carlos.gabi19581968@gmail.com
Sent: Monday, March 14, 2022 9:00 AM
To: Rajesh, Shipra
Subject: Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Carlos , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng wages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Carlos Carbajal

Sent from my iPhone

Letter O-57

From: Emilio sandoval
Sent: Monday, March 14, 2022 10:24 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Emilio Sandoval , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Emilio Sandoval

Letter O-58

From: Ramiro Reyes
Sent: Monday, March 14, 2022 11:41 AM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Ramiro Reyes, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Roberto Reyes

Letter O-59

From: Mitch Cus
Sent: Monday, March 14, 2022 12:04 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Mitch Cus and I am a loc al union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Mitch Cus
--
Mitch Cus

Sláinte

Letter O-60

From: Jesus Rodriguez
Sent: Monday, March 14, 2022 12:47 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is EDUARDO DIAZ, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

EDUARDO DIAZ

Letter O-61

From: Marn Arz ola
Sent: Monday, March 14, 2022 1:02 PM
To: Rajesh, Shipra
Subject: Marn Arz ola 562

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Email: srajesh@burbankca.gov

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Marn Arz ola, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Your name here

Letter O-62

From: Dmitri Turner
Sent: Monday, March 14, 2022 1:05 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Dmitri , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
Dmitri Turner

Sent from my iPhone

Letter O-63

From: Jay on a r6 go fast
Sent: Monday, March 14, 2022 2:04 PM
To: Rajesh, Shipra
Subject: Item #1 burbank housing element

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is josh, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
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Local 661 Carpenters Union Member,

Josh trejo

Letter O-64

From: Joe Fuchs
Sent: Monday, March 14, 2022 2:32 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name isJoseph Fuchs , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,
Joe Fuchs

Sent from my iPhone

Letter O-65

From: o che wy
Sent: Monday, March 14, 2022 3:58 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Jesus Gamez am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Jesus Gamez

Letter O-66

From: Anthony Perez
Sent: Thursday, March 24, 2022 1:54 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Anthony Perez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member

Sent from my iPhone

Letter O-67

From: Manuel Vazquez
Sent: Thursday, March 24, 2022 1:54 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Emmanuel Vazquez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Emmanuel Vazquez

Letter O-68

From: Hector Aguilar
Sent: Thursday, March 24, 2022 1:54 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Hector Aguilar , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:

The construction workforce should require;
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High quality responsible bidder standards should be established to ensure high quality construction performance;
-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
Hector Aguilar

Letter O-69

From: fredy marne z
Sent: Thursday, March 24, 2022 1:56 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is fredy marne z, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Fredy marne z

Letter O-70

From: Ian Letelier
Sent: Thursday, March 24, 2022 1:56 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Ian Leteier, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

IAN LETELIER

Letter O-71

From: Robert Acedo
Sent: Thursday, March 24, 2022 1:59 PM
To: Rajesh, Shipra

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Robert F Acedo Jr I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Robert Acedo jr

Letter O-72

From: Ian Letelier <ianletelier1995@gmail.com>
Sent: Thursday, March 24, 2022 2:02 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Veronica Leteier , I am a local union carpenter's wife out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:

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Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member wife
Veronica Letelier

Letter O-73

Email: srajesh@burbankca.gov

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Anthony Nilo I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Your name here

Letter O-74

Associate Planner Rajesh,

Hi, my name is Frankie March, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Frankie march

Letter O-75

From: Chuck Powell
Sent: Thursday, March 24, 2022 2:14 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Chuck Powell, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Chuck Powell

Chuck Powell
ICRA Specialist
(213)760-0603
Cpowell@swcarpenters.org
www.icrahealthcare.com
Infecon Con trol Risk Assessment Specialist

Disclaimer

Letter O-76

From: Daniel Garcia
Sent: Thursday, March 24, 2022 2:15 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank housing

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srajesh@burbankca.gov

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Crisan I am a loc al union carpenter out of Carpenter Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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Local 661 Carpenters Union Member,

Your name here Crisan Gar cia

Letter O-77

From: Alex Hackler
Sent: Thursday, March 24, 2022 2:30 PM
To: Rajesh, Shipra
Subject: Burbank housing element

Associate Planner Rajesh,
Hi, my name is Alex hackler , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Alex hackler

Sent from my iPhone

Letter O-78

From: Josue Solis
Sent: Thursday, March 24, 2022 2:32 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Josue Solis Quinones , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Josue Solis Quinones

Letter O-79

From: Edward Bencomo
Sent: Thursday, March 24, 2022 2:33 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Edward Bencomo, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Edward Bencomo

Sent from my iPhone

Letter O-80

From: Gabriel Castaneda
Sent: Thursday, March 24, 2022 2:34 PM
To: Rajesh, Shipra
Subject: Item NO.1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Gabriel castaneda,I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Gabriel castaneda

Letter O-81

From: Jonathan Peraza
Sent: Thursday, March 24, 2022 2:34 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Jonathan Peraza, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Jonathan Peraza

Letter O-82

From: Alvaro Aguilera
Sent: Thursday, March 24, 2022 2:35 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Alvaro Aguilera, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Alvaro Aguilera

Sent from my iPhone

Letter O-83

From: Jose Resendiz
Sent: Thursday, March 24, 2022 2:36 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is jose, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
José resendiz

Letter O-84

From: rudy ramirez
Sent: Thursday, March 24, 2022 2:43 PM
To: Rajesh, Shipra
Subject: Item no 1. Burbank housing element

Associate Planner Rajesh,
Hi, my name is Rudy Ramirez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages. Specifically:
The construction workforce should require;
-Full family health plans
-Skilled and trained workforce standards through certified apprenticeship
-Paid sick leave. Pension, and vacation-holiday pay.

High quality responsible bidder standards should be established to ensure high quality construction performance;
-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Letter O-85

From: Bryan De Leon
Sent: Thursday, March 24, 2022 2:46 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Bryan De Leon, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member, Bryan De Leon

Letter O-86

From: Jose Cardona
Sent: Thursday, March 24, 2022 2:46 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element
A achments: Burbank Housing Element.docx

Associate Planner Rajesh,
Hi, my name is Jose Cardona I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Sent from my iPhone

Letter O-87

From: gianni.rossi420@yahoo.com
Sent: Thursday, March 24, 2022 2:50 PM
To: Rajesh, Shipra
Subject: Subject: Item No. 1- Burbank Housing Element

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is gianni Rossi , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

The construcon w orkforce should require;
-Full family health plans
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High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
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- General Contractors should be required to self perform a Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Gianni Rossi

Sent from Yahoo Mail for iPhone

Letter O-88

From: Franklin Rivera
Sent: Thursday, March 24, 2022 2:53 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Franklin Rivera, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
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High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Franklin Rivera

Sent from my iPhone

Letter O-89

From: Carolina Corona
Sent: Thursday, March 24, 2022 2:54 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Carolina Corona, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
Carolina Corona

Letter O-90

From: Kory Smith
Sent: Thursday, March 24, 2022 2:55 PM
To: Rajesh, Shipra
Subject: Subject: Item No. 1- Burbank Housing Element

Email: srajesh@burbankca.gov

Associate Planner Rajesh,
Hi, my name is kory smith, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Kory smith

Sent from Yahoo Mail on Android

Letter O-91

From: Jay Hardy
Sent: Thursday, March 24, 2022 2:56 PM
To: Rajesh, Shipra

Email: srajesh@burbankca.gov

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Jusn har dy____, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
Jusn har dy
Your name here

Letter O-92

From: Jerred Langford
Sent: Sunday, March 27, 2022 8:24 PM
To: Rajesh, Shipra
Cc: Jerred Langford
Subject: Item 1- Burbank Housing Element

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Jerred Langford, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
Specifically:

The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-Paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Jerred Langford
Lead Representative – Local 661
P: 818.364.9303
M: 213.808.2417
Southwest Regional Council of Carpenters
swcarpenters.org

Download our app:
Google Play | iTunes App Store

Disclaimer

Letter O-93

From: crispin carrasco
Sent: Monday, March 28, 2022 8:39 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Hi my name is crispin Carrasco ,I am a local union carpenter out of carpenters local 661.carpenters local 661 represents over 5000 working families in the area which include members that live ,work,and make us of the business in and around the Burbank area. We would like to see labor standards and policy include in the 2021-2029 housing element.in the future projects under this plan, the city of Burbank should explicitly include language required family supporng w ages,skill training and job access to the community members rather then simply accepng pr ojects founded on low cost and low wages. Specially the construcon workforce should require,full family health plans skilled and trained workforce standards through cerfied apprenceship paid si ck leave.pension and vacaon pa y high quality responsible bidder standards should be established high quality construcon perf ormance
construcon c ontractors at every level comply with labor and law and have no history of fraudulent or grossly negligent business pracces g eneral contractors should be required to self perform a minimum is 5% of all construcon cr aft work for which they are responsible we believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers,increase access to family healthcare, and enrich the community at large. Local-661 carpenters union member. Crispin

Sent from my iPhone

Letter O-94

From: Alex Hackler
Sent: Monday, March 28, 2022 9:19 AM
To: Rajesh, Shipra
Subject: Burbank housing element

Item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Alex hackler I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Alex hackler

Sent from my iPhone

Letter O-95

From: Jonathan Peraza
Sent: Monday, March 28, 2022 9:19 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Development

Associate Planner Rajesh,
Hi, my name is Jonathan Peraza, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Jonathan Peraza.

Sent from my iPhone

Letter O-96

From: Edward Bencomo
Sent: Monday, March 28, 2022 9:20 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Edward Bencomo, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
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-Skilled and trained workforce standards through cerfied appr enceship
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High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Edward Bencomo.

Sent from my iPhone

Letter O-97

From: Josue Solis
Sent: Monday, March 28, 2022 9:20 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Josue Solis Quinones, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages.

Specifically:
The construction workforce should require;
-Full family health plans
-Skilled and trained workforce standards through certified apprenticeship
-paid sick leave. Pension, and vacation-holiday pay.

High quality responsible bidder standards should be established to ensure high quality construction performance;

-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
-General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank local deserve an innovative economic solution that puts them on a path to build better careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Josue Solis Quinones

Letter O-98

From: Gabriel Castaneda
Sent: Monday, March 28, 2022 9:21 AM
To: Rajesh, Shipra
Subject: Burbank housing element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Gabriel castaneda, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Gabriel castaneda

Letter O-99

From: Alvaro Aguilera
Sent: Monday, March 28, 2022 9:22 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Alvaro Aguilera, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

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-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Álvaro Aguilera.

Sent from my iPhone

Letter O-100

From: Mili Nuetron
Sent: Monday, March 28, 2022 9:22 AM
To: Rajesh, Shipra
Subject: Item No.1 Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Emmanuel I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng projects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
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-Skilled and trained workforce standards through cerfied appr enceship
-paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Emmanuel Milian .

Letter O-101

From: Jose Resendiz
Sent: Monday, March 28, 2022 9:24 AM
To: Rajesh, Shipra
Subject: Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is José I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:
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-Skilled and trained workforce standards through cerfied appr enceship
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High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;
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- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

José resendiz

Letter O-102

From: Gregory Ceja
Sent: Monday, March 28, 2022 9:25 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Gregorey S Ceja I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
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-Skilled and trained workforce standards through cerfied appr enceship
-paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
GREGOREY S Ceja

Letter O-103

From: rudy ramirez
Sent: Monday, March 28, 2022 9:29 AM
To: Rajesh, Shipra
Subject: Item no.1 - Burbank housing element

Associate Planner Rajesh,
Hi, my name is Rudy M Ramirez , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages.

Specifically:
The construction workforce should require;
-Full family health plans
-Skilled and trained workforce standards through certified apprenticeship
-paid sick leave. Pension, and vacation-holiday pay.

High quality responsible bidder standards should be established to ensure high quality construction performance;

-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
-General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank local deserve an innovative economic solution that puts them on a path to build better careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Rudy M Ramirez.

Letter O-104

From: Hotmail
Sent: Monday, March 28, 2022 9:44 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is johnathen hays. I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Johnathen hays

Letter O-105

From: Noah Iglesias
Sent: Monday, March 28, 2022 9:45 AM
To: Rajesh, Shipra

Associate Planner Rajesh,
Hi, my name is Noah Iglesias, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages.

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-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
-General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank local deserve an innovative economic solution that puts them on a path to build better careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Noah Iglesias

Letter O-106

From: bonifacio rojas
Sent: Monday, March 28, 2022 9:46 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Bonifasio Rojas, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
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-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Bonifasio Rojas.

Sent from my iPhone

Letter O-107

From: diana camarillo
Sent: Monday, March 28, 2022 9:46 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Diana Camarillo, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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High quality responsible bidder standards should be established to ensure high quality construcon performance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Diana Camarillo.

Letter O-108

From: Joseph Reyes
Sent: Monday, March 28, 2022 9:46 AM
To: Rajesh, Shipra
Subject: Item 1 Burbank housing element

Associate Planner Rajesh,
Hi, my name is Jose Reyes, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages.

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-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
-General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank local deserve an innovative economic solution that puts them on a path to build better careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Jose Reyes

Letter O-109

From: Paris Jernigan
Sent: Monday, March 28, 2022 9:46 AM
To: Rajesh, Shipra
Subject: 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Paris Jernigan, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
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High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

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-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Paris Jernigan.

Letter O-110

From: andres cabrera
Sent: Monday, March 28, 2022 9:47 AM
To: Rajesh, Shipra
Subject: Burbank housing element

Hi, my name is Andres cabrera , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
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High quality responsible bidder standards should be established to ensure high quality construcon performance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Andres cabrera

Letter O-111

From: Daniel Ochoa
Sent: Monday, March 28, 2022 9:47 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is__Daniel Ochoa__, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages.

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The construction workforce should require;
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-General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank local deserve an innovative economic solution that puts them on a path to build better careers, and enrich the community at large.

Local 661 Carpenters Union Member;
_____.

Letter O-112

From: David Lopez
Sent: Monday, March 28, 2022 9:47 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is David Lopez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills, training, and job access to the community members rather than simply accepng pr ojects founded on low costs and low wages.

Specifically:

The construcon w orkforce should require;

-Full family health plans

-Skilled and trained workforce standards through cerfied appr enceship

-paid sick leave. Pension, and vacaon-holi day pay.

High quality responsible bidder standards should be established to ensure high quality construcon perf ormance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.

-General Contractors should be required to self-perform a

Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers and enrich the community at large.

Local 661 Carpenters Union Member;

David Lopez.
Get Outlook for iOS

Disclaimer

Letter O-113

From: George Rodarte
Sent: Monday, March 28, 2022 9:48 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is George Rodarte, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Local 661 Carpenters Union Member;
George Rodarte.
Sent from my iPhone

Letter O-114

From: Brenden Cates <brendencates213@gmail.com>
Sent: Monday, March 28, 2022 9:49 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Brenden Cates, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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-General Contractors should be required to self perform a Minimum of 5% of all construcon cr a. work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 213 Carpenters Union Member;
Brenden Cates

Sent from my iPhone

Letter O-115

From: Josh Strickler
Sent: Monday, March 28, 2022 9:50 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Joshua Strickler , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Joshua Strickler . Sent from my iPhone

Letter O-116

From: Ricardo Trejo
Sent: Monday, March 28, 2022 10:21 AM
To: Rajesh, Shipra
Subject: Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Ricardo Trejo, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Ricardo Trejo

Letter O-117

From: Steven McClenthen
Sent: Monday, March 28, 2022 10:21 AM
To: Rajesh, Shipra
Subject: 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Steven McClenthen , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

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Local 661 Carpenters Union Member; Steven McClenthen

Letter O-118

From: angel andrade
Sent: Monday, March 28, 2022 10:22 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Angel Andrade, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Angel Andrade.

Letter O-119

From: javier rodriguez
Sent: Monday, March 28, 2022 10:22 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Javier Rodriguez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Local 661 Carpenters Union Member;
Javier Rodriguez.

Letter O-120

From: Luis Rosales
Sent: Monday, March 28, 2022 10:22 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

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Associate Planner Rajesh,
Hi, my name is Luis Rosales , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Luis Rosales

Letter O-121

From: Ricardo Arellano
Sent: Monday, March 28, 2022 10:23 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

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ssociate Planner Rajesh,
Hi, my name is Ricardo Arellano, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, skills training and job access to the community members rather then simply accepting projects founded on low costs and low wages.

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-General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank local deserve an innovative economic solution that puts them on a path to build better careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Ricardo Arellano

Letter O-122

From: Elvis Guzman
Sent: Monday, March 28, 2022 10:24 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Hi, my name is Elvis Guzman, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Elvis Guzman

Letter O-123

From: Mauricio Palmero
Sent: Monday, March 28, 2022 10:24 AM
To: Rajesh, Shipra

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Mauricio Palmero, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

Specifically:
The construcon w orkforce should require;
-Full family health plans
-Skilled and trained workforce standards through cerfied appr enceship
-paid sick leave. Pension, and vacaon-holida y pay.

High quality responsible bidder standards should be established to ensure high quality construcon performance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
-General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Mauricio palmero

Sent from my iPhone

Letter O-124

From: Oscar Jimenez
Sent: Monday, March 28, 2022 10:24 AM
To: Rajesh, Shipra
Subject: Item no.1 Burbank housing element

Hi, my name is Oscar Jimenez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Local 661 Carpenters Union Member;
Oscar Jimenez. Sent from my iPhone

Letter O-125

From: ricardo vela
Sent: Monday, March 28, 2022 10:28 AM
To: Rajesh, Shipra
Subject: 1-Burbank housing element

CAUTION: This email originated from outside of the organizaon. Do not cli ck links or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Ricardo vela, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Local 661 Carpenters Union Member;
Ricardo vela

Sent from my iPhone

Letter O-126

From: Walter Perrine
Sent: Monday, March 28, 2022 10:28 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Associate Planner Rajesh,
Hi, my name is Walter Perrine I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.
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We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.
Local 661 Carpenters Union Member;
Walter Perrine

Letter O-127

From: Anthony Vela
Sent: Monday, March 28, 2022 10:29 AM
To: Rajesh, Shipra
Subject: item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Anthony Vela, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Local 661 Carpenters Union Member;
Anthony Vela

Sent from my iPhone

Letter O-128

From: carlos.gabi19581968@gmail.com
Sent: Monday, March 28, 2022 10:30 AM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Carlos Carbajal I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;
Carlos Carbajal

Sent from my iPhone

Letter O-129

From: Emmanuel Delgado
Sent: Monday, March 28, 2022 10:40 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,

Hi, my name is Emmanuel Delgado, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:The construcon w orkforce should require;

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- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Emmanuel Delgado

Letter O-130

From: ruben granillo
Sent: Monday, March 28, 2022 3:59 PM
To: Rajesh, Shipra
Subject: Item No. 1- Burbank Housing Element

Subject: Item No. 1- Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is ruben granillo, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages. Specifically:

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Local 661 Carpenters Union Member,

Ruben granillo

Sent from my iPhone

Letter O-131

From: Nicolas Reyes
Sent: Monday, March 28, 2022 6:39 PM
To: Rajesh, Shipra
Subject: Item No. 1-Burbank Housing element

Associate Planner Rajesh,
Hi, my name is Nicolás , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Minimum of 5% of all construcon cr aft work for which they are responsible.

We believe all Burbank local deserve an innovav e economic soluon tha t puts them on a path to build be er careers, and enrich the community at large.

Local 661 Carpenters Union Member;

Nicolás Reyes

Letter O-132

From: Jesus Sandoval
Sent: Tuesday, March 29, 2022 4:17 PM
To: Rajesh, Shipra
Subject: Burbank Housing Element

Associate Planner Rajesh,
Hi, my name is Guadalupe Sandoval, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represent over 5,000 working families in the area which include members that live, work, and make use of the business around in and the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, skills training and job access to the community members rather then simply accepng pr ojects founded on low costs and low wages.

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Local 661 Carpenters Union Member;
Guadalupe Sandoval.

Letters O-2 through O-132

COMMENTER: Refer to individuals O-2 through O-132 listed in Table 2-2

DATE: March 13, 2022 – March 29, 2022

Response for Letters O-2 through O-132

The comment notes membership with Carpenters Local 661 and offers an introduction to the labor union. The comment requests that labor standards and/or policies are included in the Housing Element Update and that future projects under the Housing Element Update require family supporting wages, skills training, and job access to community members. The comment also specifically notes that the construction workforce for future projects should require family health plans, skilled workforce standards, paid sick leave, pension, vacation-holiday pay, and high-quality bidder standards to ensure that contractors comply with labor laws.

The commenters' requests for changes to the Housing Element Update are noted, but does not raise issues with the adequacy of the analysis or conclusions in the Draft EIR. The Draft EIR is not intended or required to provide justification for the Project. Rather, the EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that the Project is likely to have on the environment. This EIR also identifies ways in which the significant effects of the Project might be minimized and identifies alternatives to the Project. The City is not required to consider such comments or requests to change the Project in its CEQA analysis absent a commenter providing substantial evidence that the proposed change would feasibly reduce one or more significant adverse environmental impacts identified in the Draft EIR. Requests for changes to the Project may be addressed through the planning process outside of the CEQA process.

March 31, 2022

Letter I-1

Shipra Rajesh
Project Manager
Community Development Department
Burbank, CA 91502
via Email

RE: Comments: 1) Burbank Housing and Safety Element Update, Draft Environmental Impact Report, January 22, 2022; 2) 2nd Revised Draft Housing Element, 2021-2029, November 2021

Thank you very much for the meeting to answer my initial questions about the range of dates that accompany the data maps and tables contained in the detailed Appendices of the Draft Housing Element (HE).

My letter here covers both documents, raises questions about major concerns over the Draft EIR, suggests broad policies and detailed revisions in limited cases. 1

Since the issuance of the 2020 census data on March 17, it is clear that our City is well balanced with a healthy mix of all people (age, ethnicity, income, and housing, etc.). Our community is unique in many respects: the availability of good schools employment and access to transit is clear (Appendices, Exhibits B-12, 13,14). What is less well known is that a significant number of the city's

neighborhoods are identified as located in areas with less positive environmental outcomes (Appendices, Exhibit B-16, Environmental Opportunities). I was not surprised to see my census tract identified as a Disadvantaged Community (Appendices, Exhibit B-17). As a whole, Burbank is a city with primarily Stable, Moderate Mixed Income neighborhoods (Appendices, Exhibit B-20). The analyses in the Appendices demonstrate a clear need for populations of extremely low income— both seniors and families. Anyone who has engaged in city activities through programs like camper ships, Holiday Baskets and Family Promise know from personal experience that reality of our residents' lives include our neighbors.

1 cont.

State pre-emption of local decision-making is a deep concern for me. This concern is confirmed by the inadequacy of the Draft EIR to serve as a basis for decision-makers on the Housing and Safety Elements.

COMMENTS TO THE DEIR/ELEMENT

According to the *Project Description*, the City's housing goal is to ensure that sufficient capacity exists in the Housing Element Update to accommodate the RHNA with a buffer (a total of 10,456 additional housing units) throughout the eight-year planning period.

2

The DEIR is amazing and concerning. The data sets are incongruous. The DEIR contains very different housing unit numbers (SCAG, RHNA and DOF) that beg to be reconciled in a rational manner, for the non-professional

who does not understand the sea of acronyms coming at them. The Element is built around a State-mandated housing number, but that conflicts with forecasts by the local regional agency. The DEIR housing numbers from DOF conflict with the housing numbers from DOF in the Housing Element itself.

2 cont.

Nonetheless, here are both comments to the DEIR and the Element. Hopefully, the Element charts a better path in light of these comments.

Finally, the data for Burbank are derived from very big numbers generated, I understand, by an algorithm(s). An algorithm cannot possibly account for local nuances, activities, historic growth patterns, infrastructure, its non-profits etc.

3

DEIR Comments

1. **Unmitigated Impacts, Sewer. This should concern everyone.** The proposed Project, Housing Element, 2nd Revised Draft causes impacts on the City's wastewater treatment capacity that are significant and unavoidable:

4

"…based on the sewer generation rates that were calculated for the proposed Project, along with constraints within the City's treatment system, potentially significant impacts could result on a project-specific bases with **no feasible mitigation at the current plan**

level. Therefore, **impacts would be significant an unavoidable."**
Page ES-24

And also:

Wastewater generation for full buildout of the proposed Housing Element Update is **estimated to be up to approximately 6.3 mgd, which is not within the City's currently available treatment capacity of 4 mgd.** Therefore, impacts would be, significant and unavoidable due to constraints within the sewer system and development under the proposed Project would contribute to a cumulatively significant impact associated with wastewater generation. Cumulative Impacts 4.12-39

4 cont.

The DEIR identifies an elaborate uncharted approach that Public Works will take over time. But the overall impact is unmistakable.

How will Council to make a Finding of Overriding Considerations for sewer impacts? What is the benefit that outweighs this?

What is maximum amount of housing units permitted before the significant and unavoidable sewer impacts are reached?

How much does the proposed Project need to be modified to reduce impacts to less than significant?

4 cont.

2. There are **significant inconsistencies between RHNA, the SCAG (Burbank/regional forecasts), and existing numbers offered by the State Department of Finance 2021.** The City is required to plan for the RHNA number, but neither SCAG nor DOF offer any kind of data that would confirm even modest support of the State-mandated number (as distributed by SCAG).

Here is how it looks:

HCD Requirement by 2029 = 10,456 housing units (RHNA)

5

SCAG Forecast by 2030 = 4,650 housing units (Table 4.8-2)

over the 8-Year proposed Project (2021-2029), the added number of required units above the forecast is:

= 5,806 MORE units

The discrepancies need a full explanation.

A recent State audit has revealed problems with the RHNA numbers in some districts. Unfortunately, a similar audit has not been conducted over the RHNA number for

the SCAG region. The numbers for Burbank make no sense.

The City should demand an audit of the SCAG RHNA numbers before it approves the proposed Project which contains significant unmitigated impacts, including sewage.

5 cont.

In plain language, the discrepancies must be explained: if the forecast is for modest growth, why is RHNA 2x forecast?

3. SCAG 2020 **estimates fewer residents, jobs and housing in the region by 2040**:

"Based on an evaluation of the 2016 RTP/SCS and the 2020 RTP/SCS demographic projections, the 2020 RTP/SCS projects fewer residents, jobs, and housing units. The 2020 RTP/SCS predicts approximately **290,000 fewer residents, 80,000 fewer houses, and 210,000 jobs in the region in 2040** than under the 2016 RTP/SCS, which would represent less activities and associated emissions than would have been predicted under the 2016 RTP/SCS. Therefore, evaluating again the 2016 RTP/SCS projections would be conservative as the 2016 AQMP assumed greater growth than is currently anticipated. The impact analysis throughout this EIR uses the demographic data provided in the 2020 RTP/SCS." p. 4.1-10

6

With the regional forecasts in mind (and the 2020 forecast by SCAG is significantly less aggressive than SCAG's 2016 projections), how are these numbers reconciled with the RHNA for Burbank?

6 cont.

4. **The residential vacancy rate is 6%**. The Department of Finance (DOF) identifies 45,069 housing units in the city, of which 2,787 are vacant. This is a 6% vacancy rate, considered a "healthy" vacancy rate by HCD. Rather than showing a critical shortage of housing units, the statistics show an appropriate vacancy rate.

1. The disparity among these housing unit numbers needs to be reconciled (SCAG, RHNA and DOF).

2. If the vacancy rate is already 6% (2% more than HCD has used in the past as a maximum rate) how is an increase to 10,456 new housing units in the 6th Cycle justifiable?

7

(FYI, the DOF figure in the Housing Element is different: 44,978 Housing Units. Table 1-13)

5. A **15% added housing unit buffer** raises the total number of units that the city must accommodate to 10,456. Given all the other numbers (SCAG, RHNA, DOF — 2 numbers—) what is the justification for a further 15%?

8

The EIR should study the resulting impacts from an elimination of the 15%; will that reduce sewer impacts?

1. What statute requires this buffer?
2. Is it a State mandate?
3. Why is there no discussion in the Alternative sections about this impact?
4. What is the justification for a 15% buffer with advent of SB35, 9 and 10?

8 cont.

6. **Greenhouse Gas Emissions/Air Quality.** What factors are being used to quantify reductions in green house gas emissions for the 6th Cycle Housing Element?

A. Didn't the Biden Administration re-instate California's waiver of the CAA and restore its ability to set its own clean air standards? The Chapter currently states:

9

"However, as a result of the SAFE Vehicles Rule discussed above, California's waiver of Clean Air Act preemption was revoked, thereby rescinding the CARB's authority to implement the Advanced Clean Cars program." 4.5-6

It would seem the GHG will be reduced more.

B "As of 2019, the City has reduced GHG emission by 28 percent from 2010 baseline emission levels, well-exceeding the 2020 target in the original GGRP and

10

approaching the 2035 target established well in advance of the horizon year. To reflect new State goals established by SB 32 and EO B-55-18, the Draft GGRP Update recommends aggressive GHG emissions targets including:

- Reduce GHG emissions to 49 percent below 2010 levels by 2030 (SB 32 target year),
- Reduce GHG emissions to 66 percent below 2010 levels by 2035 (General Plan horizon year),
- Achieve carbon neutrality by 2045 (EO B-55-18 target year)."

10 cont.

Page 4.5-1

Burbank should be proud of its past record of GHG reductions.

C. To clarify the GHG Chapter, what assumptions are made for the growing aggressive use of electric vehicles? For mobile sources, where is the discussion and assumptions about electric vehicles by 2029?

11

D. Air Quality Policies: where is the policy to upgrade existing homes to greater energy efficiency? p. 4.1-26

12

E. Please answer where the threshold of a 400,000 car intersection comes from. What is Five Points compared with a 400,000 car intersection?

13

"The city does not have any intersections that would foreseeably experience daily volumes exceeding 400,000 vehicles per day. Therefore, the Housing Element Update would not have potential to contribute to localized CO concentrations at intersections that exceed state CO standards." p. 4.1-32/33

Five Points at Victory and Burbank, is unique: cars idle for many minutes at a time waiting their turn. Will the future forecast of 67,000 daily trips generate CO equal to 400,000 (or even 100,000) cars because the idle times are long at that unique intersection? 13 cont.

Where is there a 400,000 car intersection in the State of California? Where does this come from and where is it justified?

7. **Contradiction on impacts of "Unplanned growth."**
One section of the DEIR states it is not a problem.

"The Housing Element Update would not induce unplanned growth directly or indirectly, and impacts would be less than significant." page ES-19

14

However, another section states the housing units may occur anywhere in the city:

"New housing units may occur anywhere in the City where residential uses are permitted, as well as in areas that may be rezoned in the future to allow for multi-

family residential and mixed-use residential of adequate density to meet State- required housing production and affordability targets as discussed below." p. 2-14

Occurring "anywhere in the City" is certainly unplanned these days. As an example, the DEIR fails to discuss the impacts of SB9 (replace one home with 4) and SB10 (up zone to 10 units without CEQA requirements). These State mandates result in an unknowable number of new units in unknowable locations. Housing units may occur anywhere in the city zoned for residential, a net increase of 2 to 4 new units where one used to be. But we don't know where. And the Housing Element indeed induces direct (population, housing) and indirect (services, quality of life infrastructure) growth it by its implementation of State mandates.

14 cont.

Assess impacts on VMT-

growth inducing impact not addressed

need to look at j/h balance in Burbank area

whether it increases growth of jobs?

and how j/h affects VMT impact

15

8. **Loss of housing units to Short Term Rentals.** This impact is not assessed in the DEIR. Loss of these homes — even if no more than 500 — exacerbates the housing shortage…. by 500 units. Requiring these homes become available for long term rent or sales will help the city make more progress on its RHNA numbers for all income categories. And help people find homes to live in. 16

This factor should be discussed in Housing/Population. How many units? How much displacement? It would seem the State housing crisis demands every unit be available.

9. **Paradigm shift of work/commute patterns should be discussed** either in GHG, Transportation or Housing Chapter of the DEIR. Work-commute patterns have new implications for VMT, GHG and RHNA. Historically, longer commute times created more greenhouse emissions, as recognized by HCD. However, the pandemic has brought about a paradigm shift to work-travel patterns, the split office/work from home schedule; on-line learning and on-line job training. 17

The new work pattern may be around permanently: commercial property can down scale and reduce costs, employees travel into the office on a “part-time” basis, save gas money, enjoy a better quality of life.

This new work pattern is not available to employees who work with their hands, provide services.
How are the impacts of any of these foundational shifts accounted for in the DEIR?

17 cont.

10. **Inadequate discussion of impacts on water supply.** Water utilities routinely state that they will provide water to new development. However, the DEIR needs to discuss the contemporary drought more completely given the signifiant loss of snowpack and the Governor's latest order to local water agencies to develop their own plans for the drought. This will affect Burbank Water and Power. and all of its users.

18

The Chapter on water needs to more clearly state where the snow pack is estimated to be in 2029, by using an interpolation or some other method. Water availability and its management have huge implications for Burbank. See Page 4.5-3

11. **Deficient cumulative impact analysis.** Cumulative impacts analyses are deficient because neither SB35, SB9 and SB10 are assessed nor identified as part of the proposed Project.

19

A. **Water.** First, there is a housing demand on the overall availability of water for the city.

20

What is actually required to reach the water conservation levels needs to provide water to the 10,456 housing units?

20 cont.

B. **Loss of yards/green space/increase in urban heat island.** One of the benefits peoples have in these neighborhoods are yards with plants, shade and natural cooling. Once the yards are cumulatively eliminated, that will reduce a natural cooling effect.

What will be the cumulative effect of additional development and a commensurate loss of open space? What is the effect on urban heat island? Therefore, what is the effect on climate change?

21

C. **State housing mandate affects the entire MWD service area and not just Burbank.** Significantly, Burbank is not unique among MWD customers required by the State to substantially up zone their city. This is widely-based, service area impact because all cities are mandated to increase housing units.

Without a service area-wide cumulative analysis, how will the demand on water supplies be assessed? We are not an island, our needs are connected to all the cities securing water supplies through MWD.

22

Given current drought, what level of water conservation will be required to be meet water supply for 10,456 additional dwelling units in Burbank and is it feasible?

Given water conservation, what will be the impacts on landscaping and resulting heat island effect? A quantitative analysis is required under cumulative impacts for water because Burbank is not the only city in the key services area required to zone in this manner.

There needs to be a quantitative analysis.

22 cont.

D. Cumulative Impacts fails to address:
direct and indirect impacts, loss of greenery, infrastructure construction to increase provision of recycled water to neighborhoods, impacts of new piping to provide recycled water.

Why is there no cumulative analysis of what infrastructure is required to be upgraded to accommodate these new housing units?

23

12. **The Alternatives are inadequate.** The purpose of the Alternatives Section is to provide decision makers with information about how the Project would need to be modified, and to what degree, in order to reduce impacts to a level that is less than significant.

24

This is a disclosure, even if decision makers do not choose it.

This alternative- one where there are no significant and unavoidable impacts — (like the proposed Project) should realistically address the potential for impacts to wastewater, water and other infrastructure systems associated with level of proposed development. An Alternative like this needs to be included.

24 cont.

Two added Alternatives should be assessed:

1. An Alternative without the 15% buffer;
2. An Alternative that reduces all infrastructure impacts to a level of insignificance.

25

Unlike current zoning that allows the city to plan in a measured way for development and its density, allowing housing any where in the city, does not afford the city to reasonably plan for the increase in locational and cumulative infrastructure demands.

13. **Misc.**

"As discussed in Section 4.12, Utilities/Service Systems, the analysis found that existing utility systems for water, electric power, natural gas, and telecommunications facilities in the City have sufficient capacity to serve **reasonably foreseeable developmen**t under the

26

proposed Project; therefore, potential infrastructure improvements associated with these utilities and service systems would not contribute to growth in the City. Regarding wastewater treatment capacity, the analysis found that development under the proposed Project would increase wastewater generation proportional to the projected increased population. Based on the sewer generation rates that were calculated for the proposed Project, along with constraints within the City's wastewater treatment system that could result from build out of development projects under the Project, potential impacts associated with wastewater generation are significant and unavoidable. Nonetheless, the City's plans and improvements to the sewer conveyance and treatment system will be based on the projected population, and therefore, would not result in unplanned population growth." Page 5-5

26 cont.

CEQA requires analysis of the impacts of the proposed Project, not "reasonably foreseeable development."

The Elements

Safety Element
Is there a policy recommendation to armor soft story housing in the face of inevitable earth quakes?

27

Public Review of Housing Element
Move this Section to the Appendices

28

Goal 2, Adequate Housing Sites
Revise Policy 2.4
engage proactive code enforcement to return unauthorized short-term rentals to the city's housing market

29

Goal 3 Affordable Housing
ADD new policy
Establish a Task Force of Burbank Senior Board and Burbank Committee on Disabilities to determine state-of the-art housing development examples for housing of person with disabilities; and incorporate these objective standards into all density bonus and inclusionary zoning projects. SB35, 9 and 10

30

Goal 5 Equal Housing Opportunity
ADD new policy:
Establish a pre-qualification program with the Burbank Housing Corporation for elderly renter households in the extremely low income category and large family households in the low income category; and support their relocation to stabilized extremely low/low income homes.

31

Neighborhood Revitalization, Page 33
This paragraph should include the day care and job search centers and the after-school center that is in BHC but serves the entire neighborhood.

32

Map of Focus Neighborhoods page 1-34
Map needs correction | 33

Definitions:
Affordable Unit: could be tied to % of area median | 34
Burbank Housing Corporation: It is more inclusive than housing: after school learning centers for neighborhood, child care facilities. | 35
By-right development: doesn't require public hearings | 36
Grants:
- List all available State and Federal Grants and describe | 37

Conditional Use Permit: identify as quasi-judicial | 38
Density Bonus: need simpler definition | 39
Dissimilarity Index: needs a clear definition | 40
Homeless: include unsheltered who live in vehicles | 41

Thank you,

Emily
Emily Gabel-Luddy, FASLA

Letter I-1

COMMENTER: Emily Gabel-Luddy

DATE: March 31, 2022

Response I-1.1

The commenter states that the letter contains comments regarding both the Draft EIR and Housing Element. The commenter discusses 2020 census data and notes that there are a significant number of disadvantaged neighborhoods in Burbank. The commenter also states that State pre-emption of local decision making is confirmed by the inadequacy of the Draft EIR to serve as a basis for decision-makers on the Housing and Safety Elements.

Individual responses to each comment are provided below. This comment does not contain a substantive comment on the analysis in the Draft EIR. The comment will be provided to the City's decisionmakers for their consideration. No further response is required and no revisions to the Draft EIR are necessary.

Response I-1.2

The commenter states that the Draft EIR uses incongruous data sets, such as when discussing housing unit numbers. The commenter notes that all the acronyms are difficult to understand and reconcile in a rational manner. The commenter also states that the housing units listed in the Draft EIR differ from SCAG, the Regional Housing Needs Assessment (RHNA), and the California Department of Finance (DOF), and that housing units in the Draft EIR conflict with the DOF housing units listed in the Housing Element.

Please refer to pages A-1 to A-2 in the glossary of the Housing Element for a list of abbreviations. The DOF housing data provides the current estimated number of housing units within the city and serves as a baseline for Project analysis. SCAG's 2020 RTP/SCS Demographics & Growth Forecast provides growth projections for housing units in the city in the year 2045. The Housing Element Update is required to plan for the RHNA allocation, which reflects the number of housing units needed to meet existing need and accommodate projected need. Under the RHNA allocation, the City is required to provide the capacity to accommodate the development of at least 8,772 housing units during the 2021-2029 planning period. Due to the 15 percent buffer recommended by the California Department of Housing and Community Development (HCD), as well as the interpolation for housing growth assumed under the City's two Specific Plans, the estimated number of housing units analyzed in the Draft EIR was changed to 10,456 housing units. As discussed under Impact POP-1 in Section 4.8, *Population and Housing*, of the Draft EIR, the Project would facilitate housing development beyond what is forecasted in SCAG's 2020 RTP/SCS. However, SCAG's 2020 RTP/SCS was released prior to the 2021-2029 RHNA allocations and therefore, did not include the RHNA allocations in the 2045 housing projections. SCAG's 2020 RTP/SCS will be updated to reflect new forecasts for each city in the region.

The City's existing housing units in the Housing Element conflict with the number of units in the Draft EIR because at the time the Housing Element was prepared, the most current housing unit estimates available were from 2020 DOF data (44,978 units). When the Draft EIR was prepared, 2021 DOF estimates were available (45,069 units). The difference in these two estimates is 91 units, or approximately 0.2 percent, which is negligible and does not change the significance determinations presented in the Draft EIR.

Response I-1.3

The commenter states that the algorithms used to produce data in the analysis cannot account for local nuances, activities, historic growth patterns, infrastructure, non-profits, etc.

This comment does not contain a substantive comment on the analysis in the Draft EIR. No revisions to the Draft EIR are necessary; nonetheless, the comment will be provided to the City's decisionmakers for their consideration. No further response is required.

Response I-1.4

The commenter questions how the City Council will make a Finding of Overriding Consideration for the identified significant and unavoidable impacts to sewers and what benefit would outweigh these impacts. The commenter notes that the Draft EIR identifies an elaborate uncharted approach that Public Works Department's (PWD) would take over time. The commenter also questions the maximum amount of housing units that would be permitted before reaching significant and unavoidable sewer impacts and how much the Project would need to be modified to reduce potential impacts to a less than significant level.

As required under CEQA, the significant and unavoidable impact to sewerage system will be further considered by the City Council. If the City Council determines that the Project generally meets the City's objectives for the Housing Element, a Finding of Overriding Consideration will be made, which includes findings and proposed short-term and long-term measures to address sewage capacity issues attributed to the new housing units projected as part of the Housing Element Update that protect public health and safety as it relates to the safe conveyance, storage and treatment of sewage resulting from future housing production under this project. Potential benefits that may outweigh the significant and unavoidable impact include: meeting the City's fair share, plus a reasonable buffer, of the regional housing need to accommodate projected population growth within the city and region; providing housing sites that accommodate a range of housing types to meet the diverse needs of existing and future residents; and promoting non-discrimination and fair and equal housing opportunities for all persons.

Based on the PWD's calculations under Impact UTIL-3 in Section 4.12, *Utilities/Service Systems*, of the Draft EIR and Recirculated Draft EIR, the Project would be anticipated to generate an estimated peak discharge of 6.3 million gallons per day (mgd). In addition, as discussed under Impact UTIL-3 in Section 4.12, *Utilities/Service Systems*, of the Draft EIR, Burbank's PWD is currently working on both a Cost of Service/Rate Study and Needs Assessment for the Burbank Water Reclamation Plant (BWRP). PWD will also be preparing a new Sewer System Master Plan in FY 2022/23 to evaluate the City's sewer conveyance and treatment system over the next twenty years, which is inclusive of the proposed Housing Element update planning and implementation period, as well as developing the appropriate sewer facility impact fee to ensure that developers pay their fair share of the cost to expand and upgrade the capacity of the BWRP treatment facilities.

The citywide analysis of the Housing Element Update was analyzed under a Program EIR, which does not require analysis of each individual project. As such, it is not possible with the current level of information provided to reduce all variables related to sewage capacity to a single number of housing units that can be built before negatively impacting the sewer conveyance system. The City sewer system is a network of over 230 miles of interconnected gravity sewer pipelines and certain areas of the City have more available sewer capacity than others. For example, a specific location in the City may utilize a sewer tributary flow path that has available capacity for several additional housing units; whereas a separate location that is only a block away may utilize a very different

tributary sewer flow path that cannot support any additional housing units. In addition, impacts to the BWRP due to the addition of significant housing units needs to be evaluated at a project level through a Sewer Capacity Analysis. Furthermore, all proposed housing units at specific locations/property addresses throughout the City that are included as part of the Project would be incorporated into and assessed as part of the BWRP Needs Assessment and new Sewer System Master Plan.

Please note that for proposed developments with a significant increase in housing units that trigger a Sewer Capacity Analysis, which is any project with a net increase of five or more additional multi-family housing units, developers will be required to upgrade City sewer infrastructure that is directly impacted by the proposed project, and/or contribute their fair share cost of the sewer improvements as determined by the Public Works Director or their designee.

Since this will have a significant impact to both the City's conveyance system and treatment plant there are mitigation measures that can be implemented at the project level, but not under this Programmatic EIR. Nonetheless, the Recirculated Draft EIR includes the following mitigation measures that would address potential impacts related to the City's wastewater conveyance system but would not reduce potential impacts to a level of less than significant due to the exceedance of the available wastewater treatment capacity at BWRP associated with full buildout of the Housing Element Update. Mitigation Measures UTIL-3a and 3b would reduce short-term impacts, and Mitigation Measures UTIL-3c and 3d require the preparation of plans, and the implementation of infrastructure capacity and conveyance expansion and upgrades as needed by the infrastructure plans for long-term solutions.

UTIL-3a Sewer System Upgrades by Developers

A Sewer Capacity Analysis shall be required for individual housing projects of five (5) or more multi-family units, so the City may identify sewer infrastructure upgrades that can be implemented by developers when a nexus and rough proportionality is established between proposed project(s) impact to City sewer infrastructure. The SCA must be completed as part of the City's development review process or prior to the submittal of plan check documents, whichever occurs first.

UTIL-3b Sewage Diversion

Per the City's Public Works Department there are several locations throughout the City of Burbank where sewage can potentially be diverted away from the BWRP and conveyed to the City of Los Angeles' Hyperion wastewater treatment system. As a short-term measure, diversion of sewage may be used to alleviate capacity concerns for certain sewage conveyance pipelines (but not all pipelines) as well as temporarily lowering the influent flows to the BWRP. Diverting flows to the Los Angeles system would result in an increase in one-time Sewer Facility Charges (SFCs) and other recurring annual charges (capital improvement and operation & maintenance fees) that shall be paid to the City of Los Angeles. Therefore, if the sewage analysis determines that diversion is feasible, the applicant will be required to contribute a fair share fee, which shall be estimated based on the preliminary billing estimates received from the City of Los Angeles, to offset to the cost of diversion to the City of Los Angeles.

UTIL-3c Sewer System Master Plan

The City shall prepare a new Sewer System Master Plan in 2023 to evaluate the City's sewer conveyance and treatment system over the next twenty years, which is inclusive of the proposed Housing Element update planning and implementation period, as well as developing the appropriate sewer facility impact fees to ensure that developers pay their fair share of the cost to expand and upgrade the capacity of the BWRP treatment facilities.

UTIL-3d Expansion and Upgrades to BWRP Treatment Facilities

The City shall expand and upgrade the BWRP treatment facilities as needed consistent with the City's Sewer Master Plan including but not limited to, the acquisition of land adjacent to the BWRP facilities, the addition of new primary clarifiers, increased capacity in the equalization basins, and upgrades to other parts of the sewage treatment process.

The full text of the Recirculated Draft EIR is available on the City's website at the following link:

https://www.burbankhousingelement.com/wp-content/uploads/2022/07/Burbank-Housing-and-Safety-Element-Update-Recirculated-DEIR.pdf

Response I-1.5

The commenter states that there are significant inconsistencies between the RHNA, SCAG's forecasts for the region and Burbank, and the existing 2021 DOF numbers. The commenter also states that the large discrepancy between the RHNA allocation and SCAG's 2030 housing unit forecast needs a full explanation. Lastly, the commenter states that Burbank's RHNA allocation does not make sense and that the City should demand an audit of the SCAG RHNA numbers prior to approving the Project.

Refer to Response I-1.2 regarding the inconsistencies between the SCAG, RHNA, and DOF forecasts. SCAG's 2020-2030 growth forecast is used as the basis for calculating projected household growth. A jurisdiction's projected housing need is calculated based on this household growth in addition to a calculated future vacancy need and replacement need. The RHNA also includes a jurisdiction's existing housing needs, which includes factors related to access to transit and jobs. For additional information, please refer to https://scag.ca.gov/sites/main/files/file-attachments/scag-final-rhna-methodology-030520.pdf?1602189316.

As noted in the Draft Burbank Housing Element, the State is in a worsening affordable housing crisis. Implementation of the Project would assist in alleviating the housing crisis by meeting the City's fair share, plus a reasonable buffer, of the regional housing need to accommodate projected population growth within the city and region consistent with the RHNA allocation, providing housing sites that accommodate a range of housing types to meet the diverse needs of existing and future residents, continuing to facilitate the development of housing affordable for all economic segments of the community and make inroads in addressing the city's jobs-to-housing imbalance, and focusing on removing governmental constraints to the maintenance, improvement, and development of housing. Due to the current housing crisis, RHNA allocations throughout the State are high, and City staff and consultants were aware that appeals were not being granted.

Response I-1.6

The commenter states that SCAG's 2020 RTP/SCS estimates fewer residents, jobs, and housing units by 2040 than under the 2016 RTP/SCS. The commenter questions how the lower numbers for residents, jobs, and housing units are reconciled with the RHNA for Burbank.

Refer to Response I-1.5 regarding the City's RHNA allocation.

Response I-1.7

The commenter states that the disparity among housing unit numbers in SCAG, RHNA, and DOF forecasts need to be reconciled. The commenter questions how an additional 10,456 housing units in the 6th Cycle Housing Element is justifiable given the current six percent vacancy rate. The commenter also notes that the DOF forecast for housing units in the Housing Element is different from the DOF forecast in the Draft EIR.

As discussed on pages 1-27 to 1-28 in the Housing Element, a vacancy rate measures the overall housing availability in a community and is often a good indicator of how efficiently for-sale and rental housing units are meeting the current demand for housing. A vacancy rate of five percent for rental housing and two percent for ownership housing is generally considered healthy and suggests that there is a balance between the demand and supply of housing. A lower vacancy rate may indicate that households are having difficulty in finding housing that is affordable, leading to overcrowding or households having to pay more than they can afford. In addition, refer to Response I-1.2 regarding the inconsistencies between the SCAG, RHNA, and DOF forecasts.

Response I-1.8

The commenter questions what the justification is for the 15 percent housing unit buffer and states that the Draft EIR should study resulting impacts without the 15 percent buffer. The commenter also questions what statute requires this buffer, if the buffer is a State mandate, why there is no discussion in the alternatives section about the buffer's impacts on sewers, and the justification of the buffer with the arrival of Senate Bill (SB) 9, SB 10, and SB 35.

The City included the buffer to meet the State requirement to include a sufficient buffer in the Inventory of Sites to accommodate future reductions in the sites identified for affordable housing as they are developed with another use during the eight-year cycle, or the jurisdiction could be required to conduct further rezoning during the planning period if insufficient sites are available for housing. To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdictions create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required. The buffer is needed to ensure that the jurisdiction can meet the RHNA, which as noted previously is the build out of the RHNA allocation of 8,772 housing units. As stated in Section 6.3, *Alternatives Considered but Rejected*, of the Draft EIR, a reduced RHNA buffer was considered as an alternative to reduce significant impacts. However, in order to comply with State requirements, a sufficient buffer to the RHNA is needed; therefore, this alternative is not feasible and was rejected from further consideration.

The Draft EIR does not analyze housing development under SB 9 or SB 10 because they are the State's action that went into effect January 1, 2022. The EIR is required to look at the existing conditions at the time of the distribution of the Notice of Preparation (NOP) of an EIR, which was March 2021. In addition, the analysis of 10,456 housing units in the Draft EIR is a conservative approach as the Housing Element estimates maximum growth potential.

SB 9 allows a subdivision of single family residential (R-1 and R-1-H) lots into two lots and allows for construction of up to four dwelling units, inclusive if ADU ad JADU, on each lot. Therefore, up to a total of 8 residential units (4 per each lot) can be created from the one existing single-family zoned property. The City adopted an urgency ordinance for implementing SB 9 on April 5, 2022, to limit the number of residential units yielded from an existing single family zoned property to a maximum of four residential units (2 residential units per lot). The City already accounts for a main dwelling with accessory dwelling units (ADU) and Junior ADUs, so potential environmental impacts for the addition of one unit on an existing residential lot would be nominal. The ordinance adopted by the City for implementing SB 9 will significantly reduce the development impacts on the City's infrastructure and utility services by limiting the maximum number of units per single-family residential lot to four consistent with City's available infrastructure.

SB 10 allows for cities to zone for smaller housing developments of up to 10 units per lot. However, this is a voluntary effort that the City is not undertaking.

Regarding SB 35, this law now mandates the ministerial process for certain development projects instead of the discretionary review process. SB 35 may alter the City's process for approval of housing development, but does not alter the allowable base density. As such, developers will have to abide by the base density and the density bonus law.

Response I-1.9

The commenter questions what factors were used to quantify reductions in GHG emissions and whether the waiver of the Clean Air Act was reinstated. The commenter notes that if this waiver has been reinstated, GHG emissions would likely be lower.

As discussed under *Methodology* in Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR, total GHG emissions under the Housing Element Update were calculated according to the methodology explained in Appendix A of the California Emissions Estimator Model (CalEEMod) User Guide (Version 2020.4.0), and account for the 2019 Building Energy Efficiency Standards (Title 24). The CalEEMod run calculates the emissions from the following sources: transportation, electricity, natural gas, water supply, solid waste, other area sources (such as landscaping), and construction emissions (amortized). To account for the continuing effects of the State's Renewables Portfolio Standard Program, the energy intensity factors included in the Project's CalEEMod were reduced to reflect 67 percent renewable energy procurement in 2030. Mobile source emissions were estimated using vehicle activity data presented in Section 4.11, *Transportation*, of the Draft EIR and vehicle emission rates from the California Air Resources Board's (CARB) 2017 Emission Factor model. Per capita and per employee VMT were found to diminish due to reduced trip lengths.

On March 9, 2022, the United States Environmental Protection Agency reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and zero emission vehicle sales mandate. The Draft EIR is required to look at the existing conditions at the time of the distribution of the NOP, which was March 2021. Therefore, the reinstatement was not in effect when the Draft EIR was circulated for public review in January 2022.

Response I-1.10

The commenter replicates the information provided on page 4.5-10 of Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR and notes that Burbank should be proud of its past record of reductions in GHG emissions.

This comment does not address a deficiency in the Draft EIR. No revisions to the Draft EIR are necessary and no further response is required.

Response I-1.11

The commenter questions what assumptions were made for the growing use of electric vehicles and where the discussion and assumptions about electric vehicles by 2029 for mobile sources are in Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR.

As described under *Methodology* in Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR, fleet mix and vehicle emission rates in CalEEMod are based off CARB's 2017 Emission Factor (EMFAC2017) model. The EMFAC model uses trends in vehicle sales data to estimate the future mix of vehicles present on California's roads, as detailed in depth in the EMFAC2017 technical documentation: https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-iii-technical-documentation.pdf. In addition, as discussed under Impact GHG-1, mobile source emissions generated by build out of the City's RHNA allocation would be reduced with implementation of standards under the California Advanced Clean Cars Program, which requires the CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles," and SCAG's 2020-2045 RTP/SCS, which leverages technology innovations such as electric vehicles.

Response I-1.12

The commenter questions where the policy to upgrade existing homes to greater energy efficiency is in the air quality section of the Draft EIR.

The policy referred to in this comment is Policy 3.8 of the Draft Housing Element, which was included under Impact AQ-1 in Section 4.1, *Air Quality*, of the Draft EIR as a policy that would help reduce air pollutant emissions through promoting transportation and land use design factors, resulting in VMT reductions.

Please note, since the Draft EIR was released for public review, the Housing Element has updated this policy and renumbered it as Policy 3.9. This revision was made as indicated in Section 4, *Errata to the Draft EIR*.

Response I-1.13

The commenter questions the threshold of a 400,000-car intersection and where this threshold is justified. The commenter questions whether the future forecast of 67,000 daily trips will generate carbon monoxide (CO) emissions equal to a 400,000-car intersection due to the additional idling time at the at the Victory Boulevard and Burbank Boulevard five-point intersection.

The threshold of a 400,000-car intersection is based on the ratio of the most stringent 1-hour carbon monoxide (CO) standard of 20 parts per million (ppm) and the South Coast Air Quality Management District's 2003 Air Quality Management Plan's estimated 1-hour CO concentration value of 4.6 ppm at the intersection within the South Coast Air Basin expected to experience the highest CO concentrations. As discussed under Impact AQ-3 in Section 4.1, *Air Quality*, of the Draft EIR, the 1-hour CO standard of 20 ppm would not likely be exceeded at this intersection until the intersection exceeded more than 400,000 vehicle trips per day. In addition, the Burbank Victory Boulevard/Victory Place and Burbank Boulevard intersection, which the commenter is referring to, is the highest volume intersection in Burbank and is estimated to have 67,500 average daily trips with implementation of the Project, which is approximately 17 percent of the threshold of a

400,000-car intersection. Therefore, the Housing Element Update would not have potential to contribute to localized CO concentrations at intersections that exceed State CO standards.

Response I-1.14

The commenter states that the Draft EIR contains contradiction on impacts related to "unplanned growth" and that new housing units occurring "anywhere in the city" is considered unplanned growth. The commenter also states that the Draft EIR fails to discuss the impacts of SB 9 and SB 10, which would result in an unknown number of new housing units in unknown locations and adds that the Housing Element induces direct (population, housing) and indirect (services, quality of life infrastructure) growth.

As discussed in Section 2, *Project Description*, of the Recirculated Draft EIR, new housing units may occur anywhere in the city where residential uses are permitted, as well as in areas that may be rezoned in the future to allow for multi-family residential and mixed-use residential of adequate density to meet State-required housing production and affordability targets. However, the Housing Element Update does identify 19 locations as opportunity sites that have the greatest potential to accommodate the RHNA's housing growth allocated for the city and are shown in Figure 2-3 of the Draft EIR. These sites are underutilized and located in urbanized areas of the city, and they have been previously developed or disturbed. In addition, individual development projects accommodated under the Housing Element Update would require project-level CEQA review, which would identify and require mitigation for any potential site-specific impacts associated with population and housing and utilities and service systems. Furthermore, as discussed in Section 5, *Other CEQA Considerations*, of the Draft EIR, the Housing Element Update would not result in unplanned growth but would rather ensure that the projected growth is accommodated. The Housing Element Update is anticipated to satisfy the anticipated population growth in the region in an efficient manner consistent with State, regional and local policies and with the projected growth forecast for Burbank and the surrounding region.

Refer to Response I-1.8 regarding SB 9 and SB 10.

Response I-1.15

The commenter states that impacts on VMT should be assessed and that growth-inducing VMT impacts are not addressed. The commenter also states that the analysis needs to look at the job/housing balance in the Burbank area and whether it would increase growth of jobs and how it would affect VMT impacts.

The transportation analysis presented in Section 4.11, *Transportation*, of the Draft EIR accounts for the growth in population, employment and households associated with the 2029 Housing Element and uses the SCAG travel demand model to assess VMT. The future year VMT was calculated for three different metrics:

- VMT per capita
- VMT per employee
- VMT per service population

Impact TRA-2 in Section 4.11, *Transportation*, of the Draft EIR assesses the Project's VMT impacts and concluded that the Housing Element Update would reduce VMT in the three target populations (per service population, per capita, and per employee); however, it would not reduce VMT by more than the required 15 percent, resulting in a significant and unavoidable impact. Therefore, the

impacts associated with growth under the Housing Element Update are disclosed in the Draft EIR. It should be noted that the Plan does not contain any new roadway infrastructure or measures that would lead to induced VMT.

Regarding the jobs/housing balance in the city of Burbank, the transportation analysis assesses the effects of a 19 percent change in population and households along with a 10 percent increase in employment, some of which is associated with mixed use residential developments. The jobs/housing balance improves by approximately 7 percent from the baseline year, with an average daily VMT of 18.1, to 2029, with an average daily VMT of 16.7, and all VMT metrics improve over the baseline values against which the impacts are assessed.

In addition, as discussed under Section 5.3, *Growth Inducing Impacts,* of the Draft EIR, the City's existing roadway network would largely accommodate reasonably foreseeable development under the Housing Element Update. In the event that roadway upgrades are required to serve specific future development, such upgrades would likely be minor (e.g., lane reconfiguration or restriping) and would not include the construction of new roads. Therefore, the Project would not result in the extension of infrastructure to undeveloped areas which would remove an obstacle to growth. In addition, Section 5.3 states that new residential development accommodated under the Housing Element Update would increase employment, which would be within regional forecasts. New residential development would also accommodate new employees rather than induce people to move to the region, resulting in lower VMT.

Response I-1.16

The commenter states that the loss of housing units to short-term rentals should be discussed and addressed in the population and housing section of the Draft EIR. The commenter adds that loss of these housing units exacerbates the housing shortage and that requiring these homes to become available for long-term rent or sales would assist the City in making more progress towards achieving the RHNA allocation.

Section 4.8, *Population and Housing*, of the Draft EIR, analyzes the thresholds under CEQA, which include whether the Project would induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure) or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Economic analysis of issue, such as short-term rentals, is beyond the scope of the EIR.

Response I-1.17

The commenter states that the paradigm shift of work/commute patterns resulting from the pandemic should be discussed in either the GHG, Population and Housing, or Transportation section of the Draft EIR as work-commute patterns have new implications for VMT, GHG, and RHNA. The commenter questions how the impacts of these shift of work patterns are accounted for in the Draft EIR.

The shift in work/commute patterns attributable to the Covid-19 pandemic are not included in the transportation analysis in the Draft EIR. The Draft EIR analysis relies on pre-pandemic assumptions from a transportation perspective. The long-term effects of the pandemic on travel behavior and travel patterns have not yet stabilized and thus are not fully known.

According to the City's Assistant Community Development Director overseeing Transportation Planning, it is too early to predict whether the impact due to the pandemic has caused a permanent

paradigm shift in work/commute patterns on VMT. The Draft EIR has generally assumed trip assumptions for VMT analysis based on pre-pandemic patterns, and analyzes the ability of implementation of the Housing Element's goals and policies to reduce VMT from this pre-pandemic level. Travel and trip generation trends since the height of the pandemic indicate that VMT may be returning to pre-pandemic levels. However, even if the pandemic were to cause a permanently-changed level of VMT in the City, increasing housing in Burbank to address the job-housing imbalance, and locating much of that housing near transit, as proposed in the Housing Element, will help reduce per employee VMT and GHG emissions due to reduced trip lengths, regardless of whether baseline VMT has been fundamentally changed due to the pandemic.

Response I-1.18

The commenter states that the water supply discussion in Section 4.12, *Utilities/Service Systems*, of the Draft EIR, needs to discuss the contemporary drought more completely given the significant loss of snowpack and the Governor's latest order to local water agencies to develop their own plans for the drought. The commenter also states that the water supply discussion needs to clearly state where the snowpack is estimated to be in 2029 by using interpolation or another method.

As discussed in Section 4.12, *Utilities/Service Systems*, of the Recirculated Draft EIR, citywide water demand has declined compared to the early 1970s due to efficient water use after major droughts in the 1970s, 1990s, and especially in response to the previous significant water shortage and closure of major industries. In addition, Impact UTIL-2 concluded that growth under the Project is accounted for in the City of Burbank Urban Water Management Plan (UWMP), as informed by the General Plan, and that sufficient water supplies are available to serve reasonably foreseeable development accommodated under the Housing Element Update during normal (water year), dry-year, and multiple-dry-year (drought) conditions through the year 2045, resulting in less than significant impacts.

In addition, Section 4.5, *Greenhouse Gas Emissions,* of the Draft EIR, includes discussion on the loss of snowpack and states that future projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050.

Response I-1.19

The commenter states that the cumulative impacts analyses are deficient because SB 9, SB 10, and SB 35 are not assessed or identified as part of the Project.

Refer to Response I-1.8 regarding SB 9, SB 10, and SB 35.

Response I-1.20

The commenter questions what is required to reach water conservation level needs to provide water to the 10,456 housing units.

Refer to Response I-1.18 regarding the Project's projected water supply and demand.

Burbank Water and Power's 2020 Urban Water Management Plan (UWMP), which serves as the long-term planning document that will help to ensure that the City can provide its customers with reliable water supplies through 2045 (https://www.burbankwaterandpower.com/water/water-supply/urban-water-management-plan), contains future water supply and demand projections with the assumption that 12,000 new housing units will be added to the City by 2035. Based on the

analysis in the UWMP and with concurrence from the Metropolitan Water District of Southern California, the City has sufficient water supply to meet the additional water demand from 12,000 new housing units.

Response I-1.21

The commenter questions what cumulative effects will result from additional development and loss of open space. The commenter also questions the effect on urban heat island and on climate change.

Reasonably foreseeable development accommodated under the Housing Element Update would be focused in urban areas that have already been previously developed. The Housing Element identifies 19 locations as opportunity sites which have the greatest potential to accommodate the RHNA's housing growth allocated for the city and are shown in Figure 2-3, of the Draft EIR. Impact GHG-1 in Section 4.5, *Greenhouse Gas Emissions,* of the Draft EIR concluded that the Housing Element Update would be consistent with all State, regional, and local plans to reduce GHG emissions, resulting in less than significant impacts to GHG emissions and climate change. In addition, the Project would be consistent with the actions under Measure E-1.7 in the Burbank 2035 Greenhouse Gas Reduction Plan, which include amending the Zoning Ordinance to require installation of two on-site shade trees for each new single-family residential unit, continuing Burbank Water and Power's Made in the Shade Program, and updating the Street Tree Plan and Urban Forestry Program.

As discussed under Impact REC-1 in Section 4.10, *Recreation*, of the Draft EIR, the *Open Space and Conservation Element* of the Burbank2035 General Plan establishes a requirement for three acres of new parkland per 1,000 new residents. This requirement applies to large residential developments and would result in parkland dedications, improvements, or in-lieu payments if a project applicant is not able to dedicate land or the land is considered unsuitable for park or recreation use.

Response I-1.22

The commenter notes that Metropolitan's service area includes other cities and that there should be a quantitative, service area-wide cumulative analysis to assess water supply demands. The commenter questions what level of water conservation would be required to meet water supply for 10,456 additional housing units in the city and if it is feasible. The commenter also questions what impacts landscaping will have on the heat island effect.

Please see Response I-1.20 regarding water conservation levels required to meet water supply for 10,456 additional housing units. Metropolitan's 2020 Urban Water Management Plan provides an assessment of Metropolitan's ability to meet expected water demands in the region through the year 2045 under normal water years, single dry-years, and five-year drought sequences. Metropolitan's approximate 52,000 square-mile service area covers the Southern California coastal plain and extends approximately 200 miles along the Pacific Ocean from the city of Oxnard on the north to the international boundary with Mexico on the south and reaches as far as 70 miles inland from the coast, and includes portions of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura counties. The 2020 UWMP indicates the Metropolitan has sufficient water supplies to meet expected service area demands under normal water year, single dry-yeas, and five-year drought conditions.

Regarding landscaping, see Response I-1.21.

Response I-1.23

The commenter states that the cumulative impacts fail to address direct and indirect impacts, loss of greenery, infrastructure construction to increase provisions of recycled water to neighborhoods, and impacts of new piping to provide recycled water. The commenter questions why no cumulative analysis has been conducted regarding what infrastructure is required to be upgraded to accommodate these new housing units.

The cumulative impacts section included for each environmental issue area in the Draft EIR takes into consideration future housing development accommodated under the Housing Element Update, as well as cumulative development citywide and at the regional level. As discussed under Section 4.12.4, *Cumulative Impacts*, of the Draft EIR, future housing development facilitated by the Housing Element Update, in conjunction with cumulative development are also served by the respective service areas, would increase demands for utilities that could require facility expansion or construction. Potential impacts would be site-specific and would require evaluation on a case-by-case basis at the project level when future development is proposed in accordance with the proposed Project. Discretionary projects would require separate review, which would address potential impacts to utilities and service systems, as well as the identification and implementation of project-specific mitigation measures, including conducting an updated sewer service constraints analysis to identify deficiencies in existing utility systems and a resulting update in City fees for new development projects to help offset the cost of any future necessary upgrades on a project-specific basis as deemed necessary. However, cumulative impacts associated with wastewater generation were found to be significant as wastewater generation for full buildout of the proposed Housing Element Update is estimated to be up to approximately 6.3 mgd, which is not within the City's currently available treatment capacity of 4 mgd.

Reasonably foreseeable development accommodated under the Housing Element Update would be focused in urban areas that have already been previously developed and contain existing utility connections. Potential construction impacts associated with connecting to existing infrastructure would be temporary.

Response I-1.24

The commenter states that the Section 6, *Alternatives*, of the Draft EIR is inadequate because the analysis should provide an alternative that addresses the significant impacts under the proposed Project. The commenter adds that the alternatives should not have significant and unavoidable impacts and should realistically address the potential for impacts to wastewater, water, and other infrastructure systems associated with the level of proposed development.

As discussed in Section 6, *Alternatives*, of the Draft EIR, three potential alternatives were considered but rejected. The first alternative considered, which included relocating housing units to the undeveloped mountain area in the northeastern portion of the city, was rejected as it would be in conflict with the Safety Element of the Burbank2035 General Plan as residences would have been placed in a high fire area. The second alternative considered, which included increasing density in the single-family residential neighborhoods and away from freeway corridors, was rejected as it would not reduce any significant and unavoidable impacts of the proposed Project, increase VMT, and require policy revisions to the City's General Plan. The last alternative considered, which included lowering the 15 percent RHNA buffer, was rejected as it would not comply with State requirements. No other feasible alternatives were identified that would address the Project's

significant impacts. Section 15126.6(a) of the CEQA Guidelines states that "[a]n EIR is not required to consider alternatives which are infeasible."

Response I-1.25

The commenter provides two added alternatives that should be assessed. The first alternative includes removing the 15 percent buffer and the second alternative includes reducing all infrastructure impacts to a level of insignificance. The commenter also states that allowing housing anywhere in the city does not afford the City to reasonably plan for the increase in locational and cumulative infrastructure demands.

Refer to Response I-1.24 regarding the removal of the 15 percent buffer alternative and Response I-1.14 regarding potential locations within the city for development accommodated under the Housing Element Update.

Refer to Response I-1.20 regarding Burbank Water and Power's ability to provide sufficient water supply to meet the additional water demand from 12,000 new housing units.

Response I-1.26

The commenter quotes analysis on pages 5-4 to 5-5 of Section 5, *Other CEQA Considerations*, of the Draft EIR, which relates to wastewater generation, and states that CEQA requires the analysis of Project impacts and not "reasonably foreseeable development" impacts.

The Housing Element is a policy document and does not directly result in the development of housing projects. The Draft EIR is a programmatic EIR which used a conservative approach to the analysis by evaluating impacts of the development of housing required under the City's regional housing need as well as from housing developed on sites identified in the Housing Element site inventory. Individual development projects accommodated under the Housing Element Update would require project-level CEQA review, which would identify and require mitigation for any potential site-specific impacts associated with wastewater.

Response I-1.27

The commenter questions if there is a policy recommendation in the Safety Element to armor soft story housing in the face of inevitable earthquakes.

Armoring soft story housing is not a specific policy included in the Safety Element. However, Policy 5.3 under Goal 5, *Seismic Safety*, includes enforcement of seismic design provisions of the current California Building Standards Code related to seismic hazards. All housing projects are required to comply with this policy.

Response I-1.28

The commenter requests that the Public Review of the Housing Element section be moved to the appendices.

The 6th cycle planning requirements place added emphasis on demonstrating sufficient opportunities for public review of the draft Housing Element, summary of key comments received, and how these comments are addressed in the Element. This discussion is thus included in the body of the Housing Element public participation section of the Introduction.

Response I-1.29

The commenter requests revision of Policy 2.4 in the Housing Element to engage proactive code enforcement to return unauthorized short-term rentals to the city's housing market.

The City Council has reviewed options for abatement of unauthorized short-term rentals and has decided not to pursue at this time.

Response I-1.30

The commenter requests that a new policy be added under Goal 3 of the Housing Element that establishes a task force comprised of the Burbank Senior Board and Burbank Committee on Disabilities to determine state-of-the-art housing development examples for housing of persons with disabilities; and incorporates these objective standards into all density bonus and inclusionary zoning projects. SB 35, SB 9, and SB 10.

A policy establishing a task force comprised of the Burbank Senior Board and Burbank Committee on Disabilities to determine state-of-the-art housing development can be created upon direction from the City Council and is outside of the scope of the Draft EIR. Additionally, all housing units are required to comply with the California Building and Safety Code which includes objective development standards for designing buildings for persons with disabilities. As a matter of education and outreach, housing developments have been and can continue to be presented, as appropriate, to boards and commissions citywide with an interest/commitment on housing development.

Refer to Response I-1-.8 regarding SB 35, SB 9, and SB 10.

Response I-1.31

The commenter requests that a new policy be added under Goal 5 of the Housing Element that establishes a pre-qualification program with the Burbank Housing Corporation for elderly renter households in the extremely-low-income category and large family households in the low-income category, and support their relocation to stabilized extremely low/low-income homes.

This comment does not pertain to the adequacy of the EIR. Nonetheless, in response to the commenter's requestion, Burbank Housing Corporation (BHC) is a Community Housing Development Organization, a private nonprofit, community-based organization (a separate entity from the City) that develops affordable housing. BHC has received this designation as the City's partner in the creation of affordable housing utilizing federal HOME funds along with other restricted housing funds. The City does not have the authority to dictate policy of this private, nonprofit developer. However, BHC continues to work with the City to serve the needs of the community via financing of housing developments with restricted housing funds. These housing developments include new construction and the acquisition and rehabilitation of existing units. The units are made available at affordable rents for extremely-low, very-low, lower and moderate-income households. Elderly renter households with limited income, and in some cases on the Section 8 program, are already occupying extremely-low income units in the BHC portfolio. Furthermore, BHC has utilized financing to create larger units with two-and three-bedrooms to accommodate larger families. Interested and eligible households can apply when BHC opens their waiting list(s). An initial application is submitted to BHC as a pre-qualification measure to determine household income (extremely-low, very-low, lower and moderate-income), and household size for appropriate unit size (one, two or three-bedroom, etc.). When a unit is available, eligible households are matched to available units. If

income and household size changes, BHC will work with households to relocate to an appropriate unit to meet income level and household size.

Response I-1.32

The commenter states that the Neighborhood Revitalization paragraph on page 33 of the Housing Element should include the daycare and job search centers as well as the afterschool center that is in the Burbank Housing Corporation but serves the entire neighborhood.

The following has been added to the Neighborhood Revitalization paragraph on page 33 of the Housing Element: "and to provide services to residents and the greater neighborhood including day care, after-school programs and job search assistance."

Response I-1.33

The commenter notes that the Map of Focus Neighborhoods on page 1-34 of the Housing Element needs correction.

The Map of Focus Neighborhoods on page 1-34 of the Housing Element has been corrected.

Response I-1.34

The commenter states that the definition for “affordable unit” in the Housing Element could be tied to the percent of area median.

The definition refers to "income qualified household" because affordability is relative to the specific income level. Table 1-24 in the Housing Element provides affordable rent specific income level thresholds by income level, which is based on percent area median income, and compares with average rents in Burbank.

Response I-1.35

The commenter states that the definition for “Burbank Housing Corporation” in the Housing Element is more inclusive than housing.

Per page 1-97 in the Housing Element, the following has been added to the definition: “BHC also provides services to enrich the quality of life for residents, especially for children and youth, and operates four activity centers with after school programs, and two child development centers.”

Response I-1.36

The commenter states that the definition for “by-right development” in the Housing Element doesn’t require public hearings

This is the definition utilized by HCD and is consistent with Government Code Section 65583.2 (i).

Response I-1.37

The commenter states that the definition for “Grants” in the Housing Element should list and describe all available State and federal grants.

Please refer to Table 1-45 in the Housing Element.

Response I-1.38

The commenter states that the definition for “Conditional Use Permit” in the Housing Element should be identified as quasi-judicial.

The comment is noted, but no revision has been made to the Housing Element.

Response I-1.39

The commenter states that the definition for “Density Bonus” in the Housing Element needs a simpler definition.

The intent of the definitions included in the Glossary are to provide the lay public a general understanding of terms used in the Housing Element. Please refer to page 1-52 to 1-53 for more detail on density bonus incentives.

Response I-1.40

The commenter states that the definition for “Dissimilarity Index” in the Housing Element needs a clear definition.

The intent of the definitions included in the Glossary are to provide the lay public a general understanding of terms used in the Housing Element. Please refer to page B-15 for a detailed discussion of the Dissimilarity Index.

Response I-1.41

The commenter states that the definition for “Homeless” in the Housing Element should include unsheltered who live in vehicles.

The following has been added to the definition of homeless on page 1-24 of the Housing Element: "Also includes persons living in a car, van or RV/camper."

Letter I-2

From: s.ocarroll <s.ocarroll@sbcglobal.net>
Sent: Thursday, March 31, 2022, 6:49 PM
To: Rajesh, Shipra <SRajesh@burbankca.gov>
Subject: Comments on the DEIR for the Housing Element

Attached please find comments on the Housing Element DEIR. Can you please add me to the mailing list for any related notices. 1

Thank you,

Susan O'Carroll

March 31, 2022

Shipra Rajesh
Associate Planner
Community Development Department
150 North Third Street
Burbank, CA 91502
SRajesh@Burbankca.gov

Subject: Fatally Flawed EIR for the Housing Element

Dear City Council and Planning Staff

The Draft Environmental Impact Report ("DEIR") for the City's Housing Element Update ("proposed project") is fatally flawed. It fails to accurately or completely analyze the impacts of up-zoning and the construction of an additional 10,456 housing units in the City of Burbank in the next 8 years. According to the Department of Finance there are currently 45,069 housing units in Burbank. The Housing Element's housing construction targets thus represents a 23% increase in housing units, and associated Burbank population in just 8 years. Yet the Draft EIR only identifies two significant unmitigated impacts: VMT and Sewage Treatment Capacity. This defies commons sense and vastly overestimates the impact of any city to respond to this magnitude of change. 2

According to the DEIR, the City's sewer treatment capacity is 4 million gallons per day (mgd). Meeting the City's Housing Element targets would result in the generation of 6.3 mgd of sewage. Sewage generation would thus represent 157% of existing sewage treatment capacity. The need to expand sewage treatment capacity by 57% is not a simple fix and would represent a substantial impact pending development of the additional capacity which no rational City would wish to approve. 3

The DEIR's analysis of direct impacts to other public services and utilities lacks needed quantification and the conclusions do not pass the smell test (pun intended). The DEIR needs to include quantification of the increase in demand for water, other utilities and public services and to compare those numbers to existing and planned capacity. 4

The DEIR needs to more completely address the indirect impacts of the project. For example, the project generates the need for additional sewage treatment facilities. What are the impacts of the construction and operation of those facilities, and any other facilities which need to be either expanded or constructed to address project-induced demand? The California Environmental Quality Act ("CEQA") requires that both direct and indirect impacts of a project be addressed in an EIR. The DEIR has failed to adequately comply with this requirement. 5

The absurd changes in Housing Element Law in California over the last few years has resulted in a Regional Housing Needs Allocation (RHNA) for the SCAG region of 1,341,827 new housing units. The neighboring City of Los Angeles has a RHNA allocation plus buffer for its Housing Element Update of 456,643 new units for the 2021-2029 Plan period, representing a 6

30% increase in the City of Los Angeles' total housing stock. Any cumulative impact analysis needs to address the impact of the City's Housing Element targets in combination with projected housing increases in neighboring jurisdictions resulting from their Housing Element targets and this analysis needs to be quantitative, not qualitative. How will this cumulative development in combination with the proposed project impact public services and utilities in the Burbank area? Given the massive up-zoning of the entire State, how can assumptions regarding water availability be justified? It can't without an actual quantification of changing water demand and how it will affect water availability from each of the City's water sources? If additional water conservation is required as a result of the proposed project, what is the required reduction in water consumption required, and is this level of water conservation actually feasible? Given the extreme amount of growth being required by the State legislature, how will water and other service availability be impacted? This has not been adequately addressed in the DEIR. 6 cont.

In addition to changes in Housing Element law, with the consequent requirements for up-zoning, the legislature has separately engaged in substantial additional mandated up-zoning which is not accounted for in either the Housing Element Update or the DEIR. The DEIR must address, as part of the cumulative impact analysis, the impact of the proposed Project in combination with not only RHNA targets for the greater Los Angeles area, but also the impacts of SB9, SB10, SB35 and similar legislation which is not accounted for in recent housing element updates. 7

It is important that the DEIR accurately disclose to the City's decision-makers and the public the impacts of mandates imposed on the City through recent State legislation, and the projected harmful effect of those mandates on the quality of life in Burbank and the City's ability to provide basic public services and functioning infrastructure. One of the key purposes of CEQA is to disclose to the public the environmental values of elected officials so the public can take appropriate action come election day. It is very important that this DEIR disclose to the public the impacts which the State legislature has chosen to impose on the City via legislative mandates, so that the public can judge whether recent changes in State housing-related laws are acceptable to Burbank residents and, if not, take appropriate action at the State-level come election day. The DEIR fails to accomplish this basic purpose and must be rewritten to acknowledge additional significant project and cumulative impacts, and recirculated for additional public review and comment before any action can be taken to either certify the EIR or approve the project. 8

Thank you for your consideration of my concerns. I thank you in advance for correcting these fatal EIR flaws and more accurately disclosing to Burbank residents the impacts of the project and cumulative housing law changes. 9

Sincerely,

Susan O'Carroll
Burbank Resident

cc: Burbank City Council

Letter I-2

COMMENTER: Susan O'Carroll

DATE: March 31, 2022

Response I-2.1

The commenter requests to be added to the mailing list for all Project-related notices.

The commenter has been added to the Project mailing list.

Response I-2.2

The commenter states that the Draft EIR is fatally flawed and fails to accurately or completely analyze the impacts of upzoning and the construction of 10,456 housing units in Burbank over the next eight years. The commenter notes that the Housing Element would result in a 23 percent increase in housing units, and associated population, in eight years, but only identifies two significant unmitigated impacts.

The commenter does not provide substantial evidence to support their comment that more Project impacts would be considered significant and unmitigable or the need for new analysis or conclusions in the EIR. No revisions to the Draft EIR are necessary. The comment will be provided to the City's decisionmakers for their consideration. No further response is required.

Response I-2.3

The commenter states that expanding sewer treatment capacity by 57 percent would represent a substantial impact.

Refer to Response I-1.4 regarding the revised wastewater analysis under the Recirculated Draft EIR. The full text of the Recirculated Draft EIR is available on the City's website at the following link:

https://www.burbankhousingelement.com/wp-content/uploads/2022/07/Burbank-Housing-and-Safety-Element-Update-Recirculated-DEIR.pdf

Response I-2.4

The commenter states that the Draft EIR's analysis of direct impacts to public services and utilities lacks needed quantification and accurate conclusions. The commenter also states that the Draft EIR needs to include quantification of the increase in demand for water, other utilities, and public services and needs to compare those numbers to existing and planned capacity.

The Housing Element is a policy document and does not directly result in the development of housing projects. The Draft EIR is a programmatic EIR which used a conservative approach to the analysis by evaluating impacts of the development of housing required under the City's regional housing need as well as from housing developed on sites identified in the Housing Element site inventory. Individual development projects accommodated under the Housing Element Update would require project-level CEQA review, which would identify and require mitigation for any potential site-specific impacts associated with water supply, utilities and service systems, and public services. In addition, the Draft EIR included quantified analysis at a programmatic level for impacts associated with air quality, GHG emissions, noise, population and housing, public services, recreation, transportation, and utilities and service systems.

Response I-2.5

The commenter states that the Draft EIR has failed to comply with CEQA's requirement to address indirect impacts resulting from the project, such as the impacts of the construction and operation of additional sewage facilities.

As discussed under Impact UTIL-1 in Section 4.12, *Utilities/Service Systems*, of the Recirculated Draft EIR, implementation of Mitigation Measure UTIL-1 would require a sewer service constraints analysis by PWD to identify a wastewater connection fee for the recovery of the City's costs of future upgrades that are proportional to the individual projects' impacts to the City's wastewater system. The potential indirect impacts associated with sewage facilities are unknown at this time because the sewer service constraints analysis has not been completed. Therefore, the direct and indirect Project impacts associated with new or expanded wastewater conveyance are significant and unavoidable.

At the project level, future individual projects accommodated under the Housing Element Update would require project-level CEQA review, which would identify and require mitigation for any potential site-specific impacts associated with the construction of new or expanded wastewater treatment facilities.

Also, refer to Response I-1.4 regarding the revised wastewater analysis under the Recirculated Draft EIR. The full text of the Recirculated Draft EIR is available on the City's website at the following link:

https://www.burbankhousingelement.com/wp-content/uploads/2022/07/Burbank-Housing-and-Safety-Element-Update-Recirculated-DEIR.pdf

Response I-2.6

The commenter states that the cumulative impact analysis needs to address the impact of the City's projected housing increase in combination with the projected housing increases in neighboring jurisdictions, such as the City of Los Angeles. The commenter questions how this cumulative development in combination with the proposed Project impact public services and utilities in the Burbank area. The commenter also questions how assumptions regarding water availability be justified given the massive upzoning of California and states that impacts to water and other service availability was not adequately addressed in the Draft EIR.

The cumulative impacts section included for each environmental issue area in the Draft EIR takes into consideration future housing development accommodated under the Housing Element Update, as well as cumulative development citywide and at the regional level. The Housing Element is a policy document and does not directly result in the development of housing projects. The Draft EIR is a programmatic EIR which used a conservative approach to the analysis by evaluating impacts of the development of housing required under the City's regional housing need as well as from housing developed on sites identified in the Housing Element site inventory; however, the Housing Element Update does not directly result in development of housing on the identified sites. Individual development projects accommodated under the Housing Element Update would require project-level CEQA review, which would identify and require mitigation for any potential site-specific and cumulative impacts associated with water supply, utilities and service systems, and public services.

Response I-2.7

The commenter states that in the cumulative impact analysis the Draft EIR must address the impact of the Project in combination with the RHNA targets for the greater Los Angeles area, SB 9, SB 10, SB 35, and similar legislation not accounted for in recent housing element updates.

Refer to Response I-2.6 regarding the cumulative impact analysis and Response I-1.8 regarding SB 9, SB 10, and SB 35.

Response I-2.8

The commenter states that it is important for the Draft EIR to accurately disclose the impacts of mandates imposed on the City through recent State legislation and the projected harmful effect of those mandates on the quality of life in Burbank and the City's ability to provide basic public services and functioning infrastructure. The commenter also states that one of the key purposes of CEQA is to disclose the environmental values of elected officials to the public and that it is important for the Draft EIR to disclose the impacts which the State legislature has chosen to impose on the City via legislative mandates to the public. Lastly, the commenter states that the Draft EIR must be rewritten to acknowledge additional significant project and cumulative impacts, and recirculated for additional public review and comment before any action can be taken to certify the EIR or approve the Project.

The scope of the EIR is to analyze the potential environmental impacts associated with the development of reasonably foreseeable development accommodated under the Housing Element Update. Refer to Response I-1.8 regarding SB 9 and SB 10.

As described in Section 15002 of the CEQA Guidelines, the basic purposes of CEQA are to inform governmental decision makers and the public about potential, significant environmental effects of the Project; identify the ways that environmental damage can be avoided or significantly reduced; prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and disclose to the public the reasons why a governmental agency approved the Project in the manner the agency chose if significant environmental effects are involved. Refer to Response I-2.6 regarding cumulative impacts. Significant impacts at a programmatic level have been disclosed which will be assessed by the decisionmakers. Any potential impacts at a project level will require further CEQA analysis.

Response I-2.9

The commenter thanks the City in advance for their consideration and for correcting the fatal EIR flaws and more accurately disclosing to Burbank residents the impacts of the Project and cumulative law changes.

Individual responses to each comment have been provided above.

Planning Commission
Public Comment Meeting March 14, 2022

Comment P-1

COMMENTER: Christopher Rizzotti, Planning Board (Chair)

Response P-1.1

The commenter noted that the Draft EIR analysis was thin and added that traffic counts and intersection impacts were not detailed like in previous EIR documents.

SB 743 introduced changes that include the elimination of auto delay, level of service, and other similar measures of vehicular capacity or traffic congestion as the basis for determining significant CEQA impacts for land use projects and plans in California. For the purpose of this land use plan, the City applies a VMT methodology to assess the transportation impacts, which is consistent with the technical guidance provided by the Governor's Office of Planning and Research. In addition, refer to Response I-1.26 regarding the Draft EIR.

Response P-1.2

The commenter noted that the Draft EIR did not include discussion of electric vehicles which will have an impact on emissions through 2029. The commenter questioned if the electrical grid would have the ability to withstand the increase in electric vehicles through 2029 and how homeowners living in apartments would be able to charge their electric vehicles.

Refer to Response I-1.11 regarding electric vehicles.

Response P-1.3

The commenter noted that the Draft EIR did not include discussion on the impacts of SB 9 and 10 and stated that this discussion should be included in the EIR.

Refer to Response I-1.8 regarding SB 9 and 10.

Response P-1.4

The commenter noted that water and sewer impacts are a huge topic.

Refer to Impacts UTIL-1 and UTIL-2 for impacts associated with water supply and Impacts UTIL-1 and UTIL-3 for impacts associated with sewers in Section 4.12, *Utilities/Service Systems*, of the Recirculated Draft EIR. As discussed under Impact UTIL-3, sewer impacts would be significant and unavoidable as the Project would generate approximately 6.3 mgd of wastewater which would exceed BWRP's wastewater treatment capacity of 4 mgd and no feasible mitigation measure has been identified at the plan level to reduce impacts.

Refer to Response I-1.4 regarding the revised wastewater analysis under the Recirculated Draft EIR. The full text of the Recirculated Draft EIR is available on the City's website at the following link:

https://www.burbankhousingelement.com/wp-content/uploads/2022/07/Burbank-Housing-and-Safety-Element-Update-Recirculated-DEIR.pdf

Response P-1.5

The commenter noted that the Bus Rapid Transit (BRT) was not analyzed in the Draft EIR and stated that discussion on the BRT should be included. The commenter questioned if the BRT would induce growth since it would upzone all properties within 0.5-mile of the BRT.

The BRT is not part of the Project Description for the Housing Element Update; therefore, it is not analyzed in the EIR. However, as discussed under Impact 3.1-2 in Section 3.1, *Transportation*, of the Draft EIR for the North Hollywood to Pasadena Bus Rapid Transit Corridor Project, VMT is forecast to decrease during project operation due to the increased use of transit with implementation of the BRT in comparison to the Existing 2017 and 2042 Baseline scenarios. The BRT is expected to attract new transit riders which would encourage a shift from automobile use to public transit as well as providing improved regional connectivity and local transit access to corridor destinations.

Response P-1.6

The commenter noted that the city's population is decreasing rather than increasing and that the city has a current vacancy rate of 6.7 percent. The commenter questioned how to reconcile the difference between the RHNA and SCAG forecasts.

Refer to Response I-1.5 regarding the city's population forecast and Response I-1.7 regarding the vacancy rate.

Response P-1.7

The commenter questioned what agency determined the RHNA allocation and what factors went into the 6th Cycle RHNA housing allocation.

As discussed in SCAG's Final RHNA Allocation Methodology published March 5, 2020, SCAG is required to develop a final RHNA methodology to distribute existing and projected housing need for the 6th cycle RHNA for each jurisdiction, which will cover the planning period October 2021 through October 2029. Factors for determining the 6th Cycle RHNA housing allocation included a jurisdiction's household growth between 2020-2030, future vacancy need, replacement need, and transit and job accessibility.

Response P-1.8

The commenter noted that the 15 percent housing buffer is large and questioned how this buffer was determined. The commenter also questioned if the City could develop their own buffer or if this was a State mandate.

Refer to Response I-1.8 regarding the RHNA buffer.

Response P-1.9

The commenter questioned how the Project could have less than significant impacts when there would be an increase in population and growth. The commenter noted that there would be potential impacts related to electricity, traffic/congestion, air quality, jobs, sewer, and wastewater.

Refer to Response I-1.26 relating to Project impacts.

Response P-1.10

The commenter questioned why Table 2.2 in the Draft EIR included very-low- and low-income ADUs and stated that the City does not have requirements for ADUs to be very-low or low in terms of pricing, so was unsure what the table was referring to.

In December 2020, SCAG released a "Regional Accessory Dwelling Unit Affordability Analysis." SCAG conducted this analysis to "provide local governments in the region with assumptions for ADU affordability that can be used to assign ADUs to income categories for the purpose of Sixth Cycle Housing Elements." Table 1-22 in the Housing Element presents SCAG's affordability assumptions for ADUs in Los Angeles County's inland jurisdictions, providing the basis for assigning affordability to projected ADUs in Burbank's Housing Element Update. As shown, 15 percent of ADUs are estimated by SCAG to be affordable to extremely low-income households (0-30 percent AMI), 9 percent affordable to very low-income households (31-50 percent AMI), and 45 percent affordable to low income households (51-80 percent AMI). Consistent with this analysis, a February 2020 rent survey conducted of 50 ADUs in and around Burbank documented a median rent of $1,500, providing an affordable rental option for many one- and two-person lower income households.

Response P-1.11

The commenter questioned how the City Council could adopt the EIR since there are significant, unmitigable impacts related to sewers and stated that this needed further explanation.

As required under CEQA, the significant and unavoidable impact to sewers would be further considered by the City Council. If the City Council determines that the Project generally meets the City's objectives for the Housing Element, a Finding of Overriding Consideration will be made. Potential benefits that may outweigh the significant and unavoidable impact include: meeting the City's fair share, plus a reasonable buffer, of the regional housing need to accommodate projected population growth within the city and region: providing housing sites that accommodate a range of housing types to meet the diverse needs of existing and future residents; and promoting non-discrimination and fair and equal housing opportunities for all persons.

Response P-1.12

The commenter raised questions related to the Safety Element and Environmental Justice Updates, including whether soft story apartments and condominiums were considered and what environmental justice would mean for overcrowding and congestion.

Refer to Response I-1.27 regarding soft story housing. Regarding environmental justice, in accordance with SB 1000, the nature of the policies is to prioritize public improvements in disadvantage communities, improve public health from environmental pollution like improving air quality, and improving the accessibility of City communication and do not directly address overcrowding and congestions.

Comment P-2

COMMENTER: Bob Monaco, Planning Board

Response P-2.1

The commenter raised concerns regarding the Project's impacts on traffic/congestion, infrastructure, water, and electricity due to the resulting population increase. The commenter also stated that infrastructure will be needed to support the additional housing and population resulting from the Project.

Refer to Response P-1.1 regarding impacts related to traffic/congestion and Response I-1.26 regarding Project impacts.

Comment S-1

COMMENTER: Sean Mann

Response S-1

The commenter noted that he is a member of the SWRCC and offered an introduction to the labor union. The commenter offered a case that using local labor for projects implemented under the Housing Element Update would support reduced GHG emissions and VMT.

Refer to Response O-1.2 regarding skilled and trained workforce requirements and policies and associated GHG emissions.

Comment S-2

COMMENTER: Michael McCarron

Response S-2

The commenter noted that he is a member of Carpenters Local 661 and offered an introduction to the labor union. The commenter requested that labor standards and/or policies are included in the Housing Element Update and that future projects under the Housing Element Update require family supporting wages, skills training, and job access to community members.

Refer to Response for Letters O-2 through O-132 regarding the request for labor standards and/or policies.

Comment S-3

COMMENTER: Jerred Langford

Response S-3

The commenter noted that he is a member of Carpenters Local 661 and offered an introduction to the labor union. The commenter stated that a rapid underground economy is taking control of construction workers. The commenter requested that labor standards and protection are included in the Housing Element Update and that future projects under the Housing Element Update require family supporting wages, skills training, and job access to community members.

Refer to Response for Letters O-2 through O-132 regarding the request for labor standards and/or policies.

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3 Responses to Comments on the Recirculated Draft EIR

This section includes comments received during the circulation of the Recirculated Draft Environmental Impact Report (EIR) prepared for the Burbank Housing and Safety Element Update (hereafter referred to as the "Housing and Safety Element Update" or "Project").

The Recirculated Draft EIR was circulated for a 47-day public review period that began on July 22, 2022, and ended on September 6, 2022. The City of Burbank received 45 comment letters on the Recirculated Draft EIR. The commenters and the page number on which each commenter's letter appear are listed below.

The comments are typically presented chronologically based on the date received. However, among the letters received by Organizations, two commenters (Letters O-1 and O-2) raised specific concerns regarding the adequacy of the Draft EIR whereas the remaining commenters raise non-CEQA issues pertaining solely to the proposed Project and/or other topics unrelated to the Draft EIR. Therefore, these letters are addressed first to maintain the focus on the Draft EIR prepared for the proposed Project, all other comments are addressed in the order received by date. The exhibits to Letter O-1 are included as Appendix H of this EIR

Responses to oral comments received during the Planning Board meeting held on August 22, 2022, are provided under the Speaker (S) sections as identified below.

Table 3-1 List of Commenters on the Recirculated Draft EIR

The comment letters and responses follow. The comment letters have been 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 A-1.1, for example, indicates that the response is for the first issue raised in Comment Letter A-1).

Letter A-1

From: Lin, Alan S@DOT <alan.lin@dot.ca.gov>
Sent: Thursday, August 18, 2022 2:39 PM
To: Rajesh, Shipra <SRajesh@burbankca.gov>
Cc: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Subject: Burbank Housing Element Update and Associated General Plan Updates

Dear Ms. Rajesh,

Based on the phone conversation and the environmental document received, Caltrans has no further comment other than the comment letter on March 16, 2022, see attached.

Thank you for the opportunity to review this project!

Alan Lin, P.E.
Transportation Engineer, Civil
LDR, Division of Planning
State of California
Department of Transportation
Mail Station 16
100 South Main Street
Los Angeles, CA 90012
213-269-1124 Mobile

Letter A-1

COMMENTER: Alan Lin, P.E., Transportation Engineer, California Department of Transportation (Caltrans)

DATE: August 18, 2022

Response A-1.1

The commenter sent an email stating that Caltrans has no further comment other than the comment letter on March 16, 2022 for the Draft EIR.

See Section 2, *Responses to Comments on the Draft EIR*, for the full response to Caltrans' comments that were submitted for the Draft EIR.

Letter A-2

Susanne Huerta

From: Frost, Erik@DOC <Erik.Frost@conservation.ca.gov>
Sent: Tuesday, September 6, 2022 10:31 AM
To: srajesh@burbankca.gov
Cc: OLRA@DOC; OPR State Clearinghouse; Susanne Huerta
Subject: [EXT] Burbank Housing and Safety Element Update (SCH 2021020393) - CGS comments

Hello Shipra Rajesh,

The California Geological Survey (CGS) has received the Notice of Availability of a Recirculated Draft Environmental Impact Report (DEIR) for the City of Burbank's Housing and Safety Element Update. This email conveys the following recommendations from CGS concerning geologic issues related to the subject area:

1. Liquefaction and Landslide Hazards
   The DEIR appears to accurately display the extent of earthquake zones of required investigation (ZORI) for liquefaction and landsliding within the City as mapped by the CGS. However, the source of these liquefaction and landslide hazard zones and their regulatory impact are not specified. The City should consider revising the DEIR text and figures to note that the liquefaction and landslide hazard zones in Exhibits S-5 and S-6 are taken from the Seismic Hazard Zone Map for the Burbank quadrangle, and that cities affected by ZORI must regulate certain development projects within them. The Seismic Hazards Mapping Act (1990) also requires sellers of real property (and their agents) to disclose at the time of sale that the property lies within such a zone. Additional information is available at the links below:
   https://maps.conservation.ca.gov/cgs/EQZApp/app/
   https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps

1

If you have any additional comments or questions, please feel free to call or email.

Erik

Dr. Erik Frost
Senior Engineering Geologist | Seismic Hazards Program
California Geological Survey
715 P Street, MS 1901, Sacramento, CA 95814
(916) 205-8255
erik.frost@conservation.ca.gov

Letter A-2

COMMENTER: Dr. Erik Frost, Senior Engineering Geologist, California Geological Survey, Department of Conservation

DATE: September 6, 2022

Response A-2.1

The commenter notes that the Recirculated Draft EIR accurately displays the extent of earthquake zones of required investigation (ZORI) for liquefaction and landsliding within the city as mapped by the California Geological Survey. However, the commenter also states that the regulatory impacts of these issues are not clearly stated. The commenter suggests that the Recirculated Draft EIR should note that the liquefaction and landslide hazard zones are taken from the Seismic Hazard Zone Map for the Burbank quadrangle, and that cities must regulate certain development projects within them.

The Housing Element is a policy document and does not directly result in the development of housing projects. The Draft EIR is a programmatic EIR which used a conservative approach to the analysis by evaluating impacts of the development of housing required under the City's regional housing need as well as from housing developed on sites identified in the Housing Element site inventory. However, portions of each housing opportunity site districts fall within areas mapped as susceptible to earthquake-induced liquefaction. For individual housing projects that fall within a zone of required investigation for liquefaction, a site-specific investigation by a qualified engineering geologist and/or civil engineer may be required before development on the site will be permitted per the Seismic Hazards Mapping Act. Neither housing opportunity site districts occur in areas susceptible to earthquake-induced landslides. Thus, no additional assessment for landslide risks is required.

Based on this comment, Figure S-5, *Liquefaction* Zones, and Figure S-6, *Earthquake-Induced Landslide* Zones, have been added to pages 7-20 and 7-21 of the Safety Element Update. Additionally, the regulatory requirements for development within liquefaction and landslide zones of required investigation have been added to Section 7, *Geology and Soils,* in Appendix B, *Initial Study,* of the Draft EIR. Refer to Section 4, *Errata to the Draft EIR,* to see what changes have been made to the document.

Letter O-1

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

Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

August 22, 2022

Shipra Rajesh, Associate Planner
City of Burbank
275 East Olive Avenue, P.O. Box 6459
Burbank, CA 91510-6459
Em: srajesh@burbankca.gov

Zizette Mullins, City Clerk
City of Burbank
275 East Olive Avenue, P.O. Box 6459
Burbank, CA 91510-6459
Em: cityclerks@burbankca.gov

RE: City of Burbank's 6th Cycle Housing Element Update (SCH#: 2021020393).

Dear Shipra Rajesh and Zizette Mullins,

On behalf of the Southwest Regional Council of Carpenters ("**Southwest Carpenter**" or "**SWRCC**"), my Office is submitting these comments for the City of Burbank's ("**City**") August 22, 2022 Planning Board Meeting for its draft 2021-2029 update to the City's General Plan Housing Element ("**Project**").

1

The Southwest Carpenters is a labor union representing 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.

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

SWRCC expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens*

for Local Control v. Bakersfield (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

SWRCC incorporates by reference all comments raising issues regarding the 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). 1

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

The City should require the use of a local skilled and trained workforce to benefit the community's economic development and environment. 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: 2

> [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.

2 cont.

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

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

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

3

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area's jobs-housing balance, decreasing the amount of and length of job commutes and their associated greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component" can result in air pollutant reductions.[2]

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to "promote local hiring . . . to help

4

[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

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 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]

4 cont.

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]

5

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

[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.
[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.

trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

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

5 cont.

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.

6

Sincerely,

Mitchell M. Tsai
Attorneys for Southwest Regional
Council of Carpenters

Attached:

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

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

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

Letter O-1

COMMENTER: Mitchell M. Tsai, Attorney, on behalf of Southwest Regional Council of Carpenters (SWRCC)

DATE: August 22, 2022

Response O-1.1

The commenter offers an introduction to the labor union that is submitting the comment and notes the legal precedents for commenting on an EIR under CEQA during the approval process. The commenter requests that the City of Burbank send all notices referring or related to the Project to SWRCC.

SWRCC has been added to the Project mailing list. Individual responses to each comment are provided below.

Response O-1.2

The commenter states that the City should require the use of a local skilled and trained workforce to benefit the community's economic development and environment. The commenter provides supporting statements and notes that local hire and skilled and trained workforce requirements would assist with reducing environmental impacts and improving the Project's economic impact as the length of vendor trips would likely be reduced due to workers residing within 10 miles or less of the project sites, resulting in a reduction in greenhouse gas (GHG) emissions as well as localized economic benefits.

Implementation of the requirement to use a local skilled and trained workforce is beyond the scope of the Draft EIR since labor and employment is not a required topic under CEQA. Nonetheless, the commenter's recommendations are noted for review and consideration by the City's decision-makers. In addition, as discussed in Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR, the Project's impacts to GHG emissions would be less than significant because the Housing Element Update would be consistent with measures from the State Scoping Plan and GHG emission would not exceed per capita emissions levels identified in the State Scoping Plan. The Housing Element Update would also be consistent with the goals of the 2020-2045 SCS/RTP and the Burbank2035 Greenhouse Gas Reduction Plan.

Response O-1.3

The commenter quotes statements from the GHG technical report attached to the letter and notes that skilled and trained workforce requirements and policies have significant environmental benefits as they improve an area's jobs-housing balance, decreasing the amount of and length of job commutes and their associated GHG emissions.

Refer to Response O-1.2 regarding skilled and trained workforce requirements and policies and associated GHG emissions.

Please note, the reports attached as appendices to Letter O-1 are includes as Appendix H of this EIR.

Response O-1.4

The commenter notes that cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes and provides the City of Hayward as an example.

The comment is noted but does not raise specific concerns that pertain to the adequacy of the Draft EIR. The comment will be provided to the City's decisionmakers for their consideration. No further response is required.

Response O-1.5

The commenter provides supporting statements and notes that local hire mandates and skill training are critical facets of a strategy to reduce VMT and that placing jobs near housing is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents. The commenter also provides supporting statements and notes that some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues.

Refer to Response O-1.2 regarding skilled and trained workforce requirements and policies and associated GHG emissions.

Response O-1.6

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

Refer to Response O-1.2 regarding skilled and trained workforce requirements and policies and associated GHG emissions.

From: Jerred Langford <jerredl@swcarpenters.org>
Sent: Wednesday, August 24, 2022 8:50 AM
To: Rajesh, Shipra <SRajesh@burbankca.gov>
Cc: Jerred Langford <jerredl@swcarpenters.org>
Subject: Burbank Housing Element Update

Letter O-2

CAUTION: This email originated from outside of the organizaon. Do not click link s or open a achments unless you recognize the sender and know the content is safe.

Good morning Shipra,

My name is Jerred Langford with the Carpenters Union.

I wanted to send over the language change that we proposed at the Burbank Planning Commission Meeng.

2.5.1 Housing Element Update

The Housing Element is comprised of the following major components:

- Review of effecv eness of exisng Housing El ement
- Assessment of exisng and projected housing needs
- Idenfic aon of r esources – financial, land, administrav e
- Evaluaon of constraints to the development of housing

- Housing Plan – goals, policies, and programs including Programs 10 and 11 that provide for updates to local density bonus and inclusionary housing regulaons, th~~a t require an economic feasibility analysis to evaluate the potenal impact of adding workforce training and prevailing wage requirements to new housing development,~~ and the implementaon of a local hire, apprenceship policy t o have the skilled construcon w orkforce necessary to produce an ample supply of mixed-income and affordable housing units, and ensure equitable, sustainable and livable communies.

Jerred Langford
Lead Representative – Local 661

P: 818.364.9303
M: 213.808.2417

Southwest Regional Council of Carpenters
swcarpenters.org

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- Housing Plan – goals, policies, and programs including Programs 10 and 11 that provide for updates to local density bonus and inclusionary housing regulaons, ~~that require an economic feasibility analysis to evaluate the potenal impact of adding workforce training and prevailing wage requirements to new housing development,~~ and the implementaon of a local hire, apprenceship policy t o have the skilled construcon w orkforce necessary to produce an ample supply of mixed-income and affordable housing units, and ensure equitable, sustainable and livable communies .

Jerred Langford
Lead Representative – Local 661

P: 818.364.9303
M: 213.808.2417

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Letter O-2

COMMENTER: Jarred Langford (Southwest Regional Board of Carpenters)

DATE: August 24, 2022

Response O-2

The commenter suggests a revision to Section 2.5.1. The commenter suggest the following to the section:

> Housing Plan – goals, policies, and programs including Programs 10 and 11 that provide for updates to local density bonus and inclusionary housing regulations, ~~that require an economic feasibility analysis to evaluate the potential impact of adding workforce training and prevailing wage requirements to new housing development,~~ and the implementation of a local hire, apprenticeship policy to have the skilled construction workforce necessary to produce an ample supply of mixed-income and affordable housing units, and ensure equitable, sustainable and livable communities.

The commenters' requests for changes Section 2.5.1 of the Housing Element Update are noted but does not raise issues with the adequacy of the analysis or conclusions in the Draft EIR. The Draft EIR is not intended or required to provide justification for the Project. Rather, the EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that the Project is likely to have on the environment. This EIR also identifies ways in which the significant effects of the Project might be minimized and identifies alternatives to the Project. The City is not required to consider such comments or requests to change the Project in its CEQA analysis absent a commenter providing substantial evidence that the proposed change would feasibly reduce one or more significant adverse environmental impacts identified in the Draft EIR. Requests for changes to the Project may be addressed through the planning process outside of the CEQA process.

Letter O-3

From: Wesley <wesley.ricker@gmail.com>
Sent: Tuesday, August 30, 2022 2:30 PM
Cc: Housing Element Update 2021 <HousingElement@burbankca.gov>; Rajesh, Shipra <SRajesh@burbankca.gov>
Subject: Burbank housing element

Associate Planner Rajesh,
Hi, my name is Wesley Ricker, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, healthcare for workers, and all contractors must parcipa te in a state-approved apprenceship pr ogram, and local hire as a condion of appr oval for this project.
Specifically:
The construcon w orkforce should require;
-Full family health plans
-All contractors must either parcipa te in a state-approved apprenceship pr ogram or request dispatch of apprences fr om a program
-Paid sick leave. Pension, and vacaon-holida y pay.
High quality responsible bidder standards should be established to ensure high quality construcon performance;

-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.
We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member,
-Wesley ricker

Letter O-4

From: Shaun M <shaunmieure@gmail.com>
Sent: Monday, August 22, 2022 1:45 PM
To: Rajesh, Shipra <SRajesh@burbankca.gov>; City Clerks <CityClerks@burbankca.gov>
Subject: Burbank Housing Element-item No. 2

Associate Planner Rajesh,
Hi, my name is Shaun Mieure, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporng w ages, healthcare for workers, and all contractors must parcipa te in a state-approved apprenceship pr ogram, and local hire as a condion of appr oval for this project.
Specifically:
The construcon w orkforce should require;
-Full family health plans
-All contractors must either parcipa te in a state-approved apprenceship pr ogram or request dispatch of apprences fr om a program
-Paid sick leave. Pension, and vacaon-holida y pay.
High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.
We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member,

Shaun Mieure

Letter O-5

From: Fernando Castaneda <fernando.castaneda0@yahoo.com>
Sent: Tuesday, August 30, 2022 2:55:37 PM
To: Rajesh, Shipra <SRajesh@burbankca.gov>
Subject: Burbank housing element

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

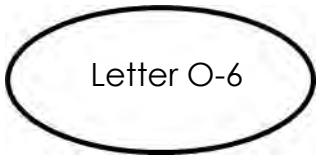
Associate Planner Rajesh,

Hi, my name is Fernando , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family suppor ng wages, healthcare for workers, and all contractors must par cipate in a state-approved appren ceship program, and local hire as a condi on of approval for this project.
Specifically:

The construc on workforce should require;

-Full family health plans
-All contractors must either parcipa te in a state-approved apprenceship pr ogram or request dispatch of apprences fr om a program
-Paid sick leave. Pension, and vacaon-holida y pay.
High quality responsible bidder standards should be established to ensure high quality construcon performance;
-Construcon c ontractors at every level comply with labor law and have no history of fraudulent or grossly negligent business pracces.
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.
We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member,

Fernando Castañeda Guerr ez
Sent from my iPhone



From: Josh Strickler <monsterpunk369@gmail.com>
Sent: Tuesday, August 30, 2022 3:09:54 PM
To: Rajesh, Shipra <SRajesh@burbankca.gov>
Subject: Burbank Housing Element- Associate Planner Rajesh

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

Hi, my name is Josh Strickler, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family suppor ng wages, healthcare for workers, and all contractors must par cipate in a state-approved appren ceship program, and local hire as a condi on of approval for this project.
Specifically:
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-Full family health plans
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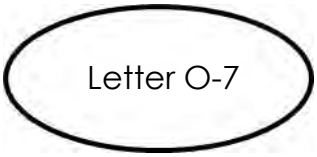
- General Contractors should be required to self perform a
Minimum of 5% of all construcon cr aft work for which they are responsible.
We believe all Burbank locals deserve an innovav e economic soluon tha t puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Joshua Strickler
Sent from my iPhone



-----Original Message-----
From: Oscar Nunez <oscarnunez99@icloud.com>
Sent: Tuesday, August 30, 2022 2:31 PM
To: Rajesh, Shipra <SRajesh@burbankca.gov>
Subject: Burbank Housing Element- Associate Planner Rajesh,

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

Hi, my name is Oscar Nunez , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family suppor ng wages, healthcare for workers, and all contractors must par cipate in a state-approved appren ceship program, and local hire as a condi on of approval for this project.
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High quality responsible bidder standards should be established to ensure high quality construc on performance; -Construc on contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business prac ces.
- General Contractors should be required to self perform a Minimum of 5% of all construc on craft work for which they are responsible.
We believe all Burbank locals deserve an innova ve economic solu on that puts them on the path to build be er careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Oscar Nunez

Sent from my iPhone

Letter O-8

From: Allen Cruz
To: Rajesh, Shipra
Subject: Burbank housing element
Date: Tuesday, August 30, 2022 2:28:09 PM

Sent from IPhone

Hi, my name is Allen Cruz, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.

Specifically:

The construction workforce should require;

-Full family health plans

-All contractors must either participate in a state-approved apprenticeship program or request dispatch of apprentices from a program

-Paid sick leave. Pension, and vacation-holiday pay.

High quality responsible bidder standards should be established to ensure high quality construction performance;

-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.

- General Contractors should be required to self perform a

Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
Allen Cruz

Letter O-9

From: hilario garcia
To: Rajesh, Shipra
Subject: Subject: Burbank Housing Element-
Date: Tuesday, August 30, 2022 2:27:31 PM

Associate Planner Rajesh,
Hi, my name is Hilario Garcia , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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High quality responsible bidder standards should be established to ensure high quality construction performance;
-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Hilario Garcia

Letter O-10

From: Horacio Gutietrez
To: Rajesh, Shipra
Subject: Burbank housing element association planer Rajesh
Date: Tuesday, August 30, 2022 2:26:50 PM

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, my name is Horacio gutierrez , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Horacio gutierrez

Sent from my iPhone

Letter O-11

From: Francisco Solis
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:32:34 PM

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.

Associate Planner Rajesh,
Hi, my name is Francisco Solis Garcia, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Francisco Solis Garcia

Letter O-12

From: Arnulfo Castellanos
To: Rajesh, Shipra
Subject: Burbank Housing Element-Associate Planner Rajesh
Date: Tuesday, August 30, 2022 2:32:07 PM

Hi, my name is Arnulfo Castellanos _, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Your name here

Letter O-13

From: Javier Rangel
To: Rajesh, Shipra
Subject: Burbank housing element association planner Rajesh
Date: Tuesday, August 30, 2022 2:33:34 PM

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, my name is Javier Rangel, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Javier Rangel

Sent from my iPhone

Letter O-14

From: Fernando Lopez
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 2:35:38 PM

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, my name is Ariel López, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Your name here

Sent from my iPhone

Letter O-15

From: maurygarzon13
To: Rajesh, Shipra
Subject: Burbank housing element
Date: Tuesday, August 30, 2022 2:35:59 PM

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, my name is Mauricio Garzon, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Unionmember , Mauricio Garzon

Enviado desde mi Galaxy

Letter O-16

From: Leonel Serrano
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:36:59 PM

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.

Associate Planner Rajesh,

Hi, my name is Leonel, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Leonel Serrano

Sent from my iPhone

Letter O-17

From: Darren Pineda
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:38:01 PM

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.

Associate Planner Rajesh,
Hi, my name is Darren Pineda , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Darren Pineda

Sent from my iPhone

Letter O-18

From: Rolando Bravo
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh,
Date: Tuesday, August 30, 2022 2:38:49 PM

Email: srajesh@burbankca.gov
Subject: Burbank Housing Element-
Associate Planner Rajesh,
Hi, my name is rolando, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project. Specifically:
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- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Your name here

Letter O-19

From: xX_RED1952_Xx
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 2:40:09 PM

Hi, my name is Alberto Ramirez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member,
Alberto Ramirez

Letter O-20

From: Aurelio Peralta
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:52:23 PM

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.

Associate Planner Rajesh,
Hi, my name is Aurelio Peralta, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member, Aurelio Peralta

Letter O-21

From: Gilbert Salcedo
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:52:36 PM

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.

Associate Planner Rajesh,
Hi, my name is Gilberto Angel Salcedo Ayon , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member,

Gilberto ángel salcedo Ayón
Sent from my iPhone

Letter O-22

From: Jesus Gonzalez
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 2:53:07 PM

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, my name is Jesus gonzalez , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Jesus gonzalez

Letter O-23

From: Kike Sanchez
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 2:53:20 PM

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, my name is Enrique Sanchez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Enrique Sanchez

Sent from my iPhone

Letter O-24

From: Ian
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:53:37 PM

Hi, my name is Ian Lyle, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project. Specifically:
The construction workforce should require;
-Full family health plans
-All contractors must either participate in a state-approved apprenticeship program or request dispatch of apprentices from a program
-Paid sick leave. Pension, and vacation-holiday pay.
High quality responsible bidder standards should be established to ensure high quality construction performance;
-Construction contractors at every level comply with labor law and have no history of fraudulent or grossly negligent business practices.
- General Contractors should be required to self perform a
Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Ian Lyle

Letter O-25

From: cesar santos
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:54:05 PM

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Associate Planner Rajesh,

Hi, my name is Cesar Santos, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,
Cesar Santos

Sent from my iPhone

Letter O-26

From: Osbaldo Flores
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:54:06 PM

Associate Planner Rajesh,
Hi, my name is Osbaldo Flores I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters,
Osbaldo Rene Flores

Letter O-27

From: Alex
To: Rajesh, Shipra
Date: Tuesday, August 30, 2022 2:56:50 PM
Attachments: image0.jpeg

Subject: Burbank Housing Element-

Associate Planner Rajesh,

Hi, my name is Marcial gallegos, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.

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Minimum of 5% of all construction craft work for which they are responsible.

We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.

Local 661 Carpenters Union Member,

Marcial Gallegos

Letter O-28

From: victor alcala
To: Rajesh, Shipra
Subject: : Burbank Housing Element- Associate Planner Rajesh,
Date: Tuesday, August 30, 2022 2:56:27 PM

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Hi, my name is victor alcala, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Local 661 Carpenters Union Member, Your name here

Sent from my iPhone

Letter O-29

From: Leo Garcia
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 2:56:55 PM

Hi, my name is leo Garcia I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Sincerely Leo Garcia

Letter O-30

From: Vinny Graciano
To: Rajesh, Shipra; Housing Element Update 2021
Subject: Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 2:57:17 PM

Hi, my name is Vinny Graciano, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Vinny Graciano

Letter O-31

From: Jared Matlock
To: Housing Element Update 2021; Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 2:58:53 PM

Hi, my name is Jared Matlock I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Your name here

Letter O-32

From: COle MYerly
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 3:05:28 PM

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, my name is _____, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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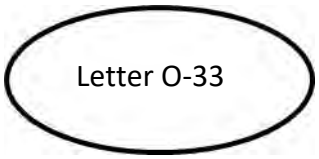
We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Cole Myerly

Sent from my iPhone



From: Hector Chavez
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 3:06:00 PM

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, my name is hector Chavez , I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Your name here

Sent from my iPhone

Letter O-34

From: Rudy
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh,
Date: Tuesday, August 30, 2022 3:06:05 PM

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, my name is Rudy Emmanuel Gonzalez, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this The construction workforce should require;
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We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, rudy Emmanuel gonzalez

Letter O-35

From: Dylan Gage
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 3:07:22 PM

Hi, my name is Dylan Gage, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Local 661 Carpenters Union Member, Dylan Gage

Letter O-36

From: Josh Michel
To: Rajesh, Shipra
Cc: Housing Element Update 2021
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 3:07:38 PM

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Hi, my name is Joshua I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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We believe all Burbank locals deserve an innovative economic solution that puts them on the path to build better careers, increase access to family healthcare, and enrich the community at large.
Local 661 Carpenters Union Member, Your name here Sent from my iPhone

Letter O-37

From: Noah Iglesias
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 3:08:48 PM

Associate Planner Rajesh,
Hi, my name is Noah Iglesias, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Local 661 Carpenters Union Member, Noah Iglesias

Letter O-38

From: COle MYerly
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 3:09:07 PM

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, my name is Cole Myerly, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Local 661 Carpenters Union Member, Cole Myerly

Sent from my iPhone

Letter O-39

From: Brenden Cates
To: Rajesh, Shipra
Subject: Burbank Housing Element
Date: Tuesday, August 30, 2022 3:09:46 PM

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Associate Planner Rajesh,
Hi, my name is Brenden , I am a local union carpenter out of Carpenters Local 213. Carpenters Local 213 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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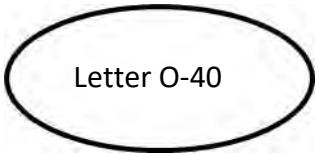
Local 213 Carpenters Union Member, Brenden Cates



From: javier vera
To: Rajesh, Shipra
Subject: Burbank Housing Element- Associate Planner Rajesh
Date: Tuesday, August 30, 2022 3:10:27 PM

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, my name is Javier Vera, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Minimum of 5% of all construction craft work for which they are responsible.
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Local 661 Carpenters Union Member, Javier Vera

Letter O-41

From: Juan Max
To: Rajesh, Shipra; Housing Element Update 2021
Subject: Burbank Housing Element-Associate Planner Rajesh,
Date: Tuesday, August 30, 2022 3:52:57 PM

Burbank Housing Element-Associate Planner Rajesh, Hi my name is Juan M Max, I am a local union carpenter out of Carpenters Local 661. Carpenters Local 661 represents over 5,000 working families in the area which include members that live, work, and make us of the businesses in and around the Burbank area. We would like to see Labor Standards and or policy included in the 2021-2029 Housing Element. In future projects under this plan, the city of Burbank should explicitly incorporate language requiring family supporting wages, healthcare for workers, and all contractors must participate in a state-approved apprenticeship program, and local hire as a condition of approval for this project.
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Local 661 Carpenters Union Member, Your name her

Letters O-3 through O-41

COMMENTER: Refer to individuals O-3 through O-41 listed in Table 3-1.

DATE: August 22, 2022 – September 6, 2022

Response for Letters O-3 through O-7

The comment notes membership with Carpenters Local 661 and offers an introduction to the labor union. The comment requests that labor standards and/or policies are included in the Housing Element Update and that future projects under the Housing Element Update require family supporting wages, skills training, and job access to community members. The comment also specifically notes that the construction workforce for future projects should require family health plans, skilled workforce standards, paid sick leave, pension, vacation-holiday pay, and high-quality bidder standards to ensure that contractors comply with labor laws.

The commenters' requests for changes to the Housing Element Update are noted, but does not raise issues with the adequacy of the analysis or conclusions in the Draft EIR. The Draft EIR is not intended or required to provide justification for the Project. Rather, the EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that the Project is likely to have on the environment. This EIR also identifies ways in which the significant effects of the Project might be minimized and identifies alternatives to the Project. The City is not required to consider such comments or requests to change the Project in its CEQA analysis absent a commenter providing substantial evidence that the proposed change would feasibly reduce one or more significant adverse environmental impacts identified in the Draft EIR. Requests for changes to the Project may be addressed through the planning process outside of the CEQA process.

Letter I-1

September 3, 2022

Shipra Rajesh
Project Manager
Community Development Department Burbank, CA 91502
via Email

RE: Comments:

**1) Burbank Housing and Safety Element Update,
Recirculated Draft Environmental Impact Report, July 2022;**

2) 2nd Revised Draft Housing Element, 2021-2029, November 2021; and

3) Suggested revisions to the Draft Housing/Safety Element 2022 for consideration by the City Council

1

Thank you for the opportunity to comment on the July 2022 Recirculated Draft EIR ("RDEIR") for the November 21, 2021 and August 2022 Revised Draft 6th Cycle Housing Element ("Project"), covering planning years 2021 to 2029. The substance of the RDEIR constitutes an improvement to impact areas identified in the previous DEIR, but significant areas remain unaddressed. These are identified in Part I, below.

Part 2 of this letter restates all of my March 31, 2022 comments to the previous DEIR because these comments have not yet been responded to.

Part 3 of this letter contains recommendations for changes to the Draft Housing Element (HE) itself (and Safety Element). I expect that these will be forwarded to the City Planning Board and City Council for their consideration as decision makers in the approval process.

Part 1: Comments to the July 22, 2022 RDEIR

This document covers mitigation in a more thorough way than the previous DEIR for the categories of Biological Resources and Utilities/Service Systems. There remain, however, significant deficiencies in proposed mitigation measures. And the discussion of water and power supply need to be updated to 2021-2022 circumstances.

2

One opportunity the City has is to amend the zone code and adopt Objective Standards that otherwise cannot be applied to individual projects declared exempt from CEQA by the State. The environment is the environment, impacts on it are not limited to whether or not a project is exempt from CEQA (see discussion below on biological resources).

"Reasonably Foreseeable Development" only a term of art

Comment: The RDEIR repeatedly makes use of the phrase, “reasonably foreseeable development” yet, there appears to be no definition of this vague phrase. Does foreseeable mean 2, 5 or 9 years? Does reasonable account for inflation, construction materials availability, interest rates, service/public infrastructure availability? If staff has prepared an analysis of the term and its application in the DEIR/RDEIR, then that information should clearly indicate how the phrase supports conclusions reached in the RDEIR across all impact areas and the RDEIR should clearly explain differences in development levels between the proposed Project and “reasonably foreseeable development.”

The term needs to be defined. If it is defined, that definition is useful only if the reader can easily find it. If, instead, it is not defined, then an analysis of it and its application is required and that should be transparent to the reader. Ultimately, of course, CEQA requires analysis of the Project as proposed, not based on a “reasonably foreseeable development.”

Finally, if the phrase is defined, the definition of reasonableness has relevance to Water and Power Supply discussions. Can Burbank reasonably expect that water supply will become more scarce with a commensurate loss of hydroelectric energy generation?

2 Cont.

Figure 2-4, Cal Enviroscreen is incomplete

Comment: Figure 2-4, p. 2-14, “Calenviroscreen - Disadvantaged Communities.”

The legend does not explain the meaning of the dot pattern overlay.

3

Impact BIO-1, Introduction discussion, no explanation of how “Development… prioritized infill sites in urbanized areas” is effectuated

Comment: Impact BIO-1, p. 4.2-5, asserts “Development would be prioritized on infill sites in urbanized areas (emphasis added) of the City….” Is there a map or definition of “urbanized areas.” Developers are going to propose development where they are going to propose development, as proven by development project proposals at the intersection of Alameda and Olive; in Toluca Lake; and Pickwick Project. None of these are located in the “urban downtown region” of Burbank, or near the Hollywood Burbank Airport (is it the proposed Golden Street Specific Plan area?).

How are the sites prioritized for just the “urbanized areas” of the City? On the other hand, where are the “non-urbanized areas” of the City. Media City? Rancho? easterly neighborhoods of Burbank? Toluca Lake in Burbank? Any analysis and impact determinations based on the assumption that development disproportionately occurs on infill sites in “urbanized areas” are thus suspect.

4

Mitigation Measure, BIO-1 is inadequate

Comment: Mitigation Measure BIO-1, Biological Resources Avoidance. Page 2

5

The Mitigation Measures are better (p. 4.2-6). However, one addition is required to apply to all development projects exempted from CEQA by State law mandates like SB35, SB 9, SB10 and now, SB2011. These mandates specifically exclude CEQA, but birds of prey/nesting birds don't know any of this.

Equal protection can be achieved codifying the measures as Objective Standards incorporated into the Zone Code to ensure resource protection occurs across project types (CEQA and State-mandated CEQA exempt projects) for the ultimate benefit of these important biological resources. Unless the measures are codified as separate Objective Standards with an enforcement mechanism, the proposed Mitigation Measures over-estimate their effectiveness for biological resources in the case of projects like SB35, SB9, SB10 and SB2011, and post-mitigation biological resources impacts are understated. 5 Cont.

Recommendation:

ADD Mitigation Measure: "The BIO-1 Mitigation Measures for direct/indirect impacts to biological resources through vegetation removal and construction activities also shall be codified as Objective Standards in the Zone Code so that they apply to all projects that may be exempt from CEQA due to State-mandated housing developments pursuant to SB35, SB9, SB10, SB2011."

Water Supply (pp. 4.12-4 to 4.12-6), the Water Update Discussion needs to go to 2022

By now it is clear that Burbank is facing not just drought conditions but an historic shift to water scarcity as a permanent way of life. While the Base Year for the RDEIR is 2021, it is irresponsible to fail to include a discussion in the "Update" section for post-2016. The magnitude of scarcity must not be overlooked particularly since it is reasonably foreseeable that this condition is the new normal. Didn't Governor Brown's 25% water reduction mandate expire in February 2016? (p. 4.12-6). Since then additional actions have taken place, including Governor Newsom's order for voluntary reduction in water use, significant cuts to Burbank from the State Water Project (restricted to 5% of supply for the MWD service areas), additional cuts by the MWD and imposition of reduced outdoor watering ordered by Burbank Water and Power. This document owes the community and the decision-makers straight talk about emerging conditions. 6

And that straight talk needs to also address potential power scarcity due to loss in the Colorado River system, the very real possibility that Lake Mead will be unable to provide the water needed for hydroelectric energy generation and the reasonable expectation that states dependent on water from the Colorado River Basin will be unable to reach a mutual allocation accord, forcing the Federal Government to step in. Proponents of additional housing are faced with this emerging reality as well.

The Water Update Section needs to be revised to account for the sweeping changes to reduce water demand because we are in a third year of drought. **Page 3**

On June 1, 2022 MWD issued new outdoor watering restrictions (1x/week) for 6 million customers, and BWP may follow (limit outdoor watering from 2x/ to 1x/week) outdoor restrictions. Water allocation from the Delta has been reduced, and Governor Newsom's Executive Orders in April, May, July and October 2021 on conservation goals — further modified by a March 2022 Executive Order N-7-22 — pivot to the likelihood of emergency regulations demanding BWP start working on a contingency plans in the face of continuing shortages. 6

We have experienced the driest two decades in 1200 years. It appears not very likely to change.

Energy Supply Discussion (pp.26-28). The discussion is inadequate

The discussion is incomplete and fails to recognize the very challenge to energy reliability and affordability. BWP is a magnificent municipal utility faced with unprecedented challenges, brought on by a hotter drier climate. If only data regarding energy are limited to the Base Year 2021, then more recent 2022 information regarding on-going impacts on energy resources will be left out of the discussion about energy availability to support the proposed Project.

California was unable to avoid rolling blackouts in 2020. Evidence of the unreliability of energy was one of the reasons the State legislature voted to extend the operation of Diablo Canyon nuclear power plant- the State's largest source of energy - for five more years to 2030.

Just two weeks after the Governor introduced draft legislation to continue the operation of the State's nuclear power plant, the State legislators voted in agreement on August 28, 2022 (SB846). Permission to extend the life of the plant will now require approval by the federal government. 7

Page 4.12-27 outlines the measures that will help Burbank Water and Power to achieve its renewable energy source goals. Energy reliability and cost are the most two critical issues that need to be examined in this RDEIR.

The City staff owe the community and Council a full discussion regarding the 2021/22 state of affairs impacting our utility, highlighting the recent scramble to secure additional power, due to extreme heat. On Thursday, September 1, 2022, BWP was forced to buy high cost power just keep the lights on in our City. The Magnolia Power Plant was operating at peak capacity, however, that apparently was insufficient and additional, expensive resources had to be secured. These costs WILL be passed onto the ratepayer; and while costs are not the subject of an environmental impact report, the City Council must discuss how the utility will maintain reliability and affordability.

This RDEIR needs to revise the section on power that identified impacts on power as "less than significant." The costs will be extremely burdensome on lower income households (families, but also on elderly single women, vulnerable in

health and income, who constitute a high percentage of individuals in poverty in Burbank, according to the HE). 7 Cont.

A new Mitigation Measure needs to be added requiring the City to conduct a Risk Assessment sooner than later and potentially in stages, to achieve Burbank's clean energy goals that would specifically address all of these measures listed in the RDEIR:

- **Rate Design:** Design time-varying rates that encourage customers to shift their consumption away from higher cost periods to lower cost periods

- **Demand Response (DR).** Consider cost-effective BWP customer DR programs

- **Beneficial Electrification.** Enhance and extend BWP efforts to encourage growth in beneficial
electrification that reduces GHG emissions, including electric vehicles.

- **Disadvantaged Communities.** Develop and implement a program to target disadvantaged communities with selected BWP energy efficiency, demand response, and beneficial electrification programs.

- **IPP Coal Replacement.** Work with LADWP and other IPP participants to determine resources that will replace the IPP coal plant when it is retired in 2025. 8

- **Transmission Delivery for Renewables.** Identify options and costs for transmission delivery of large quantities of renewable energy resulting from SB 100.

- **Solar Over-Generation.** Work to mitigate the impact of solar generation (including morning and afternoon ramping, overgeneration, and instantaneous intermittency) such that reliability and affordability are maintained.

- **Resource Positioning.** Position BWP's resources to balance supply and demand on the grid ad increased renewable energy sources come online, thereby minimizing costs and maximizing energy reliability for Burbank. In this connection, evaluate further improvement in the operational flexibility of the Magnolia Power Project.

Without a clear Risk Assessment Mitigation Measure, the RDEIR is inadequate. It needs to be added. **Page 5**

Sewer Service Constraints Analysis should be revised to account for development projects brought forward pursuant to SB35, SB9, SB10; and SB2011.

These kinds of projects continue to fly under the radar of the RDEIR, leading to a continuing understatement if the impacts of the Project (HE). The impacts of over SB35 700 units appear to be unaccounted for in the Project because they are exempt from CEQA. However, the units are not phantom housing units, they are real with demands on City services and infrastructure. Therefore the constraints analysis must clearly incorporate the impacts of these projects. The cumulative impacts of ADU's or duplexes also need to be accounted for. 9

Mitigation Measure UTIL-3 is inadequate.

It identifies potentially significant impacts that could occur on a project-specific basis and indicates that the City's wastewater treatment capacity is able to treat an additional up to 4 million gallons per day (mgd) associated with new development. Because the Project will exceed that additional amount, a new RDEIR Mitigation Measure requires the Public Works Director and Department to conduct a sewer service constraints analysis. However, the Mitigation Measure fails to take into consideration the years it takes to analyze, design, secure approval, fund, bid and build an expanded sewer treatment facility. Anyone familiar with the sewage spills from L.A.'s Hyperion Treatment Plant prior to its expansion in the 1990's will know these are complicated, expensive and long propositions. The current City Councilmembers may not be on the City Council. There is no long term plan in this Mitigation Measure, no one knows what mitigation is needed, mitigation is once again deferred to an unknown date. 10

Therefore, the Mitigation Measure needs to be revised or a new one evaluated and prepared to establish benchmarks for an effective result. For example, what happens when pending building permits or entitlements exceed the treatment plan capacity? Does the Council impose a moratorium, can the City stop issuing permits or accepting applications for new entitlements? Who will get notification, how will an exceedance effect individual residential and commercial development projects? The City should at a minimum show it is thinking about how to fix the capacity constraint before the problem arises. Therefore, a benchmark should be called for in a new Mitigation Measure to address wastewater treatment capacity expansion before exceedances occur (90%, 70% of available capacity?). There must be a benchmark or objective standard the affords a rational period of time to analyze, design, secure approval, fund and build an expanded sewer treatment facility. The Mitigation Measure states "Nonetheless impacts would remain significant and unavoidable until plans and upgrades are implement."

Part 2 - Comments from prior submittal which remain unaddressed. The following comments were submitted to the DEIR March 31, 2022 and require a response. 11

COMMENTS TO THE DEIR/ELEMENT
According to the *Project Description*, the City's housing goal is to ensure that sufficient capacity exists in the Housing Element Update to accommodate the RHNA with a buffer (a total of 10,456 additional housing units) throughout the eight-year planning period.

The DEIR is amazing and concerning. The data sets are incongruous. The DEIR contains very different housing unit numbers (SCAG, RHNA and DOF) that beg to be reconciled in a rational manner, for the non-professional

11 Cont.

who does not understand the sea of acronyms coming at them. The Element is built around a State-mandated housing number, but that conflicts with forecasts by the local regional agency. The DEIR housing numbers from DOF conflict with the housing numbers from DOF in the Housing Element itself.

Nonetheless, here are both comments to the DEIR and the Element. Hopefully, the Element charts a better path in light of these comments.

Finally, the data for Burbank are derived from very big numbers generated, I understand, by an algorithm(s). An algorithm cannot possibly account for local nuances, activities, historic growth patterns, infrastructure, its non- profits etc.

12

DEIR Comments

1. **Unmitigated Impacts, Sewer. This should concern everyone.** The proposed Project, Housing Element, 2nd Revised Draft causes impacts on the City's wastewater treatment capacity that are significant and unavoidable:

"...based on the sewer generation rates that were calculated for the proposed Project, along with constraints within the City's treatment system, potentially significant impacts could result on a project-specific bases with **no feasible mitigation at the current plan**

level. Therefore, **impacts would be significant an unavoidable."**
Page ES-24

13

And also:

Wastewater generation for full buildout of the proposed Housing Element Update is **estimated to be up to approximately 6.3 mgd, which is not within the City's currently available treatment capacity of 4 mgd.** Therefore, impacts would be, significant and unavoidable due to constraints within the sewer system and development under the proposed Project would contribute to a cumulatively significant impact associated with wastewater generation. Cumulative Impacts 4.12-39

The DEIR identifies an elaborate uncharted approach that Public Works will take over time. But the overall impact is unmistakable. **Page 7**

How will Council to make a Finding of Overriding Considerations for sewer impacts? What is the benefit that outweighs this?

What is maximum amount of housing units permitted before the significant and unavoidable sewer impacts are reached? 13 Cont.

How much does the proposed Project need to be modified to reduce impacts to less than significant?

2. There are **significant inconsistencies between RHNA, the SCAG (Burbank/ regional forecasts), and existing numbers offered by the State Department of Finance 2021.** The City is required to plan for the RHNA number, but neither SCAG nor DOF offer any kind of data that would confirm even modest support of the State-mandated number (as distributed by SCAG).

Here is how it looks:

HCD Requirement by 2029 = 10,456 housing units (RHNA)

SCAG Forecast by 2030 = 4,650 housing units (Table 4.8-2)

over the 8-Year proposed Project (2021-2029), the added number of required units above the forecast is: 14

= 5,806 MORE units The discrepancies need a full explanation.

A recent State audit has revealed problems with the RHNA numbers in some districts. Unfortunately, a similar audit has not been conducted over the RHNA number for

the SCAG region. The numbers for Burbank make no sense.

The City should demand an audit of the SCAG RHNA numbers before it approves the proposed Project which contains significant unmitigated impacts, including sewage.

In plain language, the discrepancies must be explained: if the forecast is for modest growth, why is RHNA 2x forecast?

3. SCAG 2020 **estimates fewer residents, jobs and housing in the region by 2040**:

"Based on an evaluation of the 2016 RTP/SCS and the 2020 RTP/SCS demographic projections, the 2020 RTP/ SCS projects fewer residents, jobs, and housing units. The 2020 RTP/SCS predicts approximately **290,000 fewer residents, 80,000 fewer houses, and 210,000 jobs in the region in 2040** than under the 2016 RTP/SCS, which would represent less activities and associated emissions than would have been predicted under the 2016 RTP/SCS. Therefore, evaluating again the 2016 RTP/SCS projections would be conservative as the 2016 AQMP assumed 15

greater growth than is currently anticipated. The impact analysis throughout this EIR uses the demographic data provided in the 2020 RTP/SCS." p. 4.1-10

With the regional forecasts in mind (and the 2020 forecast by SCAG is significantly less aggressive than SCAG's 2016 projections), how are these numbers reconciled with the RHNA for Burbank?

15 Cont.

4. **The residential vacancy rate is 6%**. The Department of Finance (DOF) identifies 45,069 housing units in the city, of which 2,787 are vacant. This is a 6% vacancy rate, considered a "healthy" vacancy rate by HCD. Rather than showing a critical shortage of housing units, the statistics show an appropriate vacancy rate.

1. The disparity among these housing unit numbers needs to be reconciled (SCAG, RHNA and DOF).

16

2. If the vacancy rate is already 6% (2% more than HCD has used in the past as a maximum rate) how is an increase to 10,456 new housing units in the 6th Cycle justifiable?

(FYI, the DOF figure in the Housing Element is different: 44,978 Housing Units. Table 1-13)

5. A **15% added housing unit buffer** raises the total number of units that the city must accommodate to 10,456. Given all the other numbers (SCAG, RHNA, DOF — 2 numbers—) what is the justification for a further 15%?

The EIR should study the resulting impacts from an elimination of the 15%; will that reduce sewer impacts?

1. What statute requires this buffer?
2. Is it a State mandate?
3. Why is there no discussion in the Alternative

17

sections about this impact?
4. What is the justification for a 15% buffer with

advent of SB35, 9 and 10?

6. **Greenhouse Gas Emissions/Air Quality.** What factors are being used to quantify reductions in green house gas emissions for the 6th Cycle Housing Element?

A. Didn't the Biden Administration re-instate California's waiver of the CAA and restore its ability to set its own clean air standards? The Chapter currently states:

18

"However, as a result of the SAFE Vehicles Rule discussed above, California's waiver of Clean Air Act preemption was revoked, thereby rescinding the CARB's authority to implement the Advanced Clean Cars program." 4.5-6 **Page 9**

It would seem the GHG will be reduced more. 18 Cont.

B “As of 2019, the City has reduced GHG emission by 28 percent from 2010 baseline emission levels, well- exceeding the 2020 target in the original GGRP and

approaching the 2035 target established well in advance of the horizon year. To reflect new State goals established by SB 32 and EO B-55-18, the Draft GGRP Update recommends aggressive GHG emissions targets including:

• Reduce GHG emissions to 49 percent below 2010 levels by 2030 (SB 32 target year), 19

• Reduce GHG emissions to 66 percent below 2010 levels by 2035 (General Plan horizon year),

• Achieve carbon neutrality by 2045 (EO B-55-18 target year).”

Page 4.5-1

Burbank should be proud of its past record of GHG reductions.

C. To clarify the GHG Chapter, what assumptions are made for the growing aggressive use of electric vehicles? For mobile sources, where is the discussion and assumptions about electric vehicles by 2029? 20

D. Air Quality Policies: where is the policy to upgrade existing homes to greater energy efficiency? p. 4.1-26 21

E. Please answer where the threshold of a 400,000 car intersection comes from. What is Five Points compared with a 400,000 car intersection?

"The city does not have any intersections that would foreseeably experience daily volumes exceeding 400,000 vehicles per day. Therefore, the Housing Element Update would not have potential to contribute to localized CO concentrations at intersections that exceed state CO standards.” p. 4.1-32/33 22

Five Points at Victory and Burbank, is unique: cars idle for many minutes at a time waiting their turn. Will the future forecast of 67,000 daily trips generate CO equal to 400,000 (or even 100,000) cars because the idle times are long at that unique intersection?

Where is there a 400,000 car intersection in the State of California? Where does this come from and where is it justified?

7. **Contradiction on impacts of “Unplanned growth.”** One section of the DEIR states it is not a problem. 23

“The Housing Element Update would not induce unplanned growth directly or indirectly, and impacts would be less than significant.” page ES-19 **Page 10**

However, another section states the housing units may occur anywhere in the city:

"New housing units may occur anywhere in the City where residential uses are permitted, as well as in areas that may be rezoned in the future to allow for multi-

family residential and mixed-use residential of adequate density to meet State-required housing production and affordability targets as discussed below." p. 2-14

Occurring "anywhere in the City" is certainly unplanned these days. As an example, the DEIR fails to discuss the impacts of SB9 (replace one home with 4) and SB10 (up zone to 10 units without CEQA requirements). These State mandates result in an unknowable number of new units in unknowable locations. Housing units may occur anywhere in the city zoned for residential, a net increase of 2 to 4 new units where one used to be. But we don't know where. And the Housing Element indeed induces direct (population, housing) and indirect (services, quality of life infrastructure) growth it by its implementation of State mandates. 23 Cont.

Assess impacts on VMT-
growth inducing impact not addressed need to look at j/h balance in Burbank area whether it increases growth of jobs?
and how j/h affects VMT impact 24

8. **Loss of housing units to Short Term Rentals.** This impact is not assessed in the DEIR. Loss of these homes — even if no more than 500 — exacerbates the housing shortage.... by 500 units. Requiring these homes become available for long term rent or sales will help the city make more progress on its RHNA numbers for all income categories. And help people find homes to live in. 25

This factor should be discussed in Housing/Population. How many units? How much displacement? It would seem the State housing crisis demands every unit be available.

9. **Paradigm shift of work/commute patterns should be discussed** either in GHG, Transportation or Housing Chapter of the DEIR. Work-commute patterns have new implications for VMT, GHG and RHNA. Historically, longer commute times created more greenhouse emissions, as recognized by HCD. However, the pandemic has brought about a paradigm shift to work-travel patterns, the split office/work from home schedule; on-line learning and on- line job training.

The new work pattern may be around permanently: commercial property can down scale and reduce costs, employees travel into the office on a "part-time" basis, save gas money, enjoy a better quality of life. 26

This new work pattern is not available to employees who work with their hands, provide services.
How are the impacts of any of these foundational shifts accounted for in the DEIR?

10. **Inadequate discussion of impacts on water supply.** Water utilities routinely state that they will provide water to new development. However, the DEIR needs to discuss the contemporary drought more completely given the signifiant loss of snowpack and the Governor's latest order to local water agencies to develop their own plans for the drought. This will affect Burbank Water and Power. and all of its users. 27

The Chapter on water needs to more clearly state where the snow pack is estimated to be in 2029, by using an interpolation or some other method. Water availability and its management have huge implications for Burbank. See Page 4.5-3

11. **Deficient cumulative impact analysis.** Cumulative impacts analyses are deficient because neither SB35, SB9 and SB10 are assessed nor identified as part of the proposed Project. 28

A.**Water.** First, there is a housing demand on the overall availability of water for the city. 29

What is actually required to reach the water conservation levels needs to provide water to the 10,456 housing units?

B. **Loss of yards/green space/increase in urban heat island.** One of the benefits peoples have in these neighborhoods are yards with plants, shade and natural cooling. Once the yards are cumulatively eliminated, that will reduce a natural cooling effect. 30

What will be the cumulative effect of additional development and a commensurate loss of open space? What is the effect on urban heat island? Therefore, what is the effect on climate change?

C. **State housing mandate affects the entire MWD service area and not just Burbank.** Significantly, Burbank is not unique among MWD customers required by the State to substantially up zone their city. This is widely-based, service area impact because all cities are mandated to increase housing units.

Without a service area-wide cumulative analysis,
how will the demand on water supplies be assessed? We are not an island, our needs are connected to all the cities securing water supplies through MWD. 31

Given current drought, what level of water conservation will be required to be meet water supply for 10,456 additional dwelling units in Burbank and is it feasible?

Given water conservation, what will be the impacts on landscaping and resulting heat island effect? A quantitative analysis is required under cumulative impacts for water because Burbank is not the only city in the key services area required to zone in this manner.

There needs to be a quantitative analysis. **Page 12**

D. Cumulative Impacts fails to address:
direct and indirect impacts, loss of greenery, infrastructure construction to increase provision of recycled water to neighborhoods, impacts of new piping to provide recycled water.

32

Why is there no cumulative analysis of what infrastructure is required to be upgraded to accommodate these new housing units?

12. **The Alternatives are inadequate.** The purpose of the Alternatives Section is to provide decision makers with information about how the Project would need to be modified, and to what degree, in order to reduce impacts to a level that is less than significant.

This is a disclosure, even if decision makers do not choose it.

33

This alternative- one where there are no significant and unavoidable impacts — (like the proposed Project) should realistically address the potential for impacts to wastewater, water and other infrastructure systems associated with level of proposed development. An Alternative like this needs to be included.

Two added Alternatives should be assessed:

1. An Alternative without the 15% buffer;
2. An Alternative that reduces all infrastructure impacts to

a level of insignificance.

34

Unlike current zoning that allows the city to plan in a measured way for development and its density, allowing housing any where in the city, does not afford the city to reasonably plan for the increase in locational and cumulative infrastructure demands.

13. **Misc.**

"As discussed in Section 4.12, Utilities/Service Systems, the analysis found that existing utility systems for water, electric power, natural gas, and telecommunications facilities in the City have sufficient capacity to serve **reasonably foreseeable developmen**t under the

proposed Project; therefore, potential infrastructure improvements associated with these utilities and service systems would not contribute to growth in the City. Regarding wastewater treatment capacity, the analysis found that development under the proposed Project would increase wastewater generation proportional to the projected increased population. Based on the sewer generation rates that were calculated for the proposed Project, along with constraints within the City's wastewater treatment system that could result from build out of development projects under the Project, potential impacts associated with wastewater generation are significant and unavoidable. Nonetheless, the City's plans and improvements **Page 13**

35

to the sewer conveyance and treatment system will be based on the projected population, and therefore, would not result in unplanned population growth." Page 5-5 | 35 Cont.

CEQA requires analysis of the impacts of the proposed Project, not "reasonably foreseeable development."

Part 3: Previously Submitted Comments on the Safety and Housing Elements

Safety Element
Is there a policy recommendation to armor soft story housing in the face of inevitable earth quakes? | 36

Public Review of Housing Element Move this Section to the Appendices | 37

Goal 2, Adequate Housing Sites
Revise Policy 2.4
engage proactive code enforcement to return unauthorized short-term rentals to the city's housing market | 38

Goal 3 Affordable Housing
ADD new policy
Establish a Task Force of Burbank Senior Board and Burbank Committee on Disabilities to determine state-of the-art housing development examples for housing of person with disabilities; and incorporate these objective standards into all density bonus and inclusionary zoning projects. SB35, 9 and 10 | 39

Goal 5 Equal Housing Opportunity
ADD new policy:
Establish a pre-qualification program with the Burbank Housing Corporation for elderly renter households in the extremely low income category and large family households in the low income category; and support their relocation to stabilized extremely low/low income homes. | 40

Neighborhood Revitalization, Page 33
This paragraph should include the day care and job search centers and the after-school center that is in BHC but serves the entire neighborhood. | 41

Map of Focus Neighborhoods page 1-34 Map needs correction | 42

Definitions:
Affordable Unit: could be tied to % of area median Burbank Housing Corporation: It is more inclusive than housing: after school learning centers for neighborhood, child care facilities. | 43 | 44
By-right development: doesn't require public hearings | 45

Grants: **Page 14** | 46

List all available State and Federal Grants and describe
Conditional Use Permit: identify as quasi-judicial Density Bonus: need simpler definition Dissimilarity Index: needs a clear definition Homeless: include unsheltered who live in vehicles.

46 Cont.

47-49

In closing, thank you for the opportunity to comment. City staff are under a lot pressure by State-imposed mandates to produce housing. That is clearly reflected in the multiple revisions to the 2021-2029 HE in response to comments by HCD regarding the HE. We are all proponents of housing, in the right place, with proper disclosures. This is balance. Indeed HE's have for years required a balance of water and sewer. Unfortunately recent laws mandated by the legislature notably carry no obligation by the State to help fund the increased demand on Staff resources and pressure on Staff will likely remain. The State has yet to help fund the costs of upgrading services and infrastructure. Those burdens have been passed on to Burbank and its households and ratepayers.

50

Thank you,

Emily
Emily Gabel-Luddy, FASLA

Page 15

Letter I-1

COMMENTER: Emily Gabel-Luddy

DATE: September 3, 2022

Response I-1.1

The commenter describes the comment letter, demonstrating how the letter has been broken into three sections. The first section addresses the Recirculated Draft EIR, the second section addresses comments that concern the previously circulated Draft EIR, and the third section addresses comments regarding the Housing Element and Safety Element directly.

Individual responses to each comment are provided below. This comment does not contain a substantive comment on the analysis in the Draft EIR or Recirculated Draft EIR. No further response is required and no revisions to the Recirculated Draft EIR are necessary.

Response I-1.2

The commenter states that there is no clear meaning defined in the Draft EIR for the phrase "reasonably foreseeable development." The commenter asks if "reasonable," in this context, accounts for inflation, construction materials availability, interest rates, and infrastructure availability. The commenter states that if "reasonable" can be defined then additional consideration to water supply and its use for hydroelectric power should be given.

The term "reasonably foreseeable" is not specifically defined in the CEQA statutes or Guidelines. Rather, it is framed more broadly by what it is not: "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable" (CEQA Guidelines Section 15064).

As stated in Section 4.12, *Utilities/Service Systems,* only two percent of energy produced by Burbank Water and Power is produced by hydroelectric sources. Impact UTIL-2 discusses water supply availability into the future. Metropolitan projects that water supply will be equal to water demand under all climatic conditions considered, such that water supply reliability is 100 percent through the year 2045 (BWP 2021a). This is partly due to the effectiveness of conservation programs implemented throughout the planning period. The projections for imported surface water supply availability from Metropolitan indicate that sufficient supplies are available to the City to meet projected demands. These projections are based upon the City's 2020 Urban Water Management Plan (UWMP) which reflects population growth associated with the Housing Element Update, as well as additional supplies associated with expansion of the City's current water supply portfolio through increased conservation and conjunctive use management efforts. Since BWP water demands are accounted for in the supply availability projections identified above, and with consideration to BWP's access to local groundwater supplies and recycled water supplies, both of which are expected to increase over time, it is reasonably anticipated that sufficient water supply is available for the proposed Project demands and cumulative impacts would be less than significant.

The section considers climatic variations and takes into consideration both potable and non-potable uses. Beyond the projections offered in the City's Urban Water Management Plan, making predictions or assumptions on water supply for hydroelectric power would be considered

speculative and thus, would not be "reasonably foreseeable." No edits to the Recirculated Draft EIR are required.

Response I-1.3

The commenter states that on Figure 2-4, page 2-14, the dot pattern overlay on the graphic is not clearly mentioned in the map legend.

The dotted overlay in Figure 2-4 is meant to represent a land use type other than residential. The dotted area could include commercial, office, industrial, mixed-use etc. The purpose of the figure is to demonstrate where disadvantaged communities (DACs) exist within the city, and land use type distinction is inconsequential since census tracts lie over varying land use types. DACs can exist within census tracts regardless of the mixed land uses within those tracts since the variables taken into consideration are based on various factors including, but not limited to, exposure to particulate matter, drinking water quality, pesticide use, exposure to hazardous waste, and different socioeconomic factors.

Response I-1.4

The commenter asks if there is a map of, or definition of, "urbanized areas." The commenter asks how sites are prioritized for "urbanized areas" of the city, and where "non-urbanized" areas of Burbank are within the city. The commenter states that any analysis and impact determinations based on the assumption that development disproportionately occurs on infill sites in "urbanized areas" are suspect.

According to the CEQA Guidelines Section 15387, "urbanized area" means "a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile." According to the U.S. Census Bureau, the City of Burbank has a population of 107,563 people.[1] The U.S. Census Bureau also determined that the City has a population density of 6,198.7 persons per square mile, well over the threshold of 1,000 persons per square mile to be considered an urbanized area in accordance with CEQA. Per this definition, the entire City would be considered an urbanized area.

Section 2, *Project Description*, contains Figure 2-3, *Specific Plan and Housing Opportunity Locations*. As shown in the figure, there are two main areas, the Downtown District and Golden State Specific Plan District, that the Housing Element Update is proposing as the primary areas for future housing development under the proposed Project. When compared to the City of Burbank Zoning Map, both of the housing opportunity districts line up with areas that are zoned as, but not limited to, General Industrial (M-2), Planned Development (PD), Burbank Center Commercial Manufacturing (BCCM), Burbank Center Limited Business (BCLB), Low Density Residential (R-2), Medium Density Residential (R-3), and High Density Residential (R-4). Many of the zones within the proposed housing districts have existing built-up land or urban uses. Thus, housing occurring in these areas would be considered infill development as it does not extend beyond the city boundary, or propose housing in areas where development does not already exist or isn't already planned.

The City's zoning map is available online with the link below:

https://www.burbankca.gov/documents/173607/0/20210101_Zoning_Map.pdf/c8bc55ed-98cf-505d-3892-7e1657bca8f1?t=1618866483006

[1] U.S. Census Bureau. 2020. Quick Facts – Burbank City. Available online at: https://www.census.gov/quickfacts/fact/table/burbankcitycalifornia,CA/PST045221

Response I-1.5

The commenter states that while the mitigation measures presented under Impact BIO-1 have improved, one addition is necessary. The commenter states that equal protection should be given to birds of prey/nesting birds. The commenter states that equal protection may be achieved by codifying the measures as Objective Standards incorporated into the Zone Code to ensure resource protection occurs across all project types, including CEQA and State-mandated CEQA exempt projects.

As discussed in Section 4.2, *Biological Resources*, under Impact BIO-1, construction of reasonably foreseeable development under the proposed Project could potentially occur during the bird nesting season, which is generally from March 1 through August 31 and begins as early as February 1 for raptors. As such, potential construction impacts resulting in vegetation trimming or removal during the nesting season would have the potential to disturb active nests, either directly (e.g., injury, mortality, or disruption of normal nesting behaviors) or indirectly (e.g., construction noise, dust, and vibration from equipment). For those reasons, Mitigation Measure BIO-1 will be implemented for all projects under the Housing Element where construction will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present.

For all projects that apply, Mitigation Measure BIO-1 requires a pre-construction survey by a qualified biologist, avoidance of nesting species through the establishment of buffers, and a survey report prepared by the qualified biologist to submit to the City. The qualified biologist will serve as a construction monitor during periods when construction activities would occur near active nest areas to ensure no inadvertent impacts on these nests would occur. This mitigation would be compliant with protections granted under the CFGC and MBTA.

In regard to codifying the mitigation measure as an objective standard incorporated into the Zoning Code, this comment does not pertain to the analysis in the Recirculated Draft EIR and instead proposes additional regulations to be written and enforced by the City. The comment has been noted and passed onto decision makers.

Response I-1.6

The commenter states that the discussion on current water supply conditions is insufficient and the discussion of water scarcity should also include an evaluation of potential power scarcity due to loss in the Colorado River Basin and Lake Mead. The commenter states that the Water Update section should be revised to account for sweeping changes to reduce water demands.

Refer to response I-1.2 for a discussion on reasonably foreseeable impacts to water supply. Impact UTIL-2 concluded that growth under the Project is accounted for in the City's UWMP, as informed by the General Plan, and that sufficient water supplies are available to serve reasonably foreseeable development accommodated under the Housing Element Update during normal (water year), dry-year, and multiple-dry-year (drought) conditions through the year 2045, resulting in less than significant impacts. Nonetheless, individual housing projects facilitated by the Housing Element Update will undergo review to determine the projects' water demand and its compliance with State and local water requirements. Furthermore, the UWMP conducted by MWD, indicates availability of adequate water supply that includes new regional supplies to meet their total service area water demand until 2040.

Response I-1.7

The commenter states that the discussion presented in the Draft EIR regarding energy supply is insufficient and that energy data needed to support future development under the proposed document should be included. The commenter states that energy reliability and cost are two important factors that should be discussed in the Draft EIR. The commenter suggests impacts related to energy that resulted in a less than significant impact should be reevaluated.

Refer to Section 4.12, *Utilities/Service Systems*, and Section 6, *Energy*, of the Initial Study (Appendix B of the Draft EIR) for full discussions on energy sources and available supply. The Housing Element Update, in and of itself, does not specifically propose individual housing projects. Individual housing developments would be evaluated on a project-by-project basis to determine their energy demand, if adequate supply exists, and other associated energy impacts. As part of that review, specific energy data from BWP will be utilized to measure a project's direct, indirect, and cumulative impacts. In addition, BWP will have the opportunity to review all projects and environmental analyses prior to public circulation of the documents, which occurred for the proposed Project and Draft EIR.

Regarding reliability and affordability, in order to help the City achieve its renewable energy source goals, BWP may integrate numerous issues including, but not limited to, rate design, demand response, beneficial electrification, DACs, independent power producer (IPP) coal replacement, transmission delivery for renewables, solar over-generation, and resource positioning as a part of their resource planning analysis. As stated on page 4.12-27, BWP will procure resources that meet or exceed State clean energy standards, while maintaining reliability of the grid in a cost-effective manner.

Response I-1.8

The commenter suggests that a new mitigation measure should be added to require the City to conduct risk assessments in order to achieve the City's clean energy goals. The commenter lists measures that the City should consider. Such measures include, but are not limited to, rate design, demand response, beneficial electrification, consideration for disadvantaged communities, IPP coal replacement, transmission delivery for renewables, solar over-generation, and resource positioning.

Refer to Section 4.12, *Utilities*/*Service Systems*, for additional information on the City's clean energy goals. The Housing Element Update, in and of itself, is a policy document that does not specifically propose individual housing projects. Individual housing projects facilitated by the Housing Element Update will undergo review to determine the projects energy demand and its compliance with Federal, state, and local energy policies and goals. New connections for electrical power and their impacts would be evaluated on a project-by-project basis. No additional mitigation is required.

The measures listed by the commenter are noted on page 4.12-27 of the Recirculated Draft EIR. It is stated therein "to help achieve the City's renewable energy source goals, BWP may integrate the following issues into future resource planning analysis." As such, these are measures that would need to be performed by BWP rather than the City directly in order to assist the City in reaching its energy goals. No further edits to the Recirculated Draft EIR are required.

Response I-1.9

The commenter states that sewer service constraints need to be to be analyzed to account for projects brought forward pursuant to Senate Bill (SB) 35, SB 9, SB 10, and SB 2011. The commenter states that the cumulative impacts of ADU's and/or duplexes should be discussed in the analysis.

Refer to Response I-1.8 in Section 2, *Responses to Comments on Draft EIR.* The Draft EIR does not analyze housing development under SB 9 or SB 10 because they are the State's action that went into effect January 1, 2022. The EIR is required to look at the existing conditions at the time of the distribution of the Notice of Preparation (NOP) of an EIR, which was March 2021. In addition, the analysis of 10,456 housing units in the Draft EIR is a conservative approach as the Housing Element estimates maximum growth potential.

SB 9 allows a subdivision of single family residential (R-1 and R-1-H) lots into two lots and allows for construction of up to four dwelling units, inclusive if ADU ad JADU, on each lot. Therefore, up to a total of eight residential units (four per each lot) can be created from the one existing single-family zoned property. The City adopted an urgency ordinance for implementing SB 9 on April 5, 2022, to limit the number of residential units yielded from an existing single family zoned property to a maximum of four residential units (two residential units per lot). The City already accounts for a main dwelling with accessory dwelling units (ADU) and Junior ADUs, so potential environmental impacts for the addition of one unit on an existing residential lot would be nominal. The ordinance adopted by the City for implementing SB 9 will significantly reduce the development impacts on the City's infrastructure and utility services by limiting the maximum number of units per single-family residential lot to four consistent with City's available infrastructure.

SB 10 allows for cities to zone for smaller housing developments of up to 10 units per lot. However, this is a voluntary effort that the City is not undertaking.

Regarding SB 35, this law now mandates the ministerial process for certain development projects instead of the discretionary review process. SB 35 may alter the City's process for approval of housing development, but does not alter the allowable base density. As such, developers will have to abide by the base density and the density bonus law.

Response I-1.10

The commentor states that Mitigation Measure UTIL-3 is inadequate. The commenter states that there should be a long-term plan in place for how the mitigation measure will be implemented, what the effects are, what the objectives of the mitigation measure are, and how the City plans to address capacity constraints.

Mitigation Measures UTIL-3a and 3b would reduce short-term impacts, and Mitigation Measures UTIL-3c and 3d require the preparation of plans, and the implementation of infrastructure capacity and conveyance expansion and upgrades as needed by the infrastructure plans for long-term solutions. Mitigation Measure UTIL-3c is the only mitigation measure that gives a required completion year of 2023. Impacts are still considered significant and unavoidable due to the lack of a timeframe for Mitigation Measures UTIL-3a, UTIL-3b, and UTIL-3d. Therefore, additional information for these measures are not available at this time.

Response I-1.11

The commenter states that the Draft EIR uses incongruous data sets, such as when discussing housing unit numbers. The commenter notes that all the acronyms are difficult to understand and reconcile in a rational manner. The commenter also states that the housing units listed in the Draft EIR differ from SCAG, the Regional Housing Needs Assessment (RHNA), and the California Department of Finance (DOF), and that housing units in the Draft EIR conflict with the DOF housing units listed in the Housing Element.

Refer to Response I-1.2 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The City's existing housing units in the Housing Element conflict with the number of units in the Draft EIR because at the time the Housing Element was prepared, the most current housing unit estimates available were from 2020 DOF data (44,978 units). When the Draft EIR was prepared, 2021 DOF estimates were available (45,069 units). The difference in these two estimates is 91 units, or approximately 0.2 percent, which is negligible and does not change the significance determinations presented in the Draft EIR.

The purpose of the Recirculated Draft EIR is to allow the public to see what new and significant information was added or changed in the previous Draft EIR. The purpose of the Final EIR is to respond to comments directly. The comment was adequately addressed in Section 2 and no changes to the Draft EIR were required. As such, no changes to the Recirculated Draft EIR are required. This response applies to all comments that were previously submitted and responded to in Section 2, *Responses to Comments on Draft EIR*.

Response I-1.12

The commenter states that the algorithms used to produce data in the analysis cannot account for local nuances, activities, historic growth patterns, infrastructure, non-profits, etc.

Refer to Response I-1.3 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. This comment does not contain a substantive comment on the analysis in the Draft EIR. No revisions to the Draft EIR are necessary; nonetheless, the comment will be provided to the City's decisionmakers for their consideration.

Response I-1.13

The commenter questions how the City Council will make a Finding of Overriding Consideration for the identified significant and unavoidable impacts to sewers and what benefit would outweigh these impacts. The commenter notes that the Draft EIR identifies an elaborate uncharted approach that Public Works Department's (PWD) would take over time. The commenter also questions the maximum amount of housing units that would be permitted before reaching significant and unavoidable sewer impacts and how much the Project would need to be modified to reduce potential impacts to a less than significant level.

Refer to Response I-1.4 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The citywide analysis of the Housing Element Update was analyzed under a Program EIR, which does not require analysis of each individual project. As such, it is not possible with the current level of information provided to reduce all variables related to sewage capacity to a single number of housing units that can be built before negatively impacting the sewer conveyance system. Please note that for proposed developments with a significant increase in housing units that trigger a sewer capacity analysis, which is any project with a net increase of five or more additional multi-family housing units, developers will be required to upgrade City sewer infrastructure that is directly impacted by the proposed project, and/or contribute their fair share cost of the sewer improvements as determined by the Public Works Director or their designee.

Response I-1.14

The commenter states that there are significant inconsistencies between the RHNA, SCAG's forecasts for the region and Burbank, and the existing 2021 DOF numbers. The commenter also

states that the large discrepancy between the RHNA allocation and SCAG's 2030 housing unit forecast needs a full explanation. Lastly, the commenter states that Burbank's RHNA allocation does not make sense and that the City should demand an audit of the SCAG RHNA numbers prior to approving the Project.

Refer to Response I-1.5 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. SCAG's 2020-2030 growth forecast is used as the basis for calculating projected household growth. A jurisdiction's projected housing need is calculated based on this household growth in addition to a calculated future vacancy need and replacement need. The RHNA also includes a jurisdiction's existing housing needs, which includes factors related to access to transit and jobs. For additional information, refer to https://scag.ca.gov/sites/main/files/file-attachments/scag-final-rhna-methodology-030520.pdf?1602189316.

Response I-1.15

The commenter states that SCAG's 2020 RTP/SCS estimates fewer residents, jobs, and housing units by 2040 than under the 2016 RTP/SCS. The commenter questions how the lower numbers for residents, jobs, and ho\using units are reconciled with the RHNA for Burbank.

Refer to Response I-1.5 in Section 2, *Responses to Comments on Draft EIR*, or Response I-1.14 above, as this comment was previously submitted and responded to therein.

Response I-1.16

The commenter states that the disparity among housing unit numbers in SCAG, RHNA, and DOF forecasts need to be reconciled. The commenter questions how an additional 10,456 housing units in the 6th Cycle Housing Element is justifiable given the current six percent vacancy rate. The commenter also notes that the DOF forecast for housing units in the Housing Element is different from the DOF forecast in the Draft EIR.

Refer to Response I-1.7 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. A vacancy rate measures the overall housing availability in a community and is often a good indicator of how efficiently for-sale and rental housing units are meeting the current demand for housing. A vacancy rate of five percent for rental housing and two percent for ownership housing is generally considered healthy and suggests that there is a balance between the demand and supply of housing. A lower vacancy rate may indicate that households are having difficulty in finding housing that is affordable, leading to overcrowding or households having to pay more than they can afford.

Response I-1.17

The commenter questions what the justification is for the 15 percent housing unit buffer and states that the Draft EIR should study resulting impacts without the 15 percent buffer. The commenter also questions what statute requires this buffer, if the buffer is a State mandate, why there is no discussion in the alternatives section about the buffer's impacts on sewers, and the justification of the buffer with the arrival of Senate SB 9, SB 10, and SB 35.

Refer to Response I-1.8 in Section 2, *Responses to Comments on Draft EIR*, or Response I-1.9 above, as this comment was previously submitted and responded to therein.

Response I-1.18

The commenter questions what factors were used to quantify reductions in GHG emissions and whether the waiver of the Clean Air Act was reinstated. The commenter notes that if this waiver has been reinstated, GHG emissions would likely be lower.

Refer to Response I-1.9 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. On March 9, 2022, the United States Environmental Protection Agency reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and zero emission vehicle sales mandate. The Draft EIR is required to look at the existing conditions at the time of the distribution of the NOP, which was March 2021. Therefore, the reinstatement was not in effect when the Draft EIR was circulated for public review in January 2022.

Response I-1.19

The commenter replicates the information provided on page 4.5-10 of Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR and notes that Burbank should be proud of its past record of reductions in GHG emissions.

Refer to Response I-1.10 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. This comment does not address a deficiency in the Draft EIR. No revisions to the Draft EIR are necessary.

Response I-1.20

The commenter questions what assumptions were made for the growing use of electric vehicles and where the discussion and assumptions about electric vehicles by 2029 for mobile sources are in Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR.

Refer to Response I-1.11 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. As described under *Methodology* in Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR, fleet mix and vehicle emission rates in CalEEMod are based off CARB's 2017 Emission Factor (EMFAC2017) model. The EMFAC model uses trends in vehicle sales data to estimate the future mix of vehicles present on California's roads, as detailed in depth in the EMFAC2017 technical documentation: https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-iii-technical-documentation.pdf. Mobile source emissions generated by build out of the City's RHNA allocation would be reduced with implementation of standards under the California Advanced Clean Cars Program, which requires the CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles," and SCAG's 2020-2045 RTP/SCS, which leverages technology innovations such as electric vehicles.

Response I-1.21

The commenter questions where the policy to upgrade existing homes to greater energy efficiency is in the air quality section of the Draft EIR.

Refer to Response I-1.12 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The policy referred to in this comment is Policy 3.8 of the Draft Housing Element, which was included under Impact AQ-1 in Section 4.1, *Air Quality*, of

the Draft EIR as a policy that would help reduce air pollutant emissions through promoting transportation and land use design factors, resulting in VMT reductions.

Please note, since the Draft EIR was released for public review, the Housing Element has updated this policy and renumbered it as Policy 3.9.

Response I-1.22

The commenter questions the threshold of a 400,000-car intersection and where this threshold is justified. The commenter questions whether the future forecast of 67,000 daily trips will generate carbon monoxide (CO) emissions equal to a 400,000-car intersection due to the additional idling time at the at the Victory Boulevard and Burbank Boulevard five-point intersection.

Refer to Response I-1.13 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The threshold of a 400,000-car intersection is based on the ratio of the most stringent 1-hour carbon monoxide (CO) standard of 20 parts per million (ppm) and the South Coast Air Quality Management District's 2003 Air Quality Management Plan's estimated 1-hour CO concentration value of 4.6 ppm at the intersection within the South Coast Air Basin expected to experience the highest CO concentrations. The 1-hour CO standard of 20 ppm would not likely be exceeded at this intersection until the intersection exceeded more than 400,000 vehicle trips per day. In addition, the Burbank Victory Boulevard/Victory Place and Burbank Boulevard intersection, which the commenter is referring to, is the highest volume intersection in Burbank and is estimated to have 67,500 average daily trips with implementation of the Project, which is approximately 17 percent of the threshold of a 400,000-car intersection. Therefore, the Housing Element Update would not have potential to contribute to localized CO concentrations at intersections that exceed State CO standards.

Response I-1.23

The commenter states that the Draft EIR contains contradiction on impacts related to "unplanned growth" and that new housing units occurring "anywhere in the city" is considered unplanned growth. The commenter also states that the Draft EIR fails to discuss the impacts of SB 9 and SB 10, which would result in an unknown number of new housing units in unknown locations and adds that the Housing Element induces direct (population, housing) and indirect (services, quality of life infrastructure) growth.

Refer to Responses I-1.8 and I-1.14 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The Housing Element Update does identify 19 locations as opportunity sites that have the greatest potential to accommodate the RHNA's housing growth allocated for the city and are shown in Figure 2-3 of the Draft EIR. These sites are underutilized and located in urbanized areas of the city, and they have been previously developed or disturbed. The Housing Element Update is anticipated to satisfy the anticipated population growth in the region in an efficient manner consistent with State, regional and local policies and with the projected growth forecast for Burbank and the surrounding region.

Response I-1.24

The commenter states that impacts on VMT should be assessed and that growth-inducing VMT impacts are not addressed. The commenter also states that the analysis needs to look at the job/housing balance in the Burbank area and whether it would increase growth of jobs and how it would affect VMT impacts.

Please refer to Response I-1.15 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Impacts associated with growth under the Housing Element Update are disclosed in the Draft EIR. Impact TRA-2 in Section 4.11, *Transportation*, of the Draft EIR assesses the Project's VMT impacts and concluded that the Housing Element Update would reduce VMT in the three target populations (per service population, per capita, and per employee); however, it would not reduce VMT by more than the required 15 percent, resulting in a significant and unavoidable impact. Despite the significant impacts associated with VMT, the jobs/housing balance improves by approximately 7 percent from the baseline year, with an average daily VMT of 18.1, to 2029, with an average daily VMT of 16.7, and all VMT metrics improve over the baseline values against which the impacts are assessed. In addition, the proposed Housing Element does not include any new roadway infrastructure or measures that would lead to induced VMT. As discussed under Section 5.3, *Growth Inducing Impacts,* of the Draft EIR, the City's existing roadway network would largely accommodate reasonably foreseeable development under the Housing Element Update. In the event that roadway upgrades are required to serve specific future development, such upgrades would likely be minor (e.g., lane reconfiguration or restriping) and would not include the construction of new roads. Therefore, the Project would not result in the extension of infrastructure to undeveloped areas which would remove an obstacle to growth.

Response I-1.25

The commenter states that the loss of housing units to short-term rentals should be discussed and addressed in the population and housing section of the Draft EIR. The commenter adds that loss of these housing units exacerbates the housing shortage and that requiring these homes to become available for long-term rent or sales would assist the City in making more progress towards achieving the RHNA allocation.

Please refer to Response I-1.16 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Section 4.8, *Population and Housing*, of the Draft EIR, analyzes the thresholds under CEQA, which include whether the Project would induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure) or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Economic analysis of issue, such as short-term rentals, is beyond the scope of the EIR.

Response I-1.26

The commenter states that the paradigm shift of work/commute patterns resulting from the pandemic should be discussed in either the GHG Emissions, Population and Housing, or Transportation section of the Draft EIR as work-commute patterns have new implications for VMT, GHG emissions, and RHNA. The commenter questions how the impacts of these shift of work patterns are accounted for in the Draft EIR.

Please refer to Response I-1.17 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The Draft EIR has generally assumed trip assumptions for VMT analysis based on pre-pandemic patterns, and analyzes the ability of implementation of the Housing Element's goals and policies to reduce VMT from this pre-pandemic level. Travel and trip generation trends since the height of the pandemic indicate that VMT may be returning to pre-pandemic levels. However, even if the pandemic were to cause a permanently-changed level of VMT in the City, increasing housing in Burbank to address the job-housing

imbalance, and locating much of that housing near transit, as proposed in the Housing Element, will help reduce per employee VMT and GHG emissions due to reduced trip lengths, regardless of whether baseline VMT has been fundamentally changed due to the pandemic.

Response I-1.27

The commenter states that the water supply discussion in Section 4.12, *Utilities/Service Systems*, of the Draft EIR, needs to discuss the contemporary drought more completely given the significant loss of snowpack and the Governor's latest order to local water agencies to develop their own plans for the drought. The commenter also states that the water supply discussion needs to clearly state where the snowpack is estimated to be in 2029 by using interpolation or another method.

Refer to Response I-1.18 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. As discussed in Section 4.12, *Utilities/Service Systems*, of the Recirculated Draft EIR, citywide water demand has declined compared to the early 1970s due to efficient water use after major droughts in the 1970s, 1990s, and especially in response to the previous significant water shortage and closure of major industries. Additionally, Section 4.5, *Greenhouse Gas Emissions,* of the Draft EIR, includes discussion on the loss of snowpack and states that future projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050. Further, the City of Burbank's Urban Water Management Plan (UWMP) prepared by BWP includes an assessment of past and future water supplies and demands, evaluation of the future reliability of Burbank's water supplies over a 20-year planning horizon (2040), discussion of demand management measures and Burbank's water shortage contingency plan, discussion of the use and planned use of recycled water, and an evaluation of distribution system water losses. Based on the UWMP, BWP has determined that there is sufficient water capacity to serve the City's increased water demand of 5,605 acre-feet e by 2045 resulting from Project implementation. Additionally, Metropolitan's UWMP includes 440,092 acre-feet of new supplies for their service area by 2030 from projects currently under development. An additional 359,000 acre-feet of water is possible from projects within their service area that are at the conceptual level or the CEQA phase. Their UWMP indicates availability of adequate water supply to meet the total service area water demand until 2040.

Response I-1.28

The commenter states that the cumulative impacts analyses are deficient because SB 9, SB 10, and SB 35 are not assessed or identified as part of the Project.

Refer to Response I-1.8 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein.

Response I-1.29

The commenter questions what is required to reach water conservation level needs to provide water to the 10,456 housing units.

Refer to Responses I-1.8 and I-1.20 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein.

Response I-1.30

The commenter questions what cumulative effects will result from additional development and loss of open space. The commenter also questions the effect on urban heat island and on climate change.

Refer to Response I-1.21 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Impact GHG-1 in Section 4.5, *Greenhouse Gas Emissions,* of the Draft EIR concluded that the Housing Element Update would be consistent with all State, regional, and local plans to reduce GHG emissions, resulting in less than significant impacts to GHG emissions and climate change. In addition, the Project would be consistent with the actions under Measure E-1.7 in the Burbank 2035 Greenhouse Gas Reduction Plan, which include amending the Zoning Ordinance to require installation of two on-site shade trees for each new single-family residential unit, continuing Burbank Water and Power's Made in the Shade Program, and updating the Street Tree Plan and Urban Forestry Program.

As discussed under Impact REC-1 in Section 4.10, *Recreation*, of the Draft EIR, the *Open Space and Conservation Element* of the Burbank 2035 General Plan establishes a requirement for three acres of new parkland per 1,000 new residents. This requirement applies to large residential developments and would result in parkland dedications, improvements, or in-lieu payments if a project applicant is not able to dedicate land or the land is considered unsuitable for park or recreation use.

Response I-1.31

The commenter notes that Metropolitan's service area includes other cities and that there should be a quantitative, service area-wide cumulative analysis to assess water supply demands. The commenter questions what level of water conservation would be required to meet water supply for 10,456 additional housing units in the city and if it is feasible. The commenter also questions what impacts landscaping will have on the heat island effect.

Refer to Responses I-1.20, I-1.21, and I-1.22 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The 2020 UWMP indicates the Metropolitan has sufficient water supplies to meet expected service area demands under normal water year, single dry-yeas, and five-year drought conditions.

Response I-1.32

The commenter states that the cumulative impacts fail to address direct and indirect impacts, loss of greenery, infrastructure construction to increase provisions of recycled water to neighborhoods, and impacts of new piping to provide recycled water. The commenter questions why no cumulative analysis has been conducted regarding what infrastructure is required to be upgraded to accommodate these new housing units.

Refer to Response I-1.23 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Reasonably foreseeable development accommodated under the Housing Element Update would be focused in urban areas that have already been previously developed and contain existing utility connections. Potential construction impacts associated with connecting to existing infrastructure would be temporary.

Response I-1.33

The commenter states that the Section 6, *Alternatives*, of the Draft EIR is inadequate because the analysis should provide an alternative that addresses the significant impacts under the proposed Project. The commenter adds that the alternatives should not have significant and unavoidable impacts and should realistically address the potential for impacts to wastewater, water, and other infrastructure systems associated with the level of proposed development.

Refer to Response I-1.24 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. As discussed in Section 6, *Alternatives*, of the Draft EIR, three potential alternatives were considered but rejected. No other feasible alternatives were identified that would address the Project's significant impacts. Section 15126.6(a) of the CEQA Guidelines states that "[a]n EIR is not required to consider alternatives which are infeasible."

Response I-1.34

The commenter provides two added alternatives that should be assessed. The first alternative includes removing the 15 percent buffer and the second alternative includes reducing all infrastructure impacts to a level of insignificance. The commenter also states that allowing housing anywhere in the city does not afford the City to reasonably plan for the increase in locational and cumulative infrastructure demands.

Refer to Response I-1.25 in Section 2, *Responses to Comments on Draft EIR*, regarding the removal of the 15 percent buffer alternative and I-1.14 in Section 2 regarding potential locations within the city for development accommodated under the Housing Element Update, as this comment was previously submitted and responded to therein. Additionally, refer to Response I-1.20 in Section 2 regarding Burbank Water and Power's ability to provide sufficient water supply to meet the additional water demand from 12,000 new housing units.

Response I-1.35

The commenter quotes analysis on pages 5-4 to 5-5 of Section 5, *Other CEQA Considerations*, of the Draft EIR, which relates to wastewater generation, and states that CEQA requires the analysis of Project impacts and not "reasonably foreseeable development" impacts.

Refer to Response I-1.26 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein.

The Housing Element is a policy document and does not directly result in the development of housing projects. The Draft EIR is a programmatic EIR which used a conservative approach to the analysis by evaluating impacts of the development of housing required under the City's regional housing need as well as from housing developed on sites identified in the Housing Element site inventory. Individual development projects accommodated under the Housing Element Update would require project-level CEQA review, which would identify and require mitigation for any potential site-specific impacts associated with wastewater.

Response I-1.36

The commenter questions if there is a policy recommendation in the Safety Element to armor soft story housing in the face of inevitable earthquakes.

Refer to Response I-1.27 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Armoring soft story housing is not a specific policy

included in the Safety Element. However, Policy 5.3 under Goal 5, *Seismic Safety*, includes enforcement of seismic design provisions of the current California Building Standards Code related to seismic hazards. All housing projects are required to comply with this policy.

Response I-1.37

The commenter requests that the Public Review of the Housing Element section be moved to the appendices.

Refer to Response I-1.28 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The 6th cycle planning requirements place added emphasis on demonstrating sufficient opportunities for public review of the draft Housing Element, summary of key comments received, and how these comments are addressed in the Element. This discussion is thus included in the body of the Housing Element public participation section of the Introduction.

Response I-1.38

The commenter requests revision of Policy 2.4 in the Housing Element to engage proactive code enforcement to return unauthorized short-term rentals to the city's housing market.

Refer to Response I-1.29 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The City Council has reviewed options for abatement of unauthorized short-term rentals and has decided not to pursue at this time.

Response I-1.39

The commenter requests that a new policy be added under Goal 3 of the Housing Element that establishes a task force comprised of the Burbank Senior Board and Burbank Committee on Disabilities to determine state-of-the-art housing development examples for housing of persons with disabilities; and incorporates these objective standards into all density bonus and inclusionary zoning projects. SB 35, SB 9, and SB 10.

Refer to Response I-1.30 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Also refer to Response I-1.8 in Section 2, , *Responses to Comments on Draft EIR*, or Response I-1.9 above, as this comment was previously submitted and responded to therein. As a matter of education and outreach, housing developments have been and can continue to be presented, as appropriate, to boards and commissions citywide with an interest/commitment on housing development.

Response I-1.40

The commenter requests that a new policy be added under Goal 5 of the Housing Element that establishes a pre-qualification program with the Burbank Housing Corporation for elderly renter households in the extremely-low-income category and large family households in the low-income category, and support their relocation to stabilized extremely low/low-income homes.

Refer to Response I-1.31 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Burbank Housing Corporation (BHC) is a Community Housing Development Organization, a private nonprofit, community-based organization (a separate entity from the City) that develops affordable housing. BHC has received this designation as the City's partner in the creation of affordable housing utilizing federal HOME funds along with other

restricted housing funds. The City does not have the authority to dictate policy of this private, nonprofit developer. However, BHC continues to work with the City to serve the needs of the community via financing of housing developments with restricted housing funds.

Response I-1.41

The commenter states that the Neighborhood Revitalization paragraph on page 33 of the Housing Element should include the daycare and job search centers as well as the afterschool center that is in the Burbank Housing Corporation but serves the entire neighborhood.

Refer to Response I-1.32 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The following has been added to the Neighborhood Revitalization paragraph on page 33 of the Housing Element: "and to provide services to residents and the greater neighborhood including day care, after-school programs and job search assistance."

Response I-1.42

The commenter notes that the Map of Focus Neighborhoods on page 1-34 of the Housing Element needs correction.

Refer to Response I-1.33 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The Map of Focus Neighborhoods on page 1-34 of the Housing Element has been corrected.

Response I-1.43

The commenter states that the definition for “affordable unit” in the Housing Element could be tied to the percent of area median.

Refer to Response I-1.34 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The definition refers to "income qualified household" because affordability is relative to the specific income level. Table 1-24 in the Housing Element provides affordable rent specific income level thresholds by income level, which is based on percent area median income, and compares with average rents in Burbank.

Response I-1.44

The commenter states that the definition for “Burbank Housing Corporation” in the Housing Element is more inclusive than housing.

Refer to Response I-1.35 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Per page 1-97 in the Housing Element, the following has been added to the definition: “BHC also provides services to enrich the quality of life for residents, especially for children and youth, and operates four activity centers with after school programs, and two child development centers.”

Response I-1.45

The commenter states that the definition for “by-right development” in the Housing Element doesn’t require public hearings.

Refer to Response I-1.36 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. This is the definition utilized by HCD and is consistent with Government Code Section 65583.2 (i).

Response I-1.46

The commenter states that the definition for "Grants" in the Housing Element should list and describe all available State and federal grants.

Refer to Response I-1.37 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Please refer to Table 1-45 in the Housing Element.

Response I-1.47

The commenter states that the definition for "Conditional Use Permit" in the Housing Element should be identified as quasi-judicial.

Refer to Response I-1.38 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The comment is noted, but no revision has been made to the Housing Element.

Response I-1.48

The commenter states that the definition for "Density Bonus" in the Housing Element needs a simpler definition.

Refer to Response I-1.39 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The intent of the definitions included in the Glossary are to provide the lay public a general understanding of terms used in the Housing Element. Refer to page 1-52 to 1-53 for more detail on density bonus incentives.

Response I-1.49

The commenter states that the definition for "Dissimilarity Index" in the Housing Element needs a clear definition.

Refer to Response I-1.40 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The intent of the definitions included in the Glossary are to provide the lay public a general understanding of terms used in the Housing Element. Refer to page B-15 for a detailed discussion of the Dissimilarity Index.

Response I-1.50

The commenter states that the definition for "Homeless" in the Housing Element should include unsheltered who live in vehicles.

Refer to Response I-1.40 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. The following has been added to the definition of homeless on page 1-24 of the Housing Element: "Also includes persons living in a car, van or RV/camper."

September 6, 2022

Letter I-2

Shipra Rajesh
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Community Development Department
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Subject: Recirculated Draft EIR for the Housing Element

Dear City Council and Planning Staff:

The Recirculated Draft Environmental Impact Report ("RDEIR") for the City's Housing Element Update ("proposed Project"), while an improvement over the original Draft EIR is still fatally flawed. It stills fails to accurately or completely analyze the impacts of up-zoning and the construction of an additional 10,456 housing units in the City of Burbank in the next 8 years, the Project as defined in the RDEIR. According to the Department of Finance there are currently 45,069 housing units in Burbank. The Housing Element's housing construction targets thus represents a 23% increase in housing units, and associated Burbank population in just 8 years. Yet the RDEIR only identifies one significant unmitigated impact in addition to the significant unmitigated VMT impact identified in the DEIR: the Sewage Treatment Capacity impact also identified in the original DEIR. While the RDEIR includes additional mitigation measures for this impact, the RDEIR still illustrates the fact that the State is forcing the City to engage in up-zoning which will result in significant unmitigated impacts to Sewage Treatment Capacity. This is crazy and not something the City Council should allow. 1

INTRODUCTION

According to the DEIR, the City's sewer treatment capacity is 4 million gallons per day (mgd). Meeting the City's Housing Element targets would result in the generation of 6.3 mgd of sewage. Sewage generation would thus represent 157% of existing sewage treatment capacity. The need to expand sewage treatment capacity by 57% is not a simple fix and would represent a substantial impact on the City and its residents pending development of the additional capacity. This is something no rational City would wish to approve. 2

The RDEIR's analysis of direct impacts to other public services and utilities lacks needed quantification and are not adequately supported by substantial evidence. The DEIR needs to include quantification of the increase in demand for water, other utilities and public services and to compare those numbers to existing and planned capacity. 3

The RDEIR needs to more completely address the indirect impacts of the project. For example, the project generates the need for additional sewage treatment facilities. What are the impacts of the construction and operation of those facilities, and any other facilities which need to be either expanded or constructed to address project-induced demand? The California Environmental Quality Act ("CEQA") requires that both direct and indirect impacts of a project be addressed in an EIR. The DEIR and RDEIR have failed to adequately comply with this requirement. 4

The absurd changes in Housing Element Law in California over the last few years has resulted in a Regional Housing Needs Allocation (RHNA) for the SCAG region of 1,341,827 new housing units. The neighboring City of Los Angeles has a RHNA allocation plus buffer for its Housing Element Update of 456,643 new units for the 2021-2029 Plan period, representing a 30% increase in the City of Los Angeles' total housing stock. Any cumulative impact analysis needs to address the impact of the City's Housing Element targets in combination with projected housing increases in neighboring jurisdictions resulting from their Housing Element targets and this analysis needs to be quantitative, not qualitative. How will this cumulative development in combination with the proposed Project impact public services and utilities in the Burbank area? Given the massive up-zoning of the entire State, how can assumptions regarding water availability be justified? They can't without an actual quantification of changing water demand and how it will affect water availability from each of the City's water sources? If additional water conservation is required as a result of the proposed project, what is the required reduction in water consumption required, and is this level of water conservation actually feasible? Given the extreme amount of growth being required by the State legislature, how will water and other service availability be impacted? This has not been adequately addressed in the DEIR or RDEIR. 5

In addition to changes in Housing Element law, with the consequent requirements for up-zoning, the legislature has separately engaged in substantial additional mandated up-zoning which is not accounted for in either the Housing Element Update or the DEIR or RDEIR. The RDEIR must address, as part of the cumulative impact analysis, the impact of the proposed Project in combination with not only RHNA targets for the greater Los Angeles area, but also the impacts of SB9, SB10, SB35 and similar legislation which is not accounted for in recent housing element updates. 6

In general, the RDEIR does a terrible job of supporting its conclusions with substantial evidence. It fails to footnote sources or provide links to key documents. It provides a broad largely narrative analysis without the needed supporting data. 7

The RDEIR, like the DEIR also fails to provide an adequate cumulative impact analysis. It therefore fails as an informational document for City leaders that will need to cope with these unfunded State mandates. 8

It is important that the DEIR and RDEIR accurately disclose to the City's decision-makers and the public the impacts of mandates imposed on the City through recent State legislation, and the projected harmful effect of those mandates on the quality of life in Burbank and the City's ability to provide basic public services and functioning infrastructure. One of the key purposes of CEQA is to disclose to the public the environmental values of elected officials so the public can take appropriate action come election day. It is very important that this DEIR and RDEIR disclose to the public the impacts which the State legislature has chosen to impose on the City via legislative mandates, so that the public can judge whether recent changes in State housing-related laws are acceptable to Burbank residents and, if not, take appropriate action at the State-level come election day. The DEIR and RDEIR fail to accomplish this basic purpose and must be rewritten to acknowledge additional significant project and cumulative impacts, and recirculated for additional public review and comment before any action can be taken to either certify the EIR or approve the project. 9

SPECIFIC COMMENTS

Introduction

The RDEIR needs to include a revised Impact Summary Table which incorporates the findings of the supplemental analysis. The Impact Summary Table is a very important tool for both decision-makers and the public when it comes to understanding the impacts of a projects and the mitigation measures required. 10

Page 1-1: The RDEIR states that it is for the Burbank Housing and Safety Element Update, and that the Project includes minor updates to the Safety, Land Use, Open Space and Conservation, Air Quality and Climate Change, Noise, and Mobility Elements, and the incorporation of environmental justice policies into the City's Burbank2035 General Plan. Please provide an annotated copy of the pages of these elements showing the intended updates and additions and deletions thereto. As written, the Project description is inadequate because it fails to provide a description of these changes, or to provide annotated copies of the updated Elements as linked documents or attachments. It is therefore not possible for the public to assess the accuracy of the impact analysis. 11 11

Page 1-1: The RDEIR states that: "The original NOP stated that the EIR would analyze the addition of 8,800 units under the RHNA that was conducted for the Housing Element Update. However, it was determined that the EIR would analyze 10,456 units to account for the 2029 interpolated housing growth assumed under the two Specific Plans along with the City's RHNA allocation. Therefore, the NOP was recirculated on March 17, 2021, with the higher number." Please explain why Specific Plan development was not addressed as part of the cumulative impact analysis and was instead included as part of the analysis of the proposed Project. Why was the anticipated residential development associated with the two Specific Plan not counted towards achievement of the RHNA allocation, rather than added to the RHNA allocation? Have the impacts of the two Specific Plans –which should be referred to by name - previously received environmental review, and if so when, what are their associated State Clearinghouse Numbers, and what are the hyperlinks to those documents, and when were those Specific Plans approved? 12 12

Page 1-3 The RDEIR states that Section 2 summarizes changes in the Project since the original DEIR was published. It should be noted that an accurate and stable project description is a fundamental requirement of the California Environmental Quality Act ("CEQA"). Given that there have been changes to the Project, recirculation of a full EIR, rather than just a focused RDEIR part should have occurred. 13 13

Project Description

Page 2-4 The RDEIR notes Burbank's proximity to the cities of Glendale and Los Angeles. The RDEIR's cumulative impacts analysis need to be specific about cumulative development included in the analysis and the cumulative impact of the Project in combination with the up-zoning occurring throughout the region as part of Housing Element updates and other changes in State law. 14 14

2.5.2 Either in this section, or as part of the cumulative impact analysis, the RDEIR should include a table like Table 2-1 which give the RHNA allocation of the region and for adjoining cities. 15

Page 2-6 Page 2-6 states:

> To make up for this shortfall of 1,203 units, the Housing Element includes a housing program to rezone additional opportunity sites through adoption of two specific plan projects: the Downtown Transit-Oriented-Development Specific Plan (Downtown TOD) and the Golden State Specific Plan (GSSP) (see Figure 2-3 for the Specific Plan locations and opportunity sites). Adoption of these Specific Plans will provide the necessary zoning, objective development standards, and processing procedures to facilitate the production of the shortfall of housing units required to accommodate the City's RHNA during the Housing Element planning period. The zone changes required by these Specific Plans will be adopted in 2022-2023, or within three years of the start of the planning period as required by State law. 16
>
> So, will these Specific Plans have separate EIRs or is this the EIR for those Specific Plans? If this EIR is the EIR for these two Specific Plans, then Specific Plan-specific analysis need to be included in this EIR, along with Specific Plan-specific mitigation measures. As written, this EIR (DEIR and RDEIR) is inadequate as an EIR for adoption of these two Specific Plans as it contains only program-level analysis. If separate EIRs are being prepared for the two Specific Plans, please provide links and information on the environmental analysis being prepared for these Specific Plans.

Table 2-4 Since the proposed Project includes rezoning of identified sites, more site-specific impacts analysis should be included for those sites in both the DEIR and RDEIR. No such zone changes should be approved without site-specific level environmental analysis. 17

Page 2-13 Please provide links to annotated versions of the proposed Safety Element Update and Environmental Justice Update. As written the descriptions are too general to allow the reader to be able to assess whether the impacts of the changes have been accurately assessed. 18

Biological Resources

The RDEIR at page 1-3 states that the Biological Resources section haa been revised to address comments by the California Department of Fish and Wildlife (CDFW) on the Draft EIR, which indicate that development under the proposed Project may result in adverse impacts to the least Bell's vireo, bat species, and monarch butterflies through vegetation and tree removal. It would be helpful if the RDEIR included a copy of that letter in an Appendix so that the public can see CDFW's concerns and assess whether the RDEIR has adequately addressed them. 19

Page 4.2.1 This page states that: "The urbanized environment in the City of Burbank (City) limits the abundance and diversity of biological resources that are present and those that may

be affected by the proposed project. As such, the biological resources addressed in this section are limited to nesting birds, bats, raptors, and their habitats." It therefore appears that the RDEIR is not responsive to CDFW comments, including comments regarding monarch butterflies. 20

Page 4.2.1 The RDEIR appears to ignore and fails to describe the share of land zoned for residential development which is in hillside areas at the base of the Verdugo Mountains. The RDEIR acknowledges that "(t)he Verdugo Mountains provide important habitat connectivity for many plant and animal species," but fails to address the potential biological resource impacts of development on vacant residential parcels in these sensitive areas or Accessory Dwelling Unit (ADU) development under the Housing Element which may reduce hillside backyards and thus habitat connectivity and impact wildlife corridors. This needs to be addressed in the EIR. Similarly, the RDEIR acknowledges that "(u)rbanization in the City has substantially reduced the abundance and diversity of biological resources, though landscaped areas such as street medians, parkways, and other green areas are located throughout the City and provide habitat for nesting birds and potentially other wildlife (City of Burbank 2013a)," yet fails to adequately address the impacts associated with increasing urbanization. 21

Page 4.2.5 The Initial Study provided only the most general justification for screening out analysis of impacts to sensitive species and riparian areas. Please provide a map showing the location of sensitive species identified in the California Natural Diversity Database, and thus the location where additional urbanization may result in impacts and compare these locations to the location of residential zoning in the City. Also provide a map showing the location of blue-line streams and other wetlands as compared to the location of residential zoning in the City. 22

Page 4.2-5 Please define the term "reasonably foreseeable development under the Housing Element." Is this the same as buildout under the Housing Element? If not, then the analysis may not fully address Project impacts. 23

Page 4.2-6 Page 4.2-6 states:

> . . . based on comments provided by the CDFW on the Draft EIR, development under the proposed Project may result in adverse impacts to the following biological resources: least Bell's vireo (*Vireo bellii pusillus*), a federally and State-listed Endangered species, by causing nest abandonment, reproductive suppression, or incidental loss of fertile eggs or nestlings if development occurs during the breeding and nesting season; bat species, such as pallid bat (*Antrozous pallidus*), big free tailed bat (*Nyctinomops macrotis*), and hoary bat (*Lasiurus cinereus*), which are designated as Species of Special Concern (SSC), by removal of trees, vegetation and/or structures that may provide roosting habitats; and monarch butterflies (*Danaus plexippus*) and monarch butterfly overwintering habitat through vegetation and tree removal. Therefore, construction activities have the potential to disturb biological resources, which would be a potentially significant impact. 24

The RDEIR therefore only address impacts during construction, but fails to address impacts associated with the long-term loss of habitat resulting for increased urbanization. The biological resources analysis is very general, reads more like an Initial Study discussion, and fails to provide any real analysis of long-term impacts to species of concern. The analysis if therefore deficient. The potential for significant long-term impacts remains. 24 cont.

BIO-1

As written, the mitigation measures may not be practical. How will staff know if residential construction activities or other disturbances will occur in areas within 500 feet of a previously identified habitat or observation according to CNDDB or iNaturalist? Does the City have the necessary database to implement this mitigation measure as written? How frequently is the database updated? How will the findings of such biological assessments be entered into the database to keep it updated? Does this mitigation measure apply to any and all residential developments that will require a grading permit? Are there by-right developments that will escape the requirements of this mitigation? As written, it is not clear that the mitigation is feasible and that it will reduce impacts to a level considered less-than-significant. The potential for significant unmitigated impacts remains. 25

4.2.4

Page 4.2-7 states: "(t) The area to analyze cumulative biological resource impacts includes the City limits." However, Housing Element Updates and associated up-zoning are being required throughout the region, resulting in region-wide impacts. Therefore, it is inappropriate to limit the cumulative impact analysis to the City limits. The analysis fails to indicate whether the cumulative impact analysis is based on a list or on forecasts and to provide the reader of the RDEIR with any information on the past, present and reasonably foreseeable development considered in the cumulative analysis. The analysis very general and is not support by substantial evidence. It is therefore fatally flawed and fails to support the contention that cumulative impacts would be less than cumulatively considerable. The analysis fails to address habitat loss, or impacts to species other than during nesting. The RDEIR need to include an analysis of the long-term cumulative impacts of increasing urbanization on sensitive species, habitat, and wildlife corridors. It fails to do this. 26

Utilities and Service Systems

See video of April 5, 2022 City Council meeting starting at time 3:49, wherein applicable experts discuss concerns regarding the potential impacts of increased development resulting from SB9 on the City's sewage treatment, electrical and trash services. These concerns also apply to the proposed Project. The video is available at: 27

https://burbank.granicus.com/player/clip/9749?view_id=42&redirect=true&h=7b029dbc9a87f56019f407459b080012

This video provides support for the need for a detailed analysis of the potential impacts of the Housing Element and the impacts of the Housing Element in combination with cumulative development within and outside the City on utilities and service systems, and provides evidence that the analysis contained in the RDEIR is insufficient and fails to identify likely potential impacts, such as impacts to the electrical system.

Page 4.12-1: The introduction to this section indicates that the analysis has been informed by "outputs from the CalEEMod prepared for the proposed Project, as well as publicly available data and reports from the City of Burbank, Burbank Water and Power (BWP), and other publicly available sources of information." Were any interviews conducted with experts from BWP and if not, why not? If so, they need to be properly referenced in the RDEIR. Given that Burbank has its own water and power company, and the age of some of the publicly available documents, failure to seek out expert opinion on these issues is one explanation for the poor analysis and lack of substantial evidence in support of the conclusions in this section. 28

Water Supply

Page 4.12-1 The RDEIR needs to specify what percent of Burbank's water comes from MWD and what percent from groundwater. It also needs to explain how much recycled water is being used in the City. 29

Page 4.12-4 Has Burbank complied with the California Water Conservation Bill? To what degree have targets been met? If targets have not met, what are the factors that have impacted the ability to meet conservation targets? 30

Page 4.12-5 Is the WSA an appendix to either the DEIR or RDEIR? If so, that should be noted. If not, please provide and link to the WSA prepared for the Project and a full citation for the document. 31

Page 4.12-5 Are there any existing mechanisms like SB221 for constricting development if existing demand meets or exceeds supply given the proposed Project? A mitigation measure needs to be included for a public service/infrastructure impacts whereby a development moratorium is triggered when impact thresholds are approached. 32

Page 4.12-5 How does the UWMA process address a situation like recent changes in Housing law in the State which has resulted in a massive State-wide up-zoning? How does Plan development address increase demand by other users of the same water source? 33

Was the Statewide reduction target of 20 percent in urban water use by the year 2020 met? If not, why not? What analysis has been done to address this?

Page 4.12-6 The discussion addresses the 2014 and 2015 regulations, but not more recent efforts to address the fact that we are in a historic drought. The discussion of drought-related orders and declaration is stale and must be updated. Please discuss the degree to which reduction targets have/were met and any research regarding factors influencing the achievement of water reduction targets. 34

Water supplies are predicted to decrease by 10 percent due to climate change[1] as population and residential development continues to increase. How has this been addressed in the analysis of Project water impacts? 35

Page 4.12-7 The RDEIR has failed to properly incorporate by reference the 2015 Water Tomorrow Update. See CEQA Guidelines Section 15150. Where is the document available? Please provide a link to the document and a summary of its contents as well as for the UWMPs for MWD and Burbank. All documents cited the RDEIR need to be properly referenced with links provided if available. 36

Page 4.12-23 The RDEIR acknowledges that additional infrastructure and water system upgrades will be required a serve anticipated Project demand:

> Although all parcels in Burbank have access to public utility infrastructure, in some cases the infrastructure is older and in need of replacement or insufficient to meet the needs of a particular project. Pursuant to General Plan Land Use Policy 2.3, new development is required to pay for their share of upgrading the utility infrastructure as needed to serve their project. This may include installing larger water mains, new water meters, and/or upgrades to existing facilities. 37

Recent State law have made a number of housing projects by-right projects. How does this affect the ability of the City to get developers to fund "infrastructure improvements that are required to mitigate project impacts and have not been previously identified as part of a capital improvement program covered by the development impact fees." To what degree is development that would occur as part of the proposed Project covered by existing development impact fees? Has additional infrastructure needs generated by this level of additional housing development yet been assessed? Is it captured in the existing fee structure? If so, please cite the documents in which the analysis is contained and provide links to those documents. If not, then the Project has the potential to result in significant unmitigated water conveyance system impacts which should be identified in the RDEIR.

The RDEIR states that:

> As individual housing projects are proposed and considered for approval by the City, project proponents would be required to demonstrate that any identified system deficiencies reasonably related to the development project are adequately addressed by the responsible project proponent and future upgrades are designed in accordance with the BMC and to the satisfaction of the City Engineer.

Please provide facts and sources to support this contention. How will this work when housing developments are by right? What mechanism is in place to require that

[1] https://calmatters.org/environment/2022/08/newsom-strategy-california-water-supply/ https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Water-Resilience/Final_California-Water-Resilience-Portfolio-2020_ADA3_v2_ay11-opt.pdf
https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Water-Resilience/CA-WRP-Progress-Report.pdf

individual developments demonstrate that system deficiencies are adequately addressed. The RDEIR provides no support for this contention nor does it detail how this will be accomplished. While issuance of a building permit requires demonstration of sufficient fire flow pressure, the RDEIR fails to describe how this is accomplished when it comes to the water conveyance system.

37 cont.

Given that the RDEIR includes UTIL-1 to address the need for a study to determine wastewater conveyance infrastructure needs and an updated fee structure, why is no similar mitigation required when it comes to the water transmission system.

Page 4.12-24

The contention that "(p)otential impacts related to relocation or construction of water supply facilities would be **less than significant**" has not been supported by fact, reasonable assumptions predicated on facts, or expert opinion supported by facts. In fact, it is contrary to the conclusion of a very similar analysis of the impact of the Project on the wastewater conveyance system. Why are impacts to the water conveyance system classified as less than significant, but the impacts to the wastewater conveyance system significant (page 4.12.25), given the same level and type of general analysis, which would be clear from a side-by-side comparison of the two analyses? You shouldn't be able to do the same type of general analysis and reach opposing conclusions for the two conveyance systems. This just illustrates the completely useless nature of the type of "analysis" conducted.

38

Why was BWP not consulted regarding the potential for water system impacts associated with this level of new development over the next 8 years and the agency's ability to respond to that increased demand. Please consult with BWP and revise the RDEIR accordingly.

39

4.12-30 – 4.12-35

The proposed Project includes the construction of up to 10,456 housing units between 2021-2029. The 2030 estimates of water supply vs. water availability in the City's 2020 Urban Water Master Plan "(UWMP) are based on a 2030 Housing Element goal of 10,088 units, as shown in Table 2-1 of the UWMP, not the 10,456 units in the Housing Element (proposed Project):[2]

40

The UWMP assumes a population of 2.46 persons per unit or 24,816 additional residents resulting from Housing Element development. This is shy of the 25,722 persons that would be added to the City under the Housing Element.

[2] https://www.burbankwaterandpower.com/images/administrative/downloads/BWP_2020UWMP_Final.pdf

Table 2-1: Housing Unit and Employment Growth Projections

	2025	2030	2035	2040	2045
SCAG Projections					
Single Family Housing Units	21,490	21,697	21,678	21,822	21,842
Multi-Family Housing Units	22,554	23,552	24,723	25,678	26,830
Housing Element Goal					
New Housing Units	4,000	10,088	12,000	12,000	12,000
Total Housing Units	**48,044**	**55,337**	**58,401**	**59,500**	**60,672**
Employment	**122,652**	**128,544**	**134,669**	**137,027**	**138,614**

The UWMP thus underestimates water demand resulting from the proposed Project as shown in UWMP Tables 6-2 and 6-4, as reproduced below. Given that demand is underestimated for 2030, and supply exactly matches demand, correcting for the additional units/population results in water demand in excess of supply. Given that demand would exceed supply, when correcting for the number of housing units, the potential for significant water supply impacts exists.

The analysis also assumes that the City's allocation of MWD treated water will increase over time, and that the water supply will be greater during a multi-year drought event, than during normal years. What are the bases for these assumptions? What is the flexibility in Burbank's water allocation? As previously noted, the State anticipates that water supplies will decrease by 10 percent due to climate change[3] as population and residential development continues to increase. This does not appear to be reflected in the UWMP.

40 Cont.

Furthermore, as shown in Table 2-1, the total housing units would be significantly more than the SCAG forecasts. This is true for the region, as well as Burbank. The cumulative impact analysis needs to address the impact on water supplies of the Project in combination with the additional residential development being required throughout the region.

One of Burbank's water sources is MWD, which includes 14 cities. The cumulative analysis needs to address the impact of the Project in combination with past, present and reasonably foreseeable projects in these 14 cities, including up-zoning and other actions to accelerate housing development. SCAG's RHNA allocation for the region is 1,341,827.[4] The RDEIR cumulative analysis needs to address the number of additional units allocated to MWD customers and thus the cumulative increase in demand on MWD supplies. The RDEIR then needs to address whether this increase in demand will impact Burbank's water allocation. Failure to provide this analysis is a fatal flaw of the RDEIR. In the absence of such an analysis any conclusion that water impacts will be less than significant cannot be supported.

[3] https://calmatters.org/environment/2022/08/newsom-strategy-california-water-supply/
https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Water-Resilience/Final_California-Water-Resilience-Portfolio-2020_ADA3_v2_ay11-opt.pdf
https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Water-Resilience/CA-WRP-Progress-Report.pdf

[4] https://scag.ca.gov/housing

UWMP TABLES

Table 6-2: DWR Table 7-2: Normal Year Supply and Demand Comparison – Potable

	2025 (AF)	2030 (AF)	2035 (AF)	2040 (AF)	2045 (AF)
Supply Totals	18,062	20,380	21,386	21,712	22,010
Demand Totals	18,062	20,380	21,386	21,712	22,010
Difference	**0**	**0**	**0**	**0**	**0**

Table 6-4: DWR Table 7-4: Multiple Dry Year Supply and Demand Comparison - Potable

		2025 (AF)	2030 (AF)	2035 (AF)	2040 (AF)	2045 (AF)
Year 1	MWD Treated Potable	7,559	10,072	11,021	11,411	11,706
	Supplier-Produced Groundwater	10,655	10,658	10,672	10,700	10,700
	Supply Totals	**18,214**	**20,730**	**21,693**	**22,111**	**22,406**
	Demand Totals	**18,214**	**20,730**	**21,693**	**22,111**	**22,406**
	Difference	**0**	**0**	**0**	**0**	**0**
Year 2	MWD Treated Potable	7,945	10,277	11,021	11,472	11,706
	Supplier-Produced Groundwater	10,655	10,658	10,672	10,700	10,700
	Supply Totals	**18,600**	**20,935**	**21,693**	**22,172**	**22,406**
	Demand Totals	**18,600**	**20,935**	**21,693**	**22,172**	**22,406**
	Difference	**0**	**0**	**0**	**0**	**0**
Year 3	MWD Treated Potable	8,331	10,481	11,021	11,532	11,706
	Supplier-Produced Groundwater	10,655	10,658	10,672	10,700	10,700
	Supply Totals	**18,986**	**21,139**	**21,693**	**22,232**	**22,406**
	Demand Totals	**18,986**	**21,139**	**21,693**	**22,232**	**22,406**
	Difference	**0**	**0**	**0**	**0**	**0**
Year 4	MWD Treated Potable	8,718	10,686	11,219	11,593	11,706
	Supplier-Produced Groundwater	10,655	10,658	10,672	10,700	10,700
	Supply Totals	**19,373**	**21,344**	**21,891**	**22,293**	**22,406**
	Demand Totals	**19,373**	**21,344**	**21,891**	**22,293**	**22,406**
	Difference	**0**	**0**	**0**	**0**	**0**
Year 5	MWD Treated Potable	9,104	10,891	11,286	11,654	11,706
	Supplier-Produced Groundwater	10,655	10,658	10,672	10,700	10,700
	Supply Totals	**19,759**	**21,549**	**21,958**	**22,354**	**22,406**
	Demand Totals	**19,759**	**21,549**	**21,958**	**22,354**	**22,406**
	Difference	**0**	**0**	**0**	**0**	**0**

40 Cont.

Wastewater

Page 4.12-2 The RDEIR has failed to explain or define "BWRP". The discussion indicates that treated effluent is discharged into either the Burbank Western Channel or to the City's recycled water distribution system. Where does it go once discharged into the Burbank Western Channel? Any downstream impacts associated with increased flows should be addressed in the RDEIR. 41

The discussion indicates that Burbank may divert wastewater to the Los Angeles sewer system. Under what conditions is this allowed? Is there a cap on the amount that can be diverted? In addition to treatment capacity information, please provide information on share of capacity currently in use.

Page 4.12-10 Please provide links and proper citations to the various plan documents cited. What were the key findings of the Burbank Sewer System Evaluation and Capacity Assurance Plan in terms of capacity, share of capacity used and locations in the City more likely to experience capacity issues? 42

Page 4.12-24 The analysis of water system impacts suffers from the same problems as the analysis of the water conveyance system impacts detailed above. The RDEIR acknowledges the potential for impacts, but assumes that impacts will be adequately addressed through a utility infrastructure fee and that a sewer capacity analysis would be required for individual projects. When was the existing impact fee developed, does it address the level of development anticipated in the Housing Element and if not how long will it take to prepare the analysis of likely required system upgrades and establish a new fee structure? Given the by-right nature of certain types of housing development pursuant to recent changes in State law, will the impacts of individual developments truly be addressed as described in the RDEIR? What are the likely short-term and long-term impacts of the Project, given the City's likely need to identify system upgrades associated with the level of development included in the Housing Element recalculate its fee structure? 43

Page 4.12.25 The RDEIR states: "In the long-term, redevelopment of properties in the City is anticipated to improve the quality of stormwater runoff by replacing older development with new development that incorporates Low Impact Development (LID) methods." To what degree does the Project result in redevelopment of properties verses infill development. If redevelopment is not a component of the Project then this statement should be removed from the RDEIR. 44

The RDEIR states that "while individual housing developments would include site-specific stormwater drainage and conveyance facilities, such facilities would be designed and built in accordance with the BMC and BMPs for stormwater management. Potential impacts related to relocation or construction of new wastewater conveyance facilities would be less than significant." In reaching this conclusion the RDEIR relies on the contention that "Sections 9-3-413 and 9-3-414 of the BMC would ensure that future development projects resulting from the Housing and Safety Element Update would be implemented with appropriately sized and sited stormwater conveyance facilities." The 45

RDEIR fails to quote applicable portions of these code sections to support this contention. Section 9-3-413 relates to the adoption of the SUSMP.[5]

Section 9-3-414 – Storm Water Pollution Control Measure for Development Planning Part E – Storm Water Pollution Control Requirements requires:

> 1. A new single-family **hillside home development** shall include mitigation measures to:
>
> a. Conserve natural areas;
>
> b. Protect slopes and channels;
>
> c. Provide storm drain system stenciling and signage;
>
> d. Divert roof runoff to vegetated areas before discharge unless the diversion would result in slope instability; and
>
> e. Direct surface flow to vegetated areas before discharge, unless the diversion would result in slope instability.

45 Cont.

New single-family homes that are not located in hillside areas do not appear to be planning priority projects subject to these requirements (see BMC 9-3-414 Section D). The conclusion that impacts related to the relocation or construction of new wastewater conveyance facilities would be less than significant therefore does not appear to be supported by substantial evidence. The potential for impacts remains.

Page 4.12-25 The RDEIR correctly concludes that: Therefore, **impacts to new or expanded wastewater conveyance** associated with build-out of future housing development projects associated with the Housing Element **would be potentially significant**.

UTIL-1 As written, UTIL-1 constitutes both improper deferral of analysis and improper deferral of mitigation. Furthermore, the mitigation measure uses words such as "may" that do not mandate performance. Given potential timing issues and the ability of the City to require by-right housing projects to construct infrastructure improvements, the potential for significant unmitigated impacts remains.

46

Sewage Treatment Capacity

Page 4.12-36 It is important to highlight the fact that the RDEIR shows that the Project will have a significant unmitigated impact on sewage treatment capacity, stating: **"**Although significant treatment capacity is currently available at the BWRP to treat wastewater generated because of the Project, the BWRP's capacity is 4 mgd, which would not be sufficient to accommodate a conservative estimate of 6.3 mgd of wastewater generated by a full buildout of the Housing Element Update." This level of impact does not have a

47

[5] https://www.codepublishing.com/CA/Burbank/html/Burbank09/Burbank0903.html#9-3-413

	clear and easy remedy. The RDEIR needs to provide more detail on what this impact would mean for residents in the City, how it would manifest, how long an exceedance of treatment capacity would exist before system up-grades could be brought on-line and thus the short-term of long-term nature of the impact.	47 cont.
UTIL-3a	The RDEIR needs to address the feasibility of this mitigation measure given recent changes in State housing law which creates a larger class of by-right residential developments.	48
UTIL-3b	The RDEIR needs to address the feasibility of this mitigation measure given the large-scale up-zoning of the region mandated by recent Housing Element legislation. It cannot be assumed, without supporting analysis, that other facilities will have capacity to address Burbank's overage, given cumulative development. What mechanism would be put in place to ensure that developers rather than existing residents pay the cost of any diversion to the City of Los Angeles?	49
UTIL-3d	The RDEIR needs to address the potential impacts of this mitigation measure as part of the RDEIR. The City's decision-makers and the public need to be provided with information on the likely indirect impacts of the Project.	50
Stormwater		
Page 4.12-3	What percent of the existing stormwater conveyance system is used during peak periods. What is the remaining capacity during dry and wet seasons and during average and more intense storm events?	51
Solid Waste		
Page 4.12-16	To what degree has Burbank met it's AB939 and SB1016 targets?	52
Page 4.12-17	Are there any more recent updates to the CoIWMP?	53
Page 4.12-38	How much will the Project reduce the longevity of the Burbank Landfill and the other landfills which may serve the City? To what degree will the Project in combination with cumulative development impact the lifespan of the various landfills?	54
Electricity		
Page 4.12-4	The discussion indicates that Burbank has a total usage of 995.1 GWh. Is there a maximum number of GWhs that can be supplied by BWP and if so, what is it?	55
Page 4.12-19	What percent of Burbank electricity is procured by renewable and nonrenewable sources. Please provide a source breakdown.	56
Page 4.12-26	The RDEIR needs to quantify the existing peak period electrical supply and demand and transmission capabilities, quantify the projected increase in electrical demand resulting from the Project, and identify any system deficiencies.	57

Why hasn't BWP been consulted on this analysis? BWP needs to be consulted and the analysis revised.

Page 4.12-28 This page states:

> Although all parcels in Burbank have access to public utility infrastructure, in some cases the infrastructure is older and in need of replacement or insufficient to meet the needs of a particular project. Pursuant to General Plan Land Use Policy 2.3, new development is required to pay for their share of upgrading the utility infrastructure as needed to serve their project. This may include new electrical transformers, new transmission lines and/or new substations.
>
> Developers are responsible for funding any infrastructure improvements that are required to mitigate project impacts and have not been previously identified as part of a capital improvement program covered by the development impact fees. Consistent with applicable State law, the City's development fees will ensure that the developers pay the cost attributable to the increased demand for the affected public facilities reasonably related to the development project in order to refurbish the existing facilities to maintain the existing level of service and achieve an adopted level of service that is consistent with the City's General Plan (California Government Code Section 66001(g)).
>
> Therefore, potential impacts would be less than significant.

58

Again, the RDEIR fails to address whether the existing fee structure anticipated the level of development that would result for the Housing Element, whether an assessment has been done to determine the nature and location of upgrades needed, how long it will take to do this assessment and to update the fee structure. The potential for impacts clearly remains. Furthermore, testimony by BWP staff at the April 5, 2022 City Council Meeting (see link and information in the introduction to these Infrastructure comments re this meeting) documents the potential for significant electrical transmission system impacts. The RDEIR needs to be revised and recirculated to identify and address these potential impacts.

Natural Gas

Page 4.12-4 The discussion indicates that SCG supplied a total of 5.2 billion therms of natural gas in 2019. Is there a maximum number of therms that can be supplied by SCG and if so, what is it? What is the demand generated by the Project.

59

Page 4.12-28 Please provide citations and links for the information provided regarding gas demand.

60

<u>Deficient Cumulative Impact Analysis</u>

As noted in CEQA Guidelines Section 15130(b)(1),

61

> The following elements are necessary to an adequate discussion of significant cumulative impacts:
>
> (1) Either:
>
> (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
>
> (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

61 Cont.

The RDEIR fails to include a list of cumulative projects list or a summary of projections. The cumulative impact analysis contained in the RDEIR is thus too general and lacks the specificity required by CEQA. Given that neighboring jurisdictions are also engaged in reasonably foreseeable up-zoning to meet RHNA targets, it is vitally important that any analysis of the cumulative infrastructure and public service impacts of the project (as well as the other CEQA issue areas) take account of anticipated up-zoning by nearby cities, in the region, and throughout the State. Without such analysis, the true impact of the Project on infrastructure capacity and service availability cannot be assessed. The cumulative impact analysis included in the RDEIR is very general, is narrative rather than quantitative, and constitutes general arguments unsupported by substantial evidence.

CONCLUSION

Thank you for your consideration of my concerns. I thank you in advance for correcting these fatal EIR flaws and more accurately disclosing to Burbank residents the impacts of the project and cumulative housing law changes. Given the defects in the document, and the failure to identify all of the Project and cumulative impacts, the document must be corrected and recirculated.

62

Sincerely,

Susan O'Carroll
Burbank Resident

cc: Burbank City Council

Letter I-2

COMMENTER: Susan O'Carroll

DATE: September 6, 2022

Response I-2.1

The commenter states the EIR fails to completely analyze the impacts of up-zoning and construction of 10,456 housing units in the City of Burbank, which would represent a 23 percent increase in housing units. The commentor indicates that the EIR found only two significant VMT and wastewater impacts and states the City Council should not allow the up-zoning.

This is an introductory statement and the commentor provides detailed reasons to support her position. Individual responses to each comment are provided below.

Response I-2.2

The commentor states that expanding sewer treatment capacity by 57 percent would represent a substantial impact pending development of the additional capacity.

As discussed under Impact UTIL-3 in Section 4.12, *Utilities/Service Systems*, of the Recirculated Draft EIR, implementation of the Project would generate wastewater that exceeds BWRP's wastewater treatment capacity of 4 million gallons per day (mgd). Based on the PWD's calculations, the Project would be anticipated to generate an estimated 6.3 mgd. Burbank's PWD is currently working on both a Cost of Service/Rate Study and Needs Assessment for the BWRP. PWD will also be initiating a new Sewer Master Plan in fiscal year 2023/24 to evaluate the City's sewer conveyance and treatment system over the next 20 years. The analysis acknowledges that these studies would take approximately one to two years to be completed, and final recommendations would not be available at the time the Housing Element is scheduled to be approved. Therefore, no feasible mitigation measures were identified at the plan level to reduce impacts to wastewater treatment capacity associated with the Project, resulting in significant and unavoidable impacts. However, it is anticipated that the short- and long-term wastewater mitigation measures will address the impacts over the course of the eight-year period under the proposed Housing Element. In addition, each individual housing development project will be required to undertake its own environmental impact analysis, which requires subsequent analyses to prove that there will be adequate capacity to serve the needs of the project. If adequate systems are not in place, the project would be required to take the necessary actions to ensure that the wastewater needs are met prior to approval of the project.

Response I-2.3

The commentor states the Recirculated Draft EIR's analysis of impacts to public services and utilities needed quantification. The commentor also states that the Recirculated Draft EIR needs to include quantification of the increase in demand of water, other utilities, and public services and to compare those numbers to existing and planned capacity.

The Recirculated Draft EIR included quantified analysis at a programmatic level for impacts associated with air quality, GHG emissions, noise, population and housing, public services, recreation, transportation, and utilities and service systems. The Recirculated Draft EIR evaluates the potential impacts associated with the implementation of the Housing Element Update at a programmatic level. Individual development projects accommodated under the Project would

require project-level CEQA review, which will identify and require mitigation for any potential site-specific projects associated with water supply, utilities, and public services.

Response I-2.4

The commentor states that the Recirculated Draft EIR failed to comply with CEQA's requirement to address impacts of the Project including construction and operation of additional sewage facilities.

As discussed under Impact UTIL-1 in Section 4.12, *Utilities/Service Systems*, of the Recirculated Draft EIR, implementation of Mitigation Measure UTIL-1 would require a sewer service constraints analysis by PWD to identify a wastewater connection fee for the recovery of the City's costs of future upgrades that are proportional to the individual project's impact to the City's wastewater system. The potential indirect impacts associated with sewage facilities are unknown at this time because the sewer service constraints analysis has not been completed. Therefore, the direct and indirect Project impacts associated with new or expanded wastewater conveyance are significant and unavoidable.

Response I-2.5

The commentor states that any cumulative impact analysis needs to address the impact of the City's housing element targets in combination with project housing increases in neighboring jurisdictions, such as the City of Los Angeles. The commentor questions how the cumulative development in combination with the proposed Project would impact public services and utilities in the Burbank area. In addition, the commentor questions how assumptions about water availability be justified given the massive up-zoning of California and states that water and other service availability was not adequately addressed in the Recirculated Draft EIR.

The cumulative impacts section included for each environmental issue area in the Recirculated Draft EIR takes into consideration future housing development accommodated under the Housing Element Update, as well as cumulative development at the regional level. The Draft EIR analysis was conducted at the program level which used a conservative approach by evaluating impacts of the development of housing required under the City's regional housing need as well as from housing developed on sites identified in the Housing Element site inventory; however, the Housing Element Update does not directly result in development of housing on the identified sites. Individual development projects accommodated under the Housing Element Update would require project-level CEQA review, which would identify and require mitigation for any potential site-specific and cumulative impacts associated with water supply, utilities and service systems, and public services. Also, refer to Response I-1.2 regarding water supply.

Response I-2.6

The commentor states that the Recirculated Draft EIR must address as part of the cumulative impact analysis, the impact of the proposed Project in combination with not only RHNA targets for the greater Los Angeles region, but also impacts of SB 9, SB 10, and SB 35 and similar legislation not accounted for in the housing element update.

Refer to Response I-1.8 in Section 2, *Responses to Comments on Draft EIR*, or Response I-1.9 above, as this comment was previously submitted and responded to therein.

Response I-2.7

The commentor states that the Recirculated Draft EIR fails to support its conclusion with substantial evidence and supporting data by not including footnote sources or providing links to key documents.

The Recirculated Draft EIR did not include new information that revised Section 7, *Reference*s, of the Draft EIR. The references for the Recirculated Draft EIR are available online using this link: https://www.burbankhousingelement.com/wp-content/uploads/2022/01/Burbank-Housing-and-Safety-Element-Update-DEIR.pdf

Response I-2.8

The commentor states that the Recirculated Draft EIR fails to provide adequate cumulative impact analysis which fails to inform City Leaders about unfunded state mandates.

Refer to Response I-2.5.

Response I-2.9

The commenter states that it is important for the Draft EIR and Recirculated Draft EIR to accurately disclose the impacts of mandates imposed on the City through recent State legislation and the projected harmful effect of those mandates on the quality of life in Burbank and the City's ability to provide basic public services and functioning infrastructure. The commenter also states that one of the key purposes of CEQA is to disclose the environmental values of elected officials to the public and that it is important for the Draft EIR to disclose the impacts which the State legislature has chosen to impose on the City via legislative mandates to the public. Lastly, the commenter states that the Recirculated Draft EIR must be rewritten to acknowledge additional significant project and cumulative impacts, and recirculated for additional public review and comment before any action can be taken to certify the Recirculated Draft EIR or approve the Project.

The scope of the EIR is to analyze the potential environmental impacts associated with the development of reasonably foreseeable development accommodated under the Housing Element Update.

As described in Section 15002 of the CEQA Guidelines, the basic purposes of CEQA are to inform governmental decision makers and the public about potential, significant environmental effects of the Project; identify the ways that environmental damage can be avoided or significantly reduced; prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and disclose to the public the reasons why a governmental agency approved the Project in the manner the agency chose if significant environmental effects are involved. Significant impacts at a programmatic level have been disclosed which will be assessed by the decisionmakers. Any potential impacts at a project level will require further CEQA analysis.

Response I-2.10

The commentor states that the Recirculated Draft EIR needs to include a revised impact summary table which incorporates the findings of the supplemental analysis.

A summary of the changes to the EIR is provided in Section 1.3, *Introduction*, of the Recirculated Draft EIR.

Response I-2.11

The commentor asks for annotated copies of the pages of these elements showing the intended updates, additions, and deletions of the Safety, Land Use, Open Space, Conservation, Air Quality and Climate Change, Noise, Mobility Elements, and Environmental Justice. In addition, the commentor states that the project description is inadequate because it fails to provide a description of these changes or to provide annotated copies of the updated Elements as linked documents or attachments.

The City of Burbank includes annotated copies of these elements showing the intended updates on the City of Burbank Housing Element Update website. See the links to the annotated copies below.

The Revised Draft Housing Element is available online using this link: https://www.burbankhousingelement.com/wp-content/uploads/2022/08/Draft-Housing-Element_redlined-2022.pdf

The Revised Draft Safety Element is available online using this link: https://www.burbankhousingelement.com/wp-content/uploads/2022/08/Safety-Element_August-2022.pdf

Section 2, *Project Description*, of the Recirculated Draft EIR included minor edits from the original Draft EIR that did not result in the need to edit any additional Draft EIR sections.

Response I-2.12

The commentor questions why the Specific Plan development was not addressed as part of the cumulative impact analysis and was instead included as part of the analysis of the proposed Project. The commentor asks why the anticipated residential development associated with the two Specific Plan was not counted towards achievement of the RHNA allocation, rather than added to the RHNA allocation. In addition, the commentor asks if the impacts of the two Specific Plans previously received environmental review, and if so when, what are their associated State Clearinghouse (SCH) numbers, what are the hyperlinks to those documents, and when were those Specific Plans approved.

As stated in Section 2, *Project Description*, the estimated number and affordability level of housing units to accommodate the City's RHNA under the existing General Plan and zoning results in a shortfall of 1,203 units below the RHNA allocation. As such, the Housing Element Update includes a housing program to rezone additional opportunity sites through adoption of two specific plan projects: the Downtown Transit-Oriented-Development Specific Plan (Downtown TOD) and the Golden State Specific Plan (GSSP). Adoption of these Specific Plans will provide the necessary zoning, objective development standards, and processing procedures to facilitate the production of the shortfall of housing units required to accommodate the City's RHNA during the Housing Element planning period. The zone changes required by these Specific Plans will be adopted in 2022-2023, or within three years of the start of the planning period as required by State law. EIRs are currently being prepared for the Specific Plans. A NOP was circulated for the Burbank Downtown Transit Oriented Development (TOD) Specific Plan. Due to revisions to this this Specific Plan, a revised NOP will be circulated in the near future. The SCH number is 2021050436; here is the link to documents on CEQAnet: https://ceqanet.opr.ca.gov/2021050436/2

The NOP for the Golden State Specific Plan is available using this link: https://ceqanet.opr.ca.gov/2020089016/2. The SCH number is 2020089016.

Preparation of the EIR for the Media Center Specific Plan is at the beginning stages, so no SCH number is available yet.

Response I-2.13

The commentor states that a project description is fundamental and due to changes in the project and recirculation of the EIR, the project description should include more than just the changes in the Recirculated Draft EIR.

The Recirculated Draft EIR project description identifies the location, summarizes the proposed project (including a change since the Original EIR was published), identifies Project characteristics and associated anticipated development, and outlines the Project objectives.

According to CEQA Guidelines 15124 (Project Description), the description of the project shall not supply extensive detail beyond that needed for evaluation and review of the environmental impact. The Project Description summarizes the intent and scope of the proposed updates to the General Plan elements, and also includes details regarding the anticipated development potential under the proposed Housing Element, which provides the basis for the quantitative analysis throughout the EIR. As a programmatic analysis, no additional detail for the project description is required.

Response I-2.14

The commentor states that the Recirculated Draft EIR must include an analysis and the cumulative impact of the Project in combination with the up-zoning occurring throughout the region.

Refer to Response I-2.5.

Response I-2.15

The commentor states that the Recirculated Draft EIR should include a table like Table 2-1 which provides the RHNA allocation of the region and for adjoining cities.

The SCAG RHNA allocation for adjoining cities can be found on the SCAG website using the following link: https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785.

The following are SCAG's RHNA numbers for the cities of Los Angeles and Glendale:

City of Los Angeles

Total	Very-Low Income	Low-Income	Moderate Income	Above Moderate Income
456,643	115,978	68,743	75,091	196,831

City of Glendale

Total	Very-low Income	Low Income	Moderate Income	Above Moderate Income
13,425	3,439	2,163	2,249	5,574

Response I-2.16

The commentor states that there will be two specific plan projects: The Downtown TOD and GSSP which will provide necessary zoning, objective development standards, and processing procedures to facilitate the production of the shortfall of housing units required to accommodate the City's RHNA during the Housing Element planning period. The commentor questions if these Specific Plans will have separate EIRs or if the Recirculated Draft EIR is the EIR for the Specific Plans.

Refer to Response I-2.12. The Recirculated Draft EIR is a programmatic EIR which evaluates impacts on the development of housing required under the City's regional housing needs. Individual development projects accommodated under the Housing Element update would require project-level CEQA review, which will identify and require mitigation for any potential site-specific projects associated with water supply, utilities, and public services.

Response I-2.17

The commentor states that more site-specific impact analysis should be included for Project sites identified for rezoning and states that no zone changes should be approved without site-specific level environmental analysis.

The Recirculated Draft EIR is a programmatic EIR which evaluates impacts on the development of housing required under the City's regional housing needs. Individual development projects accommodated under the Housing Element update would require project-level CEQA review, which will identify and require mitigation for any potential site-specific projects associated with water supply, utilities, and public services. A site-specific level of analysis will be conducted during individual development projects. In addition, the proposed Specific Plans have commenced separate EIR analysis.

Response I-2.18

The commentor states to provide links to annotated versions of the Proposed Safety Element Update and Environmental Justice Update.

Refer to Response I-2.11 for the link to the annotated Revised Safety Element Update. The environmental justice element can be achieved by incorporating goals, policies and objectives into existing elements. In order to address a number of State regulations, environmental justice was addressed in the existing General Plan elements such as the Housing Element Update. The City of Burbank does not have a separate Environmental Justice Element.

Response I-2.19

The commentor states that it would be helpful if the Recirculated Draft EIR included copy of the comments by the California Department of Fish and Wildlife (CDFW) that state that the proposed Project may have adverse impacts to the least Bell's vireo, bat species, and monarch butterflies through vegetation and tree removal.

Comments by the CDFW can be found in Section 2, *Responses to Comments on the Draft EIR*, and in Appendix A, Notice of Preparation – Scoping Comments, of the Draft EIR, which is available using this link: https://www.burbankhousingelement.com/wp-content/uploads/2022/01/Appendix-A_NOP-Scoping-Comments.pdf

Response I-2.20

The commentor states that the biological resources section of the Recirculated Draft EIR is not responsive to CDFW comments, including comments regarding the monarch butterflies.

Refer to Letter A-3, Responses A-3.1 through A-3.10 in Section 2, *Responses to Comments on the Draft EIR,* for full responses to the letter received from the CDFW on March 18, 2022. In the CDFW comment letter, the commenter suggested that there may be adverse impacts to least Bell's vireo (*Vireo bellii pusillus*), various bat species, and the monarch butterfly. The commenter also suggested changes to the mitigation presented in Section 4.2, *Biological Resources,* and summarized CDFWs filing fee policy.

In response to these concerns, Mitigation Measure BIO-1 was revised to address these potential impacts, which acknowledges CDFW's comments and states that a qualified biologist shall be retained by the applicant to conduct an initial site assessment that will include review of the California Natural Diversity Database (CNDDB) and iNaturalist maps to determine where sightings have occurred or habitats for the least Bell's vireo, bat species, or monarch butterflies have previously been identified. Surveys may be required for sites that are in proximity to previously identified areas where habitats for the least Bell's vireo, bat species, or monarch butterflies have previously been identified, and for development activities that would occur during the nesting season. In addition, on April 20, 2022, prior to release of the Recirculated Draft EIR, City staff had a call with CDFW staff to ensure that CDFW staff is satisfied with the revisions to Mitigation Measure BIO-1. No additional revisions are necessary.

Response I-2.21

The commentor states that the Recirculated Draft EIR fails to describe the share of land zoned for residential development at the base of the Verdugo Mountains. In addition, the commentor states that the Recirculated Draft EIR fails to address the potential biological resource impacts of development on vacant residential parcels, which may impact habitat connectivity and wildlife corridors. The commentor states that the city fails to adequately address the impacts associated with increasing urbanization.

Refer to Figure 2-3, *Specific Plan and Housing Opportunity Locations*, in Section 2, *Project Description*. Also, refer to Response I-1.4 for a full description of the land use types where housing under the Housing Element Update may be developed. The Verdugo Mountains are located to the east of the city. As shown in Figure 2-3, neither the Downtown District nor the Golden State Specific Plan District infringe on parts of the Verdugo Mountains zoned as OS – Open Space. Reasonably foreseeable development under proposed Project would primarily occur within these districts. Development outside of these districts may occur but not at the level of development that is anticipated to occur in the transit-orientated areas of the city. Therefore, it is not anticipated that development facilitated by the Housing Element Update would result in significant impacts to areas in proximity to the Verdugo Mountains. No revisions to the EIR are required to address this comment. Further, Land Use Element Policy 14.5 of Burbank2035 prohibits further subdivision of land in open space areas in the hillside areas of the Verdugo Mountains and limits future development in the hillside areas to infill development on existing lots in established neighborhoods.

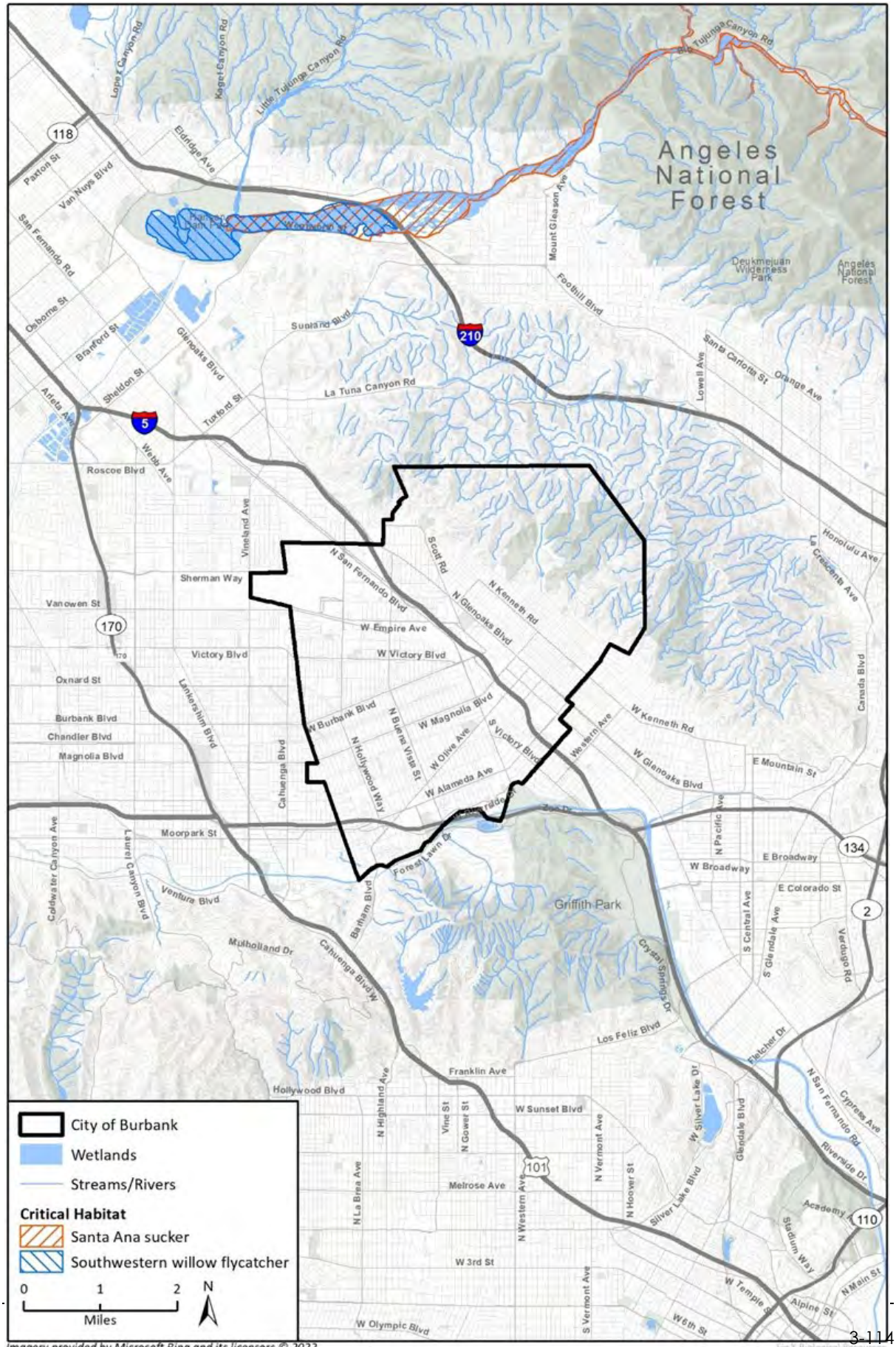
Response I-2.22

The commentor states that the Recirculated Draft EIR must provide a map showing the location of sensitive species identified in the California Natural Diversity Database and the location where additional urbanization may result in impacts and compare these locations to the location of residential zoning in the city. In addition, the commentor states to provide a map showing the location of blue-line streams and other wetlands as compared to the location of residential zoning in the city.

Public documents cannot use CNDDB data at certain scales due to the possibility of people harming a species or its habitat. As such, the figure provided below shows the city's sphere of influence and the location of streams and wetlands near critical habitat. Refer to Figure 2-3, S*pecific Plan and Housing Opportunity Locations*, in Section 2, *Project Description*, to view where the housing opportunity sites are located. When comparing Figure 2-3 to the figure on the following page, it can be seen that no streams or riparian habitat occur within the housing opportunity site districts. Figure 2-3 and the figure below may also be compared to the National Wetlands Inventory Mapper located here:

https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

As demonstrated through the figures, reasonably foreseeable development under the proposed Project would occur in urbanized areas of the city, and therefore, would not directly or indirectly impact sensitive natural communities or riparian habitat.


Angeles National Forest
Deukmejian Wilderness Park
Griffith Park
City of Burbank
Wetlands
Streams/Rivers
Critical Habitat
Santa Ana sucker
Southwestern willow flycatcher
0 1 2
Miles
N
Imagery provided by Microsoft Bing and its licensors © 2022.
Additional data provided by USGS, NHD, 2022; USFWS, NWI, 2022; USFWS, Critical Habitat, 2022.

Response I-2.23

The commentor states that the Recirculated Draft EIR must define the term, "reasonably foreseeable development under the Housing Element." The commentor states if this term is not the same as buildout under the Housing Element, the analysis must fully address Project Impacts.

Refer to Response I-1.2 above for a detail on the meaning of "reasonably foreseeable" and its application according to CEQA Guidelines Section 15064. Direct impacts of the adoption of the Housing Element Update are evaluated in the Initial Study and Recirculated Draft EIR. Reasonably foreseeable indirect impacts have also been evaluated. An impact is not considered reasonably foreseeable if the impact is speculative or unlikely to occur. Thus, buildout under the Housing Element Update is not speculative or unlikely to occur, and would be considered reasonably foreseeable.

Response I-2.24

The commentor states that the Recirculated Draft EIR fails to address impacts associated with the long-term loss of habitat resulting from increased urbanization. The commentor states that the biological resources analysis is very general and fails to provide any real analysis of long-term impacts to species of concern.

Please refer to Responses I-1.4, I-2.20 through I-2.22, and Letter 3 and the following responses in Section 2, *Response to Comments for the Draft EIR*. As described therein, development facilitated by the Housing Element Update will occur in places that are currently urbanized or built-up. However, some sensitive species may still occur in these areas. For that reason, Mitigation Measure BIO-1 will be implemented to ensure that the project would not have significant impacts to the species listed in Section 4.2, *Biological Resources*. Additionally, pages 4.2-7 and 4.2-8 discuss the cumulative impacts that the project may have on sensitive species. It was determined that implementation of Mitigation Measure BIO-1 would be adequate in ensuring no cumulative impacts would occur.

Response I-2.25

The commentor states that the mitigation measures may not be practical if the City does not have the necessary database to implement the mitigation measure with the observations to CNDDB or iNaturalist. The commentor questions how frequent will the database be updated and how will the findings of biological assessment be entered into the database. The commentor states if this mitigation measure will apply to any residential developments that will require a grading permit and if by-right developments will escape the requirements of this mitigation.

Mitigation Measure BIO-1 requires that a qualified biologist is retained by the applicant to conduct an initial site assessment that will include review of the most current California Natural Diversity Database (CNDDB) and iNaturalist maps to determine where sightings have occurred or habitats for the least Bell's vireo, bat species, or monarch butterflies have previously been identified. As a part of implementing the aforementioned mitigation measure the City will modify its grading permit process. Prior to issuing a grading permit that would remove or disrupt habitats for the least Bell's vireo, bat species, or monarch butterflies (identified based on the most current California Natural Diversity Database (CNDDB) and iNaturalist maps or other relevant database), a qualified biologist shall be retained by the project applicant to conduct a biological resources reconnaissance of the site. This mitigation measure will apply to all projects requiring a grading permit.

Response I-2.26

The commentor states that it is inappropriate to limit the cumulative impact analysis to the city limits because Housing Element Updates and associated up-zoning is being required throughout the region. In addition, the commentor states that the analysis fails to indicate whether the cumulative impact analysis is based on a list or on forecasts. The commentor states that the analysis fails to address habitat loss and long-term cumulative impacts of increasing urbanization on sensitive species, habitat, and wildlife corridors.

Refer to Responses I-2.5 and I-2.22. Moreover, the majority of development projected under the Project would occur within the City in urbanized sites that have been previously disturbed. In addition, Land Use Element Policy 14.4 of the Burbank2035 General Plan states that the City will "preserve the natural amenities of the Verdugo Mountains and use these amenities to provide outdoor recreation opportunities when appropriate." Further, other jurisdictions undertaking similar Projects with similar potential impacts would be tasked with addressing these types of concerns from the state agencies with regulatory oversight and compliance and the applicable provision of the California Environmental Quality Act (CEQA).

Response I-2.27

The commentor states that the video, linked in the comment letter, provides support for the need for detailed analysis of potential impacts of the Housing Element with cumulative development within and outside the city on utilities and service system. In addition, the commentor states that it provides evidence that the Recirculated Draft EIR fails to identify likely impacts such as impacts to the electric system.

Refer to Response I-1.4 in Section 2, *Responses to Comments on Draft EIR*, and I-1.7, above, as this comment is similar and responded to therein. The citywide analysis of the Housing Element Update was analyzed under a Program EIR, which does not require analysis of each individual project. As such, it is not possible with the current level of information provided to reduce all variables related to sewage capacity. Please note that for proposed developments with a significant increase in housing units that trigger a sewer capacity analysis, which is any project with a net increase of five or more additional multi-family housing units, developers will be required to upgrade City sewer infrastructure that is directly impacted by the proposed project, and/or contribute their fair share cost of the sewer improvements as determined by the Public Works Director or their designee.

Similarly, individual housing developments would be evaluated on a project-by-project basis to determine their energy demand, if adequate supply exists, and other associated energy impacts. As part of that review, specific energy data from BWP will be utilized to measure a project's direct, indirect, and cumulative impacts. As stated on page 4.12-27 of Section 4.12, *Utilities/Service Systems*, BWP will procure resources that meet or exceed state clean energy standards, while maintaining reliability of the grid in a cost-effective manner.

At the project level, future individual projects accommodated under the Housing Element Update would require project-level CEQA review, which would identify and require mitigation for any potential site-specific impacts associated with the construction of new or expanded wastewater treatment facilities, and electrical systems. No additional analysis is required in the Recirculated Draft EIR.

Response I-2.28

The commentor states if there were any interviews conducted with experts from the City of Burbank Water and Power (BWP) to inform the Utilities and Service Systems section for the Recirculated Draft EIR.

All applicable City departments routinely review environmental documents. As such, BWP and Public Works reviewed and assisted in writing analyses for the Draft EIR and Recirculated Draft EIR. Therefore, the document used the most recently available data from the City staff and other publicly available sources of information. As new information becomes available, it will be incorporated into the individual project analysis for developments facilitated by the Housing Element Update.

Response I-2.29

The commentor states that the Recirculated Draft EIR needs to specific what percent of Burbank's water comes from MWD and what percent comes from groundwater as seen on Table 4.12-1. In addition, the commentor states the Recirculated Draft EIR must disclose how much recycled water is being used in the city.

The Recirculated Draft EIR states that potable water comes from two sources: water purchased from MWD and from local groundwater from the San Fernando Valley Groundwater Basin (San Fernando Basin). BWP also utilizes recycled water to meet some of its demands of its water needs such as outdoor irrigation and power plant cooling.

There is no percentage breakdown for water sources provided in the UWMP prepared by BWP. However, based on the 2020 baseline provided in the UWMP, it can be determined that approximately 32 percent (6,165 AF) was MWD treated potable water, 51 percent (9,997 AF) was from groundwater sources blended with MWD treated potable water, 16 percent (3,149 AF) was recycled non-potable water, and 0.8 percent (152 AF) was MWD untreated non-potable water that all contribute to the total 2020 supply of 19,463 AF. According to the UWMP, the projected water supply will increase, and the distribution of these sources will change. For additional information on water supply, refer to the UWMP prepared by BWP at the following link: https://www.burbankwaterandpower.com/images/administrative/downloads/BWP_2020UWMP_Final.pdf

Response I-2.30

The commentor states if Burbank has complied with the California Water Conservation Bill and to what degree the city met its targets. In addition, the commentor asks if the targets have not been met, what are the factors that have impacted the ability to meet conservation targets.

The Recirculated Draft EIR addresses the State regulations including California Water Conservation Bill, Senate Bill X7-7, which required urban water suppliers, such as the City of Burbank, to reduce per capita water use 20 percent by 2020, establish water conservation targets for the years 2015 and 2020. Growth under the proposed project is accounted for in the City of Burbank Urban Water Management Plan as informed by the General Plan. According to the UWMP prepared by BWP, the City met it's 20 percent reduction in 2010. Refer to the link in Response I-2.29 for the link to the UWMP.

Response I-2.31

The commentor states if the Water Supply Assessment (WSA) is an appendix to the Draft EIR or the Recirculated Draft EIR. If the WSA is not in the appendix, the commentor states to please provide and link to the WSA prepared for the Project.

Refer to Section 4.12, *Utilities/Service Systems*, for additional information on WSAs and when they are required. Per SB 610, a WSA must be completed for any project that would demand 75 AFY of water, or the amount of water equivalent to, or greater than, the amount of water required for a 500-dwelling-unit project. As stated therein, the Housing Element Update is a planning document, not a development project, and therefore does not directly trigger the need for a WSA as defined by the California Water Code. Thus, a WSA was not prepared for the Housing Element Update. However, individual housing projects facilitated by the Housing Element Update may be subject to SB 610 and will be evaluated on a project-by-project basis.

Due to the comment received, a change to Section 4.12 has been made. Mention of a WSA prepared for the Housing Element Update was removed from the section, as this information was not accurate. Please see that change reflected in Section 4, *Errata for the Draft EIR*.

Response I-2.32

The commentor states if there is an existing mechanism like SB 221 for constricting development if existing demand meets or exceeds supply given the proposed Project. In addition, the commentor states that a mitigation measure needs to be included for a public service/ infrastructure impact whereby a development moratorium is triggered when impact thresholds are approached.

The City of Burbank's Urban Water Management Plan (UWMP) prepared by BWP includes an assessment of past and future water supplies and demands, evaluation of the future reliability of Burbank's water supplies over a 20-year planning horizon (2040), discussion of demand management measures and Burbank's water shortage contingency plan, discussion of the use and planned use of recycled water, and an evaluation of distribution system water losses. As noted, the UWMP includes a water shortage contingency plan including a shortage response actions that includes water demand reduction measures in the form of 6 stages that can be implemented in times of water shortage. Stage V, which includes amongst other things "No new or upgraded potable water services permitted, except R-1 and R-2, unless building permit already issued." Stage VI prohibits all outdoor watering.

Furthermore, Mitigation Measures UTIL-1 Sewer Service Constraints Analysis, UTIL-3a Sewer System Upgrades by Developers, UTIL-3b Sewage Diversion, UTIL-3c Sewer Master Plan and UTIL-3d Expansion and Upgrades to BWRP Treatment Facilities provide for short term and long term mitigation measures that evaluate impacts to the City's sewer system infrastructure on a project-by-project basis as well as provide for the long term master planning to account for the City's sewer system conveyance and capacity needs to facilitate new development under the Project through throughout the 8-year planning period. Included as part of these mitigation measures is preparation of a Sewer System Master Plan (SSMP) that will include amongst other things: a sewer system evaluation with flow modeling, a recommended Capital Improvement Plan (CIP) that identifies specific CIP projects to proactively address upgrades to the gravity system and pump stations; CIP costs estimates; a Long Term Rehabilitation/Replacement Strategy with recommendations on CIP phasing/implementation; and general recommendations on approaches to finance all the required upgrades and improvements to the City's sewer infrastructure over the next twenty years.

Response I-2.33

The commentor questions how the UWMP process addresses a situation like recent changes in housing law in the State, which have resulted in massive Statewide up-zoning. In addition, the commentor states how the plan development addresses the increase demand by other users of the same water source. The commentor states of the Statewide reduction target of 20 percent in urban water use by the year 2020 was met, and if not why.

Refer to Response I-2.30, above, for information regarding meeting the 20 percent urban water use reduction goal set by SB X7-7. As the UWMP is updated by BWP, it will continue to incorporate relevant and applicable policy changes into its analysis of available water supply and water demands, as necessary. As the UWMP is Burbank specific, it does include a discussion on the impacts of city zoning, and development trends within the city and surrounding areas to evaluate the potential water use and impacts of such zoning. The UWMP also makes reference to the City's Housing Element, which is more directly influenced by changes in State housing policy.

Response I-2.34

The commentor states that the discussion of drought-related orders and declarations must be updated to discuss if reduction targets were met. In addition, the commentor states that the Recirculated Draft EIR must include any research regarding factors influencing the achievement of water reduction targets.

The Recirculated Draft EIR includes a description of each federal, State, and local policy applicable to water use reduction and drought. As the Recirculated Draft EIR is specific to the Housing Element Update, it is not required that it include a general discussion on whether the City has met the goals set by these policies. Such a discussion is better found in the UWMP, linked under Response I-2.29.

The Recirculated Draft EIR evaluates how such policies effect the adoption of the Housing Element Update and development facilitated by the Housing Element Update. The analysis also reviews for project compliance with these policies, and how it may impact policy goals. Individual housing projects facilitated by the Housing Element Update will be reviewed for compliance on a project-by-project basis to analyze if and/or how the projects will impact water use reduction and drought-related goals.

Response I-2.35

The commentor states that water supplies are predicted to decrease by 10 percent due to climate change as population and residential development continues to increase and questions how this has been addressed in the analysis of Project water impacts.

The Recirculated Draft EIR addresses climate change and water supply. Impact UTIL-1 in Section 4.12, *Utilities/Service Systems*, states that the increased housing that would occur under the proposed Project would increase citywide water demand by up to 4,878 AFY, or approximately 22 percent of the City's available water supply in 2045. In addition, although population growth has continued to increase, citywide water demand throughout Burbank has declined compared to the early 1970s due to efficient water use after major droughts in the 1970s, 1990s, and especially in response to the previous significant water shortage and closure of major industries. The Burbank2035 General Plan includes policies and programs in the Land Use Element as well as the Open Space and Conservation Element to address water resources and prepare Burbank for the possible consequences of climate change on water supply availability. Such policies include using native or drought-tolerant plants in landscaping, using recycled water in irrigation, and promoting

all possible water conservation efforts. Conservation efforts would continue to be implemented and expanded as development associated with the proposed Project is constructed, and it is reasonably anticipated that conservation efforts will continue to be effective at reducing water demands. Further, the City of Burbank's Urban Water Management Plan (UWMP) prepared by BWP includes an assessment of past and future water supplies and demands, evaluation of the future reliability of Burbank's water supplies over a 20-year planning horizon (2040), discussion of demand management measures and Burbank's water shortage contingency plan, discussion of the use and planned use of recycled water, and an evaluation of distribution system water losses. Based on the UWMP, BWP and Metropolitan determined that there is sufficient water capacity to serve the City's water demand including those resulting from Project implementation.

Response I-2.36

The commentor states that the Recirculated Draft EIR failed to reference the 2015 Water Tomorrow Update. The commentor states to provide a link to the document and a summary of its contents.

The 2015 Water Tomorrow Update is referenced in Section 4.12, *Utilities/Service System*, as part of the Regulatory Setting since this is a plan to provide water supplies under a wide range of potential future conditions and risks. However, the analysis relied on the City's UWMP to address the CEQA thresholds the EIR, as it provides the most up to date information on the City's anticipated supply and demand for water.

The 2015 Water Tomorrow Update may be accessed by the following link:
https://www.mwdh2o.com/media/15970/integrated-water-resources-plan-update-2015.pdf?keywords=2015%20IRP

Refer to Response I-2.29 for the link to the 2020 UWMP.

Response I-2.37

The commentor states that recent State law have made a number of housing projects by-right developments and states if this will affect the City's ability to get developers to fund infrastructure improvements. The commentor asks to what degree will the development be covered by existing fee structures and to cite the links to these documents. In addition, the commentor states that the Recirculated Draft EIR includes UTIL-1 to address wastewater conveyance; however, there is no similar mitigation required for the water transmission system.

As stated in Section 4.12, *Utilities/Service Systems*, developers are responsible for funding any infrastructure improvements that are required to mitigate project impacts and have not been covered by the development impact fees. Development facilitated by the Housing Element Update will be subject to all existing development fees discussed in the Burbank Municipal Code (BMC), such as Sewer Facility Charges (SFCs). A Sewer Rate Study is currently being prepared and it is anticipated that an item will be brought to City Council in FY 2022-23. Additionally, consistent with applicable State law, the City's development fees will ensure that the developers pay the cost attributable to the increased demand for the affected public facilities reasonably related to the development project to refurbish the existing facilities to maintain the existing level of service and achieve an adopted level of service that is consistent with the City's General Plan (California Government Code Section 66001(g)). Title 8 of the BMC discusses sewers and other utilities. Title 8 is linked below:

https://www.codepublishing.com/CA/Burbank/#!/Burbank08/Burbank08.html

As discussed under Impact UTIL-1, as individual housing projects are proposed and considered for approval by the City, project proponents would be required to demonstrate that any identified system deficiencies reasonably related to the development project are adequately addressed by the responsible project proponent and future upgrades are designed in accordance with the BMC and to the satisfaction of the City Engineer.

New service connections that may be required for development associated with the proposed Project would be conducted within previously disturbed areas and existing rights-of-way, and would be consistent with utility expansion in urbanized areas, such that minimal areas of new disturbance would occur. Although all parcels in Burbank have access to public utility infrastructure, in some cases the infrastructure is older and in need of replacement or insufficient to meet the needs of a particular project. Pursuant to General Plan Land Use Policy 2.3, new development is required to pay for their share of upgrading the utility infrastructure as needed to serve their project. This may include installing larger water mains, new water meters, and/or upgrades to existing facilities. However, mitigation is not required.

Please note that water supply facilities would not have to be relocated to support the housing element.

- The five potable water connections with MWD would remain where they are as they exist.
- The Burbank Operable Unit (Burbank's treatment plant) and related wells would not be relocated or resized.
- An on-going pipeline replacement program, in part, guided by hydraulic analyses of water flows within our city's pipe network, requires pipes to be replaced and relocated within the street. This would remain the status quo with or without the housing element and is a minor impact.

Furthermore, water supply facilities may have to be constructed to support the housing element, which may include increasing reservoir storage. However, this will have negligible fiscal and environmental impact. Based on the latest and known information related to MWD's ability to serve Burbank, no new facilities need to be constructed in order to deliver the additional water supply to support the housing element. Burbank's pumps stations are adequately sized to convey the water needed by the housing element.

Response I-2.38

The commentor states that the contention that the "(p)otential impacts related to relocation or construction of water supply facilities would be less than significant" has not been supported by fact. The commentor states that the analysis of the impact of the Project wastewater conveyance is classified as significant. The commentor states that there should be a side-by-side comparison of the impacts of water conveyance and wastewater conveyance.

A side-by-side comparison would show that the impact of the Project on water and wastewater systems are not comparable because they are fundamentally different in their design and operation:

- Potable systems are closed conduits and the water in them is pumped. This removes the limitation on the system to accept higher flows and increased capacity. To increase capacity pumping is increased and the pipe size is evaluated to make sure the pressure required is not too high. Because the city's pipes are networked together there is much flexibility in how we move water and our ability to increase the pipe sizes as needed. The Project will require some pipes to be bigger in localized areas and this would be determined through hydraulic modeling. The impact to the distribution system from the project is not significant.

- Except for certain pipes called force mains, sewer systems are predominantly open conduits that are not under pressure. Wastewater is moved through them based on the slope of the pipes. There is not much you can do to increase the capacity of an "open channel" system. You can't pump the wastewater to increase the flow in such pipes because waste water would flow back into homes. There would only be two ways to increase capacity: (1) increase the pipe size; or, (2) change the slope of the pipe. The first would require digging up every pipe and replacing it. The second is not possible because the starting point and finishing point elevations are already fixed.
- Lastly, the wastewater that flows through the Burbank Water Reclamation Plant (BWRP) flows through it at a fixed rate because the flow relies on the difference in elevation between where the waste water goes in and where the treated waste water goes out. There is some variation in flow that can be "smoothed out" through the use of tanks to keep the rate constant. However, to increase the capacity of the BWRP, the plant would have to be significantly modified.

Impacts to the sewer system are significant. Impacts to the potable system are not.

Please refer to Response I-2.37, above, for information regarding why mitigation regarding water conveyance is not necessary.

Reasonably foreseeable development under the proposed Project would require new connections for wastewater conveyance. As described in Section 4.13.1(b) above, wastewater conveyance in Burbank is provided by approximately 230 miles of City-owned and operated underground pipelines and associated pump stations. The Burbank Public Works Department is responsible for the maintenance of the City's sewer mainlines, while individual property owners are responsible for the maintenance of the sewer laterals that connect buildings to mainlines. All structures producing sewage or liquid waste in the city must be connected to the sewer system mainline by sewer lateral lines, which require issuance of an excavation permit and a sewer connection permit from the Public Works Permit Section. Based on the results of the sewer capacity analysis, these improvements may include, but not be limited to installing new or larger sewer lines and/or upgrading existing facilities. A new Sewer System Master Plan was part of the City's approved budget for FY 2022-23, and the study will evaluate the aforementioned improvements.

Due to the built-up nature of this area, there are substantial existing utility rights-of-way previously established, largely within existing roadways, which are prevalent. New wastewater service connections that may be required as a direct result of new development associated with the proposed Project would be conducted within previously disturbed areas, existing rights-of-way, and, in some cases, a new easement would be created. Where sanitary sewer capital upgrades are needed it is possible that a new development may require new or expanded facilities to serve the project prior to the proposed project's construction (at cost to the developer). Mitigation Measure UTIL-1 is required to evaluate whether there are any sewer constraints and to determine fees that are required to support sewer system upgrades. The City's water system is prepared for current and future demands, and development facilitated by the Housing Element Update and needed water conveyance infrastructure is sufficient. However, the wastewater and sewer system will be necessary to expand, and therefore, impacts to the sewer system were found to be significant.

It should also be noted that the BWRP relies on gravity flow for the majority of its process/operations, and thus would require significant upgrades to accommodate the additional flows, which may include but are not limited to, acquisition of currently-developed land surrounding the BWRP.

Response I-2.39

The commentor states that the City must consult with BWP regarding the potential for water system impacts associated with the level of new development over the next eight years and the agency's ability to respond to increased demand.

Refer to Impact UTIL-2 in Section 4.12, *Utilities/Service Systems*, for additional detail on available water supply. Metropolitan projects that water supply will be equal to water demand under all climatic conditions considered, such that water supply reliability is 100 percent through the year 2045. This is partly due to the effectiveness of conservation programs implemented throughout the planning period. The projections shown for imported surface water supply availability from Metropolitan indicate that sufficient supplies are available to the City to meet projected demands. These projections are based upon the City's 2020 UWMP which reflects population growth associated with the Housing Element Update, as well as additional supplies associated with expansion of the City's current water supply portfolio through increased conservation and conjunctive use management efforts. Thus, based on the information provided in the UWMP prepared by BWP, there will be sufficient water supply beyond the next eight years and into the planning horizon of 2045. Additionally, new development will be evaluated on a project-by-project basis to ensure that a projects water demand does not exceed projected available supply.

Response I-2.40

The commentor states that the proposed Project underestimates water demand compared to the water availability in the City's 2020 Urban Water Master Plan (UWMP). The 2030 estimates of water supply vs. water availability in the City's 2020 Urban Water Master Plan (UWMP) are based on a 2030 Housing Element goal of 10,088 units, as shown in Table 2-1 of the UWMP, not the 10,456 units in the Housing Element. The commentor states that the analysis assumes the City's allocation of MWD treated water will increase and questions the bases of these assumptions and questions Burbank's flexibility with the water allocation.

The Housing Element Update would involve up to an estimated 10,456 new housing units in the city. However, this estimation of the number of units is based on the maximum number of housing opportunity sites available in the city. Similarly, the 10,088 units stated in the UWMP is also an estimation that was collected at the time the UWMP was being prepared. Because the Housing Element update is under development, BWP staff coordinated with the City's Community Development Department to obtain information related to expected changes to housing growth. The Housing Element is expected to lay the foundation for achievement of the City's goal for 12,000 new units through 2035. In which case, the UWMP and analysis under Impact UTIL-2 demonstrate that necessary water supplies would be available.

In regard to MWD treated water, MWD has completed extensive modeling to create management options that will include future variations in supply and demand. Additionally, MWD's large storage portfolio contains both dry-year storage and emergency storage that can be used to meet demand in case of a shortage. Expanding the range of planning scenarios that MWD considers in their supply and demand modeling will only increase the reliability of this resource for BWP. BWP projects increased demands (as weather conditions get hotter and drier) during multiple dry year scenarios, but projects that there will be enough supply to meet demands. Therefore, BWP's water supply reliability analysis shows that supplies will meet demands under all hydrologic scenarios from 2025 through 2045. Pursuant to a new requirement, a water supplier must also include in its 2020 UWMP a drought risk assessment (DRA) to compare supplies and demands over a five-year consecutive dry

period, or extended drought. All supplies assume no reduction in availability over the five-year period due to the drought resilience of local supplies and MWD's diverse water supply portfolio.

Response I-2.41

The commentor states that the Recirculated Draft EIR has failed to explain and define BWRP. In addition, the commentor states the Recirculated Draft EIR must discuss downstream impacts associated with increased flows in the Burbank Western Channel. The commentor also states that the discussion indicates that Burbank may divert wastewater to the Los Angeles sewer system and questions under what conditions this is allowed and states that the Recirculated Draft EIR must provide information on share of capacity currently in use.

As stated in Section 4.12 *Utilities/Service Systems*, the Burbank Water Reclamation Plan (BWRP), which is owned and operated by the City of Burbank and produces a disinfected tertiary-treated effluent that is approved for all uses, including full body contact, with the exception of human consumption. The BWRP produces up to 10,000 acre-feet per year (AFY) of recycled water, which is available for reuse in any of the following three ways:

- Flowed via gravity pipeline to the BWP campus
- Pumped into the recycled water distribution system
- Discharged to the Burbank Western Channel adjacent to the BWRP, which is tributary to the Los Angeles River

Recycled water produced at the BWRP is used for power production, landscape irrigation, and evaporative cooling. BWP has recently completed a feasibility study of both indirect and direct potable reuse of BWP's excess recycled water.

Wastewater flows to the BWRP, which has a design capacity of 12.5 million gallons per day (mgd) and currently treats approximately 8.5 mgd. The disinfected tertiary-treated effluent produced by the BWRP is discharged to either the Burbank Western Channel or to the City's recycled water distribution system for non-potable use. The discharged tertiary-treated effluent meets discharge limitations identified in its National Pollutant Discharge Elimination System (NPDES) permit issued by the Los Angeles Regional Water Quality Control Board. The BWRP's effluent also meets the most stringent water quality criteria for recycled water, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 3 requirement as Disinfected Tertiary Recycled Water. The City of Burbank Department of Public Works is responsible for maintaining, replacing, and upgrading the City's sewer collection system.

Response I-2.42

The commentor states that the Recirculated Draft EIR must provide links and proper citations to the various plan documents cited in page 4.12-10. In addition, the commentor asks what the key findings of the Burbank Sewer System Evaluation and Capacity Assurance Plan were, including the capacity used and locations in the city more likely to experience capacity issues.

As requested, see the following links to the various documents cited in page 4.12-19. All documents mentioned on page 4.12-19 are publicly available online and may be accessed for additional detail.

Burbank Sewer System Management Plan:
https://www.burbankca.gov/documents/174714/1057471/BurbankSSMPUpdateJuly14202.pdf/ddd42202-1f2e-e3f4-9100-f50eb6d2e52e?t=1618363811222

BMC:

https://www.burbankca.gov/web/community-development/planning-zoning

The Burbank Sewer System Evaluation and Capacity Assurance Plan (SSECAP) is included in the Burbank Sewer System Management Plan as Chapter 8.

Response I-2.43

The commentor asks if the analysis of water system impacts will address the level of development anticipated in the Housing Element and if not, how long will it take to prepare the analysis of required system upgrades and establish a new fee structure. In addition, the commentor states how will the impacts of individual developments be addressed as described in the Draft EIR, and what are the short term and long-term impacts.

Refer to Response I-2.40 for information on water supply availability for buildout of the proposed Housing Element Update. Refer to Response I-1.9 for information on the Housing Element Updates association with recent State housing policies such as SB 35, SB 9, SB 10 and SB 2011.

As discussed in Section 4.12, *Utilities/Service* Systems, as individual housing projects are proposed and considered for approval by the City, project proponents would be required to demonstrate that any identified system deficiencies reasonably related to the development project are adequately addressed by the responsible project proponent and future upgrades are designed in accordance with the BMC and to the satisfaction of the City Engineer. In addition, the City requires applicants to coordinate with the Burbank Fire Department and City of Burbank Building and Safety Division to ensure that existing and planned fire hydrants provide sufficient fire flow pressure requirements. The City's issuance of building permits is contingent upon review, testing, and approval that sufficient fire flow pressure is provided for the applicable site. Due to the existing built-up nature of the city, it is reasonably anticipated that future improvements for water supply and fire flow requirements would not disturb previously undisturbed areas and would be situated within existing utility rights-of-way, such as but not limited to within public roadways.

Existing impacts fees were developed by the City and outlined in Title 8 of the BMC. No specific timeline is included as a part of Mitigation Measure UTIL-1 or UTIL-3a for the Sewer Capacity Analysis; however, it is noted that the analysis must be completed as part of the City's development review process or prior to the submittal of plan check documents, whichever occurs first.

Response I-2.44

The commentor states asks to what extent the Housing Element Update results in redevelopment of properties versus infill development. The commenter suggests that if the Housing Element Update does not consist of redevelopment, statements pertaining to redevelopment should be removed from the Recirculated Draft EIR.

Page 1-87 of the Draft Housing Element Update states:

> Since all the opportunity sites are currently or formerly developed, the land will be redeveloped to accommodate the additional housing units.

Based on this statement above, statements regarding redevelopment will remain, as they are true to the Housing Element Update.

Response I-2.45

The commentor notes that the Draft EIR recognizes individual housing developments would be done in accordance with the BMC and BMPs for stormwater management, and that impacts related to the relocation or construction of new wastewater conveyance facilities would be less than significant. However, the commenter states that the impact determination does not appear to be supported by substantial evidence and suggests that the potential for impacts remains. In addition, the commentor states that the Recirculated Draft EIR concludes that impacts to new or expanded wastewater conveyance associated with the Housing Element would be potentially significant.

Potential impacts would be less than significant due to compliance with existing policies and regulations. Compliance with Sections 9-3-413 and 9-3-414 of the BMC would ensure that future development projects resulting from the Housing and Safety Element Update would be implemented with appropriately sized and sited stormwater conveyance facilities. In the long-term, redevelopment of properties in the city is anticipated to improve the quality of stormwater runoff by replacing older development with new development that incorporates Low Impact Development (LID) methods. LID methods include features such as stormwater detention basins and vegetated swales that slow the velocity of surface runoff and filter some water quality constituents before the runoff percolates to the underlying groundwater system or is conveyed through the City's, or Los Angeles County Flood Control District's (LACFCD), stormwater infrastructure. In accordance with the BMC, post-construction stormwater runoff from new projects must be captured and used to the maximum extent practicable, including through the implementation of on-site BMPs for stormwater management. Therefore, while individual housing developments would include site-specific stormwater drainage and conveyance facilities, such facilities would be designed and constructed in accordance with the BMC and BMPs for stormwater. It should be noted that all construction projects in the City must comply with the LID methods.

Response I-2.46

The commentor states that Impact UTIL-1 constitutes as an improper deferral of analysis and mitigation. In addition, the commentor states that the mitigation measure uses words such as "may" that do not mandate performance.

Refer to Response I-2.38 on the appropriateness of Mitigation Measure UTIL-1 and the reason for its implementation. In regard to use of the word "may," use of "may" is permitted under the CEQA Guidelines. Section 15005 states that " 'may' identifies a permissive element which is left fully to the discretion of the public agencies involved." Performance would be evaluated by the proper City departments to determine the completeness of the Sewer Capacity Analysis, as required by Mitigation Measure UTIL-1. This measure has been slightly revised based on this comment, refer to Section 4, *Errata*.

Response I-2.47

The commentor states that the Recirculated Draft EIR must provide additional details on what the impacts of a significant unmitigated impact on sewage treatment capacity would mean for residents before system up-grades could be brought on-line and the short-term and long-term impacts.

In the short-term, there is capacity for housing development under the Housing Element update; however, the reason for the significant and unavoidable impact is the long-term impacts that are unknown at this time. As stated in the Section 4.12, *Utilities/Service Systems*, the Sewer Master Plan will be prepared in fiscal year 2023/24. However, the final recommendations will not be available at

the time the Housing Element is scheduled to be approved. Individual housing projects will be evaluated on a project-by-project basis to determine their compliance with applicable sewer system requirements, increased demand, and whether additional sewer system development will be necessary to support individual projects.

Response I-2.48

The commentor states that the Recirculated Draft EIR needs to address the feasibility of mitigation measure UTIL-3a given the recent changes in State housing law, which creates a larger class of by-right residential development.

Refer to Response I-1.9 for details on recently update State housing laws such as SB 9, SB 10, SB 35 and SB 2011.

According to section 4.12, *Utilities/Service System*, a sewer capacity analysis shall be required for individual housing projects of five or more multifamily units, so the City may identify sewer infrastructure upgrades that can be implemented by developers when a nexus and rough proportionality is established between proposed project(s) impact to City sewer infrastructure. The sewer capacity analysis must be completed as part of the City's development review process or prior to the submittal of plan check documents, whichever occurs first.

Response I-2.49

The commentor states that the Recirculated Draft EIR needs to address the feasibility of Impact UTIL-3b given the large-scale up-zoning of the region mandated by recent housing element legislation. In addition, the commentor asks what mechanisms put in place to ensure that developers rather than existing residents pay the cost of any diversion to the City of Los Angeles.

According to the Recirculated Draft EIR diverting flows to the Los Angeles system would result in an increase in one-time Sewer Facility Charges (SFCs) and other recurring annual charges (capital improvement and operation & maintenance fees) that shall be paid to the City of Los Angeles. This process is to be completed as part of the City's development review process. Based on the constraints identified in the analysis under Mitigation Measure UTIL-1, the City's Public Works Department will prepare a nexus fee study to develop a fair share requirement in the form of a wastewater connection or similar project impact fee, which helps to pay for implementation of upgrades necessary to accommodate future development, including development of the opportunity sites where deficiencies in the system are identified to exist. Through the fee study, subsequent cost recovery fees applied to individual housing development projects will be based on a rough proportionality related to demands on the system reasonably attributed to the development project.

Response I-2.50

The commentor states that the Recirculated Draft EIR needs to address the potential impacts of UTIL-3d.

Mitigation Measures UTIL-3d is a long-term solution for the wastewater impacts; however, the details associated with the anticipated expansion and upgrades to BWRP facilities is unknown at this time, which is one of the reasons for the determination that the impacts to wastewater are significant and unavoidable. The potential impacts associated with the capacity and conveyance expansion and upgrades will require its own environmental analysis when the details are determined.

Response I-2.51

The commentor asks what percent of the existing stormwater conveyance system is used during peak periods and what is the remaining capacity during the dry, wet seasons, and during more intense storm events.

The individual housing developments facilitated by the Housing Element Update will be evaluated on a project-by-project basis to determine the potential impacts associated with stormwater quality and quantity.

The purpose of the local storm drain system, which is primarily owned and operated by the Los Angeles County Flood Control District, is to convey urban and stormwater runoff to the local waterways, which are commonly known as the Lockheed Channel, the Burbank Western Channel, the Burbank Eastern Channel, and the Los Angeles River. This purpose of the local storm drain system is aimed at preventing local flooding and it was designed and constructed prior to new and evolving National Pollutant Discharge Elimination System (NPDES) stormwater quality regulations.

The evolving stormwater regulations subject the City of Burbank and other public agencies in Los Angeles County to two primary requirements:

1) During dry-weather conditions, no urban runoff should be entering the local storm drain system, with the exception of the few conditionally exempt non-stormwater discharges. As the prolonged drought potentially continues, urban runoff will be minimized as local water purveyors are tasked with prohibiting many outdoor water uses. As a whole, the City of Burbank is tasked with prohibiting urban runoff discharges from entering the local storm drain system; and
2) During wet-weather conditions, the City of Burbank must design and build Stormwater Improvements as stipulated in the approved Upper Los Angeles River Enhanced Watershed Management Program (ULAR EWMP). The intent of these Stormwater Improvements is to divert stormwater runoff from entering local waterways to direct these flows for capture and A) infiltration, B) beneficial reuse, C) to be slowly introduced into the local sanitary sewer system for treatment and expanded use of recycled water, and D) as a last resort, for treatment and release into local waterways.

At this time, nearly 100% of the storm drain conveyance system is used during significant wet-weather events.

During dry-weather events, the City of Burbank continues to investigate sources of urban runoff that may be illicit discharges entering the local storm drain system, to prevent non-storm water discharges (dry-weather flows) from entering local waterways. As such, only a minimal portion of the storm drain conveyance system's available capacity should be utilized.

Finally, once the City of Burbank begins designing and constructing additional large-scale Stormwater Improvements per the ULAR EWMP, the City would be able to better quantify the revised capacities for the storm drain conveyance system during both dry-weather and wet-weather conditions.

Response I-2.52

The commentor states if Burbank met its AB 939 and SB 1016 targets.

The California Integrated Waste Management Act of 1989 (AB 939) requires each jurisdiction to divert 50% of its solid waste from being disposed in landfills. Cities, such as Burbank, were required

to prepare and implement plans to achieve 25% waste reduction from 1995 through 1999 and 50% waste reduction from the year 2000 and thereafter. Under AB 939, the City achieved compliance through a combination of reaching the 50% diversion mandate and showing a good faith effort in implementing diversion programs.

For 2007 and subsequent years, CalRecycle introduced a new diversion measurement system under SB 1016, which was based on a City's population and disposal tons to calculate a per capita disposal rate expressed in pounds per person per day. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of the City's recycling performance. Under this measurement system, a city needs to annually dispose of an amount equal to or less than its "50 percent equivalent per capita disposal target" calculated by CalRecycle. Since the implementation of the revised diversion measurement system under SB1016, Burbank has achieved compliance by remaining below the calculated per capita disposal target set by the State.

Response I-2.53

The commentor asks if there are more recent updates to the County of Los Angeles Integrated Waste Management Plan (ColWMP).

At the time of preparation of the Administrative Draft EIR, the 2012 annual report of the CoIWMP was the most recent document found online. Since preparation, the 2019 annual report was completed in September 2020. Nonetheless, this plan was referenced in the *Regulatory Setting* of Section 4.12, *Utilities/Service Systems,* to provide the background for regional policies associated with waste management. As such, the updated report does not result in any revisions to the analysis presented in the Recirculated Draft EIR.

Response I-2.54

The commentor asks how much the Project will reduce the longevity of the Burbank landfill and other landfills which may serve the city.

As discussed under Impact UTIL-4 in Section 4.12, *Utilities/Service Systems,* the City owns and operates the Burbank Landfill, located in the Verdugo Hills at the eastern edge of Burbank, which is expected to have an operational lifetime through year 2150. If all 10,456 new housing units included under the proposed Project are constructed as multi-family residential units, this equates to approximately 40,352 lbs/day (20.2 tons) of solid waste. The Burbank Landfill has average daily available permitted capacity of 117 tons (192 cy) per day, or approximately 49 percent of the permitted daily intake. Accordingly, sufficient solid waste disposal capacity is available at Burbank Landfill to meet the potential needs associated with reasonably foreseeable development under the proposed Project. In addition to the Burbank Landfill, approximately 50 percent of new waste from multi-family residential development generated in Burbank will be transported to and disposed of at seven other southern California landfills including Burbank Landfill Site No. 3, Chiquita Canyon Sanitary Landfill, Sunshine Canyon City/County Landfill, Simi Valley Landfill and Recycling Center, Puente Hills Landfill, Lancaster Landfill and Recycling Center, and Olinda Alpha Sanitary Landfill, which will lower their lifespans while still maintaining sufficient capacity.

Potential impacts from future residential development projects facilitated by the Housing Element will be mitigated through payment of fees charged for new development commensurate with the cost to transport the waste out of the city, and the proposed Project would not generate solid waste in excess of State or local standards or otherwise impair the attainment of solid waste reduction goals. Although, new sources of solid waste will contribute to reaching the capacity of the landfill at

a greater rate, the analysis adequately analyzes the potential impacts to address the CEQA thresholds associated with waste generation.

Response I-2.55

The commentor asks if there is a maximum number of GWhs that can be supplied by BWP and if so, what is it.

In Section 4 *Utilities/Service System*, the Recirculated Draft EIR states that according to the California Energy Commission, in 2020 BWP had a total usage of 995.1 Gigawatt hours (GWh). Residential uses consisted of the second most energy intensive source (287.6 GWh) for BWP, behind commercial and building (507.8 GWh). BWP's power mix from the power content label (PCL), which shows total generation delivered for a calendar year, divided by retail sales (not renewable energy credits retired) for 2020 consisted of approximately 31 percent renewable resources (wind, geothermal, biomass, solar, and small hydroelectric), 26 percent coal, 31 percent natural gas, eight percent nuclear, two percent hydroelectric, and the remainder from other sources.

The CEQA thresholds associated with energy include the relocation or construction of new or expanded electric power facilities; wasteful, inefficient, or unnecessary consumption of energy resources; and potential conflicts with a state or local plan for renewable energy. The Initial Study and Recirculated Draft EIR provided analyses that addresses each of these thresholds. No additional analysis is needed.

Response I-2.56

The commentor asks what percent of Burbank's electricity is procured by renewable and nonrenewable sources. In addition, the commentor stats to provide a breakdown of the source.

Please refer to Response I-2.56 for detail on BWP's power mix and availability of power from renewable sources.

Response I-2.57

The commentor states that the Recirculated Draft EIR needs to quantify the existing peak period electrical supply and demand, transmission capabilities, projected increase in electrical demand resulting from the project, and identify any system deficiencies.

According to Section 6, *Energy,* of Appendix B, *Initial Study*, long-term operation of new projects developed in accordance with the Housing Element Update would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. Reasonably foreseeable development under the Housing Element Update would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

Construction activity associated with individual projects under the Housing Update would be required to comply with applicable City and State energy efficiency regulations and standards, which would ensure that the proposed Project would not conflict with renewable energy and energy efficiency plans adopted by the City. Further analysis of this issue in the EIR is not needed. The Housing Element Update, in and of itself, is a policy document and does not propose specific housing developments. Thus, at the programmatic level, there is sufficient energy to supply the projects under the Housing Element Update, however individual projects must go through their own CEQA analysis to identify energy demand and transmission capabilities.

Response I-2.58

The commentor states that BWP needs to be consulted to assess whether the existing fee structure anticipated the level of development that would result from the Housing element. In addition, the commentor states that BWP needs to be consulted to address significant electrical transmission system impacts.

Please refer to Response I-2.28 for detail on consultation with BWP. When a Project is proposed, an engineering feasibility study is performed at the developer's cost. The feasibility study identifies the method of service, the impacts to the electric system, the upgrades needed, the cost to provide new electric service, and the cost to upgrade or mitigate any impacts to the electric system. These costs are called aid-in-construction (AIC) fees. The developer pays the full cost of AIC fees prior to the start of construction. BWP has reviewed and commented on the document. Additionally, BWP is conducting a high-level analysis in the Electrical Distribution Masterplan update.

Response I-2.59

The commentor states that Southern California Gas (SCG) supplied a total of 5.2 billion therms of natural gas in 2019 and questions if there is a maximum number of therms that can be supplied by SCG. In addition, the commentor asks for the demand generated by the Project.

For additional information on SCG gas capacity please refer to the 2020 California Gas Report, linked below: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf

The Housing Element Update, in and of itself, is a planning document and does not specifically propose individual housing developments. Individual housing developments will be evaluated on a project-by-project basis to determine increased demand for natural gas and the potential impacts of those increases. The analysis provided in the Recirculated Draft EIR is adequate to meet the needs of the analysis. No additional changes are required.

Response I-2.60

The commentor states that the Recirculated Draft EIR must provide citations and links for the information provided regarding gas demand.

Please refer to the link provided in Response I-2.59.

Response I-2.61

The commentor states that the Recirculated Draft EIR's cumulative impact analysis is too general and fails to include a list of cumulative projects list or summary of projections.

Refer to Response I-1.8 in Section 2, *Responses to Comments on Draft EIR*, as this comment was previously submitted and responded to therein. Cumulative impacts are adequately discussed within the Recirculated Draft EIR. CEQA Guidelines Section 15130 of states:

> "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact."

The discussion of cumulative impacts in each impact analysis section describes the cumulative direct and indirect impacts of the adoption of the Housing Element Update. Individual housing projects facilitated by the Housing Element Update will have their cumulative impacts analyzed on a project-by-project basis.

Response I-2.62

The commenter thanks the City in advance for their consideration and for correcting the fatal EIR flaws and more accurately disclosing to Burbank residents the impacts of the Project and cumulative law changes.

Refer to the responses above for more detail regarding commenter's specific concerns; no additional response is needed for this comment.

Planning Board
Public Comment Meeting August 22, 2022

Comment S-1

COMMENTER: Joshua Christensen, Southwest Regional Council of Carpenters (Representative)

Response S-1.1

The commenter noted that most residential construction workers are not unionized and rely on government public assistance for benefits such as health care and childcare. The commenter noted that it costs taxpayers approximately $3 billion annually to provide for this public assistance.

The comment is noted. However, the comment does not raise issues with the adequacy of the analysis or conclusions in the Draft EIR. The Draft EIR is not intended or required to provide justification for the Project.

Response S-1.2

The commenter asked for addition of provisions into the Housing and Safety Element Update that requires all workers to receive a fair wage, healthcare, and that all contractors that are bidding for projects in the City will provide background report which includes previous jobs, past violations and where their workers are commuting from.

Implementation of the requirement to use a local skilled and trained workforce is beyond the scope of the Draft EIR since labor and employment is not a required topic under CEQA. Nonetheless, the commenter's recommendations are noted for review and consideration by the City's decision-makers. Refer to Response for Letters O-3 through O-7 regarding the request for labor standards and/or policies.

Response S-1.3

Commenter noted long commute times of construction workers to jobs and the importance of hiring local workers.

Implementation of the requirement to use a local skilled and trained workforce is beyond the scope of the Draft EIR since labor and employment is not a required topic under CEQA. Nonetheless, the commenter's recommendations are noted for review and consideration by the City's decision-makers.

Comment S-2

COMMENTER: Jarred Langford, Southwest Regional Council of Carpenters (Member)

Response S-2.1

The commenter noted that he is a member of Carpenters Local 661 and offered an introduction to the labor union. The commenter stated that labor standards and policies need to be incorporated into Housing Elements in order to protect construction workers. He noted that many construction workers in the Burbank area do not receive health care from their jobs, work for low wages, have to commute long distances for jobs and rely on government subsistence.

Refer to Response for Letters O-3 through O-7 regarding the request for labor standards and/or policies.

Response S-2.1

The commenter supported Section 2.5.1 of the Housing Element Updated line-item but suggested a revision to make it more clear. The commenter's time ran out before revisions were stated.

The commenter wrote Letter O-2 requesting specific revisions to Section 2.5.1. Refer to the Response to Letter O-2 and Response to Comment S-4 regarding the request for revisions.

Comment S-3

COMMENTER: Chuck Powell, Southwest Regional Council of Carpenters (Member)

Response S-3.1

The commenter noted the need for affordable housing in the Burbank area.

This comment does not pertain to the adequacy of the EIR. Nonetheless, in response to the comment, the purpose of the 15 percent buffer above the RHNA allocation under the Housing Element is to include a sufficient buffer in the Inventory of Sites to accommodate future reductions in the sites identified for affordable housing as they are developed with another use during the eight-year cycle. Therefore, the proposed Project would contribute to development of affordable housing.

Response S-3.2

The commenter requested a local hire for new building in the area, so local construction workers don't have such long commute times in order to work in locations such as Los Angeles International Airport.

Implementation of the requirement to use a local skilled and trained workforce is beyond the scope of the Draft EIR since labor and employment is not a required topic under CEQA. Nonetheless, the commenter's recommendations are noted for review and consideration by the City's decision-makers.

Comment S-4

COMMENTER: Jarred Langford, Southwest Regional Council of Carpenters (Member)

Response S-4.1

Commenter provided a recommendation for Section 2.5.1. The commenter suggested to strike through and remove "that require an economic feasibility analysis to evaluate the potential impact of adding workforce training and prevailing wage requirements to new housing." The commenter suggested the addition of "the implementation of a local hire, apprenticeship policy to have the skills construction workforce necessary to produce an ample supply of mixed income and affordable housing units and ensure equitable sustainable and livable communities.".

The commenters' requests for changes Section 2.5.1 of the Housing Element Update are noted but does not raise issues with the adequacy of the analysis or conclusions in the Draft EIR. The Draft EIR is not intended or required to provide justification for the Project. Rather, the EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that the Project is likely to have on the environment. This EIR also identifies ways in which the significant effects might be minimized and identifies alternatives to the Project. The City is not required to consider such comments or requests to change the Project in its CEQA analysis absent a commenter providing substantial evidence that the proposed change would feasibly reduce one or more significant adverse environmental impacts identified in the Draft EIR. Requests for changes to the Project may be addressed through the planning process outside of the CEQA process.

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4 Errata to the Draft EIR

This Errata addresses proposed refinements and revisions to the Draft EIR. In-text deletions are noted by ~~strikeout~~ and in-text insertions by underline. Individual typographical corrections are not specifically indicated here. The revisions are organized by section and page number. As discussed below, none of the conditions in Section 15088.5 of the CEQA Guidelines would be met because revisions would not result in a significant change or an increase in the severity of any identified impact, and an additional recirculation of the Draft EIR is not required.

Effect of In-Text Revisions

As demonstrated by the following discussion, the in-text revisions to the Project would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts and therefore do not warrant recirculation of the EIR.

CEQA Guidelines Section 15088.5 requires that an EIR that has been made available for public review, but not yet certified, be recirculated only if significant new information has been added to the EIR. Pursuant to CEQA Guidelines Section 15088.5(c), the entire document need not be circulated if revisions are limited to specific portions of the document. The relevant portions of CEQA Guidelines Section 15088.5 read as follows:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way 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) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

2) A 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 environmental impacts of the project, but the project's proponents decline to adopt it.

4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The information contained in this Errata makes insignificant changes to the information that has already been presented in the Draft EIR. In addition, the minor refinements are not significant

because the EIR is not changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project. As described below, the proposed revisions would not result in any new significant impacts or a substantial increase in the severity of any impact already identified in the Draft EIR, Recirculated Draft EIR, or Final EIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met and recirculation is not required.

Air Quality

The following revision was made to update policy numbering in Section 4.1, *Air Quality*, of the Draft EIR:

Section 4.1 – Page 4.1-26

> *Policy ~~3.8:~~ 3.9:* Encourage use of sustainable and green building design in new and existing housing.

Utilities/Service Systems

The following revision was made to Section 4.12, *Utilities/Service Systems*, of the Recirculated Draft EIR:

Section 4.12 – Page 4.12-5

> The Project is subject to CEQA and includes more than 500 dwelling units. However, the Housing Element is a planning document, not a development project, and it therefore does not directly trigger the need for a WSA as defined by California Water Code. The scope of the EIR for the Housing Element was programmatic, so the analysis focused on the UWMP analysis with input from BWP in lieu of a WSA. ~~Nonetheless, a WSA was prepared for the Housing Element to provide a well-informed analysis of potential impacts to water supply availability and reliability.~~

Section 4.12 – Page 4.12-2

> *UTIL-1 Sewer Service Constraints Analysis*
>
> The City will conduct an analysis to identify any sewer service constraints to determine if there are any sewer capacity issues and any constraints in the City's wastewater system including assessment of system capacity relative to the locations of opportunity sites identified in the Housing Element Update. The analysis will identify upgrades necessary to mitigate the constraints in the system to ensure that individual housing development projects implemented under the Housing Element can be completed and that sufficient capacity and conveyance in the wastewater system exists. However, if a proposed development has a construction schedule that the City cannot accommodate, the developer may be responsible for performing the necessary sewer infrastructure upgrades per Burbank Municipal Code (BMC) 8-1-304.
>
> Based on the constraints identified in the analysis, the City's Public Works Department will prepare a nexus fee study to develop a fair share requirement in the form of a wastewater connection or similar project impact fee, which helps to pay for implementation of upgrades necessary to accommodate future development, including development of the opportunity sites where deficiencies in the system are identified to exist. Through the fee study,

subsequent cost recovery fees applied to individual housing development projects will be based on a rough proportionality related to demands on the system reasonably attributed to the development project.

In the event it is determined that necessary upgrades to serve a project cannot be completed by the City prior to project completion, the City may require the developer to perform the necessary sewer infrastructure upgrades (Per BMC 8-1-304) at cost to the developer, or the City can ~~may~~ choose to enter into a reimbursement agreement so that a developer shall ~~may~~ fund and construct the improvements within the necessary timeframe with subsequent partial reimbursement. If the City and Developer mutually agree to enter into reimbursement agreement (approved as to form by the City Attorney and approved by the City Council), it would be administered by the City's Public Works Director on behalf of the City.

Appendix B – Initial Study

In response to a comment provide by the Department of Conservation, the following revisions were made to update analysis in Appendix B, *Initial Study*, of the Draft EIR:

Section 7, Geology and Soils – Page 35

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

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

According to the DOC Earthquake Zones of Required Investigation map, portions of the City are at risk of seismically induced liquefaction (DOC 2020c). As mentioned above, development in Burbank is required to adhere to the UBC and CBC. Compliance with City and State building codes would reduce impacts associated with liquefaction from seismic ground shaking with current engineering practices and the proposed Project would not exacerbate liquefaction potential in the area. Individual housing projects facilitated by the Housing Element Update that occur in a zone of required investigation (ZORI) for liquefaction would be subject to comply with the Seismic Hazards Mapping Act. Per the Seismic Hazards Mapping Act, development occurring within a ZORI for liquefaction, a site-specific investigation by a qualified engineering geologist and/or civil engineer may be required before development on the site is permitted. As such, reasonably foreseeable development under the Housing Element Update would not directly or indirectly cause substantial adverse effects from liquefaction risk, and the Safety Element and Environmental Justice updates would not result in development that would create geologic impacts. Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.

Section 7, Geology and Soils – Page 35

The geologic character of an area determines its potential for landslides. Steep slopes, the extent of erosion, and the rock composition of a hillside all contribute to the potential for slope failure and landslide events. In order to fail, unstable slopes need to be disturbed; common triggering mechanisms of slope failure include undercutting slopes by erosion or grading, saturation of marginally stable slopes by rainfall or irrigation; and, shaking of marginally stable slopes during earthquakes. The topography of the City of Burbank is generally flat, although the northeastern portion of development in the City is situated along the foothills of the Verdugo Mountains. According to the DOC Earthquake Zones of Required investigation map, several single-family residential parcels located north of Bel Aire Drive in the northeast portion of the City have been identified as potential areas for landslides, but the majority of the City is not located in a landslide zone (DOC 2020c) and housing sites identified in the Housing Element Update are not located along the foothills. In addition, the housing opportunity sites identified in the Housing Element Update are not located in a ZORI for earthquake-induced landslides, and thus, would not be subject to requirements established by the Seismic Hazards Mapping Act. No additional investigations regarding earthquake-induced landslide risk would be required for these sites. However, any housing that may occur in the landslide zone in the northeast portion of the City would be subject to requirements established by the Seismic Hazards Mapping Act. ~~In addition, the~~ The Safety Element and Environmental Justice updates would not result in development that would create geologic impacts. Therefore, development under the proposed Project would not directly or indirectly cause impacts related to landslides. Potential impacts would be less than significant and further analysis of this issue is not warranted.

Conclusion

Based on the information presented above, the revised policy number in Section 4.1, *Air Quality*, and revisions to Section 7, *Geology and Soils*, of the Initial Study (Appendix B) would not result in any new significant impacts, the substantial increase in severity of an impact already identified in the Draft EIR and Recirculated Draft EIR, or disclose a feasible alternative or mitigation measure that have been declined to adopt. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met and an additional recirculation of the Draft EIR is not required.

5 Mitigation Monitoring and Reporting Program

CEQA requires adoption of a reporting or monitoring program for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code Section 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the Burbank Housing and Safety Element Update implementation phase. For each mitigation measure recommended in the Final EIR for the Project, specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

As a programmatic EIR, the mitigation measures included herein apply to individual projects, and as such, the cost for any studies and/or monitoring to implement the project-level mitigation measure shall be borne by the developer.

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Air Quality							
AQ-1 Construction Emissions Reduction							
For projects that would include any of the following: demolition of more 13,500 square feet of building area, greater than 5,000 cubic yards of soil cut/fill, greater than 5-acres of graded area, or use of more than ten pieces of heavy-duty construction equipment and 150 truck trips on any given day during demolition, site clearing, or grading, prior to issuance of a permit to construct and at the expense of the project applicant, the City shall retain a qualified air quality analyst to prepare an Air Quality Impact Analysis to analyze construction emissions. The air quality analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but is not limited to, the following mitigations: ▪ Off-road diesel-powered construction equipment greater than 50 horsepower shall meet the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of NO_x and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the onsite air quality construction mitigation manager that the use of such devices is not practical for specific engine types. ▪ All construction equipment shall be outfitted with best available control technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less	Verify retention of a qualified air quality analyst to evaluate project-specific construction emissions in an Air Quality Impact Analysis for projects with construction activities that exceed the screening criteria. Review and approval of the Air Quality Impact Analysis.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
AQ-1 Construction Emissions Reduction (cont'd)							
than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. ▪ Consistent with SCAQMD Rule 403, construction contractors shall identify and implement best available dust control measures during active construction operations capable of generating dust.							
AQ-2 Operations Emissions Reduction							
For any project that would include more than 553 single-family residential units, 710 multi-family residential units, or any equivalent combination thereof, prior to issuance of a permit to construct, and at the expense of the project applicant, the City shall retain a qualified air quality analyst to prepare an Air Quality Impact Analysis to analyze operational emissions The air quality analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but is not limited to, the following mitigation: ▪ Implementation of a Transportation Demand Management Plan. ▫ Installation of additional electric vehicle charging stations ▫ Public infrastructure improvements (e.g., bus stop shelter improvements) ▫ Carpool or ridesharing programs ▫ Subsidized transit costs ▫ Unbundled parking costs ▫ Bicycle amenities (storage, showers, lockers, etc.)	Verify retention of a qualified air quality analyst to evaluate project-specific operation emissions in an Air Quality Impact Analysis for projects with a residential unit count that exceeds the screening criteria. Review and approval of the Air Quality Impact Analysis.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
AQ-2 Operations Emissions Reduction (cont')							
▪ Use of all-electric appliances (i.e., elimination of natural gas service) ▪ Use solar or low emission water heaters that exceed Title 24 requirements ▪ Increased walls and attic insulation beyond Title 24 requirements ▪ Required use of electric lawnmowers, leaf-blowers, and chainsaws							
Biological Resources							
BIO-1 Biological Resources Avoidance							
For individual housing developments that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment that will include review of the California Natural Diversity Database (CNDDB) and iNaturalist maps to determine where sightings have occurred or habitats for the least Bell's vireo, bat species, or monarch butterflies have previously been identified. If construction activities or other disturbances occur in areas within 500 feet of a previously identified habitat or observation according to CNDDB or iNaturalist, the following measures shall be implemented: ▪ Prior to the issuance of a grading permit, a qualified biologist shall be retained by the project applicant to conduct a biological resources reconnaissance of the site. The qualified biologist shall thoroughly report on the biological resources present on a project site and submitted to the City.	Verification that the project applicant has retained a qualified biologist to prepare an initial site assessment. If project construction/ disturbances occur within 500 feet of an identified resource, verification that the project applicant has retained a qualified biologist to report on the site. If qualified biologist identifies the potential for special-status species or habitat for special-status wildlife, verification that focused surveys are completed in accordance with applicable protocols. Review and approval of the biological resources report.	Prior to the issuance of a grading permit	Once	City of Burbank Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
BIO-1 Biological Resources Avoidance (cont'd)							
▪ If the biologist determines that special-status species may occur, focused surveys for special-status plants shall be completed in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (California Department of Fish and Wildlife [CDFW], March 20, 2018) and Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants (USFWS, September 23, 1996). If it is determined that the project site has suitable habitat for special-status wildlife, focused surveys shall be conducted to determined presence/absence including species-specific surveys in accordance with CDFW or United States Fish and Wildlife Service (USFWS) protocols for State or federally listed species, respectively, that may occur. ▪ If it is determined that a special-status species may be impacted by a specific project, consultation with USFWS and/or CDFW shall occur prior to issuance of a development permit from the City to determine measures to address impacts, such as avoidance, minimization, or take authorization and mitigation. The report shall include a list of special-status plants and wildlife that may occur on the project site and/or adjacent area. If construction activities or other disturbances occur during the bird nesting season (February 1 through August 31), prior to issuance of grading permits for individual housing developments that will include disturbance of vegetation, structures, or other areas where bird nests could be present, the following requirements shall be implemented	If project will impact special-status species, verification that the USFWS and CDFW is consulted immediately to address impacts.						
	Verification that the project applicant has retained a qualified biologist to prepare a pre-construction bird survey if project construction/disturbances occur within bird nesting season (February 1 – August 31).	At latest, seven days prior to initiation of grading or construction activities	Once	Same as above			
	Review and approval of pre-construction bird survey.	Prior to initiation of grading or construction activities	Once	Same as above			
	If nests are found, field verification that avoidance buffers are demarcated and enforced.	Upon discovery of active nests	Continuous; throughout construction activities near active nests	Same as above			
	Review and approval of survey report prepared by qualified biologist.	Upon compliance with requirements and applicable State and Federal regulations	Once	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
BIO-1 Biological Resources Avoidance (cont'd)							
▪ Applicant shall submit a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of grading or construction activities. The nesting bird pre-construction survey shall be conducted on foot on the construction site, including a 100-foot buffer, and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California and a copy of the study shall be submitted to the Community Development Department and Building and Safety Division. The cost to hire a qualified biologist shall be borne entirely by the developer/project applicant. ▪ If nests are found, an avoidance buffer shall be demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this 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. ▪ A survey report shall be prepared by the qualified biologist documenting and verifying compliance with the above requirements and applicable State and Federal regulations protecting birds that shall be submitted to the City of Burbank. The qualified biologist shall							

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
BIO-1 Biological Resources Avoidance (cont'd)							
serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.							
Cultural Resources							
CUL-1 Historic Resource Protection							
The project proponent shall either: a) Demonstrate to the satisfaction of the City of Burbank Community Development Department that the project does not contain any historic resources either due to the site being vacant, age of the structures on the site, or due to the result of the Program LU-4 Historic Preservation Plan determination; or b) For any structure determined to be eligible for listing on a federal, State, or local registry, or currently listed, as a historic resource (typically determined as a result of the Program LU-4 Historic Preservation Plan process), project activities shall comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). During the project planning phase (prior to any construction activities), input shall be sought from a qualified architectural historian or historic architect meeting the *Secretary of the Interior's Professional Qualifications Standards* to ensure project compliance with the Standards for Rehabilitation. The cost of this assessment shall be borne entirely by the project applicant. This input will ensure the avoidance of any direct/indirect physical changes to historical resources. The findings	Verification that the project applicant has adequately demonstrated the project does not contain historic resources. If project contains eligible or currently listed historic structure, verification that the project applicant has retained a qualified architectural historian or historic architect (meeting the Secretary of the Interior's Professional Qualifications Standards) to assess the project. Review and approval of Standards Project Review Memorandum and recommendations.	Prior to project design approval	Once	City of Burbank Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
CUL-1 Historic Resource Protection (cont'd)							
and recommendations of the architectural historian or historic architect shall be documented in a Standards Project Review Memorandum at the schematic design phase. This memorandum shall analyze all project components for compliance with the Standards for Rehabilitation. Project components to be analyzed shall include direct and indirect changes to historical resources and their setting. should design modifications be necessary to bring projects into compliance with the Standards for Rehabilitation, the memorandum will document those recommendations, which will then become conditions of project approval. The report will be submitted to the City for review and approval.							
CUL-2(a) Unanticipated Discovery of Archaeological Resources							
Prior to the commencement of any ground-disturbing activities, a qualified archaeologist shall be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel. The training shall be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology. Archaeological sensitivity training will include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find. In the event of the unanticipated discovery of archaeological materials, the project applicant shall immediately cease all work activities in the area (within approximately 100 feet) of the	Verification that the project applicant has retained a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards) to conduct WEAP training.	Prior to the start of construction activities and during ground-disturbing activities, as needed	Continuous; throughout ground-disturbing activities	City of Burbank Community Development Department			
	If archaeological materials are found, field verification that all work activities within 100 feet have ceased.	Upon discovery of archaeological materials	Continuous; throughout ground-disturbing activities	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
CUL-2(a) Unanticipated Discovery of Archaeological Resources (cont'd)							
discovery until it can be evaluated by a qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with the City on the significance of the resource. If it is determined that the discovered archaeological resource constitutes a historical resource or unique archaeological resource pursuant to CEQA, avoidance and preservation in place shall be the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is determined to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The City shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.	If archaeological materials are found, consultation with retained qualified archaeologist to determine treatment of resource. If archaeological materials of Native American origin are found, consultation with Native American representatives to determine treatment of resource.	Upon discovery of archaeological materials	Continuous; until consultation is complete	Same as above			
	If data recovery through excavation is the only feasible mitigation available, review and approval of Archaeological Resources Treatment Plan.	Upon completion of consultation	Once	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
CUL-2(b) Archaeological and Native Monitors							
During initial ground disturbing activities related to the proposed project, both a qualified archaeologist and a locally affiliated Native American monitor shall monitor construction activities within the project site in accordance with City of Burbank Historic Resource Management Ordinance, Program LU-4: Historic Preservation Plan. Initial ground disturbance is defined as disturbance within previously undisturbed native soils. If, during initial ground disturbance, the qualified archaeologist determines that the construction activities have little or no potential to impact cultural resources (e.g., excavations are within previously disturbed, non-native soils, or within soil formation not expected to yield cultural resources deposits), the qualified archaeologist may recommend that monitoring be reduced or eliminated, in consultation with the Native American monitor.	Verification that a qualified archaeologist and a locally affiliated Native American monitor have been retained to monitor construction activities.	Prior to the start of construction activities	Once	City of Burbank Community Development Department			
	If qualified archaeologist confirms little or no potential to impact resources, review and approval of recommendation that monitoring be reduced or eliminated.	During initial ground disturbance	Once	Same as above			
Geology/Soils							
GEO-1(a) Paleontological Resources Management							
Housing development projects that require ground disturbance (grading, trenching, foundation work, and other excavations) beyond five feet below ground surface (bgs) on a site located in an area mapped as Quaternary young (Holocene) alluvial fan deposits (Qyf, Qf) where it was not previously excavated beyond five feet bgs, shall comply with the following requirements prior to the commencement of any construction activities: 1. The Developer shall retain a qualified professional paleontologist to review project plans to determine if underlying paleontologically sensitive units (i.e., early Holocene to Pleistocene age deposits [Qoa])	Verification that project applicant has retained a qualified paleontologist to review plans and determine underlying sensitivity for projects requiring ground disturbance beyond five feet below surface in Qyf and Qf areas. If potential impacts are identified, review and approval of a PRMP that includes WEAP training.	Prior to the start of construction activities	Once	City of Burbank Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
GEO-1(a) Paleontological Resources Management (cont'd)							
could be impacted. If potentially significant impacts are identified, the qualified professional paleontologist shall prepare and implement a Paleontological Resources Mitigation Plan (PRMP). The PRMP shall describe mitigation recommendations, including paleontological monitoring procedures; communication protocols to be followed in the event that an unanticipated fossil discovery is made during project development; and preparation, curation, and reporting requirements. 2. As part of a PRMP, require the Qualified Paleontologist or his or her designee to conduct Worker Environmental Awareness Program (WEAP) training for the general contractor, subcontractor(s), and all construction workers participating in earth disturbing activities, regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by on-site personnel. The WEAP shall be fulfilled at the time of a preconstruction meeting. A training acknowledgment form must be signed by all workers who receive the training and retained by the City. In the event a fossil is discovered by construction personnel, all work in the immediate vicinity of the find shall cease and the qualified paleontologist shall be contacted to evaluate the find before re-starting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall complete the mitigation outlined below (GEO-1[b]) to mitigate impacts to significant fossil resources.	Review and retention of WEAP training acknowledgement form signed by all trainees.	Prior to the start of construction activities and during ground-disturbing activities, as needed	Continuous; throughout ground-disturbing activities	Same as above			
	Verification that the project applicant has retained a qualified paleontologist to conduct monitoring during ground-disturbing activities	Prior to the start of construction activities	Once	Same as above			
	If a fossil is discovered, field verification that all work in the immediate vicinity of the find is ceased and qualified paleontologist evaluates the find.	Upon discovery of fossil(s)	Continuous; throughout ground-disturbing activities	Same as above			
	If qualified paleontologist confirms full-time monitoring is not warranted, review and approval of recommendation that monitoring be limited.	During initial ground disturbance	Once	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
GEO-1(a) Paleontological Resources Management (cont'd)							
3. Conduct monitoring during ground construction activities (i.e., grading, trenching, foundation work, and other excavations). Monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP (2010), which includes a B.S. or B.A. degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources. The duration and timing of the monitoring shall be determined by the Qualified Paleontologist and the location and extent of proposed ground disturbance. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend that monitoring be limited to periodic spot-checking or cease entirely.							
GEO-1(b) Fossil Discovery, Preparation and Curation							
If a paleontological resource is discovered at any time during earthmoving activities, the construction contractor shall ensure that all construction activities in the immediate area of the find are halted and diverted, and the City is contacted. A qualified paleontologist shall be retained (if not done so already) to evaluate the discovery. The paleontologist shall have the authority to temporarily direct, divert or halt construction activity around the find until it is assessed for scientific significance and collected to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to	If a paleontological resource is discovered, field verification that all work in the immediate vicinity of the find is ceased and/or diverted and qualified paleontologist evaluates the find.	Upon discovery of paleontological resource	Continuous; throughout ground-disturbing activities	City of Burbank Community Development Department			
	Coordination with qualified paleontologist to assess, collect, and remove resource.	Upon discovery of paleontological resource	Continuous; until coordination is complete	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
GEO-1(b) Fossil Discovery, Preparation and Curation (cont'd)							
a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County [NHMLAC]) along with all pertinent field notes, photos, data, and maps.							
Hazards and Hazardous Materials							
HAZ-2 Property Assessment – Phase I and II ESAs							
Prior to the start of construction (demolition or grading), the project applicant will retain a qualified environmental professional (EP), as defined by ASTM E-1527, to complete one of the following: If the project is not listed in Appendix F, DTSC (GeoTracker) or SWRCB (EnviroStor) resources, then the proponent will retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase I ESA. If the Phase I ESA identifies recognized environmental conditions or potential concern areas, a Phase II ESA will be prepared. If the project is listed in Appendix F, DTSC (GeoTracker) or SWRCB (EnviroStor) resources, then the project proponent will retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase II ESA to determine whether the soil, groundwater, and/or soil vapor has been impacted at concentrations exceeding regulatory screening levels for commercial/ industrial land uses. Any and all recommended actions included in the Phase II ESA will be followed. This may include the preparation of a Soil Management Plan (SMP) for Impacted Soils (see	Verification that the project applicant has retained a qualified EP for submittal of either a Phase I ESA or Phase II ESA. Review and approval of the Phase I ESA or Phase II ESA. Review and approval of the SMP, if recommended in the Phase II ESA. If soils contain chemical concentrations exceeding hazardous waste screening thresholds, review and approve recommendations for waste disposal, impacted wastes, and remedial engineering controls.	Prior to the start of construction activities	Once	City of Burbank Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
HAZ-2 Property Assessment – Phase I and II ESAs (cont'd)							
below) prior to project construction and/or completion of remediation at the proposed project prior to onsite construction. The completed ESAs will be submitted to the lead agency for review and approval prior to issuance of building or grading permits. **Soil Management Plan Requirements:** The SMP, or equivalent document, will be prepared to address on-site handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan will be submitted to the lead agency, and 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 site. These measures and practices may include, but are not limited to: ▪ Stockpile management including stormwater pollution prevention and the installation of BMPs ▪ Proper disposal procedures of contaminated materials ▪ Monitoring and reporting ▪ A health and safety plan for contractors working at the 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 will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. The lead agency will review and approve the development site Soil Management Plan for							

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
HAZ-2 Property Assessment – Phase I and II ESAs (cont'd)							
Impacted Soils prior to demolition and grading (construction). **Soil Remediation Requirements:** If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project proponent will 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 will 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 will 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. The project applicant will review and approve the disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction. 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.							

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
HAZ-2 Property Assessment – Phase I and II ESAs (cont'd)							
The lead agency will review and approve the development site disposal recommendations prior to transportation of waste soils offsite and review and approve remedial engineering controls, prior to construction.							
Noise							
NOI-1(a) Shielding and Silencing							
Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the project applicant or owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.	Review and verification that construction plans note all equipment to be used.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Review and verification of documentation demonstrating power construction equipment is equipped with noise shielding and silencing devices and is maintained in accordance with manufacturer specifications.	Prior to start of construction activities and during construction	Continuous; throughout construction	Same as above			
NOI-1(b) Enclosures and Screening							
All outdoor fixed mechanical equipment shall be enclosed or screened from off-site noise-sensitive uses. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment and off-site noise-sensitive uses	Review and verification that construction plans note enclosure/screening requirements for all mixed mechanical equipment.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Field verification that fixed equipment is enclosed.	During construction activities	Continuous; throughout construction	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
NOI-1(c) Construction Staging Areas							
Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints.	Review and verification that construction plans note locations of staging areas.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Field verification that staging areas are located consistent with plans.	During construction activities	Continuous; throughout construction	Same as above			
NOI-1(d) Smart Back-Up Alarms							
Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.	Review and verification that construction plans note the use of back-up alarms on mobile construction equipment.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Field verification that smart back-up alarms are utilized.	During construction activities	Continuous; throughout construction	Same as above			
NOI-1(e) Equipment Idling							
Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use.	Review and verification that construction plans note idling requirements.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Field verification that construction vehicles are not left idling.	During construction activities	Continuous; throughout construction	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
NOI-1(f) Workers' Radios							
All noise from workers' radios, including any on-site music, shall be controlled to a point that they are not audible at off-site noise-sensitive uses.	Review and verification that construction plans note worker radio requirements.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Field verification that radios are not audible off-site.	During construction activities	Continuous; throughout construction	Same as above			
NOI-1(g) Use of Driven Pile Systems							
Driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report.	Review and verification that construction plans note requirement and necessary assurances have been obtained.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Field verification that driven, sonic, or vibratory pile drivers are avoided, unless geotechnically required.	During construction activities	Continuous; throughout construction	Same as above			
NOI-1(h) Temporary Sound Barriers							
Temporary sound barriers, such as walls or sound blankets, shall be positioned between construction activities and noise-sensitive uses when construction equipment are located within a line-of-sight to and within 500 feet of off-site noise-sensitive uses. Sound barriers shall break the line-of-sight between the construction noise source and the receiver where modeled levels exceed applicable standards. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant.	Review and verification that construction plans note locations of temporary sound barriers as specified by a qualified acoustical consultant.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Field verification that sound barriers are implemented and positioned accordingly.	During construction activities	Continuous; throughout construction	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
NOI-1(i) Noise Complaint Response							
Project applicants shall designate an on-site construction project manager who shall be responsible for responding to any complaints about construction noise. This person shall be responsible for responding to concerns of neighboring properties about construction noise disturbance and shall be available for responding to any construction noise complaints during the hours that construction is to take place. They shall also responsible for determining the cause of the noise complaint (e.g., bad silencer) and shall require that reasonable measures be implemented to correct the problem. A toll-free telephone number and email address shall be posted in a highly visible manner on the construction site at all times and provided in all notices (mailed, online website, and construction site postings) for receiving questions or complaints during construction and shall also include procedures requiring that the on-site construction manager to respond to callers and email messages. The on-site construction project manager shall be required to track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction and shall notify the City's Community Development Director of each complaint occurrence.	Review and verification that an on-site construction project manager has been identified to implement the mitigation requirement.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Field verification that signage is posted on the construction site with a toll-free telephone number and email address that can be called to receive questions or complaints. Coordination with the construction manager to verify that complaints are submitted to the City's Community Development Director and confirm that an appropriate response is carried out to address the complaints.	During construction activities	Continuous; throughout construction	Same as above			
NOI-1(j) Project-Specific Construction Noise Study							
A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for housing development projects located within 500 feet of noise-sensitive land uses identified in the Burbank2035 General Plan Noise Element (i.e., residences, parks, motels, hotels, movies studios, school, and hospitals), and	Verification that the applicant has retained a qualified noise analyst to evaluate project-specific construction noise in a Construction Noise Study for projects located within 500 feet of a noise-	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
that have one or more of the following characteristics: ▪ Two subterranean levels or more (generally more than 20,000 cubic yards of excavated soil material; ▪ Construction durations of 18 months or more (excluding interior finishing); ▪ Use of large, heavy-duty equipment rated 300 horsepower or greater; ▪ The potential for pile driving; or ▪ Located within 1,000 feet of other construction projects with overlapping construction schedules. The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (e.g., residences, parks, motels, hotels, movies studios, school, and hospitals) and identify measures to reduce noise exposure. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices. Noise reduction devices or techniques may include but not be limited to silencers, enclosures, sound barriers, and/or placement of restrictions on equipment or construction	sensitive use and that exceed the one or more of the screening criteria. Review and approval of the Air Quality Impact Analysis. Review and verification that contractor agreements note requirements under Mitigation Measures NOI-1a through NOI-1f in addition to additional requirements identified and recommended by the Construction Noise Study.						
NOI-1(j) Project-Specific Construction Noise Study (cont'd)							
techniques (e.g., alternative installation methods to pile driving such as cast-in-place systems or pile cushioning). Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise-sensitive land uses. Project applicants shall be required to comply with all requirements of Mitigation Measures NOI-1a through NOI-1f in addition to any additional							

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
requirements identified and recommended by the Construction Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.							
NOI-3 Vibration Control Plan							
For construction activities involving vibratory rollers within 50 feet of a structure or pile drivers (impact or sonic) within 140 feet of a structure, the applicant shall prepare a Vibration Control Plan prior to the commencement of construction activities. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods required to minimize vibration, including, but not limited to: ▪ Alternative installation methods for pile driving (e.g., pile cushioning, drilled piles, cast-in-place systems) within 140 feet of a building to reduce impacts associated with seating the pile ▪ Vibration monitoring prior to and during pile driving operations occurring within 140 feet of a building ▪ Use of rubber-tired equipment rather than metal-tracked equipment ▪ Avoiding the use of vibrating equipment when allowed by best engineering practices	Review and verification that the applicant has retained a licensed structural engineer to prepare a Vibration Control Plan for projects involving a vibratory roller within 50 feet of a structure or a pile driver within 140 feet of a structure. Review and approval of Vibration Control Plan. Verification of submittal of Statement of Compliance from the project and applicant and owner to the Building and Safety Division. Coordination and approval from the Building and Safety Division.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
NOI-3 Vibration Control Plan (cont'd)							
The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected extremely fragile buildings/historical resources and/or residential structures. The survey letter shall determine conditions that exist prior to the commencement of	Review and approval of follow-up letter describing damage and, if applicable, recommendations for repair from licensed structural engineer.	Upon completion of vibration-causing construction activities	Once	Same as above			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
construction activities for use in evaluating potential damages caused by construction. Fixtures and finishes susceptible to damage shall be documented photographically and in writing prior to construction. The survey letter shall provide a shoring design to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings and structures. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24). A Statement of Compliance signed by the applicant and owner shall be submitted to the City' Building and Safety Division at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above shall be documented by a qualified structural engineer, and shall be provided to the City upon request.	Field verification of structural repairs to damaged buildings.	Upon completion of vibration-causing construction activities	Continuous; throughout repair work	Same as above			
NOI-C1 Construction Building Permits							
The City's Community Development Department shall review the locations and anticipated construction timing for housing development projects with respect to the locations of other pending development projects. The City shall stagger the issuance of building permits for development projects with overlapping construction schedules that meet both of the following criteria: ▪ The development project is located within 1,000 feet of another separate development project; and	Review of location and construction timing of housing projects. Staggering of building permits for development projects with overlapping schedules that meet the criteria. Review and approval of site-specific noise and vibration studies.	Prior to issuance of a construction permit	Continuous; throughout citywide development	City of Burbank Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
▪ The development project is located 500 feet or less from a sensitive receiver. In these instances, the Community Development Department shall review the findings of any site-specific noise and vibration studies pertaining to future development projects to compare their locations to sensitive receivers identified therein.							
Utilities/Service Systems							
UTIL-1 Sewer Service Constraints Analysis							
The City will conduct an analysis to identify any sewer service constraints to determine if there are any sewer capacity issues and any constraints in the City's wastewater system including assessment of system capacity relative to the locations of opportunity sites identified in the Housing Element Update. The analysis will identify upgrades necessary to mitigate the constraints in the system to ensure that individual housing development projects implemented under the Housing Element can be completed and that sufficient capacity and conveyance in the wastewater system exists. However, if a proposed development has a construction schedule that the City cannot accommodate, the developer may be responsible for performing the necessary sewer infrastructure upgrades per Burbank Municipal Code (BMC) 8-1-304. Based on the constraints identified in the analysis, the City's Public Works Department will prepare a nexus fee study to develop a fair share requirement in the form of a wastewater connection or similar project impact fee, which helps to pay for implementation of upgrades necessary to accommodate future development, including development of the opportunity sites where deficiencies in the system are identified to exist. Through the fee study, subsequent cost	Conduct a sewer service constraints analysis relative to opportunity sites. Preparation of a nexus fee study to develop a fair share requirement in the form of a wastewater connection or similar project impact fee.	Prior to issuance of a construction permit	Once	City of Burbank Community Development Department			
	Application of subsequent cost recovery fees to projects. If service upgrades cannot be completed by City for a project, require that the project developer perform the necessary sewer infrastructure upgrades (per BMC 8-1-304) or enter into a reimbursement agreement. If the City and project developer mutually agree to enter into reimbursement agreement, coordination with Public	Prior to issuance of a construction permit	Continuous; throughout citywide development	City of Burbank Community Development Department; City of Burbank Public Works Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
recovery fees applied to individual housing development projects will be based on a rough proportionality related to demands on the system reasonably attributed to the development project.	Works Department Director to administer agreement.						
UTIL-1 Sewer Service Constraints Analysis (cont'd)							
In the event it is determined that necessary upgrades to serve a project cannot be completed by the City prior to project completion, the City may require the developer to perform the necessary sewer infrastructure upgrades (Per BMC 8-1-304) at cost to the developer, or the City can choose to enter into a reimbursement agreement so that a developer shall fund and construct the improvements within the necessary timeframe with subsequent partial reimbursement. If the City and Developer mutually agree to enter into reimbursement agreement (approved as to form by the City Attorney and approved by the City Council), it would be administered by the City's Public Works Director on behalf of the City.							
UTIL-3a Sewer System Upgrades by Developers							
A Sewer Capacity Analysis (SCA) shall be required for individual housing projects of five (5) or more multi-family units, so the City may identify sewer infrastructure upgrades that can be implemented by developers when a nexus and rough proportionality is established between proposed project(s) impact to City sewer infrastructure. The SCA must be completed as part of the City's development review process or prior to the submittal of plan check documents, whichever occurs first.	Review and approve the SCA for projects that meet the criteria. If upgrades are necessary, verify that the appropriate fee is received based on a nexus fee study.	SCA to be completed as part of the City's development review process or prior to the submittal of plan check documents, whichever occurs first. Fees must be received prior to issuance of a construction permit.	Once	City of Burbank Community Development Department; City of Burbank Public Works Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
UTIL-3b Sewage Diversion							
Per the City's Public Works Department there are several locations throughout the City of Burbank where sewage can potentially be diverted away from the BWRP and conveyed to the City of Los Angeles' Hyperion wastewater treatment system. As a short-term measure, diversion of sewage may potentially be used to alleviate capacity concerns for certain sewage conveyance pipelines (but not all pipelines) as well as temporarily lowering the influent flows to the BWRP. Diverting flows to the Los Angeles system would result in an increase in one-time Sewer Facility Charges (SFCs) and other recurring annual charges (capital improvement and operation & maintenance fees) that shall be paid to the City of Los Angeles. Therefore, if the sewage analysis determines that diversion is feasible, the applicant will be required to contribute a fair share fee, which shall be estimated based on the preliminary billing estimates received from the City of Los Angeles, to offset to the cost of diversion to the City of Los Angeles.	If the sewage analysis determines that diversion is feasible, the applicant will be required to contribute a fair share fee, which shall be estimated based on the preliminary billing estimates received from the City of Los Angeles, to offset to the cost of diversion to the City of Los Angeles.	To be completed as part of the City's development review process or prior to the submittal of plan check documents, whichever occurs first. Fees must be received prior to issuance of a construction permit.	Ongoing throughout the period of sewage diversion	City of Burbank Community Development Department; City of Burbank Public Works Department			
UTIL-3c Sewer System Master Plan							
The City shall prepare a new Sewer System Master Plan in 2023 to evaluate the City's sewer conveyance and treatment system over the next twenty years, which is inclusive of the proposed Housing Element update planning and implementation period, as well as developing the appropriate sewer facility impact fees to ensure that developers pay their fair share of the cost to expand and upgrade the capacity of the BWRP treatment facilities.	Prepare a Sewer System Master Plan that includes requirements for appropriate sewer facility impact fees.	To be approved in 2023	Once	City of Burbank Community Development Department; City of Burbank Public Works Department			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
UTIL-3d Expansion and Upgrades to BWRP Treatment Facilities							
The City shall expand and upgrade the BWRP treatment facilities as needed consistent with the City's Sewer System Master Plan including but not limited to, the acquisition of land adjacent to the BWRP facilities, the addition of new primary clarifiers, increased capacity in the equalization basins, and upgrades to other parts of the sewage treatment process.	Conduct a sewer service constraints analysis relative to opportunity sites. Preparation of a nexus fee study to develop a fair share requirement in the form of a wastewater connection or similar project impact fee.	After approval of Sewer System Master Plan	Continuous; throughout citywide development	City of Burbank Community Development Department; City of Burbank Public Works Department			

Appendix H

Exhibits to Letter O-1 – Mitchell M. Tsai

EXHIBIT A

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

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March 8, 2021

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

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

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

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

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	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

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
	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

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

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

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

	ROG	NOx	CO	SO2	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.

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
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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

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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

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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.

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Other Experience:

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