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July 12, 2022

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**Re: SAFER Appeal – CEQA Infill Exemption
626 South Kingsley Drive Project
Case No: DIR-2022-0363-TOC-SPR-HCA-1A; ENV-2022-0364-CE
Central Area Planning Commission AGENDA ITEM 6 (July 12, 2022)**

Honorable Central Los Angeles Area Planning Commissioners:

This correspondence is submitted on behalf of Supporters Alliance for Environmental Responsibility and its members living in and near the City of Los Angeles (“SAFER”) regarding SAFER’s appeal of the Planning Director’s May 10, 2022 decision regarding the environmental and site plan review and categorical exemption from the California Environmental Quality Act (“CEQA”) for the 620-626 South Kingsley Drive mixed-use project (Case No.: DIR-2022-0363-TOC-SPR-HCA-1A; ENV-2022-0364-CE) (“Project”) to be heard as Agenda Item 6 at the Central Area Planning Commission meeting on July 12, 2022.

The purpose of this letter is to briefly summarize the points raised in SAFER’s comment submitted yesterday July 11, 2022, which was deemed non-compliant for exceeding the two-page limit for submissions after 3:00 p.m. on Thursday before the Commission meeting.

The Planning Director determined that the Project is categorically exempt from the requirements of CEQA pursuant to Section 15332 of the CEQA Guidelines (“Infill Exemption”). Pursuant to the Infill Exemption, a project cannot be exempt if the project would result “in any significant effects relating to traffic, noise, *air quality*, or water quality.” (14 CCR § 15332(d) [emphasis added].)

SAFER's review of the Project was assisted by air quality experts Matt Hagemann, P.G., C.Hg., and Paul E. Rosenfeld, Ph.D., of Soil/Water/Air Protection Enterprise ("SWAPE") and indoor air quality expert Francis Offermann, PE, CIH. The expert comments of SWAPE and Mr. Offermann are available as Exhibit A and Exhibit B to SAFER's July 11 comment.

SWAPE prepared a screening-level health risk assessment to evaluate potential impacts to human health from diesel particulate matter emissions ("DPM") during construction and operation of the Project. SWAPE found that the excess cancer risk for infants, children and adults at the closest sensitive receptor located approximately 25 meters away, over the course of Project construction and operation, are approximately 141, 162, and 18 in one million, respectively. SWAPE also found that the excess cancer risk over the course of a residential lifetime is approximately 327 in one million. The infant, child, adult, and lifetime cancer risks all exceed the 10 in one million significance threshold established by the South Coast Air Quality Management District ("SCAQMD"). Due to this significant air quality impact, the Project cannot be exempted from CEQA under the Infill Exemption.

Mr. Offermann reviewed the health risk posed to future residents and employees of the Project from off-gassing of formaldehyde from composite wood products used in construction. Mr. Offermann found that future residents of the Project's residential units will be exposed to a cancer risk from formaldehyde of approximately 120 per million. Future employees of the Project's commercial spaces would be exposed to a cancer risk from formaldehyde of approximately 17.7 per million. These figures exceed SCAQMD's 10 in one million significance threshold. Importantly, Mr. Offermann's calculations assume that all materials are compliant with the California Air Resources Board's most recent rules and regulations. This impact should be addressed in an EIR or MND so that mitigation measures can be imposed such as requiring the use of no-added-formaldehyde composite wood products, which are readily available.

Because the Project will result in significant impacts to air quality from emissions of diesel particulate matter and formaldehyde, the Project does not qualify for CEQA's Infill Exemption. For that reason, SAFER respectfully requests that the Commission grant SAFER's appeal and require that the Project undergo environmental review pursuant to CEQA prior to approval.

Sincerely,



Brian B. Flynn
Lozeau Drury LLP

626 South Kingsley Drive Future Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	626 South Kingsley Drive Future
Lead Agency	City of Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	16.8
Location	626 S Kingsley Dr, Los Angeles, CA 90010, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4074
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	127	Dwelling Unit	0.32	67,712	964	—	299	—
Strip Mall	0.35	1000sqft	0.01	350	0.00	—	—	—
Enclosed Parking with Elevator	38.0	Space	0.00	15,200	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.88	0.71	6.74	7.04	0.01	0.30	0.90	1.19	0.28	0.23	0.49	—	1,464	1,464	0.07	0.09	1.64	1,495
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.52	9.34	12.6	11.4	0.02	0.60	3.80	4.40	0.55	1.43	1.98	—	1,713	1,713	0.07	0.01	—	1,719
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.61	1.54	5.11	5.64	0.01	0.24	0.99	1.23	0.22	0.30	0.53	—	994	994	0.04	0.01	0.04	998
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.11	0.28	0.93	1.03	< 0.005	0.04	0.18	0.22	0.04	0.06	0.10	—	165	165	0.01	< 0.005	0.01	165
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2021	0.88	0.71	6.74	7.04	0.01	0.30	0.68	0.98	0.28	0.13	0.40	—	1,464	1,464	0.07	0.09	1.64	1,495
2023	0.69	0.58	5.93	7.00	0.01	0.28	0.90	1.19	0.26	0.23	0.49	—	1,305	1,305	0.05	0.01	—	1,309
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2021	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
2023	1.52	9.34	12.6	11.4	0.02	0.60	3.80	4.40	0.55	1.43	1.98	—	1,713	1,713	0.07	0.01	—	1,719
2024	0.83	9.30	6.50	8.12	0.01	0.29	1.07	1.35	0.26	0.27	0.53	—	1,438	1,438	0.06	0.01	—	1,443
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2021	0.05	0.04	0.41	0.42	< 0.005	0.02	0.04	0.06	0.02	0.01	0.02	—	88.0	88.0	< 0.005	0.01	0.04	89.8
2023	0.61	1.54	5.11	5.64	0.01	0.24	0.99	1.23	0.22	0.30	0.53	—	994	994	0.04	0.01	—	998
2024	0.05	0.56	0.39	0.49	< 0.005	0.02	0.06	0.08	0.02	0.02	0.03	—	87.3	87.3	< 0.005	< 0.005	—	87.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2021	0.01	0.01	0.07	0.08	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	14.6	14.6	< 0.005	< 0.005	0.01	14.9
2023	0.11	0.28	0.93	1.03	< 0.005	0.04	0.18	0.22	0.04	0.06	0.10	—	165	165	0.01	< 0.005	—	165
2024	0.01	0.10	0.07	0.09	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	0.01	—	14.4	14.4	< 0.005	< 0.005	—	14.5

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.50	3.92	1.43	19.4	0.03	0.05	0.82	0.87	0.05	0.15	0.19	26.4	3,724	3,750	2.90	0.14	10.0	3,873
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.67	3.12	1.46	10.8	0.02	0.04	0.82	0.86	0.04	0.15	0.19	26.4	3,599	3,626	2.91	0.14	0.73	3,741
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.29	2.79	0.86	10.2	0.01	0.04	0.35	0.39	0.04	0.06	0.10	26.4	2,290	2,317	2.82	0.08	2.25	2,413
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.24	0.51	0.16	1.86	< 0.005	0.01	0.06	0.07	0.01	0.01	0.02	4.37	379	384	0.47	0.01	0.37	400
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.65	1.52	1.04	11.4	0.02	0.02	0.82	0.84	0.02	0.15	0.16	—	2,440	2,440	0.14	0.10	9.54	2,484
Area	0.81	2.38	0.08	7.85	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	22.0	22.0	< 0.005	< 0.005	—	22.1
Energy	0.04	0.02	0.32	0.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	1,200	1,200	0.09	0.01	—	1,205
Water	—	—	—	—	—	—	—	—	—	—	—	9.12	61.5	70.6	0.94	0.02	—	101
Waste	—	—	—	—	—	—	—	—	—	—	—	17.3	0.00	17.3	1.73	0.00	—	60.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.49	0.49
Total	2.50	3.92	1.43	19.4	0.03	0.05	0.82	0.87	0.05	0.15	0.19	26.4	3,724	3,750	2.90	0.14	10.0	3,873
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.63	1.49	1.14	10.6	0.02	0.02	0.82	0.84	0.02	0.15	0.16	—	2,338	2,338	0.14	0.11	0.25	2,374
Area	0.00	1.61	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
Energy	0.04	0.02	0.32	0.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	1,200	1,200	0.09	0.01	—	1,205
Water	—	—	—	—	—	—	—	—	—	—	—	9.12	61.5	70.6	0.94	0.02	—	101
Waste	—	—	—	—	—	—	—	—	—	—	—	17.3	0.00	17.3	1.73	0.00	—	60.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.49	0.49
Total	1.67	3.12	1.46	10.8	0.02	0.04	0.82	0.86	0.04	0.15	0.19	26.4	3,599	3,626	2.91	0.14	0.73	3,741
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.69	0.64	0.49	4.66	0.01	0.01	0.35	0.36	0.01	0.06	0.07	—	1,014	1,014	0.06	0.05	1.76	1,031
Area	0.56	2.14	0.05	5.38	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	15.1	15.1	< 0.005	< 0.005	—	15.2
Energy	0.04	0.02	0.32	0.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	1,200	1,200	0.09	0.01	—	1,205
Water	—	—	—	—	—	—	—	—	—	—	—	9.12	61.5	70.6	0.94	0.02	—	101
Waste	—	—	—	—	—	—	—	—	—	—	—	17.3	0.00	17.3	1.73	0.00	—	60.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.49	0.49
Total	1.29	2.79	0.86	10.2	0.01	0.04	0.35	0.39	0.04	0.06	0.10	26.4	2,290	2,317	2.82	0.08	2.25	2,413

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.12	0.09	0.85	< 0.005	< 0.005	0.06	0.07	< 0.005	0.01	0.01	—	168	168	0.01	0.01	0.29	171
Area	0.10	0.39	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.50	2.50	< 0.005	< 0.005	—	2.51
Energy	0.01	< 0.005	0.06	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	199	199	0.02	< 0.005	—	200
Water	—	—	—	—	—	—	—	—	—	—	—	1.51	10.2	11.7	0.16	< 0.005	—	16.7
Waste	—	—	—	—	—	—	—	—	—	—	—	2.86	0.00	2.86	0.29	0.00	—	10.0
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08
Total	0.24	0.51	0.16	1.86	< 0.005	0.01	0.06	0.07	0.01	0.01	0.02	4.37	379	384	0.47	0.01	0.37	400

3. Construction Emissions Details

3.1. Demolition (2021) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.77	0.65	5.79	6.08	0.01	0.29	—	0.29	0.27	—	0.27	—	852	852	0.03	0.01	—	855
Demolition	—	—	—	—	—	—	0.46	0.46	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.05	0.04	0.35	0.37	< 0.005	0.02	—	0.02	0.02	—	0.02	—	51.3	51.3	< 0.005	< 0.005	—	51.5
Demolition	—	—	—	—	—	—	0.03	0.03	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.50	8.50	< 0.005	< 0.005	—	8.53
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.69	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	103	103	< 0.005	< 0.005	0.50	105
Vendor	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	0.00
Hauling	0.05	0.02	0.90	0.26	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	—	509	509	0.03	0.08	1.14	535
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	5.98	5.98	< 0.005	< 0.005	0.01	6.06
Vendor	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	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	30.7	30.7	< 0.005	< 0.005	0.03	32.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	0.99	0.99	< 0.005	< 0.005	< 0.005	1.00
Vendor	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	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.08	5.08	< 0.005	< 0.005	< 0.005	5.33

3.3. Grading (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.52	1.28	12.6	11.4	0.02	0.60	—	0.60	0.55	—	0.55	—	1,713	1,713	0.07	0.01	—	1,719
Dust From Material Movement	—	—	—	—	—	—	2.07	2.07	—	1.00	1.00	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.45	1.31	< 0.005	0.07	—	0.07	0.06	—	0.06	—	197	197	0.01	< 0.005	—	198
Dust From Material Movement	—	—	—	—	—	—	0.24	0.24	—	0.12	0.12	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.26	0.24	< 0.005	0.01	—	0.01	0.01	—	0.01	—	32.6	32.6	< 0.005	< 0.005	—	32.7
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

3.5. Building Construction (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.69	0.58	5.93	7.00	0.01	0.28	—	0.28	0.26	—	0.26	—	1,305	1,305	0.05	0.01	—	1,309
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.69	0.58	5.93	7.00	0.01	0.28	—	0.28	0.26	—	0.26	—	1,305	1,305	0.05	0.01	—	1,309
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42	0.35	3.55	4.19	0.01	0.17	—	0.17	0.16	—	0.16	—	781	781	0.03	0.01	—	784
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.06	0.65	0.76	< 0.005	0.03	—	0.03	0.03	—	0.03	—	129	129	0.01	< 0.005	—	130
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

3.7. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.67	0.56	5.60	6.98	0.01	0.26	—	0.26	0.23	—	0.23	—	1,305	1,305	0.05	0.01	—	1,309
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.34	0.42	< 0.005	0.02	—	0.02	0.01	—	0.01	—	79.2	79.2	< 0.005	< 0.005	—	79.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.1	13.1	< 0.005	< 0.005	—	13.1
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

3.9. Architectural Coating (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	0.93	1.15	< 0.005	0.04	—	0.04	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	8.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.11	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.9	15.9	< 0.005	< 0.005	—	16.0
Architectural Coatings	—	1.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.64	2.64	< 0.005	< 0.005	—	2.65

Architectural	—	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

3.11. Architectural Coating (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	8.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.10	8.10	< 0.005	< 0.005	—	8.13

Architectural	—	0.52	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.34	1.34	< 0.005	< 0.005	1.35
Architectural Coatings	—	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	789	789	0.06	0.01	—	793
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	6.59	6.59	< 0.005	< 0.005	—	6.62
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	0.27	0.27	< 0.005	< 0.005	—	0.27
Total	—	—	—	—	—	—	—	—	—	—	—	—	796	796	0.06	0.01	—	799
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	789	789	0.06	0.01	—	793
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	6.59	6.59	< 0.005	< 0.005	—	6.62
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	0.27	0.27	< 0.005	< 0.005	—	0.27
Total	—	—	—	—	—	—	—	—	—	—	—	—	796	796	0.06	0.01	—	799
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	131	131	0.01	< 0.005	—	131
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	1.09	1.09	< 0.005	< 0.005	—	1.10
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04	< 0.005	< 0.005	—	0.04
Total	—	—	—	—	—	—	—	—	—	—	—	—	132	132	0.01	< 0.005	—	132

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.04	0.02	0.32	0.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	404	404	0.04	< 0.005	—	405
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.55	0.55	< 0.005	< 0.005	—	0.55
Enclosed Parking with Elevator	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
Total	0.04	0.02	0.32	0.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	405	405	0.04	< 0.005	—	406
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.04	0.02	0.32	0.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	404	404	0.04	< 0.005	—	405
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.55	0.55	< 0.005	< 0.005	—	0.55
Enclosed Parking with Elevator	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
Total	0.04	0.02	0.32	0.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	405	405	0.04	< 0.005	—	406
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.01	< 0.005	0.06	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	66.9	66.9	0.01	< 0.005	—	67.1
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.09	0.09	< 0.005	< 0.005	—	0.09

Enclosed Parking with Elevator	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
Total	0.01	< 0.005	0.06	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	67.0	67.0	0.01	< 0.005	—	67.2

4.3. Area Emissions by Source

4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	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
Consumer Products	—	1.46	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.81	0.77	0.08	7.85	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.0	22.0	< 0.005	< 0.005	—	22.1
Total	0.81	2.38	0.08	7.85	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	22.0	22.0	< 0.005	< 0.005	—	22.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	17.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	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

Consum Products	—	1.46	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00	18.8	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coatings	—	0.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	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
Consum er Products	—	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landsca pe Equipme nt	0.10	0.10	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.50	2.50	< 0.005	< 0.005	—	2.51
Total	0.10	0.67	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.50	2.50	< 0.005	< 0.005	—	2.51

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts Mid Rise	—	—	—	—	—	—	—	—	—	—	—	9.07	61.1	70.2	0.93	0.02	—	100
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.05	0.33	0.38	0.01	< 0.005	—	0.55

Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	9.12	61.5	70.6	0.94	0.02	—	101
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	9.07	61.1	70.2	0.93	0.02	—	100
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.05	0.33	0.38	0.01	< 0.005	—	0.55
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	9.12	61.5	70.6	0.94	0.02	—	101
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	1.50	10.1	11.6	0.15	< 0.005	—	16.6
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.01	0.06	0.06	< 0.005	< 0.005	—	0.09
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	1.51	10.2	11.7	0.16	< 0.005	—	16.7

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	17.1	0.00	17.1	1.71	0.00	—	59.8
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.20	0.00	0.20	0.02	0.00	—	0.69
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	17.3	0.00	17.3	1.73	0.00	—	60.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	17.1	0.00	17.1	1.71	0.00	—	59.8
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.20	0.00	0.20	0.02	0.00	—	0.69
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	17.3	0.00	17.3	1.73	0.00	—	60.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.83	0.00	2.83	0.28	0.00	—	9.90
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.03	0.00	0.03	< 0.005	0.00	—	0.11
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	2.86	0.00	2.86	0.29	0.00	—	10.0
-------	---	---	---	---	---	---	---	---	---	---	---	------	------	------	------	------	---	------

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.48	0.48
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.49	0.49
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.48	0.48
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.49	0.49
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	4/1/2021	4/30/2021	5.00	22.0	—
Grading	Grading	1/2/2023	2/28/2023	5.00	42.0	—
Building Construction	Building Construction	3/1/2023	1/31/2024	5.00	241	—
Architectural Coating	Architectural Coating	11/1/2023	1/31/2024	5.00	66.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	12.6	LDA,LDT1,LDT2
Demolition	Vendor	—	7.75	HHDT,MHDT
Demolition	Hauling	3.50	40.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	12.6	LDA,LDT1,LDT2
Grading	Vendor	—	7.75	HHDT,MHDT
Grading	Hauling	62.9	40.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	97.9	12.6	LDA,LDT1,LDT2
Building Construction	Vendor	16.1	7.75	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	19.6	12.6	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.75	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	137,117	45,706	23,325	7,775	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	16,619	—
Grading	—	13,200	0.33	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%
Strip Mall	0.00	0%
Enclosed Parking with Elevator	0.00	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2021	0.00	690	0.05	0.01
2023	0.00	690	0.05	0.01
2024	0.00	690	0.05	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	443	443	443	69,298	2,953	2,953	2,953	461,934

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	127
Conventional Wood Stoves	0
Catalytic Wood Stoves	0

Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
137116.8	45,706	23,325	7,775	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	417,004	690	0.0489	0.0069	1,260,521
Strip Mall	3,485	690	0.0489	0.0069	1,709
Enclosed Parking with Elevator	140	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	4,733,773	16,524

Strip Mall	25,925	0.00
Enclosed Parking with Elevator	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	31.7	0.00
Strip Mall	0.37	0.00
Enclosed Parking with Elevator	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	9.58	annual days of extreme heat
Extreme Precipitation	6.70	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	0	0	0	N/A

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	0	0	0	N/A
Wildfire	0	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack	N/A	N/A	N/A	N/A
Air Quality	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack	N/A	N/A	N/A	N/A
Air Quality	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	50.5
AQ-PM	83.4
AQ-DPM	88.4
Drinking Water	92.5
Lead Risk Housing	58.1
Pesticides	0.00
Toxic Releases	76.5
Traffic	65.6
Effect Indicators	—
CleanUp Sites	34.7
Groundwater	41.5
Haz Waste Facilities/Generators	57.6
Impaired Water Bodies	0.00
Solid Waste	35.7
Sensitive Population	—
Asthma	13.1
Cardio-vascular	7.89
Low Birth Weights	70.8
Socioeconomic Factor Indicators	—
Education	65.7
Housing	97.7

Linguistic	97.6
Poverty	82.2
Unemployment	7.77

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	26.78044399
Employed	81.98383164
Education	—
Bachelor's or higher	68.98498653
High school enrollment	100
Preschool enrollment	74.38727063
Transportation	—
Auto Access	6.223533941
Active commuting	91.27422045
Social	—
2-parent households	53.36840755
Voting	8.623123316
Neighborhood	—
Alcohol availability	4.516874118
Park access	2.194276915
Retail density	63.6596946
Supermarket access	94.25125112
Tree canopy	21.26267163
Housing	—

Homeownership	3.772616451
Housing habitability	2.643397921
Low-inc homeowner severe housing cost burden	3.721288336
Low-inc renter severe housing cost burden	13.57628641
Uncrowded housing	19.65866804
Health Outcomes	—
Insured adults	3.47747979
Arthritis	92.2
Asthma ER Admissions	88.9
High Blood Pressure	71.3
Cancer (excluding skin)	87.6
Asthma	86.2
Coronary Heart Disease	87.2
Chronic Obstructive Pulmonary Disease	84.0
Diagnosed Diabetes	51.3
Life Expectancy at Birth	58.3
Cognitively Disabled	60.3
Physically Disabled	86.7
Heart Attack ER Admissions	98.0
Mental Health Not Good	58.7
Chronic Kidney Disease	79.8
Obesity	73.2
Pedestrian Injuries	76.9
Physical Health Not Good	56.1
Stroke	75.8
Health Risk Behaviors	—
Binge Drinking	86.1

Current Smoker	57.8
No Leisure Time for Physical Activity	44.2
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	78.7
Elderly	61.9
English Speaking	3.2
Foreign-born	99.2
Outdoor Workers	71.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	0.5
Traffic Density	80.6
Traffic Access	87.4
Other Indices	—
Hardship	57.4
Other Decision Support	—
2016 Voting	8.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	67.0
Healthy Places Index Score for Project Location (b)	28.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health and Equity Evaluation Scorecard not completed.

8. User Changes to Default Data

Screen	Justification
Land Use	Developer information
Construction: Construction Phases	Developer information
Construction: Dust From Material Movement	.
Construction: Trips and VMT	.
Operations: Hearths	Developer information



DOUGLASKIM+ASSOCIATES,LLC

To: File
From: Douglas Kim, AICP
Date: July 12, 2022
Re: 626 South Kingsley Drive Air Quality
Analysis

This memo updates our April 2021 analysis of potential air quality impacts from construction and operation of the proposed project at 626 South Kingsley Drive. The April 2021 analysis analyzed 63,713 total square feet of residential floor area. Since the original analysis was completed, the Project was revised to include 67,712 square feet of residential floor area, an increase of approximately 4,000 square feet of floor area. As shown in Table 1, with this addition of residential floor area, the Project's potential construction emissions would still not exceed the SCAQMD's thresholds of significance for regional and localized pollutant emissions, and Project air quality impacts would remain less than significant.

In addition, the April 2021 analysis properly assumed compliance with applicable SCAQMD regulations as part of construction, including Rule 403. Such regulatory compliance is not mitigation under CEQA, but within the computer model used to assess emissions, compliance with the regulatory requirements are assessed under the program's self-labeled "mitigation module." However, this program feature is merely the manner in which the model allows regulatory compliance to be assessed, it does not transform an applicable regulatory requirement into CEQA mitigation.

Table 1
Estimated Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2021	0.7	6.7	7.0	<0.1	1.0	0.4
2023	9.3	12.6	11.4	<0.1	4.4	2.0
2024	9.3	6.5	8.1	<0.1	1.4	0.5
Maximum Regional Total	9.3	12.6	11.4	<0.1	4.4	2.0
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	9.3	12.6	11.4	<0.1	2.7	1.6
Localized Threshold	N/A	74	680	N/A	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No

Table 1
Estimated Daily Construction Emissions

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed, emissions would be lower because of the increased penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)

Source: DKA Planning, 2022 based on CalEEMod 2022.1 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Modeling documentation included in the Technical Appendix.

Similarly, as shown in Table 2, operation emissions would still not exceed the SCAQMD's thresholds of significance for regional and localized pollutants.

Table 2
Estimated Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	2.4	<0.1	7.9	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.3	0.1	<0.1	<0.1	<0.1
Mobile Sources	1.5	1.0	11.4	<0.1	0.8	0.2
Regional Total	3.9	1.4	19.4	<0.1	0.9	0.2
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	2.4	0.3	8.0	<0.1	<0.1	<0.1
Localized Significance Threshold	N/A	64	680	N/A	1	1
Exceed Threshold?	N/A	No	No	N/A	No	No
<i>LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA SRA</i>						
<i>Source: DKA Planning, 2022. based on CalEEMod 2022.1 model runs (included in the Appendix).</i>						



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July 12, 2022

Los Angeles Department of City Planning
Central Los Angeles Area Planning Commission
Email: apccentral@lacity.org

Responses to Administrative Appeal re: 626 Kingsley Project (Project)

We write in response to the letter dated July 12, 2022, submitted by appellant “SAFER” (Appellant), challenging the Director of Planning’s (Director) adoption of a Categorical Exemption (CE) in Case No. ENV-2022-0364-CE (Related Case No. DIR-2022-0363-TOC-SPR-HCA) for a new mixed-use development pursuant to the California Environmental Quality Act (CEQA).

The Appellant’s late submittals just prior to the scheduled hearing before the Central Area Planning Commission (Commission) are procedurally invalid and do not warrant granting their appeal (Appeal). The Appellant initially sought to submit 121 pages of materials to the Commission on July 11th, the day before the hearing, which was properly rejected by the Commission due to violating the published rules for the submittal of materials for consideration. The materials submitted also constituted the same generic arguments and studies this same Appellant – who is a union labor group that regularly challenges new projects in the City of Los Angeles (City) – submits to the City for all of the many City development projects it challenges. The Appellant then submitted a revised two-page letter addressing its alleged appeal points on July 12th. However, this letter merely sets out legal arguments – it is not supported by any substantial evidence and should be rejected for this reason, alone.

In addition, the new arguments in the Appeal relating only to alleged Air Quality impacts from Toxic Air Contaminant (TAC) are substantively meritless for the following reasons:

- The Appeal ignores the substantial evidence in record supporting the conclusion that the Project would not result in significant TAC impacts, found at pages 2-70 through 2-73 of the CE. The Appellant thus fails to meet its burden and the Appeal should be denied for this reason alone.
- The Appeal invents an ongoing onsite source of diesel fuel TAC emissions that does not exist for this Project, which is a mixed-use residential and commercial infill development that would not include an ongoing onsite operational source of TACs. Instead, as analyzed in the CE and determined based on substantial evidence to be less than significant, the only source of TACs from the Project are from short-term emissions of diesel exhaust from heavy construction equipment, primarily occurring during the grading and earthwork phases of Project construction. The SCAQMD CEQA Handbook does not recommend analysis of TACs from short-term construction activities. The rationale for not requiring a health risk assessment (HRA) for construction activities is the limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, “Individual Cancer Risk” is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given that the greatest potential for diesel particulate emissions would only occur for approximately a few months during excavation/grading activities and other construction activities during the overall construction schedule of approximately 34 months would

result in reduced use of heavy-duty diesel construction equipment in comparison to excavation/grading activities, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Furthermore, neither the Office of Environmental Health Hazard Assessment (OEHHA) or the South Coast Air Quality Management District (SCAQMD) require HRAs for mixed-use residential projects because such projects are not substantial sources of TAC emissions. To the contrary, OEHHA only requires HRA's for major industrial "stationary sources" or toxic air emissions under state law AB 2588, which does not apply to this Project,¹ and SCAQMD only requires them for truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units).² These are major ongoing sources of TACs that, unlike the Project, require analysis in an HRA per SCAQMD and OEHHA regulations and guidance. The Project, on the other hand, was properly determined to not result in significant TAC emissions based on substantial evidence. The Appeal fails to even attempt to undermine this conclusion, instead basing its analysis on an entirely false and invented source of ongoing TAC emissions that does not exist for this Project and the misapplication of relevant regulatory guidance.

- The analysis of alleged formaldehyde impacts from the Project relies on speculation regarding the construction materials that would be utilized by the Project, asserting without evidence that the Project would utilize unspecified "composite wood products" indoors with no evidence. It is invalid for this reason, alone. Moreover, the Appeal's purported indoor air quality analysis here is not a CEQA analysis, but instead relies on an invented "threshold" not adopted by the City or SCAQMD to assess speculative alleged impacts of the Project on indoor air quality. However, the air quality technical analysis performed for the Project in the CE is fully compliant with CEQA in its focus on regional and localized impacts from emissions of criteria pollutants and other relevant air quality concerns, including potential emissions of TACs. In light of CEQA's general focus on projects' potential impacts on the human environment in general and not future project users,³ the State's CEQA Guidelines focus CEQA-compliant air quality impacts analyses on the impacts a project would have on *outdoor* air quality, directing air quality analyses to address whether a project would conflict with or obstruct implementation of the applicable air quality plan, contribute to an existing air quality violation, or result in a cumulatively considerable increase in a criteria pollutant for which the region is in non-attainment, among other similar relevant factors. Indoor air quality is not regulated by the applicable air quality plan, the SCAQMD's 2016 Air Quality Management Plan (AQMP). In line with CEQA's requirements, the Air Quality technical analysis prepared for the Project analyzes its consistency with the AQMP, finding that the Project is consistent with the AQMP. Such substantial evidence supports the conclusion that the Project would result in a less than significant impact. The USEPA, the California Air Resources Board (CARB) and SCAQMD have also not promulgated ambient air quality standards for indoor air quality. The Air Quality technical analysis for the Project analyzes the Project's projected emissions of criteria pollutants regulated by USEPA and the CARB and finds those emissions to be less than the significant under the thresholds of significance adopted by the City, which are promulgated by SCAQMD. Such substantial evidence supports the conclusion that the Project would result in less than significant Air Quality impacts. Instead of addressing this CEQA-compliant analysis, the Appellant relies on speculation and a non-CEQA analysis that does not warrant granting the Appeal.

¹ <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>

² SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, 2002, found at <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>, last accessed Jan. 12, 2022.

³ *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 ("In light of CEQA's text, statutory structure, and purpose, we conclude that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents.")