



THE CITY OF SAN DIEGO

ENVIRONMENTAL IMPACT REPORT

Project No. 477943
SCH No. 2016071031

SUBJECT: Costa Verde Revitalization: The project proposes a GENERAL PLAN AMENDMENT (GPA), COMMUNITY PLAN AMENDMENT (CPA) and SPECIFIC PLAN AMENDMENT (SPA) to the University Community Plan (UCP) and Costa Verde Specific Plan to increase the development intensity by 40,000 square feet (SF) of commercial/office and 360,000 SF of research and development uses, re-designate approximately one acre from Neighborhood and Community Commercial to Visitor Commercial to allow a hotel use, and complete incidental technical revisions; a SITE DEVELOPMENT PERMIT (SDP) for land use plan amendments within the Airport Land Use Compatibility Overlay Zone; a PLANNED DEVELOPMENT PERMIT (PDP) to Amend PDP No. 90-1109 for the reconfiguration and expansion of the existing 178,000-square foot shopping center; a NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) to include tandem commercial parking spaces; a TENTATIVE PARCEL MAP to create new legal lots; and EASEMENT VACATION to vacate Esplanade Court and water line easements as public facilities. The proposed hotel use would consist of a 10-story, 200-room hotel comprised of approximately 125,000 SF to be located on the northernmost portion of the site. Various site improvements would also be constructed that include associated utilities, internal circulation and access, hardscape (surface parking, driveways, and walkways) retaining walls, and landscape. The developed 13.9-acre project site is located west of Genesee Avenue between La Jolla Village Drive and Nobel Drive. The parcel is designated neighborhood and community commercial uses within the Costa Verde Specific Plan and the University Community Plan. In addition, the project site is located within the Urban Node of the Central Subarea, which is intended to be developed as a mixed-use core, with a residential density of up to 75 dwelling units per acre. The site is within the RS-1-14 Zone as well as the Affordable Housing Parking Demand Overlay Zone (Medium), the Airport Land Use Compatibility Overlay Zone (Marine Corps Aviation Station [MCAS] Miramar), the Airport Influence Area (Review Area 2 - MCAS Miramar), the Airport Federal Aviation Administration (FAA) Part 77 Noticing Area (MCAS Miramar), the Community Plan Implementation Overlay Zone (CPIOZ-A), the 300-foot Fire Brush Buffer Overlay Zone, the Very High Fire Hazard Severity Overlay Zone, the Outdoor Lighting Overlay Zone (Lighting Zone 3 - Medium), the Parking Impact Overlay Zone (PIOZ - Campus Impact Area), and the Residential Tandem Parking Overlay Zone. (Assessor Parcel Numbers: 345-210-12, 345-210-13, and 345-210-14.) Applicant: Regency Centers L.P.

UPDATE: September 4, 2020. Clarifications and/or revisions, additional information, and typographical corrections have been made to the final Environmental Impact Report when compared to draft environmental document. In accordance with the California Environmental Quality Act (CEQA) Section 15088.5, the addition of new information that clarifies, amplifies, or makes insignificant modifications and would not result in new impacts or no new mitigation does not require recirculation. Pursuant to Section 15088.5(a) of the CEQA Guidelines: "Significant new information" requiring recirculation includes, for example, a disclosure or additional data or other information 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.**

The modifications within the final environmental document do not affect the analysis or conclusions of the Environmental Impact Report. All revisions are shown in a ~~striketrough~~ and/or underline format.

ENVIRONMENTAL DETERMINATION:

This document has been prepared by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department and is based on the City's independent analysis and conclusions made pursuant to 21082.1 of the California Environmental Quality Act (CEQA) Statutes and Sections 128.0103(a), 128.0103(b) of the San Diego Land Development Code.

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: **Land Use, Transportation/Circulation, Visual Effects/Neighborhood Character, Air Quality, Greenhouse Gas Emissions, Energy, Noise, Paleontological Resources, Hydrology/Water Quality, Geology and Soils, Public Utilities, and Public Services and Facilities.** The EIR concluded that the project would result in significant but mitigated environmental impacts to **Noise**, and significant and unmitigated impacts to **Transportation/Circulation**. All other impacts analyzed in the Draft EIR were determined to be less than significant.

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft Environmental Impact Report and were invited to comment on its accuracy and sufficiency. Copies of the Environmental Impact Report, the Mitigation Monitoring and Reporting Program and any technical appendices may be purchased for the cost of reproduction.

Federal Government

Commanding General MCAS Miramar Air Station (13)

State of California

Caltrans District 11 (31)

Department of Toxic Substance Control (39)

State Clearinghouse (46A)

California Transportation Commission (51)

California Department of Transportation (51A)

California Department of Transportation (51B)

California Native American Heritage Commission (56)

City of San Diego

Mayor's Office (91)

Councilmember Bry, District 1 (MS 10A)

Councilmember Campbell, District 2 (MS 10A)

Councilmember Ward, District 3 (MS 10A)

Councilmember Montgomery, District 4 (MS 10A)

Councilmember Kersey, District 5 (MS 10A)

Councilmember Cate, District 6 (MS 10A)

Councilmember Sherman, District 7 (MS 10A)

Councilmember Moreno, District 8 (MS 10A)

Councilmember Gomez, District 9 (MS 10A)

Development Services Department

EAS

Transportation

LDR Planning

Engineering

Geology

Landscape

PUD Water & Sewer

Project Manager

City of San Diego - continued

Planning Department

Plan-Long Range Planning

Park and Recreation

Plan Facilities Financing

Public Utilities Department (MS 906)

San Diego Police Department (MS 776)

San Diego Fire-Rescue (MS603)

Environmental Services Department (MS 1102-A)

Transportation Development - DSD (78)

Development Coordination (78A)

Fire and Life Safety Services (79)

Library Department - Government Documents (81)

Central Library (81A)

University City Community Branch Library (81JJ)

North University Branch Library (81KK)

Tom Tomlinson, Facilities Financing (93B)

City Attorney (93C)

Other Interested Organization, Groups and Individuals

San Diego Association of Governments (108)

San Diego Regional Airport Authority (110)

Metropolitan Transit System (112)

Metropolitan Transit Systems (115)

San Diego Natural History Museum (166)

University City Community Planning Group (480)

Editor, Guardian (481)

Brad Werdick, UCSD Physical & Community Planning (482)

University City Community Association (486)

Friends of Rose Canyon (487)

La Jolla Village Community Council (489)

Chamber of Commerce (492)

Clint Linton, Iipay Nation of Santa Ysabel

Lisa Cumper, Jamul Indian Village

Jess Pinto, Jamul Indian Village

Richard A. Schulman, Hecht Solberg Robinson Goldberg & Bagley LLP

Susan Baldwin, San Diego Association of Governments

Janis Deady

William Burgman

Stephanie Boudreau

Thomas Feiter

Janay Kruger

Jack Hutzman

Carol Pietras

Edward Chin

Betty Chin

Gerald Bischoff

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Kung-Wei Yang
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Christopher Sanchez
Raeleine Nabors
Christopher Rowe
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Duffy Ahern
Marilyn Duffey
Gennie Gable
Michele Hagstrom
Janice Hutton
Yvonne Lazar
Geoffrey Moore
Roy Rosenwald
Celia Tingley
Cory Briggs, Briggs Law Corporation
Louis Rodolico, UCPG Costa Verde Revitalization Subcommittee
Barry Bernstein, University City Community Association
Jack Hutzman
Mauricio Medina
Yamara Miac
Nancy Acker
Faith Adair
Pamela Adam
William Addiar
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Lewis Albright
Helen Alev
Walter Alexander
Carolyn Anderson
Robert Anderson
Nancy Appleton
Janet Armstrong
Rita Atkinson
Richard Atkinson
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Other Interested Organization, Groups and Individuals - continued

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Linda Barry
Brian Barry
Wiainne Belden
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Mary Duarte
Colette Dulfon
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Raphael Engle
Ruth Epner
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Darrell Fanestil
D. Ann Fanestil
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Angelina Wang
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Kenneth Watson
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H. Weinberg
Francine Weisberger
Jerry Weisberger
Ruth Weiss
Judith Weiss
Mildred Weisz
Carol Werner
John Werner
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Amy Wiethorn
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Joesph Wu

Jessie Wuerfel

Franklin Wuerfel

Teresa Yang

Phyllis Yates

George Yee

Gwennie Yeh

Carey Algaze

Climate Action Campaign

Garden Communities

Kimpton Hotels & Restaurants

Marriott International

Sierra Club

Westfield

Jena Bellin

Beth Fountain

Henry Kerlick

Lance Parker

MJ Tichacek

Sheila M. Sannadan, Adams Broadwell Joseph Cordozo

John Murphy, Regency Centers L.P.

Andrea Bitterling, HELIX Environmental Planning, Inc., Consultant

RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- (X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.



Elizabeth Shearer-Nguyen

Senior Planner

Development Services Department

Analyst: Shearer-Nguyen

March 12, 2020

Date of Draft Report

September 4, 2020

Date of Final Report

Costa Verde Center Revitalization Project

FINAL ENVIRONMENTAL IMPACT REPORT

SCH No. 201607103; Project No. 477943

September 2020

Prepared for:

City of San Diego
Development Services Department
Land Development Review
1222 First Avenue, MS 501
San Diego, CA 92101-4155

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COSTA VERDE CENTER REVITALIZATION PROJECT

Final Environmental Impact Report

SCH No. 2016071031; Project No. 477943

September 2020

Prepared for:

City of San Diego
Development Services Department
Land Development Review
1222 First Avenue, MS 501
San Diego, CA 92101-4155

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Costa Verde Center
Revitalization Project
Final Environmental Impact Report
SCH No. 2016071031; Project No. 477943

Comments and Responses to
Comments on the Draft EIR

September 2020

**Costa Verde Center Revitalization Project
Environmental Impact Report
Letters of Comment and Responses**

Letters of comment to the Draft Environmental Impact Report (EIR) were received from agencies, organizations, and individuals. Parties that submitted comments individually are summarized in Table RTC-1, *List of Commenting Agencies, Organizations, and Individuals*. Some comments did not pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the proposed Costa Verde Center Revitalization Project on the environment pursuant to the California Environmental Quality Act (CEQA). Responses are provided to these comments; however, it is noted here for the public record that such comments are not in the purview of the EIR or CEQA. Each comment letter is reproduced alongside the corresponding responses to individual comments.

Several comment letters received during the Draft EIR public review period contained requests for revisions that resulted in minor changes to the EIR text. These changes to the text are indicated by ~~strikeout (deleted)~~ and underline (inserted) markings in the Final EIR.

**Table RTC-1
List of Commenting Agencies, Organizations, and Individuals**

Reference	Commenter	Page
Governmental Entities		
A	California Department of Transportation	RTC-1
B	San Diego Metropolitan Transit System	RTC-7
C	San Diego Association of Governments	RTC-8
D	University Community Planning Group	RTC-13
Organizations		
E	Adams Broadwell Joseph & Cardozo	RTC-29
F	Climate Action Campaign	RTC-320
G	Garden Communities	RTC-323
H	Kimpton Hotels & Restaurants	RTC-324
I	Marriott International	RTC-391
J	Sierra Club	RTC-392
K	Westfield	RTC-411
Individuals		
L	Jena Bellin	RTC-412
M	Barry Bernstein	RTC-413
N	Anthony Glaser and Barbara Glaser	RTC-414
O	Henry Kerlick	RTC-415
P	Lucy Lehman	RTC-416
Q	Lance Parker	RTC-417
R	Louis Rodolico	RTC-418
S	Louis Rodolico	RTC-425
T	MJ Tichacek	RTC-434

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COMMENTS

RESPONSES

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-3137
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Making Conservation
a California Way of Life

May 26, 2020

11-SD-5

PM R28.16

Costa Verde Revitalization

Recirculated DEIR/SCH#2016071031

Ms. Elizabeth Shearer-Nguyen
Environmental Analysis Section
City of San Diego Development Services Department
1222 First Avenue, MS-501
San Diego, CA 92101

Dear Ms. Shearer-Nguyen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Recirculated Draft Environmental Impact Report (DEIR) for the Costa Verde Revitalization project located near Interstate 5 (I-5). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Impact Studies

- Signal timing the TIS did not match Caltrans' actual signal timing. Coordination with Caltrans' Signal Operations is recommended for actual signal timing.
- In order to minimize the potential for conflicts or incidents at the SR-52 at Genesee Avenue intersection Caltrans is recommending that the City consider conditioning the development for installation of complete streets elements inclusive of bicycle and pedestrian improvements at the SR-52 at Genesee Avenue intersection.

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A1 Comments regarding Caltrans' mission and review role are noted. No further response is necessary.

A2 The Transportation Impact Analysis (TIA; draft EIR Appendix B) was performed using Caltrans signal timing plans at ramp intersections in the study area, obtained through coordination with Caltrans' staff in December 2015. An additional review of the current Caltrans signal timings was conducted in May 2020 and it was concluded that the signal timings and the associated analysis remained unchanged for all ramp intersections except for the State Route (SR-) 52 Eastbound Ramps/Genesee Avenue intersection, which updated flashing "Don't Walk" and yellow time. The intersection delays for this intersection were revised for all scenarios with the updated signal timing and incorporated into the appropriate LOS tables in Section 5.2, Transportation/Circulation, in the final EIR and included in Appendix B1. These updates did not change the significance findings or the conclusions of the EIR relative to Transportation/Circulation.

COMMENTS

RESPONSES

- | COMMENTS | RESPONSES |
|----------|--|
| | <p>A3 Mitigation measure TRA-3 of the draft EIR identifies the installation of a traffic signal to allow for protected northbound left turns at the Genesee Avenue/SR-52 Westbound Ramps. Mitigation measure TRA-4 of the draft EIR identifies right-turn overlap on the westbound approach and associated signal modification at the Genesee Avenue/SR-52 Eastbound Ramps. These mitigation measures would include improvements to pedestrian and bicycle facilities at these intersections.</p> <p>Although the identified improvements would fully mitigate the impact, the Project's impact to this intersection is considered significant and unmitigated because the timing of the identified improvements is uncertain.</p> |

COMMENTS

RESPONSES

Ms. Elizabeth Shearer-Nguyen
May 26, 2020
Page 2

- A4 ☐ • Please provide a detailed description of your methodology to develop the project's VMT values.
- Complete Streets and Mobility Network**
- Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of San Diego, is encouraged.
- A5 ☐ To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.
- Land Use and Smart Growth**
- Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.
- The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

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- A4 Sections 21.0 and 22.0 of the TIA, provided as Appendix B to the EIR, provide a detailed description of the VMT Significance Criteria, Methodology, and Analysis.
- A5 Comments regarding complete streets, multi-mobility needs, and smart growth are noted. As these comments do not pertain to the adequacy of the draft EIR, no further response is necessary.

COMMENTS

RESPONSES

Ms. Elizabeth Shearer-Nguyen
May 26, 2020
Page 3

Environmental

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

A6 An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans R/W that includes impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in any additional mitigation measures identified for the DEIR.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

A7 Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be

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A6 Caltrans' role as a Responsible Agency and the need for an encroachment permit prior to work within the Caltrans right-of-way are noted. Activities within Caltrans right-of-way would be limited to installation or modification of traffic signals. It is acknowledged that the applicant must provide approved final documents and corresponding technical studies to Caltrans as part of the encroachment process. No regulatory or resource agency permits are necessary for implementation of the Project or mitigation measures.

A7 Introductory comments regarding impact mitigation are noted. Regarding the mitigation measures TRA-3 (Genesee Avenue/SR 52 Westbound Ramps) and TRA-4 (Genesee Avenue/SR 52 Eastbound Ramps), the Project proposes improvements to mitigate the corresponding significant impacts to below a level of significance. However, as explained in the EIR (Section 5.2.2.4), because these improvements require Caltrans approval, the project applicant and City are unable to independently assure their timely implementation and therefore these improvements may not be in place prior to the development of the Project. The applicant will work with Caltrans to implement the mitigations within Caltrans' jurisdiction. However, these impacts are appropriately assessed at this time as significant and unmitigated.

COMMENTS

RESPONSES

Ms. Elizabeth Shearer-Nguyen
May 26, 2020
Page 4

A7
cont.

compatible with Caltrans concepts. Caltrans does not agree with the statements in the project's Traffic Impact Study in every location, such as on pages 107-109 (A-DI-3 through A-DI-8), stating that "Improvements are not within the applicant's or City's control as it requires Caltrans approval; therefore, impacts to this intersection would remain significant and unmitigated."

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements (<http://www.dot.ca.gov/trafficops/ice.html>).

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

Right-of-Way

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

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at <http://www.dot.ca.gov/trafficops/ep/index.html>. Early coordination with Caltrans is strongly advised for all encroachment permits.

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to enhance California's economy and livability"*

A7 (cont.) Regarding the mitigation measures TRA-5 through TRA-8, which refer to project impacts to the regional freeway mainline and metered freeway on-ramp location, there are no programmed improvements or funding identified at this time on I-5 or I-805. Absent these programs, the EIR concludes that the regional impacts would be significant and unmitigated.

The applicant will coordinate and pursue Caltrans approval of the proposed mitigation measures to the Genesee Avenue/SR 52 Westbound Ramps and Genesee Avenue/SR 52 Eastbound Ramps intersections. As a part of this approval process, an Intersection Control Evaluation (ICE) will be prepared for the SR 52 Westbound Ramps/Genesee Avenue intersection.

A8 Comments regarding right-of-way and the encroachment permit process are noted. As these comments do not pertain to the adequacy of the draft EIR, no further response is necessary.

COMMENTS

RESPONSES

Ms. Elizabeth Shearer-Nguyen
May 26, 2020
Page 5

A8
cont.

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

COMMENTS

RESPONSES

From: Rodrigo Carrasco <Rodrigo.Carrasco@sdmts.com>
Sent: Friday, May 08, 2020 3:06 PM
To: DSD EAS
Subject: [EXTERNAL] Project No. 477943 / SCH No. 2016071031 Costa Verde Revitalization DEIR comments from MTS

Good afternoon,

MTS has the following comments for the DEIR for the Costa Verde Revitalization:

B1

1. 5.2-10, 1st paragraph: Buses serve the transit center continuously. There is at total of 12 bus routes with a combined 43 buses serving the transit center at peak hours. Both ingress and egress affected by delay from the project's impacts to traffic congestion. MTS requests TSP for egress of transit vehicles from UTC transit center and for ingress to the transit center from southbound Genesee Avenue.

B2

2. 5.2-16, first paragraph: Mitigate traffic impacts causing delays for MTS service with transit signal priority with queue jumps (where applicable) at the following intersections:
 - Genesee Avenue/Esplanade Court
 - Genesee Avenue/Governor Drive
 - Genesee Avenue/SR-52 westbound ramps
 - Genesee Avenue/SR-52 eastbound ramps
 - Genesee Avenue/Nobel Drive
 - Genesee Avenue/La Jolla Village Drive

Thank you,

Rodrigo Carrasco
 Senior Transportation Planner
 San Diego Metropolitan Transit System
 Office: 619-595-4909

B1

Comments regarding the use of the UTC Transit Center by numerous bus routes are noted. The project does not propose changes to this traffic signal, which is only activated by buses for access to and from the UTC Transit Center.

B2

Each of these intersections was analyzed in Appendix B of the draft EIR for all scenarios. Mitigation measures for these intersections are identified in Section 5.2 and Chapter 9.0 of the EIR, which include both physical widening and signal phasing/operational improvements to reduce identified significant impacts to below a level significance to the extent feasible.

Impacts to two of the noted intersections would be reduced to below a level of significance, while impacts at the remaining four intersections would remain significant and unmitigated. Given that Transit Signal Priority (TSP) measures primarily require an exclusive transit lane, which is not physically feasible on Genesee Avenue, the City has determined that TSP measures are not recommended to be implemented on Genesee Avenue. Consequently, TSP improvements are not proposed to be implemented as mitigation.



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Port of San Diego
San Diego County
Waters Authority
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Tribal Chairman's Association
Mexico

April 27, 2020

File Number 3330300

Ms. E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101
DSDEAS@sanidiego.gov

Dear Ms. Shearer-Nguyen:

Subject: Costa Verde Revitalization (Project No. 477943) Draft
Environmental Impact Report

Thank you for the opportunity to comment on the City of San Diego's Costa Verde Revitalization Draft Environmental Impact Report (EIR). The San Diego Association of Governments (SANDAG) appreciates the City's efforts to implement the policies included in San Diego Forward: The 2015 Regional Plan (2015 Regional Plan) that emphasize the need for better land use and transportation coordination. These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG's comments are based on policies included in the 2015 Regional Plan and are submitted from a regional perspective.

Smart Growth

SANDAG appreciates that the City has prioritized transit-oriented development and land use changes in the project area that support both the goals of the update as well as the Smart Growth Concept Map. A key goal of the 2015 Regional Plan is to focus growth in smart growth opportunity areas. The Draft Environmental Report designates the project area as an urban node of central subarea with residential density of 75 dwelling units per acre. SANDAG appreciates that this project exceeds the minimum density. This project is located in an Existing/Planned Urban Center (SD UN-2), a Smart Growth Opportunity Area identified on the Smart Growth Concept Map. The proposed project is currently well-served by a number of high-frequency local bus routes (Routes 30, 41, 50, and 150), as well as *Rapid* services (Routes 201, 202, 204, and 237). The project also provides pedestrian access to the Mid-Coast Trolley currently under construction. SANDAG appreciates the coordination between the City and Regency Centers Senior Vice President of Real Estate John Murphy to establish pedestrian accesses to the future light rail transit station, the Mid-Coast Trolley extension, and looks forward to continued coordination.

C1 Comments regarding the City's implementation of policies in San Diego Forward: The 2015 Regional Plan are noted. No further response is necessary.

C2 Comments regarding the City's prioritization of transit-oriented development in a Smart Growth Opportunity Area, availability of transit, and coordination to establish pedestrian access to the future trolley station are noted. No further response is necessary.

COMMENTS

RESPONSES

<p>C3 Please include the following planned routes/services in the plan documents and facilitate access to these services:</p> <ul style="list-style-type: none"> • <i>Rapid</i> service (Routes 30, 41, 473, 689, and 870) • Route 30, currently a high frequency local bus service, will be transitioned to a <i>Rapid</i> service. • High-frequency local bus service (Routes 34, 101, and 921) 	
<p>C4 Active Transportation</p> <p>Many of the transportation mitigation in the Costa Verde Revitalization project include roadway widening and the addition of lanes. While this may address traffic congestion to some extent, it also has the potential to increase congestion due to induced demand. To reduce reliance on single-occupancy-vehicle trips, please consider the following comments:</p> <ul style="list-style-type: none"> • More improvements for walking and biking should be included. Such improvements could include upgrading the existing shared lanes and bike lanes to buffered or protected bike lanes, improving the intersections and crossings, showers for workers who choose to walk or bike, high quality bike parking, and other walking and biking improvements. These improvements could also help to better facilitate access to nearby retail, housing, dining, office, and transit destinations, while widening roads could deter the same accessibility. • SANDAG appreciates that the project proposes to install one-way Class 4 Bikeways on the Nobel Drive frontage, but one-way bikeways in one direction leave critical gaps for people who bike. The project should include Class 4 Bikeways on both sides of Nobel Drive and Genesee Avenue. • In order to facilitate multimodal access, protected intersections and bike signals should be considered at the intersection of Nobel Drive and Genesee Avenue. • Bike racks should be included in front of businesses, at a central location in front of each building, or along the internal streets to better accommodate and encourage bicycle trips. Indoor bike parking (secure bike cages or bike rooms) in the parking garage, at the hotel, and within larger retail spaces or clusters should also be considered. • To facilitate circulation an environment that encourages walking, street level pedestrian crossing should be considered between Building L and Building A across Esplanade Court. 	<p>C3 Information regarding proximity to existing bus routes was provided in draft EIR Section 5.2.6.2, and information has been added to this section regarding planned bus service improvements. Figure 22-1 of the TIA, included as Appendix B to the EIR, illustrates existing and planned bus routes through the project's Horizon Year (2035). Per the 2050 SANDAG Regional Transportation Plan (Table A.5), Route 473 is a future Rapid bus route identified to operate between Oceanside and UTC by 2030. However, there is no mention of Route 34 in the RTP. The Project would facilitate access to transit through a bus stop along the project frontage as well as the construction of pedestrian bridges that would connect the Project site to the Trolley Station and the UTC Transit Center.</p> <p>C4 The Project does not propose roadway widening and the addition of lanes along roadway segments as mitigation measures. Rather, it proposes to upgrade and/or repair signal interconnect, communications, detection and controller equipment as partial mitigation for roadway segment impacts as noted in Section 5.2.2.4 of the EIR. The Project would include bicycle improvements along Nobel Drive between Genesee Avenue and Regents Road. All other bicycle facilities along project frontages are consistent with planned bicycle infrastructure; therefore, no other upgrades to existing shared lanes or bike lanes are proposed. The Project proposes to provide 11 shower stalls and 38 two-tier personal effects lockers for on-site employees. The Project would provide 20 short-term and 99 long-term bicycle parking spaces. Improvements to walking and bicycling facilities are described in Section 5.2.4 of the draft EIR.</p>
<p>C5 Transportation Demand Management</p> <p>SANDAG appreciates the inclusion of Transportation Demand Management services and amenities that align with the Mid-Coast Mobility Hub Strategy, like offering shared mobility services and parking management solutions. The proposed project presents additional opportunities to implement mobility hub features that may help and mitigate traffic and parking impacts:</p> <ul style="list-style-type: none"> • Provide transit pass sales on-site to encourage use of the future Mid-Coast Trolley and other connecting transit services. • In addition to offering micromobility, consider partnering with zero-emission shuttle operators to provide quick connections throughout the project site to the transit station and other destinations within the community. • Consider the provision of smart parking technologies to provide real-time space availability, carpool/vanpool priority, and the option to reserve spaces in advance. • Consider installing micromobility parking that is flexible and can accommodate not only e-bikes and scooters but mopeds, hoverboards, and other emerging forms of micromobility. 	<p>Section 5.2.4.2 of the EIR describes improvements to expand the local alternative transportation network, including bicycle improvements the project would construct. The Costa Verde project proposes bicycle improvements along Nobel Drive between Genesee Avenue and Regents Road to provide a one-way cycle track on the north side consistent with the ongoing University Community Plan Update Draft Bicycle Network Recommendations (March 2020). The City typically requires development projects to construct bicycle improvements along their project frontages. The Costa Verde project frontage along Nobel Drive extends between Genesee Avenue and Costa Verde Boulevard but the Project's proposed Class IV bicycle improvement extends beyond its frontage westerly to Regents Road.</p> <p>Mitigation measure TRA-23 for the intersection of Genesee Ave/Nobel Drive includes the installation of a right-turn overlap phasing on the eastbound approach, with associated signal modification.</p>

COMMENTS

RESPONSES

C4	<p>(cont.) This mitigation would also include improvements to the bicycle and pedestrian facilities at this location.</p> <p>Bicycle racks would be provided in easily accessible locations throughout the site, on at least two levels. Bicycle rooms and lockers would be provided at two locations on the first level below the podium, as shown on the project plans.</p> <p>The project Bicycle Mobility Analysis in Appendix B (Section 18.0) discusses the bicycle mobility in the immediate area and focuses on the bicycle improvements along the project frontage. The Costa Verde project proposes bicycle improvements along Nobel Drive between Genesee Avenue and Regents Road to provide a one-way cycle track on the north side consistent with the ongoing University Community Plan Update Draft Bicycle Network Recommendations. The City typically requires development projects to implement bicycle improvements along their project frontages. The Costa Verde project frontage along Nobel Drive extends between Genesee Avenue and Costa Verde Boulevard but the Project's proposed Class IV bicycle improvement extends beyond its frontage westerly to Regents Road and therefore exceeds the City's requirement.</p> <p>The feasibility and implementation of other off-site bicycle improvements in the immediate area and bicycle mobility treatments such as bike signals are currently being studied as a part of the University's Community Plan Update.</p> <p>As a part of the intersection improvements proposed at the Genesee Avenue/Esplanade Court intersection, as illustrated in Figure 3-1 of the EIR, the Project would provide high-visibility crosswalk and pedestrian count-down timers, which are the current City standard. Bicycle racks would be provided in easily accessible locations throughout the site, on at least two levels. Bicycle rooms and lockers would be provided at two locations on the first level below the podium.</p> <p>Existing accessible path currently connects the hotel site and retail uses and it would remain.</p>
C5	<p>The TDM measures the project would provide are listed in Mitigation Measure TRA-5 in Section 5.2 and Chapter 9.0 of the EIR, including the following measures:</p>

COMMENTS

RESPONSES

C5
cont.

- Provision of additional bicycle and micromobility amenities, such as tire pump/repair stands, and electric bike and scooter charging stations at the Bicycle Plaza Area and throughout the project could further encourage bicycling, scooting, and use of other rideables as convenient transportation choices.
- Consider enhancing wayfinding investments to include interactive kiosks that provide real-time travel and trip planning information for regional transit services, shared mobility services, parking, and other available transportation options.

For detailed information on mobility hub services and amenities, please refer to the Mobility Hub Features Catalog. The catalog and additional information on the Regional Mobility Hub Implementation Strategy is available at <http://www.sdforward.com/mobility-planning/regionalMobilityHub>.

Information specific to the Mid-Coast Mobility Hub Implementation Strategy and the UTC Mobility Hub is available at <http://www.sdforward.com/mobility-planning/mcMobilityHub>.

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the ability to comment on the City of San Diego's Costa Verde Revitalization Draft EIR. If you have any questions, please contact me at (619) 699-1943 or at seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SLI/TFE/fwe

C5

(cont.)

- Charge salaried employees market-rate for single-occupancy vehicle parking and provide reserved, discounted, or free spaces for registered carpools or vanpools.
- Provide carpool/vanpool parking spaces as part of the overall project parking requirements at the project site. These spaces will be signed and striped "carpool/vanpool only."
- Provide showers and locker facilities located within the parking structure adjacent to the security office, as shown on Exhibit "A."
- Maintain an employer network in the SANDAG iCommute program for all tenants/employees.
- Provide on-site carsharing and/or bike sharing.
- Provide a 25 percent transit subsidy to hourly employees working on the property. The subsidy value will be limited to the equivalent value of 25 percent of the cost of a Metropolitan Transit System "Regional Adult Monthly/30-Day Pass" (currently \$72 for a subsidy value of \$18 per month). Subsidies will be available to 75 percent of the hourly employees. The subsidy will be offered at the Opening Day of the project and will be provided for a period of three years.
- Provide transit pass sales at the site's concierge.
- Provide a shuttle for workers in the research and development and office buildings to access other properties within the community owned by the same entity. If a public zero-emission shuttle is established in the community in the future, provide a stop within the project site.
- Implement smart parking technologies to provide real-time space availability, carpool/vanpool priority, and the option to reserve spaces in advance.
- Install micromobility parking to accommodate a variety of micromobility forms, near the elevators to the Trolley.
- Provide additional bicycle and micromobility amenities, such as tire pump/repair stands as well as electric bike and scooter charging stations.
- Consider enhanced wayfinding investments as part of the final design process.

C6

The Final EIR will be provided to SANDAG for review per this request.






L-Costa Verde Revitalization EIR - SANDAG
Comments_fwe

Final Audit Report

2020-04-27

Created:	2020-04-27
By:	Tracy Ferchaw (tracy.ferchaw@sandag.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA678OfBW6GWRpsRyR-sy7VeMdadC2hTze

"L-Costa Verde Revitalization EIR - SANDAG Comments_fwe" History

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COMMENTS

RESPONSES

Date: May 22, 2020

By email: DSDEAS@sandiego.gov

Ms. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Department

Re: UCPG's comments on Costa Verde Revitalization Project Draft Environmental Impact Report, SCH No. 2016071031, Project No. 477943, March 2020

Dear Ms. Shearer-Nguyen,

The University Community Planning Group (UCPG) is the City's officially recognized planning group for the University Community Plan area. As stated on the City's Community Planning Groups webpage: "The recommendations of the planning groups are integral components of the planning process, and are highly regarded by the City Council and by staff." (<https://www.sandiego.gov/planning/community/cpg>)

The UCPG has grave concerns about many of the impacts of this proposed project, about the adequacy of the DEIR, and about the process by which this Project morphed over the course of three and a half years from one proposed project that was disclosed via an NOP and Scoping Meeting to a very different project that was analyzed in the current Draft EIR.

The Proposed Project and Project Alternatives

Regency Centers is built out to its development entitlement for this property and is requesting a large increase in development rights. The proposed Project includes:

- a. 178,000 sq.' of retail. This would include keeping the gas station and McDonald's and tearing down and rebuilding the remaining retail on a reconfigured site.
- b. 40,000 sq.' of commercial/office
- c. 360,000 sq.' of research and development
- d. a 10-story, 200 room hotel (c. 125,000 sq.)

The DEIR also analyzes four project alternatives.

UCPG responses to the DEIR

This letter provides the UCPG's responses, comments and recommendations on the Draft Environmental Impact Report (DEIR) for the proposed Costa Verde Revitalization Project ("the Project"), dated March 2020.

D1 The important role of community planning groups, as well as Commenter's concerns and recommendations, are noted. The City concurs with the comment's summary of the Project and alternatives. Please refer to the detailed responses to comments that follow.

<p>D2</p> <p>1. <u>NOTICE OF PREPARATION AND PROJECT SCOPING</u></p> <p>A Notice of Preparation and a Scoping Meeting for the proposed Project were done in July 2016 for a very different project (DEIR p. 1-4 and Appendix A). The DEIR for that project was released in January, 2018, and a UCPG Subcommittee and members of the community met multiple times with Regency Centers to review and discuss the proposed Project. A number of comment letters were submitted on the DEIR.</p> <p>When in 2020 the Project subsequently changed dramatically, there was no new NOP or Scoping meeting. <i>The DEIR needs to explain why these two legally mandated public disclosure steps did not occur for this current proposed Project, and why there was no official notice to the public of the new Project until the current DEIR was released in March 2020.</i></p> <p>This timing compounded the problem of the lack of prior public notice. Due to the COVID-19 prohibition of in person public meetings, the Project could not be presented for robust public review, and in order to discuss the DEIR and prepare comments, the UCPG had to meet via Zoom. The severe limitations of both the restricted meeting format and the short time frame has meant that the UCPG and the public have constrained opportunities to review and comment on this very large proposed Project.</p> <p>CEQA mandates that an NOP be issued when an EIR is to be prepared for a particular project. The purpose of the project description is to describe the project in a way that will be meaningful to the public, reviewing agencies and decision makers. In this case, the only NOP and Scoping meetings to which the DEIR cites occurred almost four years before the current DEIR was released and was for a very different project. <i>The DEIR needs to explain at what significance level of change a new NOP and Scoping meeting would be required.</i></p>	<p>D2</p> <p>It is common for projects to undergo revisions as they complete the planning and environmental review process. In determining whether additional environmental scoping is required in response to project changes, the City considers whether the purpose of the scoping process has been fulfilled. In accordance with CEQA Guidelines Section 15082, the scoping process is intended to solicit feedback on the significant environmental issues and reasonable alternatives and mitigation measures that should be explored in the EIR. In the case of the subject EIR, environmental topics that were excluded from analysis based on the initial scoping were limited to agricultural and forestry resources, biological resources, hazards and hazardous materials, historical resources, mineral resources, population and housing, and tribal cultural resources. Because such resources and features are lacking at the site, changes to the Project would not result in potential impacts to these issue areas that were previously excluded from analysis. Similarly, the community has provided extensive input regarding potential alternative land uses on the site. Because the purpose of the scoping process has been fulfilled, the City determined that a new Notice of Preparation and scoping meeting were not required.</p> <p>The City extended its public review period for the Draft EIR from the required 45 days to a total of 75 days to provide additional opportunity for public comment. The public review period was initially published as being from March 12, 2020 to April 27, 2020. On March 25, 2020, the University Community Planning Group (UCPG) requested an extension to the public review period. In response to this request from an officially recognized community planning group and in accordance with Land Development Code Section 128.0307, Requests for Additional Public Review Time on the Draft Environmental Document, the public review period was extended to May 11, 2020. On April 15, 2020, the UCPG requested a second extension. In response, the public review period was extended to May 26, 2020. During the extended public review period, the City received comment on the Draft EIR from both the University Community Planning Group and individual members of the community. All comments received during the extended public review period are addressed in this Final EIR and will be presented to decision-makers for their consideration. It should be noted that Governor Newsom's Executive Orders N-25-20, N-29-20, and N-35-20 suspended portions of the Brown Act, including requirements for in-person meetings, in an effort to combat COVID-19. The UCPG therefore conducted a virtual meeting on May 12, 2020 to gather community input prior to issuing its comment letter on the project.</p>
<p>D3</p> <p>2. <u>THE PROPOSED PROJECT WILL CREATE A LARGE INCREASE IN TRAFFIC IN AN ALREADY CONGESTED AREA AND RESULT IN UNMITIGATED TRANSPORTATION/CIRCULATION IMPACTS.</u></p> <p>Regency Centers has stated to the UCPG that the current ADTs at the site are 8,720. The proposed Project is requesting an addition of 4,981 additional ADTs, for a total of 13,700. As the DEIR explains in its Traffic Analysis, the proposed Project will lead to Significant and Unmitigated Transportation/Circulation impacts (DEIR, p. 8-21).</p> <p>The DEIR states (p. 5.2-15), that the projected increase of 4,981 trips incorporates a 13% reduction of projected trips (a reduction of 744 trips). The assumption is that 13% of the trips will be non-vehicular (walking/biking/transit), because the Project is in a Transit Priority Area. The 13% reduction rate was determined by SANDAG, and is not broken down between walking, biking and transit.</p>	

COMMENTS

RESPONSES

- | COMMENTS | RESPONSES |
|----------|---|
| | <p>D2 (cont.) The public will also have the opportunity to participate in public hearings with the Planning Commission and City Council prior to a final decision being made regarding the Project.</p> <p>D3 Although the City cannot confirm statements made to the UCPG, this summary of information contained in the comment is consistent with the EIR. As such, no further response is necessary.</p> |

D3 cont.	<p>3. <u>THE DEIR CONTAINS PROJECT ALTERNATIVES THAT WILL REDUCE MANY OF THE PROJECT'S IMPACTS.</u></p> <p>Two of the three “build alternatives” reduce or avoid some of the Project’s impacts that are of major concern to the UCPG, although many impacts would remain. The “Retail and Office/Research and Development Alternative (No Hotel)” is identified in the DEIR as the environmentally superior alternative. It reduces or avoids some of the impacts that are of greatest concern to the UCPG.</p> <p>a. Retail and Office/Research and Development Alternative (DEIR p. 8-21)</p> <p>This Project includes all of the retail/office and the R&D buildings but no hotel. The DEIR identifies this as the “Environmentally Superior Alternative”. As stated in the DEIR, “This alternative would meet most of the identified Project objectives, and would reduce significant and unmitigated traffic impacts, as well as reduce significant but mitigable operational noise impacts. Specifically, it would result in the least amount of traffic generation of any of the build alternatives.”</p> <ul style="list-style-type: none"> The hotel is projected to account for 1740 of the 4,981 new ADT for the Project (DEIR Appendix I, p. 3). Thus, removing the hotel reduces the Traffic/Circulation impacts (although Traffic/Circulation impacts of this alternative still remain Significant and Unmitigable). Removing the hotel also reduces impacts to all of the following (DEIR p. 8-21) <ul style="list-style-type: none"> Transportation/Circulation Visual Effects/Neighborhood Character Air Quality Greenhouse Gas Emissions Energy Noise Paleontological Public utilities Public Services and Facilities 	D4 It is correct that the Costa Verde Specific Plan (CVSP) was previously amended to remove the hotel use that was originally planned for inclusion in the northern portion of the CVSP. The Project would amend the CVSP to reinstate this originally planned use (draft EIR Section 3.4.1).
D4	<ul style="list-style-type: none"> Hotel use was previously removed from the Costa Verde Specific Plan as the DEIR acknowledges (p. 5.1-10). It was removed when the Monte Verde Project was approved for residential towers at the location previously proposed for a hotel. 	D5 The City concurs with this summary of information from the draft EIR.
D5	<p>b. Retail, Hotel, Office, and Reduced R&D Alternative</p> <p>This alternative includes the retail, hotel, office, and a reduced amount of R&D (210,000 sq. ft. of R&D instead of 360,000 sq. ft.). It would “provide a mix of uses while reducing the intensity of development on the site relative to the Project, with associated potential to reduce significant traffic and operational noise impacts (although</p>	

COMMENTS

RESPONSES

D5
cont.

Traffic/Circulation impacts would remain Significant and Unmitigable).” (DEIR p. 8-6) This alternative also reduces impacts to all of the following:

Traffic/Circulation
Visual Effects/Neighborhood Character
Air Quality
Greenhouse Gas Emissions
Energy
Noise
Paleontological Resources
Public Utilities
Public Services and Facilities

4. **REGULATORY FRAMEWORK: THE UNIVERSITY COMMUNITY PLAN (DEIR p. 5.2-11)**

The DEIR states, “The updated Community Plan will consider current conditions, Citywide goals in the Climate Action Plan and the General Plan, and community specific goals to provide direction for the long-term development of the community.”

D6

However, the Project’s major increase in vehicle trips by single occupancy vehicles and its very low mode share of 13% biking/walking/transit is far below the City’s own vision for the area presented for the Update to the University Community Plan. In the University Community Plan Update Existing Conditions Report, p. iii (April 2018, prepared by Kimley+Horn), the City’s vision for the University Community Plan Update is: “No increase in driving alone, and a substantial increase in transit, biking, walking and carpooling.” Although located in a major Transit Priority Area (TPA), and in the heart of the community, the proposed Project falls far short of the vision the City has laid out in the community plan update that is underway. ***The DEIR must address the fact that the proposed Project is located in the Community’s prime TPA yet falls far short of achieving the City’s vision for biking/walking/transit mode share.***

5. **THE CLIMATE ACTION PLAN (CAP)**

The proposed Project falls far short of meeting the CAP’s goals for increasing Mode Share in Transit Priority Areas. These mode share goals are important in achieving the Greenhouse Gas reductions called for in the CAP.

D7

- The proposed Project will achieve only a 13% Mode Share (Walking/Biking/Transit) at its projected completion in 2023.
- However, the CAP’s goals for Mode Share are 20% by 2020 and 35% by 2035.

The CAP’s Mode Share goals for 2020 are: (CAP p. 37)

12% transit
4% walking

4

D6

Comments regarding the increase in vehicular trips and estimated mode share for the project are noted. Please also refer to the response to Comment D7 for additional information regarding mode share.

D7

The 13 percent non-vehicular mode share is a conservative assumption that was used in the Transportation Impact Analysis (Appendix B to the EIR). It was calculated by running a SANDAG Mixed-Use Development (MXD) model to account for non-vehicular and internal capture trip reductions.

First, the Climate Action Plan (CAP) mode share goal reflects a citywide goal for mode share in Transit Priority Areas, and is not a standard or threshold used for individual project analysis, nor is it directly comparable to the 13 percent Project-specific mode share estimate made for the purposes of the Transportation Impact Analysis. Second, while the City encourages and incentivizes non-vehicular travel, there is no requirement imposed by the City or CEQA mandating that land development projects meet a specific mode share percentage. Each project evaluated is context-specific, and dependent on project location, land use mix, and accessibility to transit, among other factors.

COMMENTS

RESPONSES

<p>D7 cont.</p> <p><u>6% biking</u> 20% total</p> <p>The DEIR thus reveals the project's primary reliance on automobile trips. Yet the Project is located at the UTC stop of the new Mid-Coast Trolley. In addition, as the DEIR states, "The project site is located adjacent to the UTC Transit Center, which is a major transit hub in the community and provides regional connections to Mira Mesa, UCSD, Old Town, downtown, Clairemont, and Pacific Beach. Bus routes that serve the UTC Transit Center include 12 routes..." (DEIR p. 5.2-10). <i>The DEIR should explain why the Project cannot substantially increase its mode share and why the City should approve a project with such a poor mode share in a major Transit Priority Area.</i></p>	<p>D7</p> <p>(cont.) Lastly, the Transportation Impact Analysis was conducted conservatively by using the lower non-vehicular mode share calculated using the SANDAG MXD Model (13 percent) rather than assuming a City-wide mode-share goal (20 percent). This conservative approach ensures that potential traffic congestion is not underestimated.</p>
<p>D8</p> <p>The CAP Checklist and GHG Emissions</p> <p>As the DEIR states (p. 5.5-8): "Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this Checklist to the extent feasible."</p> <p>The CAP Consistency Checklist</p> <p>To avoid doing a full analysis of the Project's GHG emissions, the DEIR relies on the City's policy that allows projects to avoid doing a GHG analysis by completing the CAP Checklist. The Project's CAP Checklist is DEIR Appendix D.</p> <p>The DEIR states: "The Project would be consistent with the GHG reduction measures contained in the City's CAP . . ." (DEIR p. 6-6). Unfortunately, the DEIR's responses to the CAP checklist are inadequate, vague and misleading. Furthermore, the DEIR contains no measurement or reporting mechanism and no enforcement mechanism for items on the checklist.</p>	<p>D8</p> <p>The City adopted a CAP that outlines the actions that City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.</p> <p>The purpose of the Climate Action Plan Consistency Checklist is to, in conjunction with the CAP, provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA.</p>
<p>D9</p> <p>The DEIR's CAP Checklist, p. 3, states: "This intensified development would be in proximity to the new Mid-Coast Trolley University Town Center station, as well as existing bus lines, which would support increased use of mass transit." This statement gives the misleading impression that the transit mode share for the project will be substantial simply due to the proposed Project's location, when its mode share of 13% in fact falls far short of the CAP's own 2020 mode share goals of 20%.</p> <p>The CAP Checklist (Appendix D, p. 3 of 7) asks: "Would the proposed project implement the General Plan's Mobility Element in Transit Priority Areas to increase the use of transit?" In response, the DEIR cites the Project's pedestrian bridges to the trolley station and the UTC Transit Center. The DEIR states, "The design of the project would . . . encourage use of the trolley and bus lines for employment and/or recreational purposes." Again, the DEIR fails to mention how low the <u>actual</u> projected mode share is for the Project and offers no way to increase that mode share.</p>	<p>The CAP Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impact analysis of GHG emissions.</p> <p>As documented in the draft EIR and the CAP Consistency Checklist (Appendix D), the Project would be consistent with the CAP, and therefore a less than significant impact would occur. Additionally, the measures outlined would be conditions of approval.</p>

COMMENTS

RESPONSES

D9	<p>The first referenced quote is in response to Question 1 of CAP Strategy 3, which asks, “Would the proposed project implement the General Plan’s City of Villages strategy in an identified Transit Priority Area (TPA) that will result in an increase in the capacity for transit-supportive residential and/or employment densities?” The quoted response provides an accurate answer to the Checklist question. Similarly, the answer regarding implementation of the General Plan’s Mobility Element accurately describes the Project’s features. Neither response implies a particular mode share, nor are individual projects required to demonstrate or achieve a particular mode share. Also refer to the response to Comment D7.</p>
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COMMENTS

RESPONSES

D10

The CAP Checklist (p. 4 of 7) also asks: "Would the proposed project implement the City of San Diego's Bicycle Master Plan to increase bicycling opportunities?" In response, the DEIR refers to the Bike Master Plan's identification of Class II bike lanes on Genesee, without disclosing that Genesee is so dangerous to bike that few attempt it. The DEIR also refers to the Project's provision of a one-way Class IV cycle track on Nobel Drive. The DEIR fails to mention this will only be for one or two blocks, will go only west bound, and the rest of Nobel Drive has a mix of Class II and Class III bike lanes and is extremely dangerous to bike. It also fails to mention that Costa Verde Boulevard and La Jolla Village Drive have no planned bike lanes in the Bike Master Plan. Once again, the DEIR gives a highly misleading impression about the potential for biking to and from the Project.

D11

CAP Checklist – Question 7 (p. 6) Transportation Demand Management (TDM) Program. The proposed TDM Program contains a list of measures that have no implementation requirements, no measurable goals, no mechanism for monitoring, and no requirement for reporting to the City on their impact. For example, the TDM Program does not identify which employees will be charged market rate for parking: will only professional employees who work in the Office and R&D buildings be charged? (The Office and R&D would have an estimated 1600 employees per the EIR Table 5.2-22, but it is not clear whether some of these would be the companies' low wage service workers.) What about the presumably much lower wage workers who work in the retail (509 workers) and hotel (225 workers): will they be charged market rate for parking? Who will set the market rate? Is it the responsibility of the Project's tenants to implement this program? Who will monitor it? What reporting is required? Instead of addressing any of these issues, the DEIR's responses on the CAP checklist rely on vague assurances and wishful thinking: "The project will charge employees market-rate for single-occupancy vehicle parking and providing reserved, discounted or free spaces for registered carpools or vanpools. This may encourage employees to use transit and thereby reduce single-occupant vehicle trips and associated parking demand." (CAP Checklist, p. 10)

The DEIR in numerous other places relies on this same vague list of TDM measures as partial mitigation for its traffic impacts.

6. TDM (TRANSPORTATION DEMAND MANAGEMENT)

D12

The DEIR states: "The project proposes a robust TDM program as a benefit to both the future tenants and the community. The goal of the plan is to reduce and/or remove vehicle trips to relieve congestion." (DEIR Appendix B, p. xiv)

However, this "robust" program has no measures for success, no tracking of the impact of its program, no requirement to report to the City on the program, and no actions to be taken if the "robust" TDM program does little to reduce and/or remove vehicle trips. ***The EIR needs to disclose that the impact of the proposed TDM program on actually reducing the number of trips will never be known.***

6

D10

The analysis contained the draft EIR and the CAP Consistency Checklist (Appendix D) properly addresses the effects of the Project on the environment. Section 5.2 of the draft EIR correctly describes, "The Project would provide a one-way Class IV cycle track (striped lane with a vertical barrier) along the northern edge of Nobel Drive between Genesee Avenue and Regents Road along the project frontage." The existing bicycle network in the project vicinity is accurately described on draft EIR Section 5.2. The bike lanes that were previously provided along the Genesee Avenue frontage were removed as part of the Mid-Coast Trolley construction, but will be reconstructed at the completion of construction activities.

D11

The CAP Consistency Checklist does not require ongoing measurement and reporting of performance. Refer to the response to Comment D14 regarding implementation of TDM measures. Specifically with regard to parking, salaried employees would be charged market rate for single-occupancy parking. The market rate for parking is, by definition, determined based on the market conditions in the area at the time, which will be evaluated by the site's parking management company prior to issuance of building permits and implemented by tenants with salaried employees.

As noted in the response provided to Appendix D CAP Checklist Step 2, Item 6, the Project would designate 10 percent of the total number of parking spaces for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles. Based on the provision of a total of 2,076 parking spaces, the Project is required to provide 208 designated spaces. The Project would provide 210 designated parking spaces and would thus be consistent with the CAP Consistency Checklist requirements. The locations of these spaces would be illustrated on final plans prior to issuance of Project building permits and would be marked with appropriate signage and striping in accordance with City requirements. This fulfills the applicable CAP Consistency Checklist requirements.

D12

The noted TDM measures are proposed as partial mitigation measures to reduce project impacts to less-than-significant levels on City of San Diego facilities. On impacted Caltrans facilities, while the TDM measures mentioned partially mitigate the impacts to freeways, it was concluded that the project impacts on the regional locations would still be considered significant and unmitigated. Additionally, the TDM measures were not used as a trip generation credit or trip reducing measure in the traffic analysis.

COMMENTS

RESPONSES

D12
cont.

Furthermore, the DEIR's MMRP relies repeatedly on this vague TDM Program for partial mitigation for many of its Traffic/Circulation impacts, including: TRA-5, TRA-6, TRA-8, TRA-15, TRA-16, TRA-18, TRA-29, TRA-30, TRA-31, TRA-32 (DEIR pp. 9-4 - 9-10).

For each TDM measure listed, the DEIR must set measurable goals, a mechanism for monitoring the implementation and impact and a mechanism for reporting annually to the City on the impact of the TDM program. If a TDM measure is not measurable, the DEIR should explain why.

For example: TDM Measure: (DEIR Appendix B, p. 189)

"The Project will implement a parking management plan, which will charge employees market-rate for single-occupancy vehicle parking and providing reserve, discounted, or free spaces for registered carpools or vanpools. This may encourage employees to use transit and thereby reduce single occupant vehicle trips and associated parking demand."

D13

The DEIR should state how the "market-rate" parking price will be set, and since this policy will be implemented by the Project tenants and not by Regency Centers or Alexandria, how will this be monitored and enforced? (See above comments on the CAP Consistency Checklist.) How will the number of registered vanpools and the number of employees using them be monitored? To say these measures "may encourage employees to use transit" is a meaningless measure.

7. THE DEIR PRESENTS THE PROJECT AS BIKE-FRIENDLY DEVELOPMENT THAT WILL PROMOTE BIKING. HOWEVER, WHAT THE DEIR FAILS TO CLEARLY DISCLOSE IS THAT THE STREETS SURROUNDING THE PROJECT AND THE ENTIRE "BIKESHED" ARE MOSTLY HIGH-TRAFFIC STREETS WITH MINIMAL TO NON-EXISTENT BIKE INFRASTRUCTURE.

D14

The DEIR states that the proposed Project is consistent with the City of San Diego Bicycling Goal that states: "A city where bicycling is a viable travel choice, particularly for trips of less than five miles." The DEIR describes its consistency with this goal by describing the Project's safe bicycle routes through the Project itself and the Project's design that incorporates elements such as bike access across the project and bike lockers and racks (see also DEIR CAP Checklist Consistency, p. 4). However, the DEIR fails to disclose how "unbikeable" the surrounding streets are. The DEIR does describe the heavily trafficked surrounding streets (DEIR p. 5.2-2): La Jolla Village Drive has no bike lanes; Nobel Drive, the southern boundary of the Project, has intermittent bike lanes and intermittent on-street parking; Genesee Avenue, has bike lanes but is a six lane, high traffic street with multiple driveways; Lebon Drive has no bike lanes. Regents Road has bike lanes only north of La Jolla Village Drive. ***The DEIR should clearly disclose how unbikeable the surrounding "bikeshed" is and the challenges in terms of cost and feasibility for the City to make the area more bikeable.***

D12

(cont.) The TDM measures contained in Mitigation Measure TRA-5 have been clarified to provide that the City's Environmental Designee shall verify that all requirements are included on Project Construction Drawings prior to the issuance of Building Permits, and that requirements are implemented. Each of the mitigation requirements is verifiable and the clarifications to the mitigation measures would ensure their implementation consistent with CEQA requirements. Quantification of the effect of these measures is not required.

Moreover, the project applicant has agreed to a TDM Monitoring and Reporting Program to assess the estimated net reduction in project trips due to the proposed TDM measures. Traffic counts and data relating to paid parking, non-vehicular usage, carpool/vanpool usage, and transit subsidies will be collected using on-site person surveys, field visits, coordination with the property owners and tenants and traffic counts. The project applicant will conduct the monitoring program annually for a period of three years. Annual TDM Reports will be prepared and submitted to the satisfaction of the City Engineer. The implementation, maintenance, and monitoring of the TDM Program will be a condition of the discretionary permit.

D13

Refer to response to Comment D11 regarding the parking management plan and the response to Comment D12 regarding monitoring of TDM measures.

D14

Refer to response to Comment D10 regarding the analysis of the Project's improvements to bicycle transportation. The community's bicycle network is being evaluated as part of the University Community Plan update process.

D15	<p>8. <u>PARKING</u></p> <p>The DEIR proposes between 1839 and 2,076 parking spaces (Appendix B, p. i). Total project parking required by the City is 1839 spaces (DEIR p. 185). There are currently 968 spaces.</p> <p>In describing the proposed Project, the DEIR refers time and again to “implementation of a parking management plan”:</p> <ul style="list-style-type: none"> • The proposed Project will provide a total of up to 2,076 parking spaces throughout the site upon build out of the Project, in accordance with SDMC requirements. Parking facilities will include surface lots in the southern portion of the site, with the majority of the parking below podium level. The Project will implement a parking demand management plan. (DEIR p. 5.1-43) • The Project’s consistency with Applicable Elements, Goals and Policies in the City of San Diego’s Land Use Goals, Objectives and Policies (DEIR p. 5.1-43, p. 5.1-44 are just a few examples) • As a Mitigation Measure in the Mitigation, Monitoring and Reporting Program (DEIR p. 9-5). • The DEIR (p. 5.2-56) states the project would: “Implement a parking management plan, which will charge employees market-rate for single-occupancy vehicle parking and provide reserved, discounted, or free spaces for registered carpools or vanpools.” • The DEIR 5.1-13 states that a NDP (Neighborhood Development Permit) is required for the Project because the Project proposes tandem commercial parking spaces for valet parking in association with restaurant use and assigned employee parking. The findings necessary for an NDP are the same as those noted above for an SDP. <p>Yet nowhere is the parking management plan described.</p> <p><i>Given the DEIR’s reliance on the existence of the plan, the “Parking Management Plan” needs to be spelled out in detail in the DEIR: its provisions, its assumptions, its intended impacts, the responsible parties for implementing it, the methods for its implementation, and a regular reporting mechanism on its status and impact.</i></p>	<p>D15 As referenced in draft EIR Section 5.2, as a part of the project TDM program, a parking management plan is proposed to be prepared prior to issuance of building permits that is intended to implement the project design requirements that salaried employees would be charged market rate for single-occupancy vehicle parking and reserved spaces would be provided for registered carpools or vanpools in accordance with CAP requirements. Refer to responses to Comments D11 and D12 regarding implementation and monitoring of the TDM program.</p>
D16	<p>9. <u>NOISE IMPACTS FROM PROJECT OPERATION</u></p> <p>The proposed project is directly adjacent to a senior living community and skilled nursing facility. The senior residents at this community may be more significantly impacted by noise issues than typical residential uses. As a result, <i>the proposed project’s DEIR should evaluate the noise impact specifically on the adjacent senior living community.</i></p>	<p>D16 The adjacent continuing care retirement community is considered as a sensitive receptor in the noise analysis. The analysis of construction noise describes the noise impact on the adjacent residentially zoned property to the west, which includes the Vi. For operational noise impacts, 14 receivers were specifically included in the noise analysis model at various floors and facades of the portions of the Vi closest to the project site, including the L-shaped building (skilled nursing facility) and the South Tower, as illustrated on Appendix E Figure 6. The unmitigated noise levels at each of these receivers is detailed in Appendix E Table 14. Because noise levels at some of these receivers were modeled to exceed the applicable noise limit, mitigation is included to reduce noise levels. The mitigated noise levels are detailed in Appendix E Table 16. With the proposed mitigation, noise levels at all receivers were calculated to be below the applicable noise limit.</p>
D17	<p>While it is technically correct that there is not a separate use category for noise impact for Skilled Nursing Facilities, skilled nursing facilities are “sensitive receptors” for which additional</p>	

COMMENTS

RESPONSES

D17
cont.

environmental analysis and mitigation may be warranted. For example, one of the thresholds for significance for noise impacts is when “temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as day care facilities, a significant noise impact may be identified.” Page 5.7-6 of the DEIR presents the discussion of construction noise, its impact, and provides mitigation measures for those impacts. However, the DEIR does not explicitly evaluate whether the impact would substantially interfere with normal business communication or affect sensitive receptors. Therefore, it is unclear whether additional noise attenuation mitigation measure would be necessary.

D18

Further, the event plaza is proposed to be located less than 100 feet from the skilled nursing facility. However, the proposed mitigation measure for noise barriers is intended to reduce noise to “off-site receptors to the west” (DEIR p. 5.7-8). ***The DEIR should include mitigation measures tailored to the skilled nursing facility residents, who have heightened sensitivities to noise disruptions and who are located in closer proximity to the event plaza than the off-site receptors to the west, as shown on the image below.***



D19

The proposed Mitigation Monitoring and Reporting Program (DEIR Section 9.0) should state that a representative from Vi, Garden Communities and other neighboring townhouse complex HOAs should be included in monthly meetings to be kept advised of schedule adjustments and impact feedback.

D20

10. NOISE IMPACT OF CONSTRUCTION – HEAVY TRUCK TRAFFIC

The UCPG is deeply concerned about the major noise impact of the heavy truck traffic projected during the almost three-year construction of the Project, particularly on the residences on Nobel Drive between Genesee Avenue and Towne Centre Drive. The DEIR should study routing the great majority of the Heavy Truck traffic on La Jolla Village Drive instead of Nobel Drive.

D17

Draft EIR Section 5.7 notes that the continuing care retirement community to the west (the Vi), which includes the skilled nursing facility, is considered a sensitive receptor. As a result, the draft EIR identified a potentially significant construction-noise impact at this sensitive receptor. Mitigation Measures NOI-4 and NOI-5 would be implemented that would reduce construction noise to levels considered acceptable by the City. Specific noise levels that could be considered to “interfere with normal business communication or affect sensitive receptors” are subjective. For comparison, normal human conversation level is approximately 60 decibels at a distance of three feet, a garbage disposal is 80 decibels at a distance of three feet, and a gas lawn mower is approximately 70 decibels at 100 feet. The construction noise mitigation included in the Draft EIR requires noise levels be reduced to below 75 dBA L_{EQ} (12-hour) at the project site’s property line it shares with the residentially zoned properties to the west (which include the skilled nursing facility). As such, noise levels at the exterior of the buildings to the west would be exposed to noise levels no greater than 75 dBA L_{EQ} (12-hour). Since standard building materials typically attenuate noise by 15 decibels, interior noise levels at the nearby receptors would be approximately 60 decibels averaged over a 12-hour period, or the noise level of normal human conversation. While there may be periods where noise levels at the property line exceed 75 decibels, thus potentially exposing receptors to noise levels greater than 60 decibels, these periods would be short-term, intermittent, and infrequent. In addition, as mentioned above, noise levels that could be considered to ‘interfere with normal business communication or affect sensitive receptors’ are subjective, and noise levels in excess of 60 decibels are not necessarily considered excessively loud or disruptive. As such, construction-generated noise is not anticipated to result in substantial interference with business communication or substantially affect sensitive receptors.

D18

The skilled nursing facility (as well as other elements of the Vi) are considered as part of the off-site sensitive receptors to the west, to which the required mitigation would apply.

D19

The City’s Mitigation Monitoring Coordinator is responsible for ensuring implementation of the required mitigation measures; therefore, inclusion of additional parties in the Mitigation Monitoring and Reporting Program is not required. Nonetheless, the project applicant is willing to commit to monthly meetings with the Vi, Garden Communities, and townhome homeowners’ associations within 500 feet of the site during construction.

COMMENTS

RESPONSES

D20
cont.

The DEIR identifies these residential uses on Nobel Drive as noise sensitive land uses (NSLUs) in its Cumulative Impacts analysis. The DEIR Table 6.2 shows that the residential uses between Genesee Avenue and Towne Centre Drive are within 70' of the midline of Nobel Drive.

This is particularly important because these residences have already endured the noise impact of heavy truck traffic for many years (since 2015) due to the demolition and construction of the UTC Mall, the construction of the UTC Palisade residential tower, and the construction of the trolley. ***The DEIR should acknowledge this multi-year noise impact from both construction and heavy truck traffic on these residences.***

The DEIR, Appendix B, Traffic Impact Analysis, pp. 172-173 describes the hundreds of truck trips per day that construction will require over a period of almost 3 years.

- Phase A- Dirt export – 50 trucks/day x two trips for 3 months
- Phase B - Dirt export – 110 heavy trucks/day x 2 trips for 3 months
- Phase C - Concrete demo – 140 heavy trucks/day x 2 trips for 3 months
- Phase D – Miscellaneous deliveries – 160 heavy trucks/day x 2 trips for 4 months
- Phase E – Miscellaneous deliveries – 180 heavy trucks/day x 2 trips for 4 months
- Phase F – Miscellaneous deliveries/Construction trash – 160 heavy trucks/day x 2 trips for 4 months
- Phase G – Miscellaneous deliveries/Construction trash – 100 heavy trucks/day x 2 trips for 4 months
- Phase H – Miscellaneous deliveries/Construction trash – 50 heavy trucks/day x 2 trips for 4 months
- Phase I – Miscellaneous deliveries/Construction trash – 50 heavy trucks/day x trips for 4 months

The DEIR, Appendix B, Figures 23-2 (following p. 180) shows that construction traffic is projected to be divided:

- 40% on La Jolla Village Drive between Genesee and I-805
- 40% on Nobel Drive between Genesee and I-805
- 20% on Genesee Avenue between Esplanade Court and SR-52

The DEIR states (p. 5.2-48) that “construction activity is expected to occur between 7:00 am and 3:30 pm and consist of worker vehicles and heavy vehicles. . . . Heavy vehicles are expected to arrive at regular intervals throughout the day, with the first truck arriving after 7:00 am and ending prior to the p.m. peak hour.”

The DEIR should study moving most of the 40% of heavy truck traffic from Nobel Drive onto La Jolla Village Drive in order to reduce impacts on the residents on Nobel Drive between Genesee Avenue and Towne Centre Drive.

10

D20

The Traffic Control Plan (including a Haul Route Plan) that will be required as a condition of project approval will review and consider the amount of construction vehicle traffic on community roadways.

Noise modeling was conducted for Phase E construction traffic, which involves the greatest number of daily haul truck trips (180 trucks each making two trips per day, resulting in a total of 360 daily truck trips). This construction phase also involves 300 employees each making two trips per day, resulting in a total of 600 employee trips per day. Modeling was conducted for the roadway segments of La Jolla Village Drive, Nobel Drive, and Genesee Avenue that would accommodate project construction traffic and along which noise-sensitive land uses are located.

The modeling indicates that project-generated construction traffic would not result in a perceptible or significant increase in noise levels at noise-sensitive land uses located along roadways that would accommodate project-generated construction traffic.

11. ADDITIONAL MEASUREMENT OF EXISTING TRAFFIC NOISE

The DEIR shows only two noise measurements, conducted on 04/12/16 from 10.41 A.M. to 10.51 A.M. and at 12.31 P.M. -12.41 P.M. at the Genesee and Esplanade Court corner and Nobel and the entrance to the McDonalds, adjacent to the Coco's parking (DEIR p. 57-2).

The DEIR fails to show measurements for the 12-hour period to provide a street noise profile for one full day. Two measurements of noise during the entire 24-hour period is not sufficient to generate accurate an average sound variation level. The readings may vary significantly. Therefore, another measurement study should be done from 7 A.M. to 7 P.M. to include 12 recordings of the street noise level instead of only 2. This should include the most impacted intersection, Genesee and Nobel, where multi-family residential units are located and where residents suffer due to continuous exposure to high levels of street noise.

These new measurements will significantly improve the accuracy and predictive power of the noise model used by the DEIR and directly affects future model projections.

The DEIR should present their results of descriptive statistics in table like the one below:

Table 2. Descriptive Statistics of Exposure Variables.

Exposure variables	Minimum	25th percentile	Median	75th percentile	Maximum	Mean \pm SD
Air pollution variables						
PM _{2.5} ($\mu\text{g}/\text{m}^3$)	16.04	17.65	18.29	19.08	21.45	18.39 \pm 1.05
PM _{2.5} absorbance ($10^{-5}/\text{m}$)	1.01	1.37	1.52	1.72	3.39	1.58 \pm 0.35
PM coarse ($\mu\text{g}/\text{m}^3$)	0.84	9.29	10.14	11.13	15.00	10.13 \pm 1.53
PM ₁₀ ($\mu\text{g}/\text{m}^3$)	23.97	26.54	27.43	28.62	34.68	27.74 \pm 1.84
NO ₂ ($\mu\text{g}/\text{m}^3$)	19.81	26.79	29.47	32.90	62.44	30.12 \pm 4.85
NOx ($\mu\text{g}/\text{m}^3$)	24.30	41.97	49.28	57.66	126.63	50.47 \pm 11.70
Traffic load at major roads (veh-m/d) per 100,000	0.00	0.00	0.00	13.50	268.19	9.54 \pm 21.20
Noise variables^{a,b}						
L _{DAY} (dB(A))	0.00	46.70	52.13	60.87	84.56	53.74 \pm 9.49
L _{NIGHT} (dB(A))	0.00	38.15	43.54	51.75	76.29	44.88 \pm 9.17

^aDescriptive statistics for the noise exposures are based on continuous variables, without a threshold.

^bNull values were used for those addresses where noise exposure was not modeled because of low traffic volume.

Figure 1. Data from reference [1]

1. Tzivian, L., et al., *Long-term air pollution and traffic noise exposures and cognitive function: A cross-sectional analysis of the Heinz Nixdorf Recall study*. J Toxicol Environ Health A, 2016. 79(22-23): p. 1057-1069.

D21

The primary purpose of conducting the noise measurements is to provide information on the general ambient noise levels of the project area and the existing noise setting. The measured noise levels, together with the traffic counts (which were conducted for both measurements for the project), can also be used to confirm the accuracy of or adjust the noise model, if necessary. While measurements for a 12-hour period could be useful in showing the current roadway noise profile over the course of a day and would likely reveal variation in hourly average noise levels, such measurements are not necessary for modeling the Project's potential traffic noise impacts. The analysis included in the EIR considers noise levels from future (when the Project would be operational) traffic volumes both with and without the project-generated traffic, as provided in the project-specific Transportation Impact Analysis, to assess the Project's contribution to the noise levels. Existing noise level measurements are not factored into the analysis. For the analysis, peak hour traffic volumes, assumed to be 10 percent of daily traffic volumes (which is typical in an urban setting), are included in the noise model to calculate maximum hourly average noise levels, which in turn are used to estimate CNEL from roadway traffic that could be experienced by nearby receptors. The CNEL is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. The model-calculated peak hour average noise level (with peak hour traffic as 10 percent of daily traffic volumes) is approximately equal to the CNEL, per guidance provided in the California Department of Transportation *Technical Noise Supplement for the Traffic Noise Protocol*. As such, average noise levels for traffic noise over a 24-hour period are estimated without the need to conduct extensive noise measurements.

The Draft EIR analyzes impacts based on impact criteria. The data presented in the example statistical table provided in this comment are statistical data from a published scientific journal. This information is not relevant to the analysis presented in the draft EIR, and does not provide meaningful information to assist the public or decision-makers in understanding potential impacts of the Project.

COMMENTS

RESPONSES

	<p>12. Storm Water</p>	
D22	<p>Table 5.9-1 in the DEIR summarizes potential sources of common pollutants, and the project site includes at least one source for every category. (See also page 20 of the SWQMP). <i>The DEIR should state how much is known about the chemicals that will be used for landscaping purposes on the site and if it can be ensured that fertilizers and toxic herbicides and pesticides will not contaminate our waterways.</i></p>	D22
		<p>While specific information regarding chemicals that would be used on site for landscaping is not available at this time, landscape and storm water codes require minimizing chemicals entering the storm drain system through site design and efficiency in irrigation (i.e., Source Control Best Management Practices). Irrigation would be supplied by public reclaimed water from the City's reclaimed water main in Nobel Drive. All site runoff would be routed through the storm water treatment units and detention chamber prior to entering the public system.</p>
D23	<p>Table 5.1-1 on page 5.1-80 of the DEIR mentions the "[r]euse of collected rainwater for irrigation." However, the SWQMP shows that capture and reuse for rainwater is infeasible. <i>The DEIR should clarify whether or not rainwater is to be captured and reused on site.</i></p>	D23
		<p>Rainwater is no longer planned to be captured and reused on site. The referenced EIR text has been corrected accordingly.</p>
D24	<p>In the Preliminary Drainage Study (DEIR Appendix G2, Attachment 5) page 2 states that the McDonalds and Chevron parcels will remain unchanged. However, in Exhibit C, arrows suggest that surface flows from those sub-basins (A13 and A14) will be directed to inlet #107 and then routed to the subterranean retention plant. <i>The DEIR should clarify whether some or all of the drainage from these parcels will be captured and treated, and if that is not currently planned, should consider an alternative in which trash, oil, bacteria and heavy metal are removed from surface and storm drain flows from these parcels.</i></p>	D24
		<p>The existing McDonalds and Chevron improvements would be parceled and separated from the developed site by the proposed Tentative Parcel Map. Drainage from the parcel with the existing McDonalds and Chevron would remain unchanged in the proposed conditions. Please note, the drainage patterns for sub-basins A13 and A14 are identical in Exhibit B (Existing Drainage Exhibit) and Exhibit C (Proposed Drainage Exhibit) of draft EIR Appendix G1. Node #107 is the discharge point for the site and therefore runoff generated from sub-basins A13 and A14 would not be routed to the detention system. Because the Project does not propose work in these areas, additional treatment of associated stormwater is not required.</p>
D25	<p>In the DEIR Appendix G2, p. 241, the efficacy of the proposed hydro-modification avoidance measures is detailed. The subterranean retention plant is described as detaining 41% (37,865 cfs of a total flow of 91,800 cfs) in a 100-year storm. <i>The DEIR should describe in more detail how the slow release structure will be effective in protecting downstream areas from hydro-modification in extremely heavy rainfall events. The DEIR should also justify the use of the City of San Diego's 2005 projections for 50- and 100-year interval storm values, in light of the more recent models of future climate in the area.</i></p>	D25
		<p>The page number, detention volume, and runoff rates referenced in the comment do not appear to be consistent with draft EIR Appendix G1. For the 100-year storm event, the Project would generate a peak runoff of 63.53 cubic feet per second [cfs] (per Table 4-1) prior to application of controls, and discharge at a rate of 17.53 cfs (per Table 4-2) after detention and hydromodification low-flow controls. The analyses and calculations have been performed using the most current standards and methodology for hydromodification and stormwater treatment.</p>
D26	<p>13. VISUAL IMPACT AND DESIGN COHESIVENESS</p> <p>The Alexandria R&D and Office buildings appear to be very modern in contrast to the rest of the project. How does Regency Centers plan to make the Project more coordinated in design and avoid looking like separate buildings from different architects? While the design of the Alexandria wood building is innovative, the UCPG is concerned about the sustainability of the materials that will be used on the outer walls and the overall plan to keep the building from becoming weathered and discolored by age. <i>The DEIR should more clearly state how the entire site will have design cohesiveness.</i></p>	D26
		<p>As described in draft EIR Section 3.2.1, "The architecture of the center would consist of modern design and materials, consistent with the character of the community's urban core." Regency Centers and Alexandria Real Estate Equities have hired the same architect to ensure consistency of design and the aesthetics of the Project will continue to evolve through preparation of the final set of Construction Documents. Wood used on the exterior would be conditioned and sealed and would receive routine maintenance to avoid gray discoloration.</p>
D27	<p>The DEIR misrepresents the proposed hotel and its impacts.</p>	D27
		<p>The EIR accurately describes the height of the proposed hotel in the Project Description (Section 3.2.4) as well as throughout the EIR, including in the</p>

COMMENTS

RESPONSES

D27
cont.

The proposed 200-room hotel will be 10 stories high (DEIR Public Notice). It will be 135' (DEIR P. 5.3-20). Yet the Conceptual Elevations for the Hotel (Figure 3-31) inaccurately show it as six stories high. ***The DEIR needs to correct this.***

The DEIR claims the hotel will have no significant visual effects or neighborhood character impacts. Yet this claim is elsewhere contradicted by the DEIR itself: "At a maximum height of 135 feet, this building would be a fairly prominent new vertical element within this viewshed." (DEIR p. 5.3-28). ***The DEIR needs to disclose the visual and neighborhood character impacts of the hotel.***

D28

14. PEDESTRIAN SAFETY

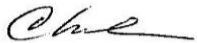
Due to high expected pedestrian traffic in the area of the Trolley and the UTC Transit Center, the DEIR should fully explain the analysis done to ensure pedestrian safety at the uncontrolled and controlled entrances and exits to the project site as vehicles make turns entering and exiting the site.

D29

Submission by the UCPG

This comment letter was approved by the UCPG Board on May 12, 2020, by a vote of 13 Yes, 0 No, 0 Abstain, and 1 Recusal.

Submitted on May 22, 2020,



Chris Nielsen
UCPG Chair

13

D27

(cont.) plans as submitted by the applicant to the City at the time of preparation of the draft EIR and are intended for illustrative purposes. Notwithstanding that the plans submitted by the applicant illustrated a lower hotel elevation, the hotel is described, and impacts analyzed, throughout the EIR based on a maximum allowable height of 135 feet, which represents a worst-case condition.

The determination of whether a project would result in a significant visual impact is based on the City's Significance Determination Thresholds (2016a). Significance criteria related to height include the following:

- The project significantly conflicts with the height, bulk, or coverage regulations of the zone and does not provide architectural interest (e.g., tilt-up concrete building with no offsets of varying window treatment) (page 5.3-18);
- The project would exceed the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project area by a substantial margin (page 5.3-24); and
- The project would be located in a highly visible area (e.g., on a canyon edge or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projections (page 5.3-24).

While the quote from the EIR analysis regarding the hotel element is accurate, it is important to consider it in context with the other analysis. As stated regarding the referenced view, "Surrounding development is currently at a larger scale and greater intensity than existing on-site development and would continue to be so upon Proposed Project implementation despite the increase in development intensities on site" (Section 5.3.4.2). The hotel would be consistent with the height and bulk of the existing surrounding development within the Urban Node and would not be out of character with the surrounding development patterns. Thus, in light of the City's significance criteria, the presence of a "fairly prominent new vertical element" within an urban context that includes many prominent vertical elements, does not comprise a significant visual impact.

D28

The uncontrolled driveways currently exist and are not proposed as new entrances or exits. The Project's uncontrolled driveways would be designed to meet City of San Diego standards as outlined in the City of San Diego Street Design Manual and to the satisfaction of the City Engineer in terms of driveway width, non-contiguous sidewalks (which separate sidewalks and the curb with a

COMMENTS

RESPONSES

- | | |
|-----|--|
| D28 | (cont.) landscaped buffer), and traffic control (i.e., stop sign on the driveway). Pedestrian improvements at the controlled intersection of Genesee Avenue/ Esplanade Court would include high visibility crosswalk and pedestrian countdown timers per current City standard and are shown on Figure 3-1 of the draft EIR. |
| D29 | Information regarding the UCPG's vote is noted. No further response is necessary. |

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May 26, 2020

Via Email and Overnight MailE. Shearer-Nguyen
Environmental Analysis Section
City of San Diego Development Services Department
1222 First Avenue, MS-501
San Diego, CA 92101
Email: DSDEAS@sanidiego.gov**Via Email Only**Martha Blake, Development Project Manager
Email: MBlake@sanidiego.gov**Re: Comments on the Draft Environmental Impact Report for the
Costa Verde Revitalization Project (Project No. 477943)
(SCH No. 2016071031)**

Dear Ms. Shearer-Nguyen, Ms. Blake:

E1 These comments are submitted on behalf of San Diegans for Sustainable, Economic and Equitable Development ("SD SEED") regarding the Draft Environmental Impact Report ("DEIR") prepared by the City of San Diego ("City") for the Costa Verde Revitalization Project (Project No. 477943; SCH No. 2016071031) ("Project"), proposed by Regency Centers L.P. ("Applicant").

The Project proposes to reconfigure and expand the existing Costa Verde retail shopping center, located west of Genesee Ave between La Jolla Village Drive and Nobel Drive,¹ to add additional retail shops and restaurants, neighborhood services, community gathering spaces, a hotel, and expand commercial/office uses. The Project proposes to re-designate an approximately one-acre portion of the site

¹ DEIR, p. 3-1. The Project site includes Assessor's Parcel Numbers ("APN") 345-210-12, 345-210-13, and 345-210-14. Notice of Availability of DEIR.
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E1 Introductory comments regarding the summary of the Project, discretionary entitlements, summary of the Commenter's concerns, statement of interest, and legal background information regarding CEQA are noted. Refer to the responses to the individual comments that follow.

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as Visitor Commercial to add a 200-room, 10-story, approximately 125,000 square feet ("SF") hotel use to the Costa Verde Specific Plan (CVSP) area.² The Project would retain the existing 178,000 SF of commercial/retail uses on the site, and add approximately 360,000 SF of new research and development and 40,000 SF of new commercial/office uses.³ Building heights would be up to 45 feet for commercial/retail structures, and 135 feet for commercial/office/research and development and hotel uses.⁴

Project implementation would require a number of discretionary entitlements in addition to the DEIR, including a General Plan Amendment, Specific Plan Amendment to the CVSP, and Community Plan Amendment to the University Community Plan ("UCP") to increase the development density for the Project's new commercial, office, and research and development uses, and to redesignate the hotel site as "Visitor Commercial."⁵ The Project also requires a Site Development Permit ("SDP") for land use plan amendments within the Airport Land Use Compatibility Overlay Zone, a Planned Development Permit ("PDP") to Amend PDP No. 90-1109 for the reconfiguration and expansion of the existing 178,000-square foot shopping center, Neighborhood Development Permit ("NDP") to include tandem commercial parking spaces, Tentative Parcel Map to create new legal lots, and an Easement Vacation to vacate Esplanade Court and water line easements as public facilities.⁶

Our review of the DEIR demonstrates that the DEIR fails to comply with the California Environmental Quality Act⁷ ("CEQA"), the Subdivision Map Act ("Map Act"), and local land use plans and codes. As explained more fully below, the DEIR fails to accurately describe the Project and its existing baseline conditions, and fails to accurately disclose the extent of the Project's potentially significant impacts on air quality, public health, noise, traffic, from greenhouse gas ("GHG") emissions, and from inconsistencies with applicable land use plans. The DEIR fails to support its significance findings with substantial evidence, and fails to mitigate the Project's potentially significant impacts to the greatest extent feasible, in violation of CEQA. As a result of these deficiencies, the City also cannot make the requisite findings under the Map Act, the General Plan, CVSP, and the San Diego Municipal Code

² DEIR, pp. 3-1 to 3-2.

³ *Id.*

⁴ DEIR, p. 3-2.

⁵ DEIR, p. 3-12.

⁶ DEIR, pp. 3-12 to 3-13.

⁷ Pub. Resources Code ("PRC") §§ 21000 et seq.; 14 Cal. Code Regs. ("CCR") §§ 15000 et seq. 4829-020acp

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("SDMC") to approve the Project's plan amendments, PDP, SDP, and NDP. The City cannot approve the Project until the errors and omissions in the DEIR are remedied, and a revised DEIR is recirculated for public review and comment which fully discloses and mitigates the Project's potentially significant environmental and public health impacts.

We reviewed the DEIR and its technical appendices with the assistance of our technical consultants, including air quality and GHG expert Paul E. Rosenfeld, Ph.D. of Soil Water Air Protection Enterprises;⁸ acoustics, noise and vibration expert Derek Watry of Wilson Ihrig;⁹ and traffic and transportation expert Daniel T. Smith, Jr., P.E., principal at Smith Engineering & Management.¹⁰ The attached expert reports are incorporated by reference in this comment letter and require separate responses under CEQA.¹¹ We reserve the right to supplement these comments at a later date and at any future proceedings related to this Project.¹²

I. STATEMENT OF INTEREST

SD SEED is an unincorporated association of individuals and labor organizations formed to ensure that the construction of major urban projects in the San Diego region proceeds in a manner that minimizes public and worker health and safety risks, avoids or mitigates environmental and public service impacts, and fosters long-term sustainable construction and development opportunities. The association includes the United Association of Plumbers, Steamfitters, Refrigeration & HVAC Service Technicians Local 230 and the International Association of Bridge and Structural Ironworkers Local 229 along with their members, their families, and other individuals who live and work in the San Diego region.

Individual members of SD SEED and its member organizations include Leonard Skywat, Brian White, and Keith Woodstra. These individuals live in the City of San Diego, and work, recreate, and raise their families in the City and

⁸ SWAPE's technical comments and Dr. Rosenfeld's curriculum vitae are attached hereto as **Exhibit A**.

⁹ Mr. Watry's technical comments and curriculum vitae are attached hereto as **Exhibit B**.

¹⁰ Mr. Smith's technical comments and curriculum vitae are attached hereto as **Exhibit C**.

¹¹ 14 CCR §§ 15088(a), (c).

¹² Gov. Code § 65009(b); PRC § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield ("Bakersfield")* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

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surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

SD SEED has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

SD SEED supports the development of commercial, research and development, and office projects where properly analyzed and carefully planned to minimize impacts on public health, climate change, and the environment. Commercial projects should avoid adverse impacts to air quality, public health, climate change, noise, and traffic, and must incorporate all feasible mitigation to ensure that any remaining adverse impacts are reduced to the maximum extent feasible. Only by maintaining the highest standards can commercial development truly be sustainable.

II. LEGAL BACKGROUND

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR") (except in certain limited circumstances).¹³ The EIR is the very heart of CEQA.¹⁴ "The foremost principle in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language."¹⁵

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project.¹⁶ "Its purpose is to inform the public and its responsible officials of the

¹³ See, e.g., PRC § 21100.

¹⁴ *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.

¹⁵ *Comtys. for a Better Env' v. Cal. Res. Agency* (2002) 103 Cal. App.4th 98, 109 ("CBE v. CRA").

¹⁶ 14 CCR § 15002(a)(1).

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environmental consequences of their decisions before they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’”¹⁷ The EIR has been described as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.”¹⁸

Second, CEQA requires public agencies to avoid or reduce environmental damage when “feasible” by requiring “environmentally superior” alternatives and all feasible mitigation measures.¹⁹ The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to “identify ways that environmental damage can be avoided or significantly reduced.”²⁰ If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns.”²¹

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position. *A clearly inadequate or unsupported study is entitled to no judicial deference.*”²² The question of whether an EIR is sufficient as an informational document is determined by the Court “without reference to substantial evidence.”²³

As the courts have explained, “a prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decisionmaking and

¹⁷ *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564.

¹⁸ *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal. App. 4th 1344, 1354 (“*Berkeley Jets*”); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

¹⁹ 14 CCR§ 15002(a)(2) and (3); *see also Berkeley Jets*, 91 Cal.App.4th at 1354; *Citizens of Goleta Valley*, 52 Cal.3d at 564.

²⁰ 14 CCR §15002(a)(2).

²¹ PRC § 21081; 14 CCR § 15092(b)(2)(A) & (B).

²² *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added), *quoting, Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 391 409, fn. 12.

²³ *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 520.

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cont.

informed public participation, thereby thwarting the statutory goals of the EIR process.”²⁴

III. THE DEIR FAILS TO ADEQUATELY DESCRIBE THE PROJECT

The DEIR does not meet CEQA’s requirements because it fails to include an accurate, complete and stable Project description, rendering the entire analysis inadequate. California courts have repeatedly held that “an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.”²⁵ CEQA requires that a project be described with enough particularity that its impacts can be assessed.²⁶ Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the project’s impacts and undermining meaningful public review.²⁷ Accordingly, a lead agency may not hide behind its failure to obtain a complete and accurate project description.²⁸

E2

A. The DEIR Fails to Describe the Project’s Research and Development Component.

The DEIR describes the largest component of the Project as the addition of 360,000 SF of “research and development.”²⁹ This proposed research and development use would outsize all other Project uses combined, including the Project’s existing 178,000 SF of retail use and its proposed addition of a 125,000 SF hotel and 40,000 SF of commercial/office uses.³⁰ However, the DEIR contains no definition of “research and development” or any other discussion of the type of research and development uses planned for these buildings. The omission of this

²⁴ *Berkeley Jets*, 91 Cal.App.4th at 1355; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946.

²⁵ *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond (“CBE v. Richmond”)* (2010) 184 Cal.App.4th 70, 85–89; *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185, 193.

²⁶ 14 CCR § 15124; see, *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 192-193.

²⁷ *Id.*

²⁸ *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311 (“*Sundstrom*”).

²⁹ DEIR, p. 5-3.

³⁰ DEIR, pp. 3-1 to 3-2.

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E2

The description of the Project as presented in the EIR is stable and consistent.

Appendix B to the draft EIR, includes trip generation rates for two land use categories that involve offices: Commercial Office for one building and Scientific Research and Development for two buildings. The University Community Plan, Costa Verde Specific Plan, and associated implementing permits for the project allocate separate maximum allowable square footage limits for the two land use categories.

The draft EIR and the associated Appendix B used to prepare the Transportation/Circulation analysis presented in Section 5.2 of the EIR uses the average daily trip (ADT), AM and PM peak hour trip rates for the Scientific Research and Development land use per the City of San Diego Trip Generation Manual, May 2003 for two of the three buildings. The Project’s Research and Development buildings are comparable to the Scientific Research and Development category listed in the Trip Generation Manual rather than other forms of office use based on the following consideration stated by the applicant:

- Similar Functions-Employees would be engaged in innovative research in scientific and technological fields including life sciences (pharmaceuticals, diagnostics, medical devices and genomics), telecommunications, hardware/software/applications, nanotechnology, drones, artificial intelligence, and autonomous driving cars to any other number of cutting-edge advancements.
- Space per Employee-Research buildings are designed to include significantly more work space per employee than a conventional commercial office due to specialized functions and equipment.
- Internal Space Planning-Multi-use support spaces within research buildings are necessary to foster collaboration and accommodate specialized functions.

Approval of the proposed planning documents and discretionary permits, which identify and restrict permissible uses of the subject property, requires the constructed project to be consistent with the transportation analysis conducted for the Project.

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E2
cont.

information is critical, because City's planning documents, trip generation manual, and air emissions modeling guidance relied on for the DEIR's impact analysis describe several different forms of "research and development," each with different impacts.

The UCP and the City's Trip Generation Manual explain that "research and development" facilities include a variety of site uses and varying numbers of employees.³¹ The City's Trip Generation Manual identifies research and development uses under both "Industrial" and "Office" classifications.³² Both the UCP and the Trip Generation Manual describe "Scientific Research and Development" as single-tenant facilities devoted to the discovery and development of new products or improvement of existing products.³³ The UCP and Manual both further explain that "the number of employees [for Scientific Research and Development] is usually low when compared to other industries."³⁴

By contrast, the Trip Generation Manual describes "Industrial" research and development as "uses that permit research and development uses with some limited manufacturing as well as a mix of light industrial and office uses."³⁵ The UCP then alternatively describes "research and development" as part of "Business Park" uses, which include "office, research and development, and light manufacturing uses."³⁶ The UCP further explains that business park uses "serve as a transition area to scientific research, commercial and residential uses and are compatible in nature."³⁷ Finally, the CalEEMod Users Guide, which was used to model the Project's construction and operational air emissions, explains that "Research & Development

³¹ See University Community Plan, p. 172, available at https://www.google.com/url?sa=t&rc=1&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiT6ZSE28pAhWBsJ4KHSqWC5wQFjABegQIAhAB&url=https%3A%2F%2Fwww.sandiego.gov%2Fsites%2Fdefault%2Ffiles%2Funiversity_cp_07.11.19.pdf&usq=AOvVaw07gyu7BWdiSr9_1ICZoNg2 (last visited 5/25/20); City of San Diego Trip Generation Manual ("Trip Generation Manual"), p. C-4, available at <https://www.google.com/url?sa=t&rc=1&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwi38fOMr8pAhWRup4KHQ2gD2EQFiAAegQIAhAB&url=https%3A%2F%2Fwww.sandiego.gov%2Fsites%2Fdefault%2Ffiles%2Flegacy%2Fplanning%2Fdocuments%2Fpdf%2Ftrans%2Ftripmanual.pdf&usq=AOvVaw3t1fH-CRQnabuSoDxbxKnM> (last visited 5/25/20).

³² Trip Generation Manual, p. 4, 13 (Industrial), p. 10 (Office).

³³ Trip Generation Manual, p. C-4; UCP, p. 172.

³⁴ *Id.*

³⁵

³⁶ UCP, p. 172.

³⁷ UCP, p. 207.

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E2 (cont.) Based on the foregoing, the trip generation rate and associated operational air pollutant emission calculations (including CalEEMod inputs) are appropriately based on the type of use proposed for the site.

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E2
cont.

centers may contain offices and light fabrication areas,” and that “[t]he range of specific types of businesses contained in this land use category varies significantly.”³⁸ CalEEMod requires the modeler to define the type of use that should be applied to each project as “site-specific data that are supported by substantial evidence.”³⁹

The nature and intensity of use at “research and development” facilities therefore varies widely, ranging from basic office uses and meeting spaces, to more technical and industrial facilities such as laboratories, product assembly, fabrication and testing. These factors, in turn, result in wide variations of daily traffic trip generation and mobile source air pollutant emissions associated with each type of “research and development” use. At true scientific research and development facilities, which generally include some large areas devoted to laboratories, product assembly, fabrication and testing, employee density tends to be low, approaching or exceeding 1 thousand square feet per person.⁴⁰ However, buildings described more generally as “research and development” often function as offices, with employee densities at or approaching those characteristic of maximally dense office functions, about 4 employees per thousand square feet.⁴¹ The DEIR’s failure to define which type of research and development will occur at the Project site resulted in inaccurate and unsupported assumptions being used to model the Project’s impacts.

The DEIR’s Traffic Impact Analysis (“TIA”) relied on the least traffic-intensive “Scientific Research and Development” uses to calculate the Project’s daily operational traffic trip estimates. As traffic consultant Mr. Smith explains, this assumption resulted in a lower daily trip estimate than would be associated with more office-related research and development uses. Mr. Smith’s review of the TIA demonstrated that the TIA (Table 8-1) calculates the gross trip generation of the “research and development” component at a rate of 1.28 trips per thousand square feet (“KSF”) in the AM peak hour, and 1.12 per KSF in the PM peak hour.⁴² However, the gross trip generation of the Project’s commercial “office” component, based on the same data source, is calculated to be 2.75 trips per KSF in the AM

³⁸ CalEEMod Users Guide, p. 21, available at <http://www.aqmd.gov/calceemod/user%27s-guide> (last visited 5/25/20).

³⁹ *Id.*, p. 1.

⁴⁰ Exhibit C, Smith Comments, p. 2.

⁴¹ *Id.*

⁴² *Id.*, p. 1.

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peak and 2.95 trips per KSF in the PM peak.⁴³ As Mr. Smith explains, “relying on the actual estimated trip totals and square footages in DEIR Appendix B, Table 8-1, office space generates trips at roughly 2.15 times the rate of R&D in the AM peak and 2.63 times the rate of R&D in the PM peak.”⁴⁴ Using the reduced R&D trip numbers for the Project’s 360,000 SF of “research and development” uses, the TIA concluded that operation of the Project would generate 4,981 daily vehicle trips.⁴⁵ Depending on the type of “research and development” use that will actually occur at the Project site, the TIA may have substantially undercalculated daily trip generation.

E2
cont.

The DEIR’s Air Quality Technical Report (“Air Report”) similarly relies on the TIA’s daily vehicle trip calculations to estimate the Project’s operational mobile source air emissions.⁴⁶ For the same reasons, the DEIR’s Air Report may have substantially undercalculated the Project’s operational emissions.

The DEIR’s failure to accurately describe the type of “research and development” planned for the Project site resulted in a skewed and inaccurate analysis of the Project’s impacts on compliance with local plans, traffic, and air quality. The courts have held that an EIR fails as an informational document when the project description is inconsistent and obscure as to the true purpose and scope of the project.⁴⁷ The DEIR must be revised to include a complete and accurate description of the types of “research and development” uses planned for the Project site, and updated traffic and air quality modeling prepared to correct errors based on inaccurate use assumptions.

B. The DEIR’s Description of Project Construction Is Inconsistent and Misleading.

E3

The DEIR contains conflicting and inconsistent descriptions of the length of the Project’s construction period. This inconsistency skewed the results of the DEIR’s analysis of construction traffic and air quality impacts, rendering them both unsupported.

⁴³ *Id.*

⁴⁴ *Id.*, p. 2.

⁴⁵ TIA, p. i.

⁴⁶ DEIR, Appendix C, p. 12.

⁴⁷ *CBE v. Richmond*, 184 Cal.App.4th at 85–89.

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E3

The Chapter 3, Project Description of the draft EIR appropriately describes that construction of the Project is anticipated to take “approximately three years.”

While construction traffic levels would be expected to vary during the construction period, the analysis was conducted based on the four-month period that would be expected to have the greatest amount of traffic. Given that the construction traffic analysis is conducted based on a peak hour level on a given day, the overall construction duration of construction activities does not affect the construction traffic analyses or their conclusions.

The modeling of air pollutant emissions as reported in Section 5.4, Air Quality, of the EIR and the Air Quality Technical Report (Appendix C) has been revised to reflect that architectural coating activities will overlap with building construction and paving activities to accurately reflect the 36-month project construction schedule. This revision would not result in emissions exceeding the established significance criteria.

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According to the DEIR's Project Description chapter, demolition and construction of the proposed Project is anticipated to take "approximately three years."⁴⁸ The Project Description chapter goes on to describe Project general construction impacts related to a three-year construction period.

The DEIR's subsequent analysis of Project impacts relied on different and conflicting construction schedules. The TIA analyzed the Project's construction traffic impacts over a shorter 33-month period (which translates to a construction period of just 2 years, 9 months).⁴⁹ By relying on a shorter construction period, the TIA underestimates the duration of the Project's traffic impacts, resulting in a less significant impact than if calculated as the full "three years" described in the Project Description section.

The DEIR's Air Report modeled construction emissions over a longer construction schedule of 40.5 months, beginning on September 1, 2020 and ending on January 16, 2024 (which translates to a construction period of 3 years, 4 months, and 15 days), as follows:⁵⁰

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Underground Utilities	Trenching	9/1/2020	2/26/2021	5	129	
2	Demolition	Demolition	2/1/2021	2/26/2021	5	20	
3	Site Preparation	Site Preparation	2/1/2021	2/26/2021	5	20	
4	Grading	Grading	5/1/2021	7/16/2021	5	55	
5	Building Construction	Building Construction	7/19/2021	7/18/2023	5	522	
6	Paving	Paving	7/19/2023	9/18/2023	5	44	
7	Architectural Coating	Architectural Coating	9/18/2023	1/16/2024	5	86	

The Air Report's reliance on a longer construction schedule resulted in the Project's construction emissions being spread out over a longer time period. By spreading emissions over a 40.5-month period, rather than a 36-month or 33-month period, the Air Report dilutes the maximum daily emissions associated with Project construction. This resulted in lower reported daily construction emission estimates which fall *below* San Diego Air Pollution Control District ("SDAPCD") daily significance thresholds, rather than *exceeding* them, as occurs when emissions are

⁴⁸ DEIR, p. 3-11.

⁴⁹ TIA, pp. 172-173.

⁵⁰ DEIR, Appendix C, pp. 51.
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E3

(cont.) As stated in Appendix C, "The construction schedule was determined by input from the Project Applicant." Additionally, this information source is included in Section 1.3, *User Entered Comments and Non-default Data*, of the CalEEMod outputs included as Appendix A to draft EIR Appendix C. More specifically, the construction schedule modeling is based on input from an experienced and licensed construction contractor who was conducting scheduling activities for the project applicant, which was the best available source of information regarding likely construction scheduling and activities. As indicated above, the minor modifications made to the construction schedule and associated air pollutant emission modeling do not result in a new significant impact and therefore do not require recirculation of the EIR.

Noise impacts are determined based on noise levels on any given day and are not affected by the duration of construction.

In summary, the EIR was revised to clarify that the anticipated construction timeframe is three years. The associated revisions did not result in the identification of new significant impacts. Therefore, recirculation is not warranted.

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E3
cont.

calculated using the basic 3-year period described in the Project Description section.⁵¹ As a result, the Air Report underestimates the Project's construction-related emissions.

None of these sections of the DEIR provide supporting evidence for their reliance on fluctuating construction schedules. Neither the Project Description section nor TIA explain the basis for their respective 36-month and 33-month estimates. The Air Report explains that the source for its construction schedule is "CalEEMod output data...provided in Appendix A."⁵² However, this reference is circular, because the CalEEMod data is the Air Report's own emission modeling, and is its "Appendix A." A reference to itself does not explain where the construction schedule in the Air Report originally came from. Finally, the Noise Report relies on the same 40.5-month schedule as the Air Report, and similarly cites to the Air Report's "CalEEMod" data as its source.⁵³

There is no single document in the DEIR which consistently describes the Project's construction schedule, and the DEIR contains no supporting evidence for any of the three construction schedules used to analyze construction impacts on its Appendices. This is clear violation of CEQA, which resulted in an inaccurate and unsupported analysis of multiple Project impacts. The courts have explained that "a project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading."⁵⁴ The DEIR must be revised and recirculated to analyze the Project's construction impacts according to a single, accurate construction schedule.

C. The DEIR Fails to Describe the Project's Proposed Conversion of Lots to Condominiums.

E4

The Project requires a Tentative Parcel Map under the Subdivision Map Act to create new legal lots on the Project site.⁵⁵ The proposed Tentative Map would subdivide the site's existing two parcels into four separate parcels, vacate and privatize Esplanade Court, and describes proposed.⁵⁶ The DEIR also explains that

⁵¹ See Exhibit A, SWAPE Report, pp. 8-9, 15.

⁵² DEIR Appendix C, p. 10.

⁵³ DEIR Appendix E, Table 5.

⁵⁴ *Stopthemillenniumhollywood.com*, 39 Cal.App.5th at 17.

⁵⁵ DEIR, p. 3-13; Figure 3-8 (Tentative Parcel Map).

⁵⁶ *Id.*

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E4

Residential uses are not proposed or contemplated as part of the Project. The Project is requesting a Tentative Map for commercial purposes only. Draft EIR Figure 3-8, Tentative Parcel Map, clearly indicates in bold, capital letters, "**FOR COMMERCIAL CONDOMINIUM PURPOSES.**" This would enable individual ownership of the proposed uses and would not allow for uses that have not been analyzed in the draft EIR. The Commenter's assumption that the allowance for creation of condominium lots has the potential to result in residential development on the site is incorrect. The potential for division of ownership of the analyzed uses would not result in the potential for additional environmental impacts beyond those analyzed in the draft EIR.

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E4
cont.

the Tentative Parcel would “allow the central lot to be condominiumized (divided) up to a maximum of 20 condominium lots in the future.”⁵⁷

The DEIR does not discuss or analyze the proposed creation of condominiums, condominium lots, or any residential uses anywhere else in the DEIR. For example, the TIA’s trip generation calculations are blank for all residential uses, including the category reserved for “Condominium” trips.⁵⁸ Similarly, the DEIR’s Project Description section does not discuss proposed condominium conversions.⁵⁹ The Air Report does not analyze emissions associated with condominium construction or operation.⁶⁰ The Noise Study does not describe or analyze noise impacts from condominium construction.⁶¹ The Waste Management Plan does not discuss or analyze waste management related to residential use.⁶² The March 2020 Addendum to the Project’s Water Supply Assessment analyzes water use associated with the Project’s retail/commercial uses, but explains that the Project’s previously proposed residential uses were not considered.⁶³ Finally, the DEIR does not discuss whether the Project’s future condominiums would replace or displace any other uses planned for that portion of the Project site.

The project description must include all relevant parts of a project, including any reasonably foreseeable future expansion or other future activities that are part of the project.⁶⁴ In particular, an EIR must include an analysis of the environmental effects of a proposed future expansion or other future action at a project site if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.⁶⁵ Additionally, the Map Act requires the lead agency to make findings that a proposed subdivision is consistent with the general plan/specific plan, and does not have any detrimental

⁵⁷ DEIR, p. 3-13.

⁵⁸ DEIR, App. B TIA, Site-Specific Internalization Percentages, Section 3 – Trip Generation; Section 2 – Variable Modeling Parameters (“Condominium... n/a No Apts”).

⁵⁹ DEIR, pp. 3-1 to 3-13.

⁶⁰ DEIR Appendix C, Air Report.

⁶¹ DEIR Appendix E, Acoustical Analysis Report.

⁶² DEIR Appendix H.3.

⁶³ DEIR Appendix H.1, p. 1.

⁶⁴ *Laurel Heights Improvement Ass’n v Regents of Univ. of Cal.* (“*Laurel Heights*”) (1988) 47 Cal.3d 376, 396.

⁶⁵ *Id.*

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environmental or public health effects.⁶⁶ The DEIR fails to provide the necessary information to meet either of these legal standards.

Residential uses have different impacts than commercial uses, and must be separately analyzed in the DEIR. Residential uses also trigger different land use obligations on the part of the Applicant, which require separate mitigation under CEQA, the Water Code, and local land use codes. The DEIR fails to describe or analyze these Project components, and fails to mitigate the impacts of the Project's residential component.

For example, the City's General Plan requires the creation of population-based parks and open space at the rate of 2.8 useable acres per 1,000 residents.⁶⁷ The City has a current deficit of 65.02 useable acres of population-based parks based on existing residential population, and is therefore not in compliance with General Plan open space requirements.⁶⁸ The addition of 20 new condominiums to the Project site would exacerbate this impact, and would require the Applicant to dedicate additional open space acreage commensurate to its contribution of additional residents to the UCP area. This requirement is not analyzed in the DEIR. In fact, the DEIR claims precisely the opposite, stating that the Project "does not propose new residential development and thus would not create an increased demand on parks and recreation facilities....Therefore, implementation of the Project would not result in impacts related to parks and recreation facilities."⁶⁹ This is a major informational defect in the DEIR.

The Water Code requires the City to determine the Project's water supply sufficiency for a 20-year projection, in addition to the demand of existing and other planned future uses.⁷⁰ The DEIR includes a Addendum to the Project's 2017 Water Supply Assessment ("WSA") and will-serve letter from the San Diego Public Utilities Department ("PUD") which concludes that a sufficient water supply is available for the Project.⁷¹ However, the Addendum did not analyze water use associated with residential development at the Project site, and the will-serve letter

⁶⁶ Gov Code §§66473.5, 66474.

⁶⁷ DEIR, P. 5.12-4.

⁶⁸ *Id.*

⁶⁹ DEIR, p. 5.12-9.

⁷⁰ Wat.Code, § 10910 et seq., 10914.

⁷¹ DEIR, Appendix H.1, Addendum to Water Supply Assessment.

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cont.

is based on exclusively commercial uses.⁷² Residential water use (-23.7 AFY) is higher than retail commercial water use (-16.8 AFY).⁷³ The DEIR and WSA Addendum fail to analyze the water use associated with the Project's condominium conversions.

Finally, the City's waste management guidelines set different minimum waste storage areas for residential and non-residential development.⁷⁴ The DEIR's Waste Management Plan fails to analyze whether the Project would comply with the City's waste management regulations for residential development. The DEIR's failure to comply with these and other requirements may result in significant impacts on public services.

The inclusion of a proposed condominium subdivision in the Project's proposed Tentative Map demonstrates that residential uses are a reasonably foreseeable future component of the Project.⁷⁵ The City was therefore required to analyze the impacts of the Project's condominium subdivision in the DEIR. The DEIR's failure to do so results in a truncated Project description and incomplete impact analysis that fails to comply with CEQA or the Map Act. The DEIR must be revised to analyze the residential components of the Project.

IV. THE DEIR FAILS TO ADEQUATELY ESTABLISH THE EXISTING BASELINE

E5

The DEIR fails to accurately disclose the baseline environmental conditions related to the Project's construction noise and traffic impacts. As a result, the DEIR lacks the necessary baseline information against which to measure the Project's environmental impacts with regard to impacts on sensitive receptors from construction noise and the Project's long-term traffic impacts.

The existing environmental setting is the starting point from which the lead agency must measure whether a proposed project may cause a significant environmental impact.⁷⁶ CEQA defines the environmental setting as the physical

⁷² *Id.*

⁷³ *Id.*

⁷⁴ DEIR, Appendix H. 3, p. 5.

⁷⁵ *Laurel Heights* (1988) 47 Cal.3d 376, 396.

⁷⁶ See, e.g., *Communities for a Better Env't v. S. Coast Air Quality Mgmt. Dist.* (March 15, 2010) 48 Cal.4th 310, 316.

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E5

The Commenter is incorrect in stating that the CEQA Guidelines "require an EIR to consider 'whether a project would result in...[g]eneration of a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project....'" CEQA Guidelines Appendix G, from which this quote is taken, also states, "The following is a sample form that may be tailored to satisfy individual agencies' needs and project circumstances... The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance." As encouraged by the CEQA Guidelines, the City has adopted its own Significance Determination Thresholds, which are relied upon for the analysis in the EIR.

Refer to the response to Comment D21 regarding ambient noise measurements. As shown in Table 3 and Table 4 of draft EIR Appendix E, site notes and observed traffic distribution were recorded. These observations were then used to help calibrate the computer model, but not as the baseline for project analysis.

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environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, from both a local and regional perspective.⁷⁷ Describing the environmental setting accurately and completely for each environmental condition in the vicinity of the Project is critical to an accurate, meaningful evaluation of environmental impacts. The courts have clearly stated that, “[b]efore the impacts of a project can be assessed and mitigation measures considered, an [environmental review document] must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined.”⁷⁸

A. The DEIR’s Noise Analysis Contains Inadequate Baseline Data.

The CEQA Guidelines require an EIR to consider “whether a project would result in...[g]eneration of a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project . . .”⁷⁹ Construction noise is considered a temporary noise impact.⁸⁰ The DEIR’s Noise Report fails to contain the baseline ambient noise data necessary to assess the significance of the Project’s three-year construction noise on sensitive receptors in the vicinity of the Project site.

To establish ambient noise levels at the Project site, the DEIR relies on two, 10-minute, on-site noise measurements conducted on a single day: April 12, 2016. One measurement was near the intersection of Genesee Avenue and Esplanade Court, the second was near the Project site driveway off Nobel Drive.⁸¹ The recorded noise levels at those site visits were 68.5 dBA LEQ and 67.6 dBA LEQ, respectively.⁸² These isolated measurements are inadequate to establish existing ambient noise levels at all relevant areas in the vicinity of the Project site.

In particular, the DEIR failed to take ambient baseline noise measurements from areas identified as “Noise and Vibration Sensitive Land Uses,” uses which include existing and under-construction residences, a continuing care retirement

⁷⁷ CEQA Guidelines §15125(a) (emphasis added); *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1453 (“*Riverwatch*”).

⁷⁸ *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 952.

⁷⁹ CEQA Guidelines, Appendix G, Sec. XII(d).

⁸⁰ DEIR, p. 5.7-4.

⁸¹ DEIR, Appendix E, p. 6-7, App. A.

⁸² DEIR at p. 5.7-2 and Acoustical Analysis Report, Appendix E at p. 6.

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E5 (cont.) Furthermore, construction noise assessments are not dependent on baseline noise levels, but rather are based on a set standard noise limit. Per the City’s CEQA Significance Determination Thresholds, “temporary construction noise that exceeds 75 dBA L_{EQ} at sensitive receptors would be considered significant.” Specifically, the threshold addresses average noise levels between the 12-hour period 7:00 a.m. and 7:00 p.m., as measured “at or beyond the property lines of any property zoned residential.” The EIR appropriately identified significant construction noise impacts as well as mitigation measures to reduce those impacts to below a level of significance.

E5
cont.

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E5
cont.

community, and a pocket park.⁸³ Critically, the DEIR's baseline noise measurements do not establish ambient noise levels for the most noise-sensitive receptors in the project vicinity: residents at Vi at La Jolla Village (a continuing care retirement facility) and Towers at Costa Verde.⁸⁴

The DEIR's baseline ambient noise measurements fail to establish existing noise levels at relevant noise-sensitive receptors in the vicinity of the Project site. As a result, the DEIR fails to accurately assess the temporary increase in ambient noise levels at those receptors for the three years during which demolition and construction will occur. The DEIR should be revised to correct these deficiencies.

B. The DEIR Incorrectly Discounts the Project's Traffic Baseline With Unused Trips from the UCP.

E6

The DEIR estimates that the Project will generate a net trip total of 4,981 average daily trips ("ADT").⁸⁵ While this total may omit some trips related to the Project's research and development use (discussed above), the DEIR's calculation method correctly sought to account for all new trips related to the Project. However, the DEIR next proceeds to discount this total with 1,615 unused ADT trips which remain within the CVSP Area, concluding that the trips from the CVSP with the Project relative to what was envisioned by the UCP is only 3,366 ADT.⁸⁶ As Mr. Smith explains, both the DEIR's text and the text of DEIR Appendix B (the TIA) indicate that an additional 1,615 ADT trip discount may have been taken before assigning Project trips to the street and highway network.⁸⁷ Mr. Smith explains that the language in the DEIR and TIA are ambiguous as to whether the UCP's unused trip assignments were double-counted, or whether the DEIR is merely attempting to identify the increase in allowable ADT that must be reflected

⁸³ DEIR at p. 5.7-2; Exhibit B, Watry Comments, pp. 1-2.

⁸⁴ *Id.*

⁸⁵ DEIR at page 5.2-14, 5-2.6. The flaws in the trip generation estimates discussed above related to unsubstantiated research and development trip counts are ignored for the purposes of this discussion.

⁸⁶ DEIR, p. 5.2-14, Table 3.

⁸⁷ Exhibit C, Smith Comments, pp. 1-2. Mr. Smith explains that the DEIR is unclear as to whether the assignments and consequent findings of impact reflect the full 4,981 trip increase or whether the paragraph is merely indicating the amount of increase in allowable ADT that must be reflected in Amendments to the University Community Plan and Costa Verde Specific Plan. This must be clarified.

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E6

The project is expected to generate approximately 4,981 average daily trips (ADT) as summarized in Table 5.2-6 of the EIR and detailed in Chapter 8 of the TIA (Attachment B to the EIR). All 4,981 ADT were assigned to the network and analyzed under the study scenarios. The 1,615 unused ADT refers to the number of trips associated with the original planning process for the Costa Verde Specific Plan Area and was discussed as an informational item only in the EIR. The trip assignment in the draft EIR and Appendix B did not take any credit for the unused 1,615 ADT. Therefore, no changes are required to the traffic analysis or the EIR regarding the project trip generation.

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in Project amendments to the UCP and CVSP.⁸⁸ From a plain reading of the DEIR's ADT discussion, it appears the DEIR discounted the UCP's unused 1,615 ADT trips before assignment, thus creating an artificial baseline. As a result, the DEIR incorrectly calculates the Project's traffic impacts resulting from 3,366 ADT, rather than the total net ADT of 4,981 trips.⁸⁹ The DEIR's reliance on hypothetical traffic trips authorized by the UCP, but not occurring, fails to comply with CEQA's requirement that the DEIR's baseline analysis disclose existing traffic conditions.

When an agency's approvals merely reaffirm an existing plan or authorized use, but do not change it, the agency may find that no change to the environment will occur.⁹⁰ By contrast, where, as here, an agency's approvals will change an existing plan or authorization, the agency must compare the impacts of the new plan or use with existing environmental conditions, not with the potential impacts of the existing plan or authorization.⁹¹ Similarly, when a new permit is sought to modify or expand a facility, and the permit will allow an increase in operations that would not otherwise occur, the project's impacts are compared to the existing level of operations, not to hypothetical conditions that might be authorized by existing permits.⁹²

In this case, the Project proposes to substantially expand the existing development uses (and traffic) authorized under the UCP and CVSP. This is evidenced by the fact that the Project requires amendments to both the UCP and CVSP in order to increase the plans' authorized development intensity to allow the Project's new research and development use (360,00 SF), commercial/office use (40,000 SF), and hotel use.⁹³ The DEIR analyzes this *expansion*, and does not simply "reaffirm" the existing traffic authorized under the UCP. As a result, the DEIR may not rely on hypothetical, unused UCP trips as part of its traffic baseline. The DEIR must instead compare the impacts of the Project, and its amendments to the UCP and CVSP, to existing traffic conditions.

⁸⁸ *Id.*

⁸⁹ DEIR, p. 5.2-14, Table 3.

⁹⁰ *Black Prop. Owners Ass'n v City of Berkeley* (1994) 22 Cal. App. 4th 974.

⁹¹ *Lighthouse Field Beach Rescue v City of Santa Cruz* (2005) 131 Cal App. 4th 1170; *Christward Ministry v. Superior Court* (1986) 184 Cal. App. 3d 180, 190.

⁹² *Communities for a Better Env't v South Coast Air Quality Mgmt. Dist.* ("CBE v. SCAQMD") (2010) 48 Cal.4th 310.

⁹³ DEIR, p. 3-12.

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V. THE DEIR FAILS TO ADEQUATELY DISCLOSE AND MITIGATE POTENTIALLY SIGNIFICANT IMPACTS

An EIR must fully disclose all potentially significant impacts of a Project, and implement all feasible mitigation to reduce those impacts to less than significant levels. The lead agency's significance determination with regard to each impact must be supported by accurate scientific and factual data.⁹⁴ An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.⁹⁵

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by CEQA.⁹⁶ Challenges to an agency's failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project's environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual conclusions.⁹⁷ In reviewing challenges to an agency's approval of an EIR based on a lack of substantial evidence, the court will 'determine de novo whether the agency has employed the correct procedures, scrupulously enforcing all legislatively mandated CEQA requirements.'⁹⁸

Even when the substantial evidence standard is applicable to agency decisions to certify an EIR and approve a project, reviewing courts will not 'uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference.'⁹⁹

⁹⁴ 14 CCR § 15064(b).

⁹⁵ *Kings Cty. Farm Bur. v. Hanford* (1990) 221 Cal.App.3d 692, 732.

⁹⁶ *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236.

⁹⁷ *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.

⁹⁸ *Id.*, *Madera Oversight Coal., Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102.

⁹⁹ *Berkeley Jets*, 91 Cal.App.4th at 1355.

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E7 Comments regarding CEQA requirements are noted. As these comments do not specifically address the adequacy of the draft EIR, no response is necessary.

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A. The DEIR Fails to Accurately Disclose and Mitigate the Project's Significant Construction Air Quality Impacts.

Under CEQA a project has significant impacts if it "[v]iolate[s] any air quality standard or contribute[s] substantially to an existing or projected air quality violation."¹⁰⁰

The DEIR relies on unsubstantiated input parameters to estimate the Project construction air emissions. SWAPE's review of the DEIR found that several of the values inputted into the DEIR's CalEEMod emissions modeling were not consistent with information disclosed elsewhere in the DEIR. As a result, the DEIR underestimated the Project's construction and operational emissions, which are, in fact, significant.

E8

First, the Project's criteria pollutant and diesel particulate matter ("DPM") emissions were modeled assuming that all Project construction equipment would be equipped with "Tier 4 Final" engines, when the DEIR contains no such mitigation measure.¹⁰¹ As SWAPE explains, Tier 4 Final DPM emissions control equipment is more efficient than other forms of DPM emissions controls, and provides more stringent DPM reductions than Tier 4 Interim or any other kind of DPM emissions control equipment.¹⁰² The MMRP does not contain any air quality mitigation measures, and the DEIR's Air Report states that the Project may utilize "any combination of" DPM emissions control equipment, including "diesel catalytic converters, diesel oxidation catalysts, and diesel particulate filters *as well as* California Air Resources Board (CARB)/U.S. Environmental Protection Agency (USEPA) Engine Certification Tier 4, or other equivalent methods approved by the CARB."¹⁰³ The DEIR therefore explains that Tier 4 equipment is only one possible form of DPM emissions control equipment that the Project may use, not the only one. The DEIR's reliance on non-binding DPM mitigation to reduce the Project construction emissions is unsupported and violates CEQA.

¹⁰⁰ CEQA Appendix G.

¹⁰¹ Exhibit A, pp. 2-6.

¹⁰² *Id.*, pp. 3-4.

¹⁰³ Appendix C, p. ES-1.
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E8

The Project Description (Section 3.3, *Phasing, Demolition and Construction*) states that project construction activities would use "CARB/USEPA Engine Certification Tier 4, or equivalent methods approved by CARB." The description has been modified to clarify that Final Tier 4 equipment is required. As the use of this technology is incorporated into the Project Description, it need not be included as a mitigation measure. It will be included as a condition of approval for the Project.

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- E9 Second, the DEIR's emission modeling reduced the amount of construction grading from 11.9 acres (described in the DEIR) to 11.03 acres.¹⁰⁴ This error resulted in artificially reduced construction emissions calculations.
- E10 Third, as discussed above, the DEIR modeled construction emissions using a longer construction schedule than the schedule describe elsewhere in the DEIR – 3 years, 4 months, and 15 days.¹⁰⁵ By spreading construction emissions over a longer 40.5-month period, rather than a 36-month or 33-month periods described elsewhere in the DEIR, the DEIR's emissions modeling artificially dilutes the maximum daily emissions associated with Project construction.
- E11 Fourth, the DEIR reduced the default numbers for construction equipment before running the constructions emissions model.¹⁰⁶ Neither the DEIR, nor its supporting reference documents, contain any evidence to support the equipment numbers used in the DEIR's modeling.
- E12 Fifth, the DEIR modeled reduced particulate matter ("PM") emissions based on implementation of dust control measures that are not expressly required in either the MMRP or SDAPCD Rules.¹⁰⁷ As with the DEIR's reliance on Tier 4 DPM mitigation, reliance on non-binding mitigation measures that are not included in the MMRP or the Project's enforceable conditions of approval does not constitute adequate mitigation under CEQA, and cannot be relied upon in the DEIR's emissions modeling.
- 1. Updated Modeling Discloses Significant Construction NO_x Impact.**
- E13 In an effort to accurately determine the Project's construction emissions, SWAPE prepared an updated CalEEMod model that includes more site-specific information and corrected the errors in the DEIR's input parameters discussed above.¹⁰⁸ When correct, site-specific input parameters are used to model emissions, SWAPE found that the Project's construction-related NO_x emissions increase when

¹⁰⁴ Exhibit A, p. 7.

¹⁰⁵ Exhibit A, p. 8.

¹⁰⁶ Exhibit A, p. 9.

¹⁰⁷ Exhibit A, pp. 11-12.

¹⁰⁸ Exhibit A, pp. 14-15.

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- E9 CalEEMod defaults for schedule and equipment are based on total project acreage. Tables 3.1 and 3.2 of CalEEMod Appendix D, Default Data Tables, list the default equipment and construction schedule assumed within the model based on site acreage. As described in Chapter 3 of the draft EIR, the Project would disturb 11.9 acres of the previously developed 13.9-acre project site. The Acres of Grading modeled in draft EIR Appendix C were adjusted to 11.03 acres. While this should have been set to 11.9 acres for consistency, all project-specific acreages fall within the 10- to 15-acre project size bin identified in CalEEMod Appendix D. Therefore, even with the omission of the 0.87 acre identified by the Commenter, any CalEEMod defaults maintained through the analysis are consistent based on the site acreage. This is confirmed with revised modeling included in the final EIR where Acres of Grading has been set to 11.9 consistent with Chapter 3 of the draft EIR and no change to grading phase emissions resulted. There is no change to the impact conclusions presented in the draft EIR.
- E10 Refer to the response to Comment E3 regarding the project construction schedule.
- E11 As stated in draft EIR Appendix C, "Construction equipment estimates are based on assumptions provided by the Project Applicant." Additionally, this information source is included in Section 1.3, *User Entered Comments and Non-default Data*, of the CalEEMod outputs included as Appendix A to the Air Quality Technical Report. The inputs were based on project-specific information regarding the type and duration of planned construction activities. More specifically, the construction equipment inputs were based on input from an experienced and licensed construction contractor who was conducting scheduling activities for the project applicant, which was the best available source of information regarding likely construction activities.
- E12 As noted by the Commenter, Rule 55 does not expressly require specific dust control measures. The measures applied are standard industry practice in order to achieve the performance standard (airborne dust beyond the property line) set by the Rule. Compliance with applicable regulations is not considered a mitigation measure and therefore need not be included in the MMRP. Refer to response to Comment E8 regarding the use of Tier 4 equipment.

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compared to the DEIR's model and exceed the 250 pounds per day ("lbs/day") threshold set by the SDAPCD (see table below)¹⁰⁹

Maximum Daily Construction Emissions (lbs/day)	
Model	VOC/ROG
DEIR	169
SWAPE	268
Percent Increase	59%
SCAQMD Regional Threshold (lbs/day)	250
Threshold Exceeded?	Yes

SWAPE concludes that the Project's construction-related NO_x emissions are 268 lbs/day, approximately 59% higher than the emissions estimated in the DEIR.¹¹⁰ This exceeds the SDAPCD threshold of 250 lbs/day, resulting in a potentially significant air quality impact that was not disclosed in the DEIR.

The DEIR must be revised and recirculated to disclose and mitigate this impact.

B. The DEIR Failed to Disclose and Mitigate the Project's Significant Cancer Risk from Construction Emissions.

The DEIR fails to include a health risk analysis ("HRA") to disclose the adverse health impacts that will be caused by exposure to toxic air contaminants ("TACs") from the Project's construction and operational emissions. As a result, the DEIR fails to disclose the potentially significant cancer risk posed to nearby residents and children from TACs, and fails to mitigate it. Because the DEIR fails to support its conclusion that the Project will not have significant health impacts from DPM emissions with the necessary analysis, this finding is not supported by substantial evidence.

One of the primary emissions of concern regarding health effects for land development projects is DPM, which can be released during Project construction

¹⁰⁹ "California Environmental Quality Act Significance Determination Thresholds." City of San Diego, July 2016, available at: https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf, p. 9, Table A-2.

¹¹⁰ *Id.*
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E13 The modeling completed by the Commenter is not accurate. Discrepancies are detailed in the responses to Comments E34 through E40. The CalEEMod output prepared by SWAPE shows the parking lot size was set to 16.91 acres. As detailed in draft EIR Chapter 3, "Approximately 11.9 acres of the previously developed 13.9-acre site would be graded." The parking lot as modeled by the Commenter is larger than the entire Costa Verde Center. The modeling conducted to support the draft EIR utilized accurate assumptions based on the Project description and determined that the Project would not result in significant air quality impacts.

E14 The assessment of exposure to toxic air contaminants, including diesel particulates (diesel PM) was adequately and appropriately evaluated, as disclosed in the draft EIR and Appendix C. Construction activities would result in short-term project-generated emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, health risk assessments (HRAs), which determine the exposure of sensitive receptors to TAC emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. There would be relatively few pieces of off-road, heavy-duty diesel equipment used during construction, and the construction period would be relatively short, especially when compared to 30 years. Combined with the highly dispersive properties of diesel PM and additional reductions in exhaust emissions from construction equipment that would include diesel particulate filters, construction-related emissions would not expose sensitive receptors to substantial emissions of toxic air contaminants.

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cont.

and operation. The DEIR acknowledges that the greatest potential for TAC emissions during construction would be related to DPM emissions associated with heavy-duty equipment during excavation and grading activities.¹¹¹ However, the DEIR failed to perform a quantitative assessment of the Project's DPM emissions, instead concluding that the Project's cancer risk from exposure to DPM would be less than significant based on the DEIR's conclusion that the Project's criteria pollutant emissions are less than significant.

The DEIR's health risk conclusion is unsupported for three reasons. First, DPM is not a criteria pollutant like PM10 and PM2.5. Therefore, the DEIR relies on an analysis of the wrong pollutants to analyze health risk. DPM is a toxic air contaminant ("TAC") that is recognized by state and federal agencies, and atmospheric scientists, as causing severe respiratory disease, lung damage, cancer, and premature death. Air districts have recently recognized that "TACs present an even greater health risk than previously thought."¹¹² By contrast, standard criteria pollutants, which include both PM10 and PM2.5, are defined under both federal and state laws as "criteria pollutants."¹¹³ PM alone does not contain toxic chemicals. PM is simply defined as "very small solid or liquid particles that can be suspended in the atmosphere."¹¹⁴ TACs, by contrast, are defined as "air pollutant[s] which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. Unlike regular particulate matter, DPM contains toxic chemicals which are not evaluated in a criteria pollutant analysis. The DEIR's attempt to rely on its criteria pollutant analysis to conclude that DPM emissions are insignificant is therefore a major error, and one which fails to provide any support for the DEIR's conclusion that the health risk posed by exposure to DPM is insignificant.

Second, the DEIR's failure to quantify the health risk from DPM exposure is unsupported. CEQA expressly requires that an EIR to discuss, inter alia, "health and safety problems caused by the physical changes" resulting from the project.¹¹⁵

¹¹¹ DEIR, p. 5.4-14.

¹¹² *California Bldg. Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 379.

¹¹³ The seven criteria air pollutants are: ozone (O₃); carbon monoxide (CO); nitrogen dioxide (NO₂); sulfur dioxide (SO₂); PM10; PM2.5; and lead (Pb).

¹¹⁴ *CURE v. Mojave Desert Air Qual. Mgm't Dist.* (2009) 178 Cal. App. 4th 1225, 1231-32; see 40 C.F.R. § 50.6(c).

¹¹⁵ 14 CCR § 15126.2(a).
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(cont.) Operational HRAs are generally conducted for major sources of toxic air contaminant emissions. For stationary sources, HRAs are required for industrial facilities (e.g., refineries, distribution centers, and rail yards) that emit substantial amounts of air pollutants. Such facilities with the potential for harmful toxic air contaminants are specifically listed in the California Air Resources Board's (CARB) Air Quality and Land Use Handbook. CARB does not list mixed-use or retail developments, like the Project, because they are not major toxic air contaminant emission sources. Therefore, as a matter of guidance and standard practice, mixed-use developments such as the Project are not required to prepare health risk assessments to satisfy CEQA mandates.

The Project air quality analysis complied with California Air Pollution Control Officers Association (CAPCOA; the association comprised of all air pollution control districts in California) guidance, as well as adopted City thresholds, and is fully adequate under CEQA. A description similar to that provided by the Commenter regarding how TACs differ from criteria pollutants is provided in Section 5.4.1.2 of the draft EIR.

Refer to response to Comment E43.

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cont.

When a project results in exposure to toxic contaminants, this analysis requires a “human health risk assessment.”¹¹⁶ OEHHA¹¹⁷ guidance also sets a recommended threshold for preparing an HRA of a construction period of two months or more.¹¹⁸ Construction of the instant Project will last at least 36 months – almost 20 times the threshold triggering a quantified health risk analysis pursuant to the OEHHA Guidance. SDAPCD Rules adopt the OEHHA Guidance in their TAC rules, and the DEIR adopts the thresholds set forth in those SDAPCD Rules.¹¹⁹

Third, the DEIR’s conclusion that health risk is less than significant is factually inaccurate. SWAPE performed a quantified analysis of the Project’s construction TAC emissions from using the corrected construction parameters discussed above. SWAPE CalEEMod model’s annual emissions indicate that Project construction activities will generate approximately 356 pounds of DPM, and the Project’s operational activities will generate approximately 185 pounds of DPM per year over approximately 27.68 years of operation.¹²⁰ When properly calculated, SWAPE found that the Project’s construction and operational DPM emissions will result in an excess cancer risk to adults, children, infants, and during the 3rd trimester of pregnancy at the MEIR (located approximately 175 meters away) of approximately 7.5, 68, 51, and 2.1 in one million, respectively. The excess cancer

¹¹⁶ *Sierra Club*, 6 Cal.5th at 520; *Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs.* (“*Berkeley Jets*”) (2001) 91 Cal.App.4th 1344, 1369; *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1219–1220 (CEQA requires that there must be some analysis of the correlation between the project’s emissions and human health impacts).

¹¹⁷ OEHHA is the organization responsible for providing recommendations and guidance on how to conduct health risk assessments in California. See OEHHA organization description, available at <http://oehha.ca.gov/about/program.html>.

¹¹⁸ See “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments,” OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/hotspots2015.html (“OEHHA Guidance”), p. 8-18.

¹¹⁹ The DEIR adopts SDAPCD’s Excess Cancer Risk thresholds of “1 in 1 million” for development projects, and “10 in 1 million” for projects utilizing T-BACT. See DEIR, p. 5.4-10, Table 5.4-4; DEIR Appendix C, p. 13, Table 6. Toxics Best Available Control Technology (T-BACT) is defined as “the most effective emission limitation or emission control device or control technique which: (i) has been achieved in practice for that source or category of source; or (ii) is any other emissions limitation or control technique, including process and equipment changes of basic and control equipment and implementation of pollution prevention measures, found by the Air Pollution Control Officer to be technologically feasible for that source or category of source, or for a specific source. If there is an applicable MACT standard, the Air Pollution Control Officer shall evaluate it for equivalency with T-BACT.” See SDAPCD Rule 1200(c)(24).

¹²⁰ Exhibit A, p. 18.

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risk over the course of a residential lifetime (30 years), utilizing age sensitivity factors, is approximately 130 in one million.

The infant, child, adult, and lifetime operational cancer risks, using age sensitivity factors, all exceed the SDAPCD threshold of 1 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the DEIR. The DEIR must be revised to disclose and mitigate this significant impact.

E15

C. The DEIR Fails to Disclose and Mitigate the Project's Potentially Significant Cumulative Impacts from Criteria Pollutants.

A project has a significant cumulative impact if the project's potential environmental impacts, although individually limited, are cumulatively considerable.¹²¹ The term "cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.¹²² A significant cumulative air quality impact occurs where a project results in a net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.¹²³

The Project's construction NOx emissions of 268 lbs/day exceed the SDAPCD's NOx significance threshold of 250 lbs/day. NOx is an ozone precursor which the DEIR acknowledges causes particularly significant air quality problems in the San Diego Air Basin ("SDAB") due to the areas marine layer and temperature inversions.¹²⁴ The SDAB is currently in non-attainment for ozone under both the federal NAAQS and California CAAQS.¹²⁵ The Project would therefore result in a "cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard." This is a cumulative impact under CEQA.

¹²¹ PRC § 21083(b); 14 CCR §§ 15064(h)(1), 15065(a)(3).

¹²² PRC § 21083(b)(2).

¹²³ CEQA Appendix G; DEIR, p. 5.4-9.

¹²⁴ DEIR, p. 5.4-12, 5.4-1.

¹²⁵ DEIR, p. 5.4-4.

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Commenter's assertion that, "A significant cumulative air quality impact occurs where a project results in a net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard" is incorrect. Rather the standard is whether a project would result in a "cumulatively considerable net increase." As described in draft EIR Section 5.4, Air Quality, the region is in a federal and/or state nonattainment area for particulate matter (PM₁₀ and PM_{2.5}) and ozone. The Project would result in the generation of particulates as well as ozone precursors volatile organic compounds and oxides of nitrogen (NO_x). Refer to response to Comment E13, which explains that correct modeling confirms that the Project would not result in emissions of NO_x or other pollutants that would exceed thresholds established by the San Diego Air Pollution Control District (SDAPCD; Rule 20.2(d)(2)) and City's CEQA Significance Determination Thresholds.

The screening level thresholds established within SDAPCD Rule 20.2 have been calculated to determine the volume of emissions that would have the potential to affect regional air quality standards within the San Diego Air Basin. Any project which results in emissions equal to or greater than these levels must demonstrate whether it would cause additional violations of a national or state ambient air quality standards anywhere the standards are already being exceeded. Therefore, for CEQA purposes, the screening level thresholds can be used to demonstrate that a project's total emissions would not result in a significant impact to air quality. A project that would have a significant impact on air quality with regard to emissions of ozone precursors would also have a cumulatively considerable impact to regional air quality. However, the proposed project's construction emissions would be below the screening level thresholds and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, construction emissions would not be cumulatively considerable, and the cumulative impact would be less than significant.

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cont.

A revised DEIR must be prepared and recirculated disclose and mitigate this significant cumulative impact.

D. The DEIR Fails to Adequately Disclose and Mitigate the Project's GHG Emissions.

Under the CEQA Guidelines, which have been recently updated, a lead agency must analyze a project's impacts on GHG emissions.¹²⁶ The Guidelines allow for several approaches to this analysis, both qualitative and quantitative. The Guidelines explicitly mandate, however, that the "analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes."¹²⁷

E16

The DEIR concludes that the Project's GHG impact would be less than significant based on the Project's consistency with the City of San Diego Climate Action Plan ("CAP") and the Conservation Element of the City of San Diego General Plan. The DEIR includes a CAP Consistency Checklist in Appendix D.¹²⁸ Compliance with the City's CAP and General Plan climate change elements are applicable methods for evaluating GHG's under the CEQA Guidelines.¹²⁹ However, review of the DEIR and CAP Consistency Checklist demonstrate that the City failed to analyze all necessary climate change elements required in the CAP and General Plan, and failed to demonstrate consistency with several of the elements it did address. As a result, the DEIR's conclusion regarding GHG impacts is unsupported.

E17

1. The DEIR Fails to Demonstrate Consistency with the CAP.

The CAP Checklist fails to provide sufficient information and analysis to determine the Project's consistency with various mandatory measures in the CAP, including but not limited to, the following elements identified by SWAPE:

¹²⁶ 14 CCR §15064.4.

¹²⁷ 14 CCR §15064.4(b)

¹²⁸ DEIR, pp. 5.5-9 to 5.5-12; Appendix D.

¹²⁹ 14 CCR § 15064.4(b)(3).

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Introductory comments regarding analysis of GHG emissions are noted. Refer to responses to Comments E17, E18, and E44 through E55 of this letter for detailed responses.

E17

The measures cited by Commenter are from the County of San Diego Climate Action Plan Consistency Review Checklist, rather than the City's CAP Consistency Checklist. The County's Checklist does not apply to projects for which the City is the CEQA Lead Agency. Refer to Section 5.5, *Greenhouse Gas Emissions*, in the draft EIR for evaluation of the Project's compliance with the City's CAP Consistency Checklist. The Project was found to be consistent with the City CAP Consistency Checklist, thereby resulting in a less than significant impact.

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cont.

City of San Diego Climate Action Plan ("CAP") Checklist ¹³⁰	
Project Operations	
Reducing Vehicle Miles Traveled	
<p><i>1a. Reducing Vehicle Miles Traveled Non-Residential:</i></p> <p>For non-residential projects with anticipated tenant- occupants of 25 or more, will the project achieve a 15% reduction in emissions from commute vehicle miles traveled (VMT), and commit to monitoring and reporting results to demonstrate on-going compliance? VMT reduction may be achieved through a combination of Transportation Demand Management (TDM) and parking strategies, as long as the 15% reduction can be substantiated.</p> <p>VMT reduction actions though TDM may include, but are not limited to:</p> <ul style="list-style-type: none"> • Telecommuting • Car Sharing • Shuttle Service • Carpools • Vanpools • Bicycle Parking Facilities <p>Transit Subsidies Shared and reduced parking strategies may include, but are not limited to:</p> <ul style="list-style-type: none"> • Shared parking facilities • Carpool/vanpool-only parking spaces • Shuttle facilities • Electric Vehicle-only parking spaces 	<p>Here, the proposed Project is non-residential and has anticipated tenant-occupants of 25 or more. As such, the proposed Project should have demonstrated a 15% reduction in emissions from commute VMT and committed to monitoring and reporting results to demonstrate on-going compliance. However, the DEIR fails to substantiate a 15% reduction and fails to demonstrate consistency with this measure. The DEIR states that "[t]he Project would further support Transit Oriented Development through creation of multiple new urban public spaces and implementation of a transportation demand management plan" (p. 5.5-9). However, while the DEIR makes this claim, it fails to disclose any specifics of the transportation demand management plan, as required by the CAP. As a result, we are unable to verify that it will be implemented, monitored, and enforced on the Project site. Finally, the DEIR fails to mention or evaluate the feasibility of implementing VMT reductions through a shuttle service and facilities and transit subsidies. While the DEIR does state that the Project would "implement on-site carsharing <u>and/or</u> bikesharing, iCommute, and a parking management plan," the DEIR fails to</p>

¹³⁰ See Exhibit A, pp. 23-24.
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cont.

<p>The project may incorporate the measures listed above, and propose additional trip reduction measures, as long as a 15% reduction in emissions from commute VMT can be demonstrated through substantial evidence.</p>	<p>elaborate on what these measures will include, the extent of VMT reductions they will achieve, or how they will be implemented, monitored, and enforced on the Project site. Also, by giving the choice between either carsharing <u>and/or</u> bikesharing, we cannot verify that the Project will implement both. As such, the proposed Project is not consistent with this measure of the CAP, and the DEIR lacks substantial evidence to support its CAP consistency determination.</p>
<p>Reduce Outdoor Water Use</p> <p><u>6a. Reduce Outdoor Water Use Residential:</u> Will the project submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current Maximum Applied Water Allowance (MAWA) for outdoor use?</p> <p><u>Non-Residential:</u> Will the project submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current MAWA for outdoor use?</p>	
	<p>Here, the DEIR fails to mention or indicate that the proposed Project will submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance. While the DEIR mentions AB 1881, the Water Conservation in Landscaping Act of 2006, Model Water Efficient Landscaping Ordinance, and City's Landscaping Regulations, the DEIR fails to mention the County's Water Conservation in Landscaping Ordinance, as required. Furthermore, the DEIR fails to mention or demonstrate a 40% reduction in current MAWA for outdoor use. Thus, the Project is not consistent with this measure, and the DEIR lacks substantial evidence to support its CAP consistency determination.</p>

The lack of information in the DEIR's CAP Checklist makes it impossible to verify whether the Project is consistent with CAP. The DEIR must be revised to include further information and analysis in order to determine CAP consistency.

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E18

2. The DEIR Fails to Demonstrate Consistency with the General Plan's Climate Change Policies.

The DEIR entirely omits an analysis of several General Plan policies that are specifically identified in the General Plan as "climate change policies." As a result, the DEIR lacks substantial evidence to support its conclusion that the Project is consistent with the City of San Diego General Plan's Conservation Element, and as a result, would result in less than significant GHG impacts.¹³¹

The General Plan's Conservation Element, at Table CE-1, includes a comprehensive list of all General Plan policies related to climate change issues, as follows:¹³²

¹³¹ DEIR, p. 5.5-10, Table 5.5-1

¹³² See City of San Diego General Plan, Conservation Element, pages CE-5 to CE-6, Table CE-1: *Issues Related to Climate Change Addressed in the General Plan*; Exhibit A, pp. 27-28.
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As outlined in Section 5.5, the draft EIR addresses consistency with the General Plan policies that are most applicable to the Project. In addition to the information contained in Table 5.5-1, detailed evaluation of the Project's consistency with applicable General Plan policies is contained in draft EIR Table 5.1-1, *City of San Diego Land Use Goals, Objectives, and Policies Consistency Information*. Analysis of Policies ME-E.1, ME-A.5, ME-A.6, ME-E.7, ME-E.8, ME-K.6, UD-C.7, CE-B.4, CE-J.1, and CE-J.4 has been added to Table 5.1-1, demonstrating the Project's consistency with these measures.

Policies cited in this comment that are not included in Table 5.1-1 are specific to certain resources, or address City policies or facilities, and are therefore not applicable to the Project, as detailed below.

Policies UD-A.1 through UD-A.3, CE-B.1 through CE-B.3, and CE-B.5 address open space, natural landforms, and park lands. Policy CE-C.7 addresses coastal resources. Policies CE-L.3, CE-L.5, and CE-L.7 through CE-L.11 address agricultural resources. Policies UD-B.5.d and UD-B.6 address residential neighborhood streets and are therefore not applicable to the Project. Because the project site is entirely developed and surrounded by developed land within the Urban Node of the University Community (and not in a residential neighborhood), these policies are not applicable to the Project.

Policies LU-A.5 through LU-A.8 address land use planning activities to be addressed at the Community Plan level. Policies LU-I.9 and LU-I.10 address the transportation planning process. These policies are therefore not applicable to the Project as an individual private development project.

Policy ME-A.3 addresses engagement in a public education campaign and Policy ME-A.9 addresses collaboration between the City and various other parties to better realize the benefits of walkable communities. Policies ME-B.1 and ME-B.4 through ME-B.10 address coordination between the City, regional agencies, and other parties regarding mass transit planning and implementation. Policy ME-C.4.c addresses encouragement of community participation regarding the circulation system. Policy ME-E.2 addresses support for public and private transportation projects; Policy ME-E.4 addresses promotion of the most efficient use of the City's transportation network; and Policy ME-E.5 addresses support of SANDAG's efforts to market TDM benefits. Policy ME-F.2 addresses identification and

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TABLE CE-1 Issues Related to Climate Change Addressed in the General Plan

Issues	General Plan Policy		
	Element	Section	Policy
City of Villages Strategy	Conservation	A. Climate Change and Sustainable Development	CE-A.2
		B. Open Space and Landform Preservation	CE-B.1 through CE-B.5
	Land Use and Community Planning	A. City of Villages Strategy	LU-A.1 through LU-A.11
		H. Balanced Communities and Equitable Development	LU-H.6; LU-H.7
		I. Environmental Justice	LU-I.9 through LU-I.11
	Mobility	A. Walkable Communities	ME-A.1 through ME-A.9
		B. Transit First	ME-B.1 through ME-B.10
		F. Bicycling	ME-F.2; ME-F.4; ME-F.5
		K. Regional Coordination and Financing	ME-K.2; ME-K.6
	Urban Design	A. General Urban Design	UD-A.1; UD-A.2; UD-A.3; UD-A.9; UD-A.11
		B. Distinctive Neighborhoods and Residential Design	UD-B.5d; UD-B.6
		C. Mixed-Use Villages and Commercial Areas	UD-C.1; UD-C.4; UD-C.6; UD-C.7
Greenhouse Gas (GHG) Emissions and Alternative Modes of Transportation	Conservation	A. Climate Change and Sustainable Development	CE-A.1; CE-A.2; CE-A.13
		F. Air Quality	CE-F.1 through CE-F.8
		J. Urban Forestry	CE-J.4
		N. Environmental Education	CE-N.3; CE-N.5
	Land Use and Community Planning	I. Environmental Justice	LU-I.11
		A. Walkable Communities	ME-A.8; ME-A.9
	Mobility	B. Transit First	ME-B.1; ME-B.8; ME-B.9; ME-B.10
		C. Street and Freeway System	ME-C.2e; ME-C.4c
		E. Transportation Demand Management	ME-E.1 through ME-E.8;
		G. Parking Management	ME-G.5
		F. Bicycling	ME-F.5
	Urban Design	A. General Urban Design	UD-A.9; UD-A.10; UD-C.4; UD-C.7

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E18

(cont.) implementation of a broad-scale bikeway network. Policy ME-K.2 addresses the City taking a leadership role relative to transportation funding. These policies are therefore not applicable to the Project as an individual private development project.

Policy PF-F.5 addresses construction and maintenance of City wastewater facilities. Policies PF-H.1 through PF-H.3 address the City's water infrastructure facilities. Policies PF-I.1, PF-I.3, and PF-I.4 address City's waste collection services and disposal facilities as well as litter prevention efforts and practices in public spaces. These policies are therefore not applicable to the Project as an individual private development project.

Policy RE-A.7 addresses establishment of a policy for park design and development. This policy is therefore not applicable to the Project as an individual private development project.

Policy CE-A.1 addresses the City influencing state and federal efforts to reduce GHG emissions; Policy CE-A.6 addresses City facilities; and Policy CE-A.13 addresses the City monitoring, updating and implementing its CAP. Policy CE-D.1 through CE-D.5 address the City's water management efforts. Policies CE-F.1 through CE-F.3 address development of a City fuel efficiency policy, upgrades to energy conservation at City buildings, and use of methane as an energy source from inactive and closed landfills, respectively. Policy CE-F.5 addresses the promotion of technological innovations to help reduce motorized equipment emissions, and Policies CE-F.7 and CE-F.8 address influencing the development of state, federal, and local actions to increase the use of alternative fuels, increase fuel efficiency, and reduce GHG emissions. Policies CE-I.1 through CE-I.3 and Policies CE-I.5, CE-I.6, and CE-I.8 through CE-I.13 address City programs, policies, and pursuit of funding opportunities. Policies CE-N.3 through CE-N.5 and CE-N.7 address environmental education. These policies are therefore not applicable to the Project as an individual private development project.

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TABLE CE-1 Issues Related to Climate Change Addressed in the General Plan

Issues	General Plan Policy		
	Element	Section	Policy
			CE-A.5; CE-A.6; CE-A.8; CE-A.9; CE-A.11; CE-A.12
		F. Air Quality	CE-F.2; CE-F.3
		I. Sustainable Energy	CE-I.1 through CE-I.13
		A. General Urban Design	UD-A.4; UD-A.5i
Local Food	Conservation	L. Agricultural Resources	CE-L.3, CE-L.5, CE-L.7-L.11
Urban Heat Island Effect	Conservation	A. Climate Change and Sustainable Development	CE-A.2; CE-A.5; CE-A.6; CE-A.11; CE-A.11
		E. Urban Runoff Management	CE-E.2c; CE-E.d
		J. Urban Forestry	CE-J.1
		A. Park and Recreation Guidelines	RE-A.7
	Urban Design	A. General Urban Design	UD-A.8e; UD-A.12
Waste Management and Recycling	Conservation	A. Climate Change and Sustainable Development	CE-A.2; CE-A.8; CE-A.9; CE-A.10
		C. Coastal Resources	CE-C.7
		D. Water Resources Management	CE-D.1; CE-D.3
		E. Urban Runoff Management	CE-E.6
		F. Air Quality	CE-F.3
		N. Environmental Education	CE-N.4; CE-N.5; CE-N.7
		F. Wastewater	PF-F.5
	Public Facilities, Services and Safety	I. Waste Management	PF-I.1 through PF-I.4
Water Management and Supply	Conservation	A. Climate Change and Sustainable Development	CE-A.2
		D. Water Resources Management	CE-D.1; CE-D.2; CE-D.4
		I. Sustainable Energy	CE-I.4; CE-I.6
	Public Facilities, Services and Safety	H. Water Infrastructure	PF-H.1 through PF-H.3

The DEIR fails to disclose this list of climate change policies, thus failing to inform the public of the full extent of General Plan climate change policies that the Project is required to comply with. The DEIR also *fails to include an analysis of approximately forty-six (46) of these policies*.¹³³ This glaring omission renders the DEIR's GHG analysis patently inadequate under CEQA. The DEIR also lacks substantial evidence to support its conclusions that the Project is consistent with City climate change policies, and that the Project would result in less than

¹³³ See Exhibit A, pp. 27-38.
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E18 (cont.) Furthermore, CEQA Guideline 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision maker should address. A project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. Generally, a project need not be in perfect conformity with each and every general plan policy.

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E18
cont.

significant GHG emissions. The DEIR must be revised and recirculated to include a legally adequate GHG analysis.

E19

E. The DEIR Fails to Adequately Disclose and Mitigate the Project's Construction Noise Impacts.

Mr. Watry reviewed the DEIR's Noise Report and concludes that the Noise Report contains several errors and omissions which render it deficient as an informational document. The DEIR also fails to disclose and mitigate the Project's significant construction noise impacts, in violation of CEQA.

E20

1. The DEIR's Significance Threshold for Construction Noise is Not Based on Substantial Evidence.

CEQA does not set a numeric threshold for determining the significance of ambient noise increases. Lead agencies may select their own thresholds. The agency's selection of a threshold of significance must be supported by substantial evidence.¹³⁴

The DEIR incorrectly relies on the City's Noise Ordinance, which sets a maximum noise level for construction noise, as its threshold of significance. Reliance on the Noise Ordinance violates CEQA because it fails to consider whether the magnitude of changes in noise levels is significant.¹³⁵ The Noise Ordinance provided a single numeric threshold for construction noise impacts, as follows:

A significant noise impact would occur from construction of a project if it would result in temporary construction noise that exceeds 75 dBA LEQ (12 hour) at the property line of a residentially zoned property from 7:00 a.m. to 7:00 p.m. (as identified in SDMC Section 59.0404 [sic]) or if non-emergency construction occurs during the 12-hour period from 7:00 p.m. to 7:00 a.m. Monday through Saturday. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as day care facilities, a significant noise impact may be identified.¹³⁶

¹³⁴ 14 CCR § 15064(b); *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 884.

¹³⁵ *Id.* at 865.

¹³⁶ DEIR at p. 5.7-4.
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E19

Introductory comments regarding review of the Noise Report are noted and no further response is required. Refer to the responses to Comments E20 through E22 regarding construction noise impacts.

E20

This comment is correct that CEQA does not set numeric thresholds for determining significance, and that Lead Agencies select their own thresholds. According to the City's CEQA Significance Determination Thresholds, "temporary construction noise which exceeds 75 dBA LEQ at a sensitive receptor would be considered significant." The thresholds specify that construction noise levels are to be measured "at or beyond the property lines of any property zoned residential," which is derived from the San Diego Municipal Code, Section 59.5.0404 (Noise Ordinance). Additionally, impacts may be identified when noise levels "interfere with normal business communication or affect sensitive receptors." This threshold is qualitative. For comparison, normal human conversation level is approximately 60 decibels at a distance of three feet, and commercial and urban areas may be between 70 and 80 decibels. As disclosed in the draft EIR, the Project would result in short-term construction noise impacts that would be reduced to below a level of significance with implementation of mitigation. The construction noise mitigation requires noise levels be reduced to below 75 dBA LEQ (12-hour) at the project property line it shares with the residentially zoned properties to the west. As such, noise levels at the exterior of the buildings to the west would be exposed to noise levels no greater than 75 dBA LEQ (12-hour). Since standard building materials typically attenuate noise by 15 decibels, interior noise levels at the nearby receptors would be approximately 60 decibels averaged over a 12-hour period, or the noise level of normal human conversation. While there may be periods where noise levels at the property line exceed 75 decibels, thus potentially exposing receptors to noise levels greater than 60 decibels, these periods would be short-term, intermittent, and infrequent. In addition, as mentioned above, noise levels that could be considered to 'interfere with normal business communication or affect sensitive receptors' are qualitative, and noise in excess of 60 decibels doesn't necessary constitute excessively loud or disruptive noise levels. As such, construction-generated

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E20
cont.

Mr. Watry explains that the DEIR's exclusive reliance on the numeric limit established in the City's Noise Ordinance does not provide a complete picture of the noise impacts that may result from the Project, particularly to the most sensitive receptors near the Project site, whose noise exposure will be exacerbated during the Project's 3-year construction period.¹³⁷ This is because the quantitative method of calculating ambient noise under on Noise Ordinance limits does not consider the magnitude of the ambient increase in noise caused by the Project on local receptors during actual construction hours. As Mr. Watry explains, by specifying the construction noise limit in terms of a 12-hour average, the effective noise "limit" for an 8-hour period under the Noise Ordinance becomes 76.8 dBA, because 4 hours of "construction silence" will be averaged along with the 8 hours of construction noise.¹³⁸ This creates an illusory threshold which fails to measure the actual human impacts that noise exposure that would cause during the Project's construction hours.

The courts have held that reliance on a maximum noise level as the sole threshold of significance for noise impacts violates CEQA because it fails to consider whether the magnitude of changes in noise levels is significant.¹³⁹ In *Keep our Mountains Quiet v. County of Santa Clara*,¹⁴⁰ neighbors of a wedding venue sued over the County of Santa Clara's failure to prepare an EIR for a proposed project to allow use permits for wedding and other party events at a residential property abutting an open space preserve. Neighbors and their noise expert contended that previous events at the facility had caused significant noise impacts that reverberated in neighbors' homes and disrupted the use and enjoyment of their property.¹⁴¹ Similar to the EIR in this case, the City's CEQA document relied on the noise standards set forth in its noise ordinance as its thresholds for significant noise exposure from the project, deeming any increase to be insignificant so long as the absolute noise level did not exceed those standards.¹⁴²

The Court examined a long line of CEQA cases which have uniformly held that conformity with land use regulations is not conclusive of whether or not a

¹³⁷ Exhibit B, p. 1-2.

¹³⁸ *Id.*

¹³⁹ *King & Gardiner Farms, LLC*, 45 Cal.App.5th at 865.

¹⁴⁰ *Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714.

¹⁴¹ *Id.* at 724.

¹⁴² *Id.* at 732.

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E20 (cont.) noise is not anticipated to result in substantial interference with business communication or substantially affect sensitive receptors.

The comment is correct that noise levels modeled during an 8-hour period within a 12-hour period would be lower than those of a 12-hour construction day within that same 12-hour period, as an 8-hour day assumes 4 hours of "construction silence." The draft EIR assumes that construction equipment would be fully utilized for approximately 8 hours within a given 12-hour period. The City's CEQA Significance Determination Thresholds remain at 75 dBA averaged out over a 12-hour period.

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E20
cont.

project has significant noise impacts.¹⁴³ In particular, citing *Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs.*, the Court explained that “the fact that residential uses are considered compatible with a [County noise ordinance maximum] noise level of 65 decibels for purposes of land use planning is not determinative in setting a threshold of significance under CEQA.”¹⁴⁴ The Court further explained that, as required by CEQA Guidelines Appendix G, § XII, subd. (d), the CEQA lead agency is required to “consider both the increase in noise level and the absolute noise level associated with a project” in evaluating whether a project has significant noise impacts. The Court held that evidence submitted by local residents and an expert attesting to potentially significant noise impacts amounted to substantial evidence demonstrating that the project would have potentially significant noise impacts, notwithstanding the Project’s compliance with existing noise regulations. Moreover, the Court held that the County’s reliance on the project’s compliance with noise regulations did not constitute substantial evidence supporting the County’s finding of no significant impacts.¹⁴⁵

Similarly here, the City relies on the Project’s purported compliance with a single numeric limit of 75 dBA from the City’s Noise Ordinance to conclude that the Project will not result in significant construction noise impacts. As in *Keep Our Mountains Quiet*, the City’s reliance on noise regulations does not provide substantial evidence to support the DEIR’s conclusion that the Project will not have significant noise impacts. The DEIR must be revised and recirculated to analyze the Project’s construction noise impacts against a meaningful significance threshold.

E21

2. The DEIR’s Substantially Underestimates Construction Noise Impacts.

M. Watry concludes that the DEIR’s noise analysis makes a major error in applying the San Diego 75 dBA LEQ (12-hour) construction noise limit. As Mr.

¹⁴³ *Id.*, citing *Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 881–882; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project’s effects can be significant even if “they are not greater than those deemed acceptable in a general plan”); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, (“CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan”).

¹⁴⁴ *Id.*, citing (2001) 91 Cal.App.4th 1344, 1381, 111 Cal.Rptr.2d 598 (“*Berkeley Jets*”).

¹⁴⁵ *Id.* at 732-734.
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E21

The noise analysis modeled noise levels for individual pieces of construction equipment as well as groupings of construction equipment that would be likely to be used simultaneously and in conjunction with one another. As noted in the draft EIR, construction-noise impacts were identified and mitigation measures NOI-4 and NOI-5 would be required that would reduce impacts to below a level of significance. Mitigation measure NOI-4 identifies mitigation for specific equipment because those in isolation would individually result in noise levels exceeding 75 dBA LEQ (12 hour). Mitigation measure NOI-5 provides mitigation for individual equipment as well as combinations of construction equipment. Both mitigation measures provide reduction techniques for multiple individual pieces of equipment and for combinations of equipment, and provide a performance standard.

The Commenter states that, assuming the 75 dBA LEQ (12 hour) threshold, noise levels would be significant if receptors are located within 221 feet during demolition activities and 188 feet during grading activities, and 135 feet during the remainder of the construction period.

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Watry explains, the Noise Ordinance limit is intended to be applied to the entire Project site, in order to assess the totality of construction noise coming from the Project site during construction.¹⁴⁶ However, the DEIR incorrectly applied the 75 dBA LEQ limit to *each piece of construction equipment individually*, rather than to all construction equipment cumulatively.¹⁴⁷ By applying the noise limit to each piece of construction equipment separately, the DEIR concluded that each piece of equipment had a less than significant noise impact based upon its distance from sensitive receptors.¹⁴⁸ As a result, the DEIR substantially underestimated the Project's ambient construction noise levels.

The DEIR bases the noise mitigation in its Mitigation Monitoring and Reporting Program ("MMRP") on the analyses conducted for separate pieces of equipment. Mr. Watry explains that the MMRP's noise mitigation is therefore inadequate to address the ambient noise impacts from the entire construction site.¹⁴⁹

When calculated correctly, Mr. Watry concludes that the Project will generate significant construction noise impacts at the nearest sensitive receptors which vastly exceed the DEIR's calculations. As he explains:

[The DEIR] ignores the fact that the most noise-sensitive receptors in the Project vicinity are the residents of the Vi at La Jolla Village and Towers at Costa Verde buildings. These buildings are 19 and 15-stories high, respectively, which puts their heights at approximately 205 feet and 165 feet, respectively. Residences in both buildings have balconies that have a birds-eye views of the entire project site. The minimum distances from construction to receptors necessary to meet the DEIR's own noise significance threshold are 221 feet during demolition activities, 188 feet during grading activities, and 135 feet during the remainder of the construction period. The nearest Vi building is 70 feet from the Project boundary and the nearest Towers building is 110 feet, both within these minimum distances. Project construction activities are therefore likely to create a significant noise impact on receptors at the Vi at La Jolla Village and Towers at Costa Verde buildings which the DEIR fails to disclose.

¹⁴⁶ Exhibit B, p. 3.

¹⁴⁷ *Id.*; see e.g. DEIR at p. 5.7-6 (At a distance of 85 feet, a breaker would generate a noise level of 79.7 dBA LEQ (12-hour). The 75 dBA LEQ noise contour would be 145 feet.)

¹⁴⁸ DEIR, p. 5.7-7.

¹⁴⁹ Exhibit B, p. 3.

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E21

(cont.) As shown in mitigation measures NOI-4 and NOI-5, noise levels were modeled to exceed the threshold at distances ranging from 40 feet to 145 feet, depending on the equipment used. The calculations provided by the Commenter describe scenarios where between 7 and 12 pieces of equipment would be used simultaneously for each hour of the workday. The analysis presented in the draft EIR more accurately describes the number of equipment that would be used at a given time for areas that would impact off-site noise-sensitive land uses. Additionally, the draft EIR assumes that construction equipment would be fully utilized for approximately 8 hours within a given 12-hour period. Although the City's CEQA Significance Determination Thresholds remain at 75 dBA averaged out over a 12-hour period, a typical construction day was assumed to be 8 hours within that 12-hour period. The equipment presented by the Commenter would not be expected to be in use simultaneously for each hour of the workday.

Furthermore, the construction equipment was conservatively measured distances described in relation to the property line. Because the property line is closer to construction equipment than the receptors within the neighboring buildings, noise levels described in the draft EIR are more conservative.

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E21
cont.

The DEIR must be revised to identify and mitigate this impact.

3. The DEIR Fails to Incorporate All Feasible Mitigation to Reduce Construction Noise Impacts to the Greatest Extent Feasible.

CEQA requires the lead agency to adopt feasible mitigation measures that will substantially lessen or avoid a project's potentially significant environmental impacts and describe those mitigation measures in the EIR.¹⁵⁰ The lead agency may not make the required CEQA findings regarding a project unless the administrative record demonstrates that it has adopted all feasible mitigation to reduce significant environmental impacts to the greatest extent feasible.¹⁵¹

E22

Mr. Watry explains that the DEIR's primary construction noise mitigation requiring 12-foot high noise barriers "will do nothing for most of the balconies of the residences at Vi at La Jolla Village and Towers at Costa Verde buildings that face the Project site" given the height of the residential towers (19 and 15-stories high).¹⁵² Mr. Watry identifies an additional, potentially feasible mitigation measure in the form of Plexiglass balcony barriers, a measure that is often used on residential balconies which abut noisy roadways. Mr. Watry explains that installation of heavy Plexiglass or other clear panels around the edges of the residential balconies would act as sound barriers without affecting residents' light or view.¹⁵³

The City should consider this additional, feasible mitigation for the Project's construction noise impacts on the Vi at La Jolla Village and Towers at Costa Verde buildings in a revised DEIR.

E23

F. The DEIR Fails to Adequately Disclose and Mitigate the Project's Traffic Impacts.

Mr. Smith reviewed the DEIR's TIA and concludes that the TIA relies on flawed trip generation assumptions which underestimate the Project's retail-related trips.

¹⁵⁰ PRC §§§ 21002, 21081(a) 21100(b)(3); CEQA Guidelines § 15126.4.

¹⁵¹ *Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 883.

¹⁵² Exhibit B, p. 5.

¹⁵³ Exhibit B, p. 6.

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E22

Mitigation Measures NOI-4 and NOI-5 outlined in the draft EIR each establish a performance standard that construction noise shall not exceed 75 dBA L_{EQ} (12-hour) and provides noise barriers as one potential method to reduce noise levels at the nearby property lines. As outlined in mitigation measure NOI-4, other methods "including, but not limited to the use of alternative sound barriers, noise attenuation devices/modifications to construction equipment, limiting hours of operation, or a combination of these measures" can be used to reduce noise levels to the specified performance threshold. These options are sufficient to feasibly reduce construction noise impacts to below a level of significance. Therefore, it has been added to mitigation measure NOI-4 of the EIR as an option in addition to the options previously identified. This option would also be applicable to mitigation measure NOI-5 of the EIR. This modification would not change the conclusion or impact significance determination in the EIR. The revised mitigation measure is provided below.

NOI-4 Parking Garage Demolition Noise Barriers. Prior to issuance of demolition, grading, or building permits, the City's Environmental Designee and Mitigation Monitoring Coordination (MMC) shall ensure the following notes are included on the project plans. For demolition of the underground parking garage and ground level slabs, if a breaker is used within 145 feet or if a concrete saw is used within 139 feet of a residentially-zoned property line, a temporary 12-foot-high noise control barrier shall be erected between the breaker and concrete saw and the property line to reduce noise levels below the City Noise Ordinance construction threshold of 75 dBA L_{EQ} (12 hour). If applicable, a construction safety barrier may be enhanced to act as a noise control barrier by meeting the specifications listed below.

The temporary noise control barrier shall be tall enough to break the line of sight between the breaker and concrete saw and the property line. The sound attenuation barrier must be solid. It can be constructed of wood, plywood, or flexible vinyl curtains that meet a rating of Sound Transmission Class (STC) 19, as long as there are no cracks or gaps, through or below the wall. Any seams or cracks must be filled or caulked. If wood or plywood is used, it can be tongue and

COMMENTS

RESPONSES

- | | |
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| E22 | <p>(cont.) groove and must be at least 5/8-inch total thickness or have a density of at least 3.5 pounds per square foot.</p> <p>Alternative methods (including, but not limited to the use of alternative sound barriers, noise attenuation devices/modifications to construction equipment, limiting hours of operation, or a combination of these measures) may be employed to reduce noise levels below the City Noise Ordinance construction threshold of 75 dBA L_{EQ} (12 hour). <u>For example, for residences located on floors higher than 12 feet at off-site residences facing the project site to the west, noise barriers placed on balconies would reduce noise levels. Where architectural or aesthetic factors allow, glass or clear plastic 3/8 of an inch thick or thicker may be used, if it is desirable to preserve a view. Noise-attenuating materials may be placed on off-site balconies if they meet the criteria listed above for ground-level sound barriers and are properly supported and stiffened so that they do not rattle or create noise itself from vibration or wind.</u></p> <p>however, if a Alternate measures are employed, they shall be evaluated by a qualified acoustician prior to the initiation of construction activities to ensure that they will reduce noise levels to within City standards. <u>The following additional requirements also will be implemented:</u></p> <ul style="list-style-type: none"> • <u>All construction equipment shall have properly operating and maintained mufflers;</u> • <u>The construction contractor shall post notices, legible at a distance of 50 feet, at the project construction site. All notices shall indicate the dates and duration of construction activities, as well as provide a contact name and a telephone number where area residents can inquire about the construction process and register complaints;</u> • <u>An on-site coordinator shall be employed by the project applicant/contractor. The coordinator's duties shall include fielding and documenting noise complaints, determining the source of the complaint (e.g., piece of construction equipment), determining whether noise levels are within acceptable limits and according to City standards, and reporting complaints to the City. The coordinator shall contact nearby noise-sensitive receptors, advising them of the construction schedule; and</u> • <u>Where feasible during construction, the construction contractor shall place stationary construction equipment in locations where the emitted noise is away from sensitive noise receivers.</u> |
|-----|--|

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E23
cont.

The TIA assumes that future retail at the Project site would have the same trip generation as the existing retail at the Costa Verde shopping center.¹⁵⁴ As Mr. Smith explains, the DEIR's analysis is unsupported because it assumes that the Project's upgrades to retail services, which would include restaurants, personal services, boutique retail, entertainment, athletics, and other popular uses, would generate the same amount of traffic as the Costa Verde Center's currently underperforming retail stores, many of which are vacant.¹⁵⁵

Mr. Smith further explains that, because "traffic from vacant and underperforming retail floor area is not represented in the existing conditions traffic counts, the DEIR cannot reasonably assume that the traffic from the existing use and the future retail component use would be the same."¹⁵⁶ The DEIR's VMT calculations for the Project may credit only traffic from an actual measured traffic count of the existing retail use or discount traffic estimated at normal trip generation rate, based on fair estimates of vacancy and underperformance.¹⁵⁷ The DEIR overcredits existing retail use, thus resulting in an inaccurate analysis of the Project's retail traffic. This error must be corrected in a revised DEIR.

G. The DEIR Impermissibly Relies on Non-Binding Measures and Design Features to Mitigate Project Impacts.

E24

The DEIR contains a short list of mitigation measures in the MMRP related to noise and traffic impacts. The remainder of the Project's mitigation relies on several non-binding design features to reduce other impacts to less than significant levels. For example, the DEIR relies on the Applicant's use of "Tier 4 Final" construction equipment to reduce DPM impacts to less than significant levels, without actually requiring the use of "Tier 4 Final" equipment anywhere in the DEIR. The DEIR's reliance on non-binding measures to mitigate otherwise significant impacts violates CEQA's requirement that measures which are needed to reduce project impacts to less than significant levels, are required to be included as binding mitigation pursuant to CEQA.¹⁵⁸

¹⁵⁴ Exhibit B, p. 2.

¹⁵⁵ *Id.*

¹⁵⁶ *Id.*

¹⁵⁷ *Id.*

¹⁵⁸ *Lotus v. Dept. of Transportation* (2013) 223 Cal.App.4th 650.
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E23

The Project does not propose an increase to the retail square footage or the retail type as compared to what is currently on site. Therefore, only the new project land uses (office, research and development, and hotel) are included in the project trip generation calculations.

As explained in the TIA (Appendix B), the existing traffic volumes along the project-fronting study area were collected in Year 2015 at a time when the Costa Verde Center was leased at 95 percent occupancy per the applicant. The trip generation calculations were conducted per the City requirements and standards (including the Traffic Impact Study Manual standards). The trip generation calculations for the Project are conservative in that no transit credit was taken for the future retail use from the Trolley line now under construction (i.e., existing retail patrons that drive today could convert into a transit riders in the future). Therefore, project trip generation was appropriately analyzed in the draft EIR. Regardless, the Project does not propose an increase to the retail square footage or change to the retail type as compared to what is currently on site. Therefore, based on City standards, only the new project land uses are included in the project trip generation calculations in order to determine the expected project impact.

E24

Refer to response to Comment E8. Design features contained in the Project Description of the draft EIR are components of the Project itself, and not mitigation measures under CEQA. Therefore, the inclusion of such features as mitigation measures is inappropriate and unnecessary.

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VI. THE PROJECT FAILS TO COMPLY WITH THE SUBDIVISION MAP ACT

The Project requires a Tentative Map to subdivide the existing two parcels into four separate parcels, privatize the City street Esplanade Court, and to allow the central lot to be subdivided into 20 condominium lots in the future.¹⁵⁹

As discussed above, the DEIR fails to analyze this component of the Project. The DEIR therefore lacks substantial evidence to support the Map Act's required factual findings to approve the Tentative Map, which require the City to find that a proposed subdivision is consistent with the general plan/specific plan, and does not have any detrimental environmental or public health effects.¹⁶⁰ In addition, as discussed in Section VI above, there is substantial evidence demonstrating that the Project is likely to have, potentially significant impacts on air quality, public health, climate change, noise, and traffic. These impacts are not adequately mitigated in the DEIR. As a result of these unmitigated impacts, the Project fails to comply with mandatory Map Act requirements and the City cannot make the requisite findings to approve the Project's Tentative Map.

The purpose of the Map Act is to regulate and control design and improvement of subdivisions with proper consideration for their relation to adjoining areas, to require subdividers to install streets and other improvements, to prevent fraud and exploitation, and to protect both the public and purchasers of subdivided lands.¹⁶¹ Before approving a tentative map, the Map Act requires the agency's legislative body to make findings that the proposed subdivision map, together with the provisions for its design and improvement, is consistent with the general plan and any specific plan.¹⁶² The Map Act also requires the agency's legislative body to deny a proposed subdivision map in any of the following circumstances:

☐

(a) the proposed map is ***not consistent with applicable general and specific plans*** as specified in Section 65451.

☐ (b) the design or improvement of the proposed subdivision is ***not consistent with applicable general and specific plans***.

¹⁵⁹ DEIR, p. 3-13.

¹⁶⁰ Gov Code §§66473.5, 66474.

¹⁶¹ *Pratt v. Adams* (1964) 229 Cal.App.2d 602.

¹⁶² Gov Code § 66473.5.

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E25 Refer to the response to Comment E4.

Refer to the responses to Comments throughout this letter regarding the Project's impacts on air quality, public health, climate change, noise, and traffic. As detailed in those responses, the Project's impacts would be reduced to below a level of significance, with the exception of certain traffic impacts, which are appropriately disclosed as significant and unmitigated. The proposed vacation of easements would not adversely affect access or public utilities.

Both the Tentative Map and Easement Vacations are discretionary actions requiring the decision-maker adopt findings consistent with State law and City ordinances. Neither CEQA nor the Map Act preclude a lead agency from approving a Tentative Map due to the presence of significant and unmitigated traffic impacts.

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(c) the site is not physically suitable for the type of development.
(d) the site is not physically suitable for the proposed density of development.
(e) the ***design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.***
(f) the ***design of the subdivision or type of improvements is likely to cause serious public health problems.***
(g) the ***design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.*** In this connection, the governing body may approve a map if it finds that alternate easements, for access or for use, will be provided, and that these will be substantially equivalent to ones previously acquired by the public. This subsection shall apply only to easements of record or to easements established by judgment of a court of competent jurisdiction and no authority is hereby granted to a legislative body to determine that the public at large has acquired easements for access through or use of property within the proposed subdivision.¹⁶³

E25
cont.

SD SEED's experts have provided substantial evidence demonstrating that the Project is likely to have significant, unmitigated impacts on air quality from excess NOx emissions that exceed SDAPCD thresholds; on public health from excess cancer risk from the Project's construction DPM emissions; on the environment and public health from excess construction noise and traffic; and from GHG emissions due to the City's failure to ensure compliance with the City's Climate Action Plan and General Plan. These impacts demonstrate that the Project, as analyzed in the DEIR, fails to comply with the General Plan and CVSP, is "likely to cause substantial environmental damage," and "is likely to cause serious public health problems."¹⁶⁴ These unmitigated impacts render the Project inconsistent with Map Act requirements. The Map Act therefore requires the City to deny the Project's Tentative Map pursuant to Government Code Sections 66473.5 and 66474(a), (b), (e), and (f).

The Project also requires street and easement vacations to vacate Esplanade Court from being a City street, and to vacate public easements and privatize water

¹⁶³ Gov. Code § 66474 (emphasis added).
¹⁶⁴ Gov. Code §§ 66474(a), (b), (e), and (f).
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E25
cont.

lines within the Project site.¹⁶⁵ Easements are currently located on the Project site for utilities, parking, slope and drainage, and Trolley infrastructure.¹⁶⁶ The Project would convert these public facilities to private use, and would dedicate a new General Utility and Emergency Vehicle Access Easement along the northern portion of Esplanade Court.¹⁶⁷ The DEIR fails to analyze the impacts of the Project's easement vacations on existing public services, and fails to discuss whether the Project's alternate easement would be "substantially equivalent to ones previously acquired by the public," as required by the Map Act.¹⁶⁸ The City therefore lacks substantial evidence to determine whether the Project complies with Section 66474(g) of the Map Act.

**VII. THE CITY LACKS SUBSTANTIAL EVIDENCE TO APPROVE
THE PROJECT'S LOCAL LAND USE PERMITS**

E26

The Project requires a number of discretionary entitlements and related approvals under local City plans and codes, including: a General Plan Amendment; a Specific Plan Amendment to the CVSP; a Community Plan Amendment to the UCP to increase development density;¹⁶⁹ a Site Development Permit for land use plan amendments within the Airport Land Use Compatibility Overlay Zone; a Planned Development Permit to Amend PDP No. 90-1109 for the reconfiguration and expansion of the existing 178,000-square foot shopping center; a Neighborhood Development Permit to include tandem commercial parking spaces; and an Easement Vacation to vacate Esplanade Court and water line easements as public facilities.¹⁷⁰

Each permit requires the City to make findings regarding land use consistencies and/or environmental factors. As discussed above, the DEIR fails to disclose the Project's potentially significant, unmitigated impacts on air quality, public health, climate change, noise, and traffic. These impacts also create inconsistencies with General Plan, CVSP, and UCP policies which the DEIR fails to disclose and mitigate. The DEIR fails to disclose these inconsistencies. As a result

¹⁶⁵ DEIR, p. 1-3.

¹⁶⁶ DEIR, p. 2-2.

¹⁶⁷ DEIR, p. 3-13.

¹⁶⁸ Gov. Code § 66474(g).

¹⁶⁹ DEIR, p. 3-12.

¹⁷⁰ DEIR, pp. 3-12 to 3-13.
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E26

The Commenter's summary of the discretionary entitlements and related approvals requested by the Project is noted. These introductory comments are noted; refer to the responses to Comments E27 through E30 for details.

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E26
cont.

of these impacts, the City is unable to make the necessary findings to approve the Project's local land use permits.

A. Plan Amendments.

The City's plan amendment process is set forth in the General Plan's Land Use Element.¹⁷¹ The Land Use Element explains that amendments to precise plans or specific plans are simultaneously considered a community plan and General Plan amendment.¹⁷² The City's approval of the Project's General Plan amendment, CVSP amendment, and UCP amendment must therefore meet the following criteria:

- a) the amendment request is consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria;
- b) the proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site design; and
- c) public facilities are available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process.¹⁷³

As discussed above, the Project fails to comply with the General Plan's climate change policies, and fails to provide park space for the Project's residential use as required by the Open Space Element. The Project's other potentially significant, unmitigated impacts on air quality, public health, noise, and traffic render the Project inconsistent with other critical elements of the General Plan, CVSP, and UCP, including, *inter alia*:

- **Conservation Element:** The Conservation Element contains policies to guide the conservation of the resources that are "a fundamental component of San Diego's environment."¹⁷⁴ The Project's unmitigated impacts render it

¹⁷¹ As a charter city, the City has established its own plan amendment process as part of the General Plan. Govt C §65700; *De Vita v County of Napa* (1995) 9 Cal. 4th 763, 785.

¹⁷² General Plan, p. LU-27.

¹⁷³ General Plan, Policy LU-D.10, p. LU-30; Policy LU-D.13, p. p. LU-31.

¹⁷⁴ General Plan, p. CE-3.

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E27

The Commenter's summary of the City's plan amendment process is noted. These criteria relate to initiation of a plan amendment process. Adoption of land use plan amendments by the City Council are not required to meet plan amendment initiation criteria, nor do plan amendments include findings of approval. Refer to the response to Comments E17, E18, and E45 through E54 regarding consistency with the applicable policies. As the Project does not propose a residential land use, no provision of park space is required. CEQA Guideline 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision maker should address. A project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. Generally, a project need not be in perfect conformity with each and every general plan policy. The Commenter generally asserts inconsistency, no specific information regarding points of disagreement with the consistency analysis is provided; therefore, no further response is required. The Project would not result in a significant land use impact. The Project does not propose residential use; refer to response to Comment E4.

The purpose of an EIR is to disclose potential environmental impacts, not to demonstrate the benefits of a project. Discussion of the benefits of the Project in relation to the anticipated environmental impacts would be appropriately detailed in the Statement of Overriding Considerations that would be before decision-makers as they determine whether to approve or deny the Project.

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cont.

inconsistent with CE policies related to climate change, environmental impacts, and the provision of open space.

- Land Use Element: The Land Use Element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses. The Project's unmitigated impacts render it inconsistent with LU policies related to land use consistency, climate change, environmental impacts, balanced communities, equitable development, and environmental justice.¹⁷⁵
- Mobility Element: The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network."¹⁷⁶ ME policies address the City's transportation network and strategies needed to support the anticipated General Plan land uses. The Project's unmitigated impacts render it inconsistent with ME policies related to land use consistency, climate change, traffic congestion and movement of goods.
- Noise Element: The Noise Element establishes the City's noise land use compatibility guidelines.¹⁷⁷ As discussed above, the Project will exceed the City's noise guidelines during the Project's three-year construction period. The Project is therefore inconsistent with NE policies related to construction noise.
- Public Facilities, Services and Safety Element: The purpose of the Public Facilities, Services, and Safety Element is "to provide the public facilities and services needed to serve the existing population and new growth."¹⁷⁸ The Project's unmitigated impacts render it inconsistent with PFE policies related to the provision of specific facilities and services that must accompany growth.

Additionally, the DEIR fails to analyze the residential component proposed by the Project's Tentative Map condominium subdivisions. As a result, the DEIR fails to confirm whether adequate public facilities are available to serve the proposed increase in density/intensity proposed by the Project.

Finally, while the Project likely provides some public benefits to the City, the DEIR fails to demonstrate that the benefits of the Project outweigh its

¹⁷⁵ DEIR, p. 5.1-4.

¹⁷⁶ DEIR, p. 5.1-4.

¹⁷⁷ DEIR, p. 5.1-6.

¹⁷⁸ DEIR, p. 5.1-5.

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cont.

environmental and public health costs. The City cannot make the necessary findings to approve the Project's plan amendments until these deficiencies in the DEIR are corrected.

B. Site Development Permit.

The DEIR explains that the purpose of the City's SDP procedures is to "establish a review process for proposed development that may have significant impacts on resources or on the surrounding area."¹⁷⁹ Under section 126.0501 of the San Diego Municipal Code ("SDMC"), an SDP may only be approved if the following findings can be made relative to the ALUCP:

E28

1. The proposed development will not adversely affect the applicable land use plan;
2. The proposed development will not be detrimental to the public health, safety, and welfare; and
3. The proposed development will comply with the applicable regulations of the Land Development Code.¹⁸⁰

The Project's potentially significant unmitigated impacts render the Project inconsistent with the City's SDP criteria. In particular, the Project's excess construction DPM emissions and construction noise impacts are detrimental to public health, safety and welfare. The City therefore lacks substantial evidence to support the findings necessary to approve the Project's SDP.

C. Planned Development Permit.

E29

The Costa Verde Center currently operates under an existing PDP.¹⁸¹ The DEIR explains that the Project requires a new PDP because the Project proposes to exceed limited deviations allowed by the City's development regulations to reconfigure and expand the existing 178,000-square foot shopping center.¹⁸² However, the DEIR fails to discuss whether the Project complies with existing residential PDP requirements, or whether a new PDP is also required to support the Project's proposed condominium subdivision.

¹⁷⁹ DEIR, p. 5.1-12.

¹⁸⁰ *Id.*; SDMC § 126.0501.

¹⁸¹ DEIR, p. 5.1-12 (PDP No. 90-1109 and PCD 85-0783).

¹⁸² *Id.*
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Refer to the responses to Comments E43 and E20 through E22 with regard to DPM emissions and construction noise, respectively. As detailed in those responses, the Project would not result in significant impacts related to DPM emissions and construction noise impacts would be reduced to below a level of significance through the identified mitigation measures. Therefore, substantial evidence is available to support the necessary findings.

E29

Refer to response to Comment E4. The residential land in the Costa Verde Specific Plan area is not owned by the applicant and a significant portion of the residential component is built or under construction with prior approval. As no residential uses are proposed, the Project would not be required to comply with the residential regulations pertaining to a PDP. The Project would comply with the applicable PDP requirements for commercial developments.

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E29
cont.

The SDMC contains distinct PDP requirements for commercial and residential developments.¹⁸³ Unlike the general PDP requirements, the City's residential PDP regulations require dedications of open space.¹⁸⁴ Projects with a residential component that are located in RS zone, where the Project is located, also require PDPs to limit density, bulk, and scale of any single dwelling units to the average density of similarly zoned properties within a 500-foot radius of the site.¹⁸⁵

The DEIR discusses the Project's consistency with the SDMC's general requirements for all PDPs,¹⁸⁶ but fails to discuss the Project's consistency with PDP residential regulations. As discussed above, the Project does not provide the per capita open space required for residential development. This renders the Project inconsistent with SDMC section 143.0420(a). The proposed addition of condominium subdivisions to the Project site appears to indicate that the Project will add single dwelling units. This requires a PDP in compliance with SDMC section 143.0430. The DEIR therefore lacks the necessary analysis and supporting evidence to support the issuance of a PDP for the Project.

D. Neighborhood Development Permit.

E30

The DEIR explains that the purpose of the City's NDP procedures is to "establish a review process for proposed development that may be desirable but may have some limited physical impacts on the surrounding properties."¹⁸⁷ The findings necessary for a NDP are the same as those noted above for an SDP.¹⁸⁸ The City therefore lacks substantial evidence to support the findings necessary to approve the Project's NDP for the same reasons described in Section VII.B above. The Project's significant traffic impacts are particularly relevant to these considerations since the NDP related to the Project's parking requirements.

¹⁸³ See e.g. SDMC § 143.0410 (General Development Regulations for Planned Development Permits); §143.0420 (Supplemental Planned Development Permit Regulations for Residential Development).

¹⁸⁴ SDMC § 143.0420(a).

¹⁸⁵ SDMC § 143.0430(a), (b).

¹⁸⁶ DEIR, p. 5.1-12 to 5.1-13.

¹⁸⁷ DEIR, p. 5.1-13.

¹⁸⁸ *Id.*

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E30 Refer to response to Comment E28 regarding the ability to make the necessary findings for the Project and responses to Comments E2, E6, E23, and E71 through E74 regarding traffic impacts. Furthermore, the Project would be required to meet the parking requirements in the Land Development Code.

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VIII. CONCLUSION

The DEIR is inadequate as an environmental document because it fails to accurately describe the Project and its baseline conditions, fails to fully disclose and mitigate the Project's potentially significant impacts on air quality, public health, climate change, noise, and traffic, and fails to disclose inconsistencies with local plans and policies. The DEIR's findings regarding Project impacts are not supported by substantial evidence. The City cannot approve the Project until it prepares and recirculates a revised DEIR that resolves these issues and complies with CEQA's requirements.

Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.


Sincerely,



Christina M. Caro

CMC:acp
Attachments

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E31 Refer to the responses to individual comments regarding the adequacy of the draft EIR. The comments provided do not indicate that the draft EIR meets any of the criteria for recirculation detailed in CEQA Guidelines Section 15088.5. Therefore, recirculation of the EIR is not required.

EXHIBIT A



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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May 26, 2019

Christina Caro
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Subject: Comments on Costa Verde Center Revitalization Project (SCH No. 201607103)

Dear Ms. Caro,

We have reviewed the March 2020 Draft Environmental Impact Report ("DEIR") for the Costa Verde Center Revitalization Project ("Project") located in the City of San Diego ("City"). The Project proposes the demolition of 169,300-SF of existing shopping center, the renovation of 8,730-SF of existing shopping center, and the construction of 200 hotel rooms, 360,000-SF of research and development space, 40,000-SF of office space, as well as a pedestrian promenade and 1,837 parking spaces on the 13.9-acre Project site.

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. A revised DEIR should be prepared and recirculated to adequately assess and mitigate the potential hazards and hazardous waste, air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment.

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The DEIR's air quality analysis relies on emissions calculated with CalEEMod.2016.3.2.¹ CalEEMod provides recommended default values based on site-specific information, such as land use type,

¹ CAPCOA (November 2017) CalEEMod User's Guide, http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4.

E32 Introductory comments regarding the nature of the Project and air quality, health risk and GHG concerns are noted. Please note that the Project does not include renovation of 8,730 square feet of existing shopping center. Refer to responses to Comments E33 through E55 for responses to the more detailed comments that follow.

E33 Project-specific information was included in the modeling in accordance with the requirements of CalEEMod and CEQA in order to provide more project-specific analysis of potential impacts. Refer to the responses to Comments E3 and E9, E11, and E12 regarding the appropriateness of the inputs used for project emissions modeling, and response to Comment E8 regarding Tier 4 Final equipment.

COMMENTS

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cont.

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.² Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters were utilized in calculating the Project's air pollutant emissions and make known which default values were changed as well as provide justification for the values selected.³

Review of the Project's air modeling demonstrates that the DEIR underestimates emissions associated with Project activities. Our review of the Project's CalEEMod output files, provided as Appendix C to the DEIR found that several of the values inputted into the model were not consistent with information disclosed in the DEIR. As a result, the Project's construction and operational emissions are underestimated. A revised DEIR should be prepared and recirculated to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

E34

Incorrect Application of Tier 4 Final Equipment Mitigation

Review of the CalEEMod output files demonstrates that the Project's emissions were modeled assuming that construction equipment would be equipped with "Tier 4 Final" engines (see excerpt below) (Appendix C, pp. 45, 46).

E34

Refer to response to Comment E8 regarding the Project's use of Tier 4 Final equipment. The Commenter acknowledges that equipment subject to more stringent emission controls is being phased in over time, yet relies on 2014 data regarding the availability of Tier 4 equipment. Tier 4 Final construction equipment that would be used by the Project is now readily available in California. Furthermore, the Project has been conditioned to ensure that only Tier 4 Final equipment would be utilized.

² CAPCOA (November 2017) CalEEMod User's Guide, http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 1, 9.

³ CAPCOA (November 2017) CalEEMod User's Guide, http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, fn 1, p. 11, 12 – 13. A key feature of the CalEEMod program is the "remarks" feature, where the user explains why a default setting was replaced by a "user defined" value. These remarks are included in the report.

RESPONSES

[illegible]

⁴ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

COMMENTS

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cont.

two types of Tier 4 emissions control equipment – Tier 4 *Interim* or Tier 4 *Final* equipment. This is a significant omission in the DEIR, because Tier 4 Final equipment is more efficient than Tier 4 Interim equipment and provides greater DPM emissions reductions than Tier 4 Interim equipment. The DEIR further states that the Project may utilize “any combination of” DPM emissions control equipment, including “diesel catalytic converters, diesel oxidation catalysts, and diesel particulate filters as well as California Air Resources Board (CARB)/U.S. Environmental Protection Agency (USEPA) Engine Certification Tier 4, or other equivalent methods approved by the CARB.” (emphasis added) (Appendix C, p. ES-1). The Air Quality Technical Report indicates that Tier 4 equipment is one possible form of DPM emissions control equipment that the Project may implement use. Thus, according to the Air Quality Technical Report, the Project may or may not include any Tier 4 equipment, let alone the most stringent Tier 4 Final equipment assumed in the CalEEMod modeling. Finally, the DEIR’s Mitigation, Monitoring and Reporting Program (“MMRP”) fails to require the use of any DPM emissions control equipment for the Project. As such, the DEIR fails to require the use of this measure or demonstrate that it will be implemented, monitored, and enforced on the Project site. This presents an issue, as the inclusion of “Newer Tier Engines” impacts the VOC, SO_x, NO_x, PM₁₀, and PM_{2.5} emissions outputs calculated by the CalEEMod model (see excerpt below).⁵

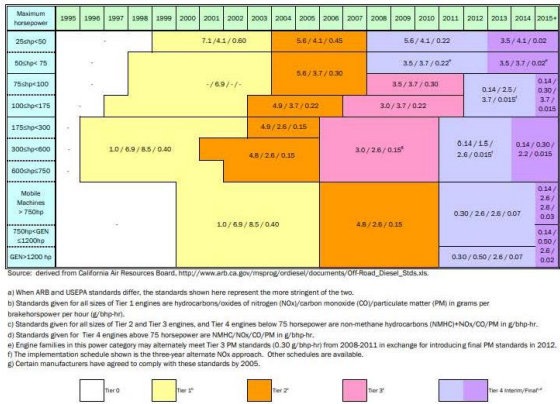
Mitigation Measure	Applicability						
	VOC	SO _x	NO _x	PM ₁₀	PM _{2.5}	GHG Anthropogenic	GHG Biogenic
Alternative Fuel		x	x	x	x	X	x
Electric Equipment	x	x	x	x	x	X	x
DPF				x	x		
Diesel Oxidation Catalyst/SCR			x	x	x		
Newer Tier Engines	x	x	x	x	x		
User Input	x	x	x	x	x	X	x

Thus, by incorrectly assuming that all construction equipment would be equipped with Tier 4 Final engines, the model underestimates the Project’s construction-related VOC, SO_x, NO_x, PM₁₀, and PM_{2.5}, emissions, including DPM. Unless a mitigation measure is included in the DEIR, as well as the MMRP, with binding requirements for the use of “Tier 4 Final” equipment, the DEIR’s air model and air quality impact conclusions regarding emissions are unsupported and should not be relied upon to determine Project significance.

The United States Environmental Protection Agency (U.S. EPA) has slowly adopted more stringent standards to lower the emissions from off-road construction equipment since 1994. Since that time, Tier 1, Tier 2, Tier 3, Tier 4 Interim, and Tier 4 Final construction equipment has been phased in over time.

⁵ “Appendix A: Calculation Details for CalEEMod.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 63.

Tier 4 Final represents the cleanest burning equipment and therefore has the lowest emissions compared to other tiers, including Tier 4 Interim equipment (see excerpt below):⁶



As demonstrated in the figure above, Tier 4 Interim has higher emission levels than Tier 4 Final equipment. Therefore, by modeling construction emissions assuming nearly a full Tier 4 Final equipment fleet, the DEIR failed to account for the higher emissions that would occur as a result of the use of Tier 4 Interim or other less-stringent DPM emissions control equipment. Since the DEIR fails to specify whether the Project will use Tier 4 Interim, Tier 4 Final equipment, or other form of DPM emissions control equipment, it is incorrect and unsupported to model emissions assuming that the most efficient Tier 4 Final equipment will be used. Unless the DEIR adds binding mitigation requiring the Project to actually use Tier 4 Final engines during all phases of construction, and not Tier 4 Interim or other less-effective DPM emissions control equipment, the Project's potential impacts should not be evaluated assuming the use of this cleaner burning equipment.

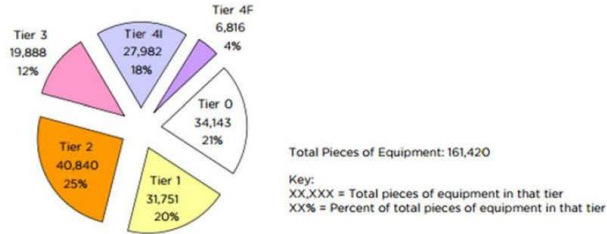
Furthermore, review of the DEIR demonstrates that the DEIR failed to evaluate the feasibility in obtaining Tier 4 equipment. Due to the limited amount of Tier 4, especially Tier 4 Final, equipment available, the DEIR should have assessed the feasibility in obtaining equipment with Tier 4 engines (see excerpt below).⁷

⁶ "San Francisco Clean Construction Ordinance Implementation Guide for San Francisco Public Projects." August 2015, available at: https://www.sfdph.org/dph/files/EHSdocs/AirQuality/San_Francisco_Clean_Construction_Ordinance_2015.pdf, p. 6

⁷ *Ibid.*

E34
cont.

Figure 4: 2014 Statewide All Fleet Sizes (Pieces of Equipment)



As demonstrated in the figure above, the Tier 4 Final and Interim equipment only account for 4% and 18%, respectively, of all off-road equipment currently available in California. Thus, emissions are modeled assuming that the Project will be able to obtain Tier 4 Final equipment, even though this equipment only accounts for 4% of available off-road equipment currently available in California. Therefore, the model represents the best-case scenario for the Project without supporting evidence demonstrating that it is feasible for the Applicant to obtain Tier 4 Final equipment. Evidence of feasibility is particularly important for this Project given the three-year construction period, as it may be more difficult to obtain the amount of Tier 4 Final equipment required for the duration of the proposed Project's construction period. As a result, the model may underestimate the Project's construction-related emissions and should not be relied upon to determine Project significance.

Failure to Model All Proposed Land Uses

According to the DEIR, the Project would include "a pedestrian-oriented promenade," parking beneath the podium level, "a surface parking lot," "paving," and "sidewalks" (p. S-3). However, review of the Project's CalEEMod output files demonstrates that these land uses were not included in the model (see excerpt below) (Appendix C, pp. 43).

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	40.00	1000sqft	0.92	40,000.00	0
Research & Development	360.00	1000sqft	8.25	360,000.00	0
Hotel	200.00	Room	0.95	125,000.00	0

As you can see in the excerpt above, the model failed to include any amount of parking lot, pedestrian-oriented promenade, paving, or sidewalks. This is a significant omission, as the land use type and size features are used throughout CalEEMod to determine default variable and emission factors that go into the model's calculations.⁸ The square footage of a land use is used for certain calculations such as determining the wall space to be painted (i.e., VOC emissions from architectural coatings) and volume that is heated or cooled (i.e., energy impacts). Thus, by failing to include the proposed parking,

⁸ "CalEEMod User's Guide." CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/cal-eemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 18.

E35 The land uses identified in the comment do not result in operational emissions. Sidewalks, for example, do not have walls to be covered in architectural coatings or floor area requiring heating, ventilation, and air conditioning (HVAC). Operational emissions as modeled by the Commenter result in the same level of emissions for all pollutants. A detailed review of the Commenter's CalEEMod output reveals an error in the application of mobile source mitigation. As shown therein, the Commenter's modeling results show an increase in mobile source emissions with the application of mitigation. Due to this error, the results prior to the application of reduction measures are used for comparison to the results provided in the EIR. As shown in the table below, comparing emissions without controls from the EIR Air Quality Technical Report to the emissions without controls provided by the Commenter, the operational emissions are consistent.

DAILY OPERATIONAL EMISSIONS COMPARISON						
Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Page 8 of Appendix A of DEIR Appendix C	19	31	87	<0.5	31	9
Comment 61	19	31	87	<0.5	31	9

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E35
cont.

promenade, sidewalk, and paved land uses, the model underestimates the Project's construction and operational emissions and should not be relied upon to determine Project significance.

Failure to Include Total Amount of Grading

According to the DEIR, the proposed Project would include "approximately 11.9 acres" of grading (p. 3-11). Thus, in order to conduct the most conservative analysis, as required by CEQA, the model should have included the full 11.9 acres of grading. However, review of the Project's CalEEMod output files demonstrates that the number of acres of grading were manually reduced to 11.03 acres (see excerpt below) (Appendix C, pp. 46).

E36

Table Name	Column Name	Default Value	New Value
tblGrading	AcresOfGrading	227.50	11.03

As you can see in the excerpt above, the acres of grading were underestimated by 0.87 acres, or approximately 37,897-SF. This presents an issue which results in an underestimation of the Project's construction-related emissions. The CalEEMod User's Guide explains that grading involves the cut and fill of land and is used by the model to calculate fugitive dust emissions associated with dozers, graders, scrapers, and haul trucks.⁹ Thus, by underestimating the acres of grading required for construction of the proposed Project, the model also underestimates the Project's construction-related emissions. As a result, the model should not be relied upon to determine Project significance.

Unsubstantiated Changes to Construction Schedule

Review of the Project's CalEEMod output files demonstrates that the model includes five unsubstantiated changes to several of the Project's default construction phases (see excerpt below) (Appendix C, pp. 46).

E37

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	20.00	86.00
tblConstructionPhase	NumDays	300.00	522.00
tblConstructionPhase	NumDays	30.00	55.00
tblConstructionPhase	NumDays	20.00	44.00
tblConstructionPhase	NumDays	10.00	20.00

As you can see in the excerpt above, the model includes several changes to the anticipated construction period for the proposed Project. However, these changes are incorrect and unsubstantiated for two reasons.

First, according to the DEIR, demolition and construction of the proposed Project "is anticipated to take approximately three years" (p. 3-11). The DEIR does not indicate or address the length of each phase of construction. However, review of the Project's CalEEMod output files reveals that a construction

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. 31, 33.

E35

(cont.) Regarding construction period emissions, as noted by the Commenter, CalEEMod defaults for schedule and equipment are based on total project acreage. Tables 3.1 and 3.2 of CalEEMod Appendix D, Default Data Tables, list the default equipment and construction schedule assumed within the model based on site acreage. As described in Chapter 3 of the EIR, the project would disturb 11.9 acres of the previously developed 13.9-acre project site. The land uses modeled in EIR Appendix C add up to a total of 10.13 acres. All project specific acreages fall within the 10- to 15-acre project size bin identified in CalEEMod Appendix D. Therefore, even with the exclusion of the sidewalks and promenade, any CalEEMod defaults maintained through the analysis are consistent based on the site acreage.

E36

Refer to the response to Comment E9 regarding the extent of project grading.

E37

Refer to the response to Comment E3 regarding the project construction schedule.

schedule of 3 years, four months, and 15 days was included in the model, with changes to five of the seven phases (see excerpt below) (Appendix C, pp. 51).

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Underground Utilities	Trenching	9/1/2020	2/26/2021	5	129	
2	Demolition	Demolition	2/1/2021	2/26/2021	5	20	
3	Site Preparation	Site Preparation	2/1/2021	2/26/2021	5	20	
4	Grading	Grading	5/1/2021	7/16/2021	5	55	
5	Building Construction	Building Construction	7/19/2021	7/18/2023	5	522	
6	Paving	Paving	7/19/2023	9/18/2023	5	44	
7	Architectural Coating	Architectural Coating	9/19/2023	1/16/2024	5	86	

As you can see in the excerpt above, the model assumes that Project construction will begin on September 1, 2020 and end on January 16, 2024, for a total construction period of 3 years, 4 months, and 15 days. This is incorrect, as the model should have included a construction schedule of 3 years, as indicated by the DEIR. In addition, as the DEIR fails to address the length of each individual construction phase, we are unable to verify the individual construction phase lengths included in the CalEEMod model, as well as the overall construction period length. This inconsistency presents an issue, as spreading out construction emissions over a more than 40-month period, rather than a 36-month period as indicated by the DEIR, artificially dilutes the maximum daily emissions associated with construction. Thus, the construction schedule assumed by the model is incorrect and not the most conservative analysis, and as a result, the model may underestimate the Project's construction-related emissions.

Second, as previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.¹⁰ However, while the Air Quality Technical Report provides a tentative construction schedule, the source provided for this schedule is the Project's own CalEEMod model (see excerpt below) (Appendix C, p. 11).

Table 5
ANTICIPATED CONSTRUCTION SCHEDULE

Construction Activity	Construction Period		
	Start	End	Number of Working Days
Underground Utilities	9/1/2020	2/26/2021	129
Demolition	2/1/2021	2/26/2021	20
Site Preparation	2/1/2021	2/26/2021	20
Grading	5/1/2021	7/16/2021	55
Building Construction	7/19/2021	7/18/2023	522
Paving	7/19/2023	9/18/2023	44
Architectural Coating	9/19/2023	1/16/2024	86

Source: CalEEMod (output data is provided in Appendix A)

As you can see in the excerpt above, the source provided for the anticipated construction schedule is the Project's own CalEEMod output file. This reference to itself does not provide substantial evidence of

¹⁰ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9.

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E37
cont.

an accurate construction schedule, as the DEIR and Project documents should substantiate the construction schedule inputted into the model, not vice versa. The DEIR reference documents provided by the City also do not contain any evidence supporting the DEIR's reliance on this construction schedule. Thus, we are unable to verify the extended construction schedule provided in the CalEEMod model and Air Quality Technical Report, as it is inconsistent with the information provided in the DEIR. This presents an issue, as spreading out construction emissions over a longer period than is expected results in an underestimation of the maximum daily emissions associated with construction. In addition, while the DEIR addresses the overall construction schedule, the specific changes to each phase are unsubstantiated. As a result, the model may underestimate the Project's construction-related emissions and should not be relied upon to determine Project significance.

Unsubstantiated Changes to Off-Road Construction Equipment Unit Amounts

Review of the Project's CalEEMod output files demonstrates that several of the off-road construction equipment unit amounts were changed in the model (see excerpt below) (Appendix C, pp. 46, 47).

E38

Table Name	Column Name	Default Value	New Value
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00

As you can see in the excerpt above, the unit amounts of 9 types of off-road construction equipment were manually altered. As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.¹¹ According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "Construction equipment list provided by applicant" (Appendix C, pp. 44). However, while the Air Quality Technical Report provides a construction equipment list, the source provided for this equipment list is the Project's own CalEEMod model (see excerpt below) (Appendix C, p. 10).

¹¹ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9.

E38 Refer to the response to Comment E11 regarding anticipated project construction equipment.

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Table 4
CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Phase	Equipment	Number
Demolition	Excavator	2
	Concrete/Industrial Saw	1
	Rubber Tired Loader	1
	Off-highway Truck	2
Site Preparation	Rubber Tired Dozer	4
	Tractor/Loader/Backhoe	4
Grading	Excavator	1
	Grader	1
	Rubber Tired Dozer	1
	Tractors/Loaders/Backhoe	3
	Scraper	3
	Off-highway Truck	2
Underground Utilities	Tractors/Loaders/Backhoe	2
	Crane	1
Building Construction	Excavator (for soil drill)	1
	Rough Terrain Forklift	4
	Generator Set	2
	Tractors/Loaders/Backhoe	3
	Welder	3
	Off-highway Truck (cement truck)	2
	Paver	2
Paving	Paving Equipment	2
	Roller	2
Architectural Coating	Air Compressor	1

Source: CalEEMod (output data, including equipment horsepower, is provided in Appendix A)

As you can see in the excerpt above, the source provided for the anticipated construction equipment list is the Project's own CalEEMod output file. Furthermore, the DEIR, associated appendices, and reference documents fail to mention or justify this revised construction equipment list. This is incorrect, as the Project documents should substantiate the construction equipment list inputted into the model, not vice versa. Furthermore, the DEIR fails to mention or justify these changes. As a result, we cannot verify the altered construction equipment list, and the model may underestimate the Project's construction-related emissions.

Unsubstantiated Application of Construction-Related Mitigation Measures

Review of the Project's CalEEMod output files demonstrates that the model included the following construction-related mitigation measures: "Water Exposed Area," "Water Unpaved Roads," and "Reduce Vehicle Speed on Unpaved Roads" (see excerpt below) (Appendix C, pp. 53).

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

Additionally, the model included a 12% soil moisture content as a result of "Water Exposed Area" and a reduced vehicle speed of 15 MPH (see excerpt below) (Appendix C, pp. 45).

E39 Refer to the response to Comment E12 regarding implementation of Rule 55. The 12 percent soil moisture content was conservatively assumed based on guidance contained within the South Coast Air Quality Management District CEQA Air Quality Analysis Handbook. As detailed in Table A9-9-F-2 of the Handbook, a moisture content of 15 percent is considered "moist."

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15

The CalEEMod User's Guide requires any changes to model defaults be justified.¹² According to the "User Entered Comments & Non-Default Data" table in the DEIR's model, the justification provided for these changes is: "Dust BMPs" (Appendix C, pp. 44). The DEIR states that modeling included "relevant dust control measures in accordance with SDAPCD Rule 55" (Appendix C, pp. 335). However, review of SDAPCD Rule 55 demonstrates that the specific dust-control measures included in the CalEEMod modeling are not expressly required by the Rule. Specifically, Rule 55(d) states,

"(1) **Airborne Dust Beyond the Property Line:** No person shall engage in construction or demolition activity subject to this rule in a manner that discharges visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60 minute period.

(2) **Track-Out/Carry-Out:** Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall:

(i) be minimized by the use of any of the following or equally effective trackout/carry-out and erosion control measures that apply to the project or operation: track-out grates or gravel beds at each egress point, wheel-washing at each egress during muddy conditions, soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; and for outbound transport trucks: using secured tarps or cargo covering, watering, or treating of transported material; and

(ii) be removed at the conclusion of each work day when active operations cease, or every 24 hours for continuous operations. If a street sweeper is used to remove any track-out/carry-out, only PM10-efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances" (emphasis added).¹³

As you can see in the excerpt above, while Rule 55 generally prohibits discharge of visible construction dust emissions beyond the property line, it does not specify any required methods to comply with this requirement. Furthermore, while watering is mentioned, Rule 55 does not expressly require it. Thus, Rule 55 therefore does not expressly *require* any of the dust control mitigation measures included in the CalEEMod model. Additionally, the MMRP does not include any binding mitigation requiring these measures to be implemented, nor does the DEIR provide any discussion or supporting evidence

¹² CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9.

¹³ "Rule 55 Fugitive Dust Control." SDAPCD, June 2009, available at: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Prohibitions/APCD_R55.pdf.

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cont.

demonstrating that these measures will be used for the Project. Furthermore, the DEIR fails to demonstrate that, if implemented and enforced, these measures would effectively reduce construction-related dust emissions to a level that is below the SDAPCD threshold. The mitigation measures identified in the CalEEMod modeling also do not address the roadway dust requirements of Rule 55(d)(2). Thus, the DEIR's reliance on implementation of the mitigation measures identified in Section 3.1 of the Air Quality Technical Report is unsupported, and its conclusion that these measures will be effective at reducing the Project's fugitive dust emissions, is unsubstantiated in the model.

Furthermore, the Air Quality Technical Report states:

"Construction emission calculations presented herein assume the implementation of standard dust control measures listed in Section 1.3, including watering two times daily during grading, ensuring that all exposed surfaces maintain a minimum soil moisture of 12 percent, and limiting vehicle speeds on unpaved roads to 15 mph" (p. 11).

However, as with the other dust-control measures discussed above, the Project cannot simply assume that these measures will be included without demonstrating a binding commitment to implementation, monitoring, and enforcement on the Project site. In addition, the Project fails to provide calculations or an explanation for the 12 percent soil moisture assumption. Finally, these measures are not included in the DEIR's MMMP and thus, we cannot verify that these measures will be implemented, monitored, and enforced. As a result, we cannot verify the inclusion of these measures, and the model may underestimate the Project's construction-related emissions.

Unsubstantiated Application of Water-Related Operational Mitigation Measure

Review of the Project's CalEEMod output files demonstrates that the model included the following water-related operational mitigation measure: "Apply Water Conservation Strategy" (see excerpt below) (Appendix C, pp. 80).

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

However, the DEIR fails to demonstrate consistency with this measure. According to the CalEEMod User's Guide, the inclusion of operational mitigation measures in the model is based on CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* document. Specifically, the CalEEMod User's Guide states,

"The mitigation measures included in CalEEMod are largely based on the CAPCOA Quantifying Greenhouse Gas Mitigation Measures (<http://www.capcoa.org/wp-content/uploads/downloads/2010/09/CAPCOA-Quantification-Report-9-14-Final.pdf>) document. The CAPCOA measure numbers are provided next to the mitigation measures in

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The California Energy Commission's 2006 Refining Estimates of Water-Related Energy Use in California defines average energy values for water in Southern California. These values are used in CalEEMod to establish default water-related emission factors. The 2010 CALGreen Code established chapters for residential and nonresidential mandatory measures, including a 20 percent reduction of water use. The 2013 CALGreen Code clarified and expanded a number of requirements that included nonresidential additions and alterations. Application of mitigation in CalEEMod is in response to these CALGreen requirements. CalEEMod default data sources predate CALGreen requirements for a 20 percent reduction in water consumption. The City's program achieving savings of "as much as 20 percent" is separate and not accounted for in the modeling. As such, the assumptions contained within CalEEMod are conservative as the Project would comply with the City's program, resulting in a greater reduction to water consumption.

CalEEMod to assist the user in understanding each measure by referencing back to the CAPCOA document.”¹⁴

However, the DEIR fails to demonstrate consistency with the “Apply Water Conservation Strategy” mitigation measure included in the model as described in CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* document (see table below).

Measure	Consistency
CAPCOA’s Quantifying Greenhouse Gas Mitigation Measures¹⁵	
Water Measures	
Measure WUW-2 Apply Water Conservation Strategy <i>“This mitigation measure describes how to calculate GHG emissions reductions from a Water Conservation Strategy which achieves X% reduction in water use (where X% is the specific percentage reduction in water use committed to by the Project Applicant). The steps taken to achieve this X% reduction in water use can vary in nature and may incorporate technologies which have not yet been established at the time this document was written. In order to take credit for this mitigation measure, the Project Applicant would need to provide detailed and substantial evidence supporting the percent reduction in water use.”</i> GHG emission reduction = PercentReduction, where: GHG emission reduction = % reduction in GHG emissions for water use PercentReduction = Expected percent reduction in water use after implementation of Water Conservation Strategy	Here, the “User Entered Comments & Non-Default Data” table attempts to justify reliance on this measure by stating: “CalGreen requirements” (Appendix C, pp. 44). Additionally, the DEIR states that “[t]he Project would implement a water conservation strategy that would reduce water consumption by 20 percent” (p. 5.5-11, Table 5.5-1). The DEIR discusses the City of San Diego Public Utilities District’s Water Conservation Program and states that “[d]epending on conditions, these savings can account for as much as 20 percent of raw water purchases annually” (emphasis added) (5.11-3). However, this does not provide substantial evidence, as required by Measure WUW-2, demonstrating that compliance with the Conservation Program will result in the full 20 percent reduction relied upon in the DEIR. Just because the <i>City’s</i> program <i>could</i> account for as much as 20 percent savings does not guarantee that the proposed Project will implement any project-level measures or, if it does, that the Project would achieve the maximum 20% reduction. The DEIR also lacks the detail required by Measure WUW-2 because

¹⁴ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: <http://www.caleemod.com/>, p. 53.

¹⁵ “Quantifying Greenhouse Gas Mitigation Measures.” CAPCOA, August 2010, available at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

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cont.

it fails to include the calculations for this reduction at the city- or project-level. Finally, these measures were not included in the DEIR's MMRP. Thus, we cannot verify that the proposed Project will implement, monitor, or enforce the water conservation strategy assumed in the modeling, nor that compliance with the strategy would reduce water consumption by 20 percent.

As you can see in the table above, the DEIR fails to justify the inclusion of the "Apply Water Conservation Strategy" mitigation measure as described by the CalEEMod User's Guide and CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* document. As a result, the inclusion of this measure in the model is unsubstantiated and the model should not be relied upon to determine Project significance.

Updated Analysis Indicates Significant Pollutant Emissions

In an effort to accurately determine the proposed Project's construction and operational emissions, we prepared an updated CalEEMod model that includes more site-specific information and correct input parameters, as provided by the DEIR. In the updated model, we included the proposed parking land use and amount of grading, left the default construction schedule and equipment list, as well as omitted the unsubstantiated number of new trees, water-related operational mitigation measure, and construction mitigation measures from the model. While we do not know the specific size of the proposed promenade, sidewalk, and paved land uses, as they were not included in the DEIR, these should be included in an updated CalEEMod model once disclosed.

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When correct, site-specific input parameters are used to model emissions, we find that the Project's construction-related NO_x emissions increase when compared to the DEIR's model and exceed the 250 pounds per day ("lbs/day") threshold set by the SDAPCD (see table below).¹⁶

Maximum Daily Construction Emissions (lbs/day)	
Model	NO _x
DEIR	169
SWAPE	268
Percent Increase	59%
SCAQMD Regional Threshold (lbs/day)	250
Threshold Exceeded?	Yes

When correct input parameters are used to model the Project's emissions, construction-related NO_x emissions increase by approximately 59% and exceed the SDAPCD threshold of 250 lbs/day. Our

¹⁶ "California Environmental Quality Act Significance Determination Thresholds." City of San Diego, July 2016, available at: https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf, p. 9, Table A-2.

E41 The modeling completed by the Commenter is not accurate. Refer to the response to Comment E13 regarding the modeled size of the parking area. Discrepancies are detailed in the responses to Comments E8 and E34 through E40. As shown in Appendix A of EIR Appendix C, the use of Tier 4 equipment reduced construction period emissions of oxides of nitrogen (NO_x) by more than 20 percent. The analysis presented by the Commenter shows a value that exceeds the threshold by just seven percent. It can, therefore, be concluded that even with the conservative assumptions made by the Commenter in the revised CalEEMod run, with just the application of Tier 4 Final equipment, which is incorporated into the Project Description in Section 3.3 of the draft EIR and would be a condition of project approval, all emissions would be less than the thresholds.

Refer to response to Comment E15 regarding cumulative impacts.

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updated model demonstrates that when the Project's emissions are estimated correctly, the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the DEIR.

This is also a significant cumulative air quality impact. The Project's NO_x emissions of 268 lbs/day exceed the SDAPCD significance threshold of 250 lbs/day. NO_x is an ozone precursor which the DEIR acknowledges causes particularly significant air quality problems in the San Diego Air Basin ("SDAB") due to the areas marine layer and temperature inversions (p. 5.4-1 & 5.4-12). The SDAB is currently in non-attainment for ozone under both the federal NAAQS and California CAAQS (p. 5.4-4). The Project would therefore result in a "cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard" (p. 5.4-9, Impact 2: Criteria Pollutant Emissions). This is a cumulative impact under CEQA.

A revised DEIR should be prepared and recirculated to include an updated air pollution model to adequately estimate the Project's construction and operational emissions, disclose the severity of the Project's individual and cumulative criteria pollutant impacts, and incorporate mitigation to reduce these emissions to a less than significant level.¹⁷

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

The DEIR concludes that the Project's construction and operational health risk impacts would be less than significant without conducting a quantified construction or operational health risk assessment ("HRA") (Appendix C, p. 19, 20). In an attempt to justify the omission of a construction HRA, the DEIR states:

"There would be relatively few pieces of off-road, heavy-duty diesel equipment used during construction, and the construction period would be relatively short, especially when compared to 30 years. Combined with the highly dispersive properties of diesel PM and additional reductions in exhaust emissions from improved equipment (as detailed under Section 1.3), construction-related emissions would not expose sensitive receptors to substantial emissions of TACs. Impacts from construction emissions would be less than significant" (Appendix C, p. 19).

Regarding the omission of an operational HRA, the DEIR states:

"[T]he project does not warrant a HRA and the proposed project uses would not generate substantial TACs during long-term operations" (Appendix C, p. 20).

However, these justifications and subsequent less than significant impact findings are incorrect for four reasons.

First, the DEIR's unsupported claims that Project construction would require "relatively few pieces of off-road, heavy-duty diesel equipment," that "construction would be relatively short," that diesel PM has "highly dispersive properties," and the Project would include "additional reductions in exhaust

¹⁷ See section titled "Feasible Mitigation Measures Available to Reduce Construction Emissions" on p. 35 of this comment letter. These measures would effectively reduce construction-related NO_x emissions.

E42 Refer to response to Comments E14 and E43 regarding the EIR's proper assessment of health risk impacts.

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emissions from improved equipment,” do not justify the omission of a quantified analysis of the Project’s construction emissions. Without quantified evidence to support the DEIR’s claims that Project construction will result in less than significant health risk impacts from toxic air contaminants, the DEIR’s significance determination is unsupported and should not be relied upon.

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Second, the omission of a quantified construction HRA is inconsistent with the most recent guidance published by the Office of Environmental Health Hazard Assessment (“OEHHA”), the organization responsible for providing guidance on conducting HRAs in California, which is recommended by the SDAPCD.¹⁸ In February of 2015, OEHHA released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments*.¹⁹ This guidance document describes the types of projects that warrant the preparation of an HRA. Construction of the Project will produce emissions of DPM, a human carcinogen, through the exhaust stacks of construction equipment over a construction period of approximately 3-years (p. 3-11). The OEHHA document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors.²⁰ As the Project’s proposed 3-year construction duration vastly exceeds the 2-month requirement set forth by OEHHA, it is clear that the Project meets the threshold requiring a quantified HRA under OEHHA guidance. We also recommend that health risk impacts from Project construction be evaluated in a revised DEIR, per the OEHHA guidelines, in order to determine the nature and extent of the Project’s health risk impacts.

Third, the DEIR’s claim that “the proposed project uses would not generate substantial TACs” is an unsupported conclusion that does not justify the omission of a quantified operational HRA. Without evidence to support this claim and to demonstrate how the Project would result in less than significant impacts, we are unable to verify the DEIR’s conclusion and impacts may actually be significant. In particular, the Traffic Impact Analysis (“TIA”) indicates that operation of the proposed Project would generate 4,981 daily vehicle trips, which will generate additional exhaust emissions and continue to expose nearby sensitive receptors to DPM emissions (Appendix B, p. 45, Table 8-1). The OEHHA document recommends that exposure from projects lasting more than 6 months be evaluated for the duration of the project, and recommends that an exposure duration of 30 years be used to estimate

¹⁸ The DEIR adopts the significance thresholds set forth in SDAPCD Rule 20.2 (New Source Review (NSR)-Non-Major Stationary Sources) and Rule 1210 (Toxic Air Contaminant Public Health Risks-Public Notification and Risk Reduction). See DEIR, p. 5.4-10, Table 5.4-4; DEIR Appendix C, p. 13, Table 6. Rule 1210 adopts OEHHA’s health risk assessment guidelines for Toxic Air Contaminants. See Rule 1210(c)(18), available at:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwihuoLzp8jpAhVNu54KHbfMAwQQFIAAegQIARAB&url=https%3A%2F%2Fwww.sandiegocounty.gov%2Fcontent%2Fdam%2Fsd%2Fapcd%2Fpdf%2Frules_and_regulations%2FRule_Development-Archive%2F2013%2FR1210-Tables_rev101113.pdf&usq=AOvVaw2W0TulRKw0aORChNCneruH; see also “Supplemental Guidelines for Submission of Rule 1200 Health Risk Assessments (HRAs)” related to health risk assessments conducted under Rule 1210, SDAPCD, July 2019, available at: https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/Toxics_Program/APCD_1200_Supplemental_Guidelines.pdf, p. 1.

¹⁹ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/hotspots2015.html

²⁰ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/2015GuidanceManual.pdf, p. 8-18

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This comment suggests that the air quality analyses are inconsistent with Office of Environmental Health Hazard Assessment (OEHHA) recommendations for technical review of both construction and operations. It is noted that the Commenter’s concern over potential impacts is based on an AERSCREEN model. The purpose of the AERSCREEN model is to screen for the possibility of a potential impact. Using this approach to assess project-specific impacts is inferior to the detailed air quality modeling conducted in support of the EIR, for a number of reasons as described below.

First, there are issues regarding the conservative nature of the model itself. The AERSCREEN model is widely acknowledged (including by the US Environmental Protection Agency in <https://www.epa.gov/scram/air-quality-dispersion-modeling-screening-models>) as being conservative and is generally used to determine whether refined modeling is needed. AERSCREEN does not account for spatial relation, geography, or local meteorology. It looks at a hypothetical sensitive receptor and assesses the impact as if that receptor is directly downwind of the source. Rather than using project-specific geographical source and receptor locations (both of which are critical in assessing real potential impact), it simply takes the worst-case emissions information (regardless of where it would be generated on site and whether it would move over time)—and assumes that there is a receptor downwind, regardless of whether airflow actually goes in that direction. In this case, the nearest sensitive receptors are not downwind. As shown in windrose data available cited within Section 5.4 of the EIR (http://mesonet.agron.iastate.edu/sites/windrose.phtml?station=NKX&network=CA_ASOS), wind in the area primarily blows from the west-northwest. The nearest sensitive receptors are northwest (upwind) of the project site. For these reasons, the AERSCREEN run completed in support of the comment overestimates the potential concentration of toxic air contaminants (TACs) and, therefore, the corresponding health risk values.

Furthermore, though OEHHA’s guidance recommends evaluation of short-term projects, that guidance supports health risk assessments (HRAs) written for the purpose of Assembly Bill 2588 inventories and focuses on stationary sources associated with facilities such as automobile body shops, gasoline service stations, power plants, or treatment facilities. Any given construction activity resulting in emissions would occur on a portion of the over 11-acre site for a relatively

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individual cancer risk for the maximally exposed individual resident ("MEIR").²¹ Even though we were not provided with the expected lifetime of the Project, we can reasonably assume that the Project will operate for at least 30 years, if not more. Therefore, we recommend that health risk impacts from Project operation also be evaluated in a revised DEIR, as the Project's reasonably foreseeable 30-year exposure duration vastly exceeds the 6-month requirement set forth by OEHHA. This recommendation reflects the most recent state and SDAPCD health risk policies. As such, we recommend that an assessment of health risks to nearby sensitive receptors from Project operation be included in a revised EIR for the Project.

Fourth, by claiming a less than significant impact without conducting a quantified HRA to disclose the exposure levels to nearby, existing sensitive receptors as a result of Project construction and operation, the DEIR fails to compare the excess health risk to the SDAPCD's specific numeric threshold of 1 in one million.²² Thus, the DEIR cannot conclude less than significant health risk impacts resulting from Project construction and operation without quantifying emissions to compare to the proper threshold.

Screening-Level Analysis Demonstrates Significant Impacts

In an effort to demonstrate the potential health risk posed by Project construction and operation to nearby, existing sensitive receptors, we prepared a simple screening-level HRA. The results of our assessment, as described below, demonstrate that the proposed Project will have a significant impact.

In order to conduct our screening-level risk assessment we relied upon AERSCREEN, which is a screening level air quality dispersion model.²³ The model replaced SCREEN3, and AERSCREEN is included in the

²¹ "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf, p. 8-6, 8-15

²² As indicated by the DEIR, the SDAPCD's Excess Cancer Risk threshold is one "1 in 1 million" for development projects, and "10 in 1 million" for projects utilizing T-BACT (see DEIR, p. 5.4-10, Table 5.4-4; DEIR Appendix C, p. 13, Table 6). Toxics Best Available Control Technology (T-BACT) is defined as "the most effective emission limitation or emission control device or control technique which: (i) has been achieved in practice for that source or category of source; or (ii) is any other emissions limitation or control technique, including process and equipment changes of basic and control equipment and implementation of pollution prevention measures, found by the Air Pollution Control Officer to be technologically feasible for that source or category of source, or for a specific source. If there is an applicable MACT standard, the Air Pollution Control Officer shall evaluate it for equivalency with T-BACT." See SDAPCD Rule 1200(c)(24), available at:

https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Toxic_Air_Cotaminants/AP_CD_R1200.pdf;

T-BACT can include diesel particulate filters, catalytic converters and selective catalytic reduction technology. See "County Of San Diego Guidelines For Determining Significance And Report Format And Content Requirements, Section 4.4," available at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf>.

However, since the DEIR fails to include a binding requirement to use DPM control equipment for the Project, and fails to specify which kind of DPM control equipment would be used, as discussed above, the DEIR lacks evidence to support use of the 10-in-1-million threshold, which requires the use of T-BACT.

²³ U.S. EPA (April 2011) AERSCREEN Released as the EPA Recommended Screening Model, http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf

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(cont.) short duration. For instance, a grader may be operating adjacent to the property line nearest the sensitive receptors to the northwest on one day, but the next it could be on the other side of the site. These are not stationary sources. OEHHA's guidance recognizes, "The local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste remediation." The analysis contained within the EIR and Air Quality Technical Report are not intended to support permitting decisions by the local air district.

There are also issues associated with the information entered into the AERSCREEN model by the Commenter. For instance, the screening modeling undertaken by the Commenter appears to have modeled both on- and off-site exhaust particulate matter 10 microns or less in diameter (PM₁₀) emissions as occurring on the project site. This has the effect of overestimating emissions that would be generated from the project site and would therefore resulting in increased concentrations at the downwind sensitive receptor. Not only would the off-site PM₁₀ exhaust emissions occur farther away from the site itself, and therefore the receptors in question, but the analysis also characterizes all exhaust PM₁₀ emissions as being emitted from diesel vehicles. This is inaccurate in terms of vehicular mix as all of the construction-period PM₁₀ would not stem from diesel fuel burning sources. This has resulted in an overestimation of diesel particulate matter (DPM) emissions. The Commenter's analysis also removed the use of Tier 4 compliant offroad equipment which, as detailed in response to Comment E34, would be implemented by the Project. These input errors result in model output that is not accurate and is inapplicable to the Project.

Regardless, even when all these overly conservative and inaccurate inputs are included into the screening model, they do not meet the threshold that would require further, more detailed, construction-period HRA modeling. This is not immediately apparent in the comment as the data need to be taken from the table titled "The Maximally Exposed Individual at an Existing Residential Receptor." Looking at each of the items identified as occurring during construction and summing them together, a total is reached (5.4E-06). This is then multiplied by 1,000,000 to get the risk per million. Based on the comment letter, this would equate to a 5.4 in a million cancer risk. Also as stated in the letter, the threshold for requiring more detailed analysis is 10 in a million cancer risk for Projects that implement Toxics Best Available Control Technology, such as the Project's use of a construction fleet equipped with diesel catalytic converters, diesel oxidation catalysts, and/or diesel particulate filters, as documented in draft EIR Section 3.3. In other words, even assuming that:

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OEHHA²⁴ and the California Air Pollution Control Officers Associated (CAPCOA)²⁵ guidance as the appropriate air dispersion model for Level 2 health risk screening assessments ("HRSAs"). A Level 2 HRA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.

We prepared a preliminary HRA of the Project's health-related impact to sensitive receptors using the annual PM₁₀ exhaust estimates from SWAPE's annual CalEEMod output files. Using Google Earth, we found that the closest sensitive receptor is located approximately 30 meters west of the Project site. Consistent with recommendations set forth by OEHHA, we used a residential exposure duration of 30 years, starting from the 3rd trimester stage of life. We also assumed that construction and operation of the Project would occur in quick succession, with no gaps between each Project phase. The SWAPE annual CalEEMod model's annual emissions indicate that construction activities will generate approximately 356 pounds of DPM. As a result of our comment regarding the DEIR CalEEMod model's unsubstantiated construction schedule, we relied on the CalEEMod default value of an 846-day construction period. The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project construction, we calculated an average DPM emission rate by the following equation.

$$\text{Emission Rate } \left(\frac{\text{grams}}{\text{second}} \right) = \frac{356 \text{ lbs}}{846 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = 0.002209 \text{ g/s}$$

Using this equation, we estimated a construction emission rate of 0.002209 grams per second (g/s). The SWAPE annual CalEEMod output files indicate that operational activities will generate approximately 185 pounds of DPM per year over approximately 27.68 years of operation. Applying the same equation used to estimate the construction DPM emission rate, we estimated the following emission rate for Project operation.

$$\text{Emission Rate } \left(\frac{\text{grams}}{\text{second}} \right) = \frac{185.4 \text{ lbs}}{365 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = 0.002667 \text{ g/s}$$

Using this equation, we estimated an operational emission rate of 0.002667 g/s. Construction and operation were simulated as a 13.9-acre rectangular area source in AERSCREEN, with dimensions of 351.5 meters by 160 meters. A release height of three meters was selected to represent the height of stacks of operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

²⁴ Supra, fn 20.

²⁵ CAPCOA (July 2009) Health Risk Assessments for Proposed Land Use Projects, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

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(cont.)

- Every exhaust PM₁₀ emission is a DPM emission;
- Off-site emissions are occurring on site;
- Construction emission sources are aligned along the site border and remain there as stationary sources; and
- Airflow moves from the Project toward off-site sensitive receptors as opposed to sensitive receptors being upwind of the Project site,

the Commenter's construction modeling does not support need for additional modeling. As such, the EIR appropriately concludes that construction-related health risks (here specifically cancer health risks) would be less than significant.

Relative to operations, the City agrees that Project operations would exceed two months and understands the OEHHA recommendation that an exposure duration of 30 years be evaluated. As an introduction to this discussion, it is necessary to point out that the Project does not propose any major sources of TACs.

The same caveats apply relative to the screening modeling assumptions completed by the Commenter. In this instance, the overestimation of DPM emissions is even more glaring as vehicular mix for operational PM₁₀ contains a relatively small percentage of diesel vehicles (4.2 percent based on EMFAC's vehicle populations for the County). This has resulted in a notable overestimation of DPM emissions. Finally, it is noted that the primary source of exhaust PM₁₀ would be mobile in nature. Most of these emissions would occur during off-site travel and therefore, should not be included in an HRA analyzing on-site emissions exposure to off-site receptors. Specific to the Project, other source locations would include water heaters and furnaces; but those sources are not considered substantial by CARB, CAPCOA, or OEHHA. Even area sources such as landscape maintenance equipment are ordinarily gasoline (rather than diesel) fired. As such, there is no need for additional modeling.

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cont.

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project Site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant to be estimated by multiplying the single-hour concentration by 10%.²⁶ As previously stated, the closest residential receptors are located approximately 30 meters from the Project site. However, review of the AERSCREEN output files demonstrates that the *maximally* exposed residential receptor is located 175 meters from the Project site. The single-hour concentration estimated by AERSCREEN for Project construction is approximately 1.55 µg/m³ DPM at approximately 175 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.155 µg/m³ for Project construction at the MEIR. For Project operation, the single-hour concentration at the MEIR estimated by AERSCREEN is approximately 1.871 µg/m³ DPM at approximately 175 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.1871 µg/m³ for Project operation at the MEIR.

We calculated the excess cancer risk to the MEIR using applicable HRA methodologies prescribed by updated OEHHa guidance from 2015, as recommended by SDAPCD.²⁷ Consistent with an 846-day construction schedule, the annualized average concentration for construction was used for the entire third trimester of pregnancy (0.25 years), the entire infantile stage of life (0 – 2 years), and the first 0.07 years of the child stages of life (2 – 16 years). The annualized average concentration for operation was used for the remainder of the 30-year exposure period, which makes up the remainder of the child stages of life (2 – 16 years) and entire adult stage of life (16 – 30 years).

Consistent with OEHHa, Southern California Air Quality Management District (“SCAQMD”), Bay Area Air Quality Management District (“BAAQMD”), and San Joaquin Valley Unified Air Pollution Control District (“SJVAPCD”) guidance, we used Age Sensitivity Factors (“ASFs”) to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution.^{28, 29, 30, 31} According to the most updated guidance, quantified cancer risk should be multiplied by a factor of ten during the third trimester of pregnancy and during the first two years of life (infant). Furthermore, in accordance with

²⁶ U.S. EPA (October 1992) Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised, http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf.

²⁷ “Supplemental Guidelines for Submission of Rule 1200 Health Risk Assessments (HRAs).” SDAPCD, July 2019, available at: https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/Toxics_Program/APCD_1200_Supplemental_Guidelines.pdf.

²⁸ OEHHa (Feb 2015) Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments, <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>.

²⁹ SCAQMD (March 2019) Draft Environmental Impact Report (DEIR) for the Proposed The Exchange (SCH No. 2018071058), p. 4, <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2019/march/RVC190115-03.pdf?sfvrsn=8>.

³⁰ BAAQMD (May 2017) California Environmental Quality Act Air Quality Guidelines, p. 56, http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en; see also BAAQMD (May 2011) Recommended Methods for Screening and Modeling Local Risks and Hazards, p. 65, 86, <http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx>.

³¹ SJVAPCD (May 2015) Update to District’s Risk Management Policy to Address OEHHa’s Revised Risk Assessment Guidance Document, p. 8, 20, 24, <https://www.valleyair.org/busind/pto/staff-report-5-28-15.pdf>.

guidance set forth by OEHHA, we used the 95th percentile breathing rates for infants.³² Finally, consistent with OEHHA guidance, we used a Fraction of Time At Home ("FAH") Value of 1 for the 3rd trimester and infant receptors.³³ We used a cancer potency factor of 1.1 (mg/kg-day)⁻¹ and an averaging time of 25,550 days. The results of our calculations are shown in the tables below.

The Maximally Exposed Individual at an Existing Residential Receptor						
Activity	Duration (years)	Concentration (ug/m3)	Breathing Rate (L/kg-day)	Cancer Risk without ASFs*	ASF	Cancer Risk with ASFs*
Construction	0.25	0.155	361	2.1E-07	10	2.1E-06
3rd Trimester Duration	0.25			2.1E-07	3rd Trimester Exposure	2.1E-06
Construction	2.00	0.155	1090	5.1E-06	10	5.1E-05
Infant Exposure Duration	2.00			5.1E-06	Infant Exposure	5.1E-05
Construction	0.07	0.155	572	9.1E-08	3	2.7E-07
Operation	13.93	0.1871	572	2.2E-05	3	6.7E-05
Child Exposure Duration	14.00			2.2E-05	Child Exposure	6.7E-05
Operation	14.00	0.1871	261	7.5E-06	1	7.5E-06
Adult Exposure Duration	14.00			7.5E-06	Adult Exposure	7.5E-06
Lifetime Exposure Duration	30.00			3.5E-05	Lifetime Exposure	1.3E-04

* We, along with CARB and SCAQMD, recommend using the more updated and health protective 2015 OEHHA guidance, which includes ASFs.

As demonstrated in the table above, the excess cancer risk to adults, children, infants, and during the 3rd trimester of pregnancy at the MEIR located approximately 175 meters away, over the course of Project construction and operation, utilizing age sensitivity factors, are approximately 7.5, 68, 51, and 2.1 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), utilizing age sensitivity factors, is approximately 130 in one million. The infant, child, adult, and lifetime operational cancer risks, using age sensitivity factors, all exceed the SDAPCD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the

³² SCAQMD (Jun 2015) Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics 'Hot Spots' Information and Assessment Act, p. 19, <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588-risk-assessment-guidelines.pdf?sfvrsn=6>; see also OEHHA (Feb 2015) Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments, <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>.

³³ SCAQMD (Aug 2017) Risk Assessment Procedures for Rules 1401, 1401.1, and 212, p. 7, http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf.

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DEIR.³⁴ Utilizing age sensitivity factors is the most conservative, health-protective analysis according to the most recent guidance by OEHHA. Results without age sensitivity factors are presented in the table above, although we **do not** recommend utilizing these values for health risk analysis. Regardless, the excess cancer risk posed to adults, children, infants, and during the third trimester of pregnancy at the MEIR, located approximately 175 meters away, over the course of Project construction and operation, without age sensitivity factors, are approximately 7.5, 23, 5.1, and 0.21 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years) at the MEIR, without age sensitivity factors, is approximately 35 in one million. The child and lifetime construction and operational cancer risks, using age sensitivity factors, all exceed the SDAPCD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the DEIR.³⁵ While we recommend the use of age sensitivity factors, health risk impacts exceed the SDAPCD threshold regardless.

An agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. Our analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection. The purpose of the screening-level construction and operational HRA shown above is to demonstrate the link between the proposed Project's emissions and the potential health risk. Our screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used. Therefore, since our screening-level construction HRA indicates a potentially significant impact, an updated CEQA analysis should include a reasonable effort to connect the Project's air quality emissions and the potential health risks posed to nearby receptors. Thus, further CEQA analysis should include a quantified air pollution model as well as an updated, quantified refined health risk assessment which adequately and accurately evaluates health risk impacts associated with both Project construction and operation.

Greenhouse Gas

Failure to Adequately Evaluate the Project's Greenhouse Gas Impacts

The DEIR concludes that the Project's greenhouse gas ("GHG") impact would be less than significant based on the Project's consistency with the City of San Diego Climate Action Plan ("CAP") and the Conservation Element of the City of San Diego General Plan. The DEIR includes a CAP Consistency Checklist in Appendix D.

In regard to the CAP, the DEIR states:

³⁴ "Rule 1210. Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction." SDAPCD, May 2019, available at: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Toxic_Air_Cotaminants/APCD_R1210.pdf, p. 4.

³⁵ "Rule 1210. Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction." SDAPCD, May 2019, available at: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Toxic_Air_Cotaminants/APCD_R1210.pdf, p. 4.

E44

The Commenter's restatement of information contained in the EIR and summary of comments regarding this analysis are noted. Refer to the responses to individual responses E45 through E55 of this letter addressing the more detailed explanation of these comments.

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"Though the Project would not be consistent with the Community Plan's land use and development intensity, it is located within a Transit Priority Area and would implement CAP Strategy 3 actions. Furthermore, the Project would implement and be consistent with all seven of the CAP measures identified in Step 2 of the Checklist. Given the aforementioned, the Project would be consistent with the Checklist and, therefore, the CAP, and the Project's incremental contribution to a cumulative GHG emissions effect would not be cumulatively considerable. Impacts to GHG emissions from the Project would be less than significant" (p. 5.5-9).

In regard to the General Plan, the DEIR states:

"The City has also adopted the City General Plan with policies to reduce GHG emissions. The Conservation Element of the General Plan lists City policies to reduce emissions. The Project's consistency with these policies is analyzed in Table 5.5-1, City General Plan Implementation Strategies. As shown in the table, the Project would be consistent with the City's General Plan policies for reducing GHG emissions" (p. 5.5-10).

However, these consistency claims and less than significant impact conclusions are incorrect for two reasons.

- 1) The DEIR fails to demonstrate consistency with the City of San Diego CAP; and
- 2) The DEIR fails to demonstrate consistency with the City's General Plan.

(1) Failure to Demonstrate Consistency with the City of San Diego CAP

The DEIR attempts to claim that the proposed Project is consistent with the City of San Diego CAP, and as a result, the Project would result in less than significant GHG impacts. However, review of the City of San Diego CAP reveals that the proposed Project is inconsistent with numerous measures, including but not limited to those listed below:

E45

City of San Diego Climate Action Plan ("CAP") Checklist ³⁶	
Project Operations	
Reducing Vehicle Miles Traveled	
1a. Reducing Vehicle Miles Traveled	
<p><u>Non-Residential:</u></p> <p>For non-residential projects with anticipated tenant- occupants of 25 or more, will the project achieve a 15% reduction in emissions from commute vehicle miles traveled (VMT), and commit to monitoring and reporting results to demonstrate on-going compliance? VMT reduction may be achieved through a combination of</p>	<p>Here, the proposed Project is non-residential and has anticipated tenant-occupants of 25 or more. As such, the proposed Project should have demonstrated a 15% reduction in emissions from commute VMT and committed to monitoring and reporting results to demonstrate on-going compliance. However, the DEIR fails to substantiate a 15% reduction and fails to demonstrate consistency with this measure. The</p>

³⁶ "Appendix A: Final Climate Action Plan Consistency Review Checklist." County of San Diego Land Use and Environment Group, available at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Roetzhelm/CAP%20Consistency%20Checklist.pdf>.

E45

As indicated in Commenter's Footnote 36, Commenter has referenced the County of San Diego Climate Action Plan Consistency Review Checklist, rather than the City's CAP Consistency Checklist. The Commenter has inaccurately labeled the referenced section of the County's CAP Checklist as City's. The County's Checklist does not apply to comments for which the City is the CEQA Lead Agency. Refer to Appendix D for evaluation of the Project's compliance with the City's CAP through the CAP Consistency Checklist measures. As the Project would be consistent with the requirements of the CAP, impacts would be less than significant, as described in draft EIR Section 5.5, *Greenhouse Gas Emissions*. Also refer to response to Comment D8.

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<p>Transportation Demand Management (TDM) and parking strategies, as long as the 15% reduction can be substantiated.</p> <p>VTM reduction actions though TDM may include, but are not limited to:</p> <ul style="list-style-type: none"> • Telecommuting • Car Sharing • Shuttle Service • Carpools • Vanpools • Bicycle Parking Facilities <p>Transit Subsidies Shared and reduced parking strategies may include, but are not limited to:</p> <ul style="list-style-type: none"> • Shared parking facilities • Carpool/vanpool-only parking spaces • Shuttle facilities • Electric Vehicle-only parking spaces <p>The project may incorporate the measures listed above, and propose additional trip reduction measures, as long as a 15% reduction in emissions from commute VMT can be demonstrated through substantial evidence.</p>	<p>DEIR states that “[t]he Project would further support Transit Oriented Development through creation of multiple new urban public spaces and implementation of a transportation demand management plan” (p. 5.5-9). However, while the DEIR makes this claim, it fails to disclose any specifics of the transportation demand management plan, as required by the CAP. As a result, we are unable to verify that it will be implemented, monitored, and enforced on the Project site. Finally, the DEIR fails to mention or evaluate the feasibility of implementing VMT reductions through a shuttle service and facilities and transit subsidies. While the DEIR does state that the Project would “implement on-site carsharing and/or bikesharing, iCommute, and a parking management plan,” the DEIR fails to elaborate on what these measures will include, the extent of VMT reductions they will achieve, or how they will be implemented, monitored, and enforced on the Project site. Also, by giving the choice between either carsharing and/or bikesharing, we cannot verify that the Project will implement both. As such, the proposed Project is not consistent with this measure of the CAP, and the DEIR lacks substantial evidence to support its CAP consistency determination.</p>
<p>Reduce Outdoor Water Use</p>	
<p><i>6a. Reduce Outdoor Water Use</i></p> <p><u>Residential:</u> Will the project submit a Landscape Document Package that is compliant with the County’s Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current Maximum Applied Water Allowance (MAWA) for outdoor use?</p> <p><u>Non-Residential:</u> Will the project submit a Landscape Document Package that is compliant with the County’s Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current MAWA for outdoor use?</p>	<p>Here, the DEIR fails to mention or indicate that the proposed Project will submit a Landscape Document Package that is compliant with the County’s Water Conservation in Landscaping Ordinance. While the DEIR mentions AB 1881, the Water Conservation in Landscaping Act of 2006, Model Water Efficient Landscaping Ordinance, and City’s Landscaping Regulations, the DEIR fails to mention the County’s Water Conservation in Landscaping Ordinance, as required. Furthermore, the DEIR fails to mention or demonstrate a 40% reduction in current MAWA for outdoor use. Thus, the Project is not consistent with this measure, and the DEIR lacks substantial evidence to support its CAP consistency determination.</p>

As the above tables indicate, the DEIR fails to provide sufficient information and analysis to determine Project consistency with various measures required by the City of San Diego General Plan and City of San Diego CAP. Thus, we cannot verify that the Project is consistent with the General Plan or CAP. As a

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result, we recommend that an updated EIR include further information and analysis in order to conclude consistency for the proposed Project.

(2) Failure to Demonstrate Consistency with the City's General Plan

The DEIR attempts to claim that the proposed Project is consistent with the City of San Diego General Plan's Conservation Element, and as a result, the Project would result in less than significant GHG impacts (p. 5.5-10, Table 5.5-1). According to the DEIR,

"The City has also adopted the City General Plan with policies to reduce GHG emissions. The Conservation Element of the General Plan lists City policies to reduce emissions. The Project's consistency with these policies is analyzed in Table 5.5-1, *City General Plan Implementation Strategies*. As shown in the table, the Project would be consistent with the City's General Plan policies for reducing GHG emissions" (p. 5.5-10).

The DEIR goes on to include a table evaluating the Project's consistency with six manually selected policies included in the general plan (see table below) (p. 5.5-10, Table 5.5-1).

Table 5.5-1 CITY GENERAL PLAN IMPLEMENTATION STRATEGIES	
Policy	Project Consistency
CE A.2: Reduce the City's carbon footprint through improved energy efficiency, land use patterns to reduce vehicular trips, and reduce fuel emissions levels by encouraging alternative transportation.	Consistent. The Project would be built in accordance with Title 24 energy-efficiency standards. In addition, the Project would be built adjacent to a Trolley stop and an existing bus stop to allow for non-vehicular trips to the Project site, and would incorporate transit-supportive land use patterns.
CE A.9: Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible.	Consistent. The Project would utilize recycled construction materials where feasible, with a minimum target of 5 percent and a goal of 10 percent.
CE A.10: Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.	Consistent. Recycling facilities and bins would be provided throughout the building and parking areas in compliance with the City's Storage Ordinance.
CE A.11: Implement sustainable landscape design and maintenance.	Consistent. The Project would use a drought-tolerant plant palette appropriate for U.S. Department of Agriculture Plant Hardiness Zone 10a. The landscaping would be hydrozoned and irrigated with weather-based irrigation systems to comply with the California Model Water Efficient Landscape Ordinance.
CE A.12: Reduce the San Diego Urban Heat Island, through actions such as planting trees and other vegetation to provide shade.	Consistent. The strategic locations of Project trees throughout the Project site would provide shade that would increase pedestrian usability, and would also provide protection for pavement as described in the Urban Forest Management Plan. Palm trees would be replaced with canopy trees to provide increased canopy cover and shade. The number of trees on site would be increased, which would increase carbon sequestration.
CE I.4: Maintain and promote water conservation and waste diversion programs to conserve energy.	Consistent. The Project would implement a water conservation strategy that would reduce water consumption by 20 percent, and would implement waste diversion programs.

E46

E46

Refer to response to Comment E18 regarding analysis of policies that the General Plan identifies as related to climate change. The EIR concludes that impacts related to greenhouse gas emissions and land use policy consistency would be less than significant.

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Thus, as you can see in the excerpts above, the DEIR attempts to claim consistency with the City of San Diego General Plan by evaluating the Project's consistency with six selected policies of the plan. However, this list is incomplete, rendering the DEIR's General Plan consistency analysis incorrect and incomplete.

First, as stated above, "[t]he **Conservation Element** of the General Plan lists City policies to reduce emissions" (emphasis added) (p. 5.5-10). As such, the DEIR evaluates the proposed Project's consistency with the Conservation Element of the General Plan. However, this analysis is incomplete, as the DEIR should have compared the proposed Project to all aspects of the General Plan that reduce GHG emissions. As the DEIR explains, the General Plan's Land Use and Community Planning Element, the Mobility Element, the Urban Design Element, and the Public Facilities, Services and Safety Element also identify GHG reduction and climate change adaptation goals.³⁷ The General Plan's Conservation Element, at Table CE-1, includes a comprehensive list of all General Plan policies related to climate change issues, as follows:³⁸

³⁷ DEIR, p. 5.5-7.

³⁸ "City of San Diego General Plan, Conservation Element." City of San Diego, March 2008, *available at*: <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwif2pi9uMjpAhWBsJ4KHSqWC5wQFIABegQICxAD&url=https%3A%2F%2Fwww.sandiego.gov%2Fsites%2Fdefault%2Ffiles%2Flegacy%2Fenvironmental-services%2Fpdf%2Fenergy%2Fconservation%2520element.pdf&usg=AOvVaw1u98u3QifpPoPXdirJH82K>, p. CE-5 - CE-6, Table CE-1: *Issues Related to Climate Change Addressed in the General Plan*.

TABLE CE-1 Issues Related to Climate Change Addressed in the General Plan

Issues	General Plan Policy		
	Element	Section	Policy
City of Villages Strategy	Conservation	A. Climate Change and Sustainable Development	CE-A.2
		B. Open Space and Landform Preservation	CE-B.1 through CE-B.5
	Land Use and Community Planning	A. City of Villages Strategy	LU-A.1 through LU-A.11
		H. Balanced Communities and Equitable Development	LU-H.6; LU-H.7
		I. Environmental Justice	LU-I.9 through LU-I.11
	Mobility	A. Walkable Communities	ME-A.1 through ME-A.9
		B. Transit First	ME-B.1 through ME-B.10
		F. Bicycling	ME-F.2; ME-F.4; ME-F.5
		K. Regional Coordination and Financing	ME-K.2; ME-K.6
	Urban Design	A. General Urban Design	UD-A.1; UD-A.2; UD-A.3; UD-A.9; UD-A.11
		B. Distinctive Neighborhoods and Residential Design	UD-B.5d; UD-B.6
		C. Mixed-Use Villages and Commercial Areas	UD-C.1; UD-C.4; UD-C.6; UD-C.7
Greenhouse Gas (GHG) Emissions and Alternative Modes of Transportation	Conservation	A. Climate Change and Sustainable Development	CE-A.1; CE-A.2; CE-A.13
		F. Air Quality	CE-F.1 through CE-F.8
		J. Urban Forestry	CE-J.4
		N. Environmental Education	CE-N.3; CE-N.5
	Land Use and Community Planning	I. Environmental Justice	LU-I.11
	Mobility	A. Walkable Communities	ME-A.8; ME-A.9
		B. Transit First	ME-B.1; ME-B.8; ME-B.9; ME-B.10
		C. Street and Freeway System	ME-C.2e; ME-C.4c
		E. Transportation Demand Management	ME-E.1 through ME-E.8;
		G. Parking Management	ME-G.5
		F. Bicycling	ME-F.5
	Urban Design	A. General Urban Design	UD-A.9; UD-A.10; UD-C.4; UD-C.7

TABLE CE-1 Issues Related to Climate Change Addressed in the General Plan

Issues	General Plan Policy		
	Element	Section	Policy
			CE-A.5; CE-A.6; CE-A.8; CE-A.9; CE-A.11; CE-A.12
		F. Air Quality	CE-F.2; CE-F.3
		I. Sustainable Energy	CE-I.1 through CE-I.13
	Urban Design	A. General Urban Design	UD-A.4; UD-A.5i
Local Food	Conservation	L. Agricultural Resources	CE-L.3, CE-L.5, CE-L.7-L.11
Urban Heat Island Effect	Conservation	A. Climate Change and Sustainable Development	CE-A.2; CE-A.5; CE-A.6; CE-A.11; CE-A.11
		E. Urban Runoff Management	CE-E.2c; CE-E.d
		J. Urban Forestry	CE-J.1
	Recreation	A. Park and Recreation Guidelines	RE-A.7
Waste Management and Recycling	Urban Design	A. General Urban Design	UD-A.8e; UD-A.12
		A. Climate Change and Sustainable Development	CE-A.2; CE-A.8; CE-A.9; CE-A.10
		C. Coastal Resources	CE-C.7
	Conservation	D. Water Resources Management	CE-D.1; CE-D.3
		E. Urban Runoff Management	CE-E.6
		F. Air Quality	CE-F.3
		N. Environmental Education	CE-N.4; CE-N.5; CE-N.7
	Public Facilities, Services and Safety	F. Wastewater	PF-F.5
		I. Waste Management	PF-I.1 through PF-I.4
		A. Climate Change and Sustainable Development	CE-A.2
Water Management and	Conservation	D. Water Resources Management	CE-D.1; CE-D.2; CE-D.4
		I. Sustainable Energy	CE-I.4; CE-I.6
	Public Facilities, Services and Safety	H. Water Infrastructure	PF-H.1 through PF-H.3

While the DEIR and the CAP Consistency Checklist contain a partial analysis of the Project's consistency with some climate change elements identified in the Conservation Element and Mobility Element of the General Plan, the DEIR failed to consider or demonstrate the Project's consistency with several of the GHG reduction and climate change adaptation measures identified above, including, for example, those listed below:

City of San Diego General Plan³⁹

Measures – Mobility Element⁴⁰

Safety and Accessibility

³⁹ "General Plan" City of San Diego, March 2008, available at: <https://www.sandiego.gov/planning/genplan#genplan>.

⁴⁰ "Mobility Element" City of San Diego, June 2015, available at: https://www.sandiego.gov/sites/default/files/me_2015.pdf.

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ME-A.1. Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions, including but not limited to those described in the Pedestrian Improvements Toolbox, Table ME-1, as described below:

- High Visibility Crosswalk Striping such as zebra or ladder-style markings improve visibility of crosswalks to drivers.
- Lead Pedestrian Intervals at Traffic Signals enable pedestrians to establish themselves in the crosswalk before concurrent traffic movements get a green indication. This reduces conflicts between pedestrians and turning vehicles.
- Marked Crosswalks with In-Pavement Flashers are highly visible and warn drivers that pedestrians are present in the crosswalk.
- On-Street Parking provides a buffer between pedestrians on the sidewalk and moving vehicles.
- Pedestrian Countdown Displays at Traffic Signals let pedestrians know how much crossing time remains.
- A Planting Strip/Parkway Planting along the sidewalk sets the pedestrian path away from the roadway, provides a buffer between pedestrians and moving vehicles, and is aesthetically pleasing.
- Pedestrian-Scale Lighting improves visibility and security.
- Pedestrian Bridges/Grade Separations eliminate conflicts between vehicles and pedestrians.
- Bulb-outs, also known as Pop-Outs and Curb Extensions, narrow the width of a street at an intersection by extending the curb into roadway at the corner(s) of an intersection. This reduces the speeds of right-turning vehicles, increases the visibility of pedestrians to drivers, and creates a shorter crossing distance, reducing pedestrians' exposure to moving vehicles.
- Raised Crosswalks have ramps on both sides of the flat crosswalk surface. The vertical deflection encourages traffic to slow down while markings increase visibility of the crosswalk to drivers.
- Raised Median Pedestrian Refuges are used to reduce pedestrian exposure to moving vehicles, and provide a refuge in the middle of the street. This allows the pedestrian to identify a safe gap and cross one direction of traffic at a time.
- Sidewalks are walkways that parallel vehicle roadways. Contiguous sidewalks have the pedestrian path of travel immediately adjacent to the curb. Non-contiguous sidewalks have the pedestrian path of travel separated from the curb by a planting strip.
- Street Furnishings such as benches and other amenities improve the pedestrian environment.
- Canopy Trees provide protection from the sun. When trees are located between the sidewalk and roadway, they provide a buffer between pedestrians and moving vehicles.
- Traffic Controls such as stop signs and traffic signals assign right-of way.
- Turn Restrictions may be used at intersections to reduce or eliminate vehicle conflicts with pedestrians.

Walkways are prepared exterior routes designed to provide pedestrian accessibility. They are general pedestrian routes, including plazas, courts and sidewalks.

ME-A.2. Design and implement safe pedestrian routes.

- a. Collaborate with appropriate community groups, and other interested private and public sector groups or individuals to design and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. Implement needed improvements and programs such as wider and noncontiguous sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, street and pedestrian lighting, pedestrian trails, and educating children on traffic and bicycle safety.
- b. Promote "Walking School Bus" efforts where parents or other responsible adults share the responsibility of escorting children to and from school by foot or bicycle.

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cont.

<ul style="list-style-type: none"> c. Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment d. Ensure that there are adequate law enforcement, code enforcement, and litter and graffiti control to maintain safe and attractive neighborhoods.
Provide adequate levels of lighting for pedestrian safety and comfort.
ME-A.3. Engage in a public education campaign to increase drivers' awareness of pedestrians and bicyclists, and to encourage more courteous driving.
ME-A.4. Make sidewalks and street crossings accessible to pedestrians of all abilities. <ul style="list-style-type: none"> a. Meet or exceed all federal and state requirements. b. Provide special attention to the needs of children, the elderly, and people with disabilities. Maintain pedestrian facilities to be free of damage or trip hazards.
ME-A.5. Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage. <ul style="list-style-type: none"> a. Minimize obstruction and barriers that inhibit pedestrian circulation. Consider pedestrian impacts when designing the width and number of driveways within a street segment.
Connectivity
ME-A.6. Work toward achieving a complete, functional and interconnected pedestrian network. <ul style="list-style-type: none"> a. Ensure that pedestrian facilities such as sidewalks, trails, bridges, pedestrian-oriented and street lighting, ramps, stairways and other facilities are implemented as needed to support pedestrian circulation. <ul style="list-style-type: none"> 1. Close gaps in the sidewalk network. 2. Provide convenient pedestrian connections between land uses, including shortcuts where possible. 3. Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets. b. Link sidewalks, pedestrian paths and multi-purpose trails into a continuous region-wide network where possible c. Provide and maintain trash and recycling receptacles, and restrooms available to the public where needed. d. Address pedestrian needs as an integral component of community and public facilities financing plan updates and amendments, other planning studies and programs, and the development project review process. Routinely accommodate pedestrian facilities and amenities into private and public plans and projects.
Walkability
ME-A.7. Improve walkability through the pedestrian-oriented design of public and private projects in areas where higher levels of pedestrian activity are present or desired. <ul style="list-style-type: none"> a. Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art or other measures including, but not limited to those described in the Pedestrian Improvement Toolbox. b. Encourage the use of non-contiguous sidewalk design where appropriate to help separate pedestrians from auto traffic. In some areas, contiguous sidewalks with trees planted in grates adjacent to the street may be a preferable design. c. Enhance alleys as secure pathways to provide additional pedestrian connections. d. Implement traffic calming measures to improve walkability in accordance with Policy ME-C.5.

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cont.

When existing sidewalks are repaired or replaced, take care to retain sidewalk stamps and imprints that are indicators of the age of a particular neighborhood, or that contribute to the historic character of a neighborhood

ME-A.9. Continue to collaborate with regional agencies, school districts, community planning groups, community activists, public health professionals, developers, law and code enforcement officials, and others, to better realize the mobility, environmental, social, and health benefits of walkable communities.

Transportation Demand Management (TDM)

ME-E.1. Support and implement TDM strategies including, but not limited to: alternative modes of transportation, alternative work schedules, and telework.

ME-E.2. Maintain and enhance personal mobility options by supporting public and private transportation projects that will facilitate the implementation of Transportation Demand Management (TDM) strategies.

ME-E.5. Support SANDAG's efforts to market TDM benefits to employers and identify strategies to reduce peak period employee commute trips.

ME-E.6. Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate.

ME-E.7. Consider TDM programs with achievable trip reduction goals as partial mitigation for development project traffic and air quality impacts.

ME-E.8. Monitor implementation of TDM programs to ensure effectiveness.

Bicycling

ME-F.2. Identify and implement a network of bikeways that are feasible, fundable, and serve bicyclists' needs, especially for travel to employment centers, village centers, schools, commercial districts, transit stations, and institutions.

- a. Develop a bikeway network that is continuous, closes gaps in the existing system, improves safety, and serves important destinations.
- b. Implement bicycle facilities based on a priority program that considers existing deficiencies, safety, commuting needs, connectivity of routes, and community input.
- c. Recognize that bicyclists use all City roadways.
 1. Design future roadways to accommodate bicycle travel; and
 2. Upgrade existing roadways to enhance bicycle travel, where feasible.

ME-F.5. Increase the number of bicycle-transit trips by coordinating with transit agencies to provide safe routes to transit stops and stations, to provide secure bicycle parking facilities, and to accommodate bicycles on transit vehicles.

These are examples of omissions in the DEIR's analysis of the Project's consistency with General Plan elements related to GHG reduction and climate change. As you can see in the table above, the DEIR failed to evaluate the proposed Project's consistency with many required elements of the Mobility Element of the General Plan. Not only does the Mobility Plan require the reduction of emissions through the decrease in single-occupancy vehicles and overall VMT, it also indirectly requires the reduction of emissions through the increase in pedestrian and bicycle safety, education, and facilities. Thus, the proposed Project fails to demonstrate consistency with the City of San Diego General Plan as a result of its failure to evaluate all applicable measures in the General Plan, including those in the Mobility Element.

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Second, as previously stated, the DEIR claims that “[t]he Conservation Element of the General Plan lists City policies to reduce emissions” (emphasis added) (p. 5.5-10). Thus, the DEIR’s analysis of the Project’s consistency with these City policies is incomplete. Because the DEIR fails to demonstrate that the Conservation Element of the General Plan contains Project-level measures, the DEIR’s analysis is incorrect and inapplicable.

Third, as shown above, the DEIR evaluates the proposed Project’s consistency with six measures in the City of San Diego General Plan’s Conservation Element. However, this is also incomplete, as the DEIR fails to address or demonstrate consistency with numerous other GHG reduction and climate change measures in the Conservation Element, including but not limited to those listed below:

E48

City of San Diego General Plan ⁴¹	
Measures – Conservation Element ⁴²	
<i>Climate Change & Sustainable Development</i>	
CE-A.4. Pursue the development of “clean” or “green” sector industries that benefit San Diego’s environment and economy.	
CE-A.5. Employ sustainable or “green” building techniques for the construction and operation of buildings.	
a.	Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:
	<ul style="list-style-type: none"> • Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology; • Minimize energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens; • Employing self generation of energy using renewable technologies; • Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods; • Reducing levels of non-essential lighting, heating, and cooling; and • Using energy efficient appliances and lighting.
b.	Provide technical services for “green” buildings in partnership with other agencies and organizations.
CE-A.8. Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2., or by renovating or adding to existing buildings, rather than constructing new buildings.	
<i>Open Space and Landform Preservation</i>	
CE-B.1. Protect and conserve the landforms, canyon lands, and open spaces that: define the City’s urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands	

⁴¹ “General Plan” City of San Diego, March 2008, available at: <https://www.sandiego.gov/planning/genplan#genplan>.

⁴² “Conservation Element” City of San Diego, March 2008, available at: <https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/2012/ce120100.pdf>.

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Some General Plan policies and goals are intended to be implemented by the City rather than by individual projects. Refer to the response to Comment E27 regarding analysis of impacts relative to General Plan consistency and to draft EIR Section 5.1 for detailed analysis of the Project’s consistency with applicable goals and policies the City’s Conservation Element.

E48

Detailed evaluation of the Project’s consistency with all applicable General Plan Conservation Element policies is contained in EIR Table 5.1-1, *City of San Diego Land Use Goals, Objectives, and Policies Consistency Information*. Refer to response to Comment E18. The Project would be consistent with applicable land use policies.

Policy CE-B.1 addresses protection and conservation of landforms, canyon lands, and open spaces; Policy CE-B.3 addresses use of natural landforms and features; and Policy CE-B.5 addresses incorporating trails and greenways linking local and regional open space and recreation areas. Because the project site is entirely developed and surrounded by developed land within the Urban Node of the University Community, these policies are not applicable to the Project. Additionally, the following policies are intended to be citywide efforts, rather than items to be addressed on an individual project basis: CE-A.4, CE-D.1, CE-D.3, CE-F.5, CE-F.7, CE-F.8, CE-I.5, CE-I.8, CE-I.11, CE-I.12, CE-I.13, CE-J.5, CE-N.3, CE-N.4, CE-N.5, and CE-N.9.

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cont.

habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.
<ul style="list-style-type: none"> a. Support the preservation of rural lands and open spaces throughout the region. b. Encourage the removal of invasive plant species and the planting of native plants near open space preserves.
CE-B.3. Use natural landforms and features and integrating elements in project design to complement and accentuate the City's form.
CE-B.4. Limit and control runoff, sedimentation, and erosion both during and after construction activity.
CE-B.5. Maximize the incorporation of trails and greenways linking local and regional open space and recreation areas into the planning and development review process.
<i>Water Resources Management</i>
CE-D.1. Implement a balanced, water conservation strategy as an effective way to manage demand by: reducing dependence on imported water supplies; maximizing efficiency of existing urban water and agricultural supplies through conservation measures/programs; and developing alternative, reliable sources to sustain present and future water needs.
<ul style="list-style-type: none"> a. Integrate watershed planning with water supply and land use studies to achieve an integrated approach to ensure that the City can provide adequate water supplies for present uses, accommodate future growth, attract and support commercial and industrial development, and supply local agriculture. b. Manage groundwater and surface water resources and capacity through an integrated approach to meet overall water supply and resource management objectives. c. Emphasize and refine recycled water programs to help meet non-potable irrigation demands. d. Develop and expand water-efficient landscaping to include urban forestry, urban vegetation, and demonstration projects. e. Support regional efforts towards ensuring that imported water is reliable, cost-effective, and is of high quality. f. Implement conservation incentive programs that increase water-use efficiency and reduce urban runoff. g. Develop a response plan to assist citizens in reducing water use during periods of water shortages and emergencies. h. Explore alternative conservation measures and technology as they become available. i. Educate the public on wise water use.
CE-D.3. Continue to participate in the development and implementation of watershed management plans.
<ul style="list-style-type: none"> a. Control water discharge in a manner that does not reduce reasonable use by others, damage important native habitats and historic resources, or create hazardous conditions (e.g., erosion, sedimentation, flooding and subsidence). b. Improve and maintain drinking water quality and urban runoff water quality through implementation of Source Water Protection Guidelines for New Development.
Improve and maintain urban runoff water quality through implementation of storm water protection measures.
<i>Urban Runoff Management</i>
CE-E.2. Apply water quality protection measures to land development projects early in the process—during project design, permitting, construction, and operations—in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of stormwater runoff.

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cont.

c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible.
d. Increase the use of vegetation in drainage design.
<i>Air Quality</i>
CE-F.4. Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.
CE-F.5. Promote technological innovations to help reduce automobile, truck, and other motorized equipment emissions.
CE-F.6. Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking.
CE-F.7. Influence the development of state, federal, and local actions to increase the use of alternative fuels.
CE-F.8. Influence the development of state, federal, and local efforts to increase fuel efficiency and reduce greenhouse gas emissions.
<i>Sustainable Energy</i>
CE-I.5. Support the installation of photovoltaic panels, and other forms of renewable energy production.
a. Promote the use and installation of renewable energy alternatives in new and existing development.
CE-I.7. Pursue investments in energy efficiency and direct sustained efforts towards eliminating inefficient energy use.
CE-I.8. Improve fuel-efficiency to reduce consumption of fossil fuels.
CE-I.10. Use renewable energy sources to generate energy to the extent feasible.
CE-I.11. Collaborate with others to develop incentives to increase the use of renewable energy sources or reduce use of non-renewable energy sources.
CE-I.12. Use small, decentralized, aesthetically-designed, and appropriately-sited energy efficient power generation facilities to the extent feasible.
CE-I.13. Promote and conduct energy conservation education.
<i>Urban Forestry</i>
CE-J.1. Develop, nurture, and protect a sustainable urban/community forest.
a. Plant large canopy shade trees, where appropriate and with consideration of habitat and water conservation goals, in order to maximize environmental benefits.
b. Seek to retain significant and mature trees.
c. Provide forest linkages to connect and enhance public parks, plazas, recreation and open space areas.
CE-J.4. Continue to require the planting of trees through the development permit process.
a. Consider tree planting as mitigation for air pollutant emissions, storm water runoff, and other environmental impacts as appropriate.
CE-J.5. Support public outreach efforts to educate City staff, the business community, and the general public on the environmental and economic benefits of trees.
<i>Environmental Education</i>
CE-N.3. Continue and expand City and regional transportation demand management programs that promote fuel-efficient alternatives to driving alone, such as ridesharing, transit, bicycling, walking, and teleworking.
CE-N.4. Publicize voluntary water and energy conservation measures that focus on reducing waste and decreasing the possibility of rationing and other undesirable restrictions.
CE-N.5. Actively encourage public discussion of air quality policies, understanding that it is individual decisions that are an essential component to their success.

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cont.

CE-N.9. Expand educational opportunities within open space lands and regional parks.

As you can see in the table above, the DEIR failed to evaluate the proposed Project's consistency with numerous measures of the General Plan's Conservation Element. The same is true for several other General Plan climate change policies identified in Conservation Element Table CE-1. While the DEIR evaluates the proposed Project's consistency with six measures of the Conservation Element, numerous other measures are completely ignored. Thus, the proposed Project fails to demonstrate consistency with the City of San Diego General Plan as a result of its failure to evaluate all applicable measures related to GHG reductions and climate change adaptation.

Fourth, the DEIR fails to demonstrate consistency with the six measures of the General Plan's Conservation Element which it purports to analyze in DEIR Table 5.5-1, *City General Plan Implementation Strategies* (shown above) (p. 5.5-10). The DEIR fails to adequately demonstrate consistency with these six measures, as demonstrated below:

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City of San Diego General Plan ⁴³	
Measures – Conservation Element ⁴⁴	
Climate Change & Sustainable Development	
CE-A.2. Reduce the City's carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan to:	Here, the DEIR claims to be consistent with this measure because "[t]he Project would be built in accordance with Title 24 energy-efficiency standards. In addition, the Project would be built adjacent to a Trolley stop and an existing bus stop to allow for non-vehicular trips to the Project site, and would incorporate transit-supportive land use patterns" (p. 5.5-10, Table 5.5-1). However, this is incorrect for several reasons. First, Title 24 is required for all buildings in the state. As a result, the proposed Project cannot take credit for complying with these standards that it already must implement. As the measure says to " reduce the City's carbon footprint," simply complying with already required policies would not further reduce the City's carbon footprint. Furthermore, the DEIR fails to elaborate upon what "transit-supportive land use patterns" means or how it demonstrates compliance with CE-A.2. Without any more information or analysis, we cannot verify that "transit-supportive land use patterns" are actually being implemented or that they reduce the City's
<ul style="list-style-type: none"> • Create sustainable and efficient land use patterns to reduce vehicular trips and preserve open space; • Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency; • Improve energy efficiency, especially in the transportation sector and buildings and appliances; • Reduce the Urban Heat Island effect through sustainable design and building practices, as well as planting trees (consistent with habitat and water conservation policies) for their many environmental benefits, including natural carbon sequestration; 	

⁴³ "General Plan" City of San Diego, March 2008, available at: <https://www.sandiego.gov/planning/genplan/genplan>.

⁴⁴ "Conservation Element" City of San Diego, March 2008, available at: <https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/2012/ce120100.pdf>.

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Table 5.5-1 of the draft EIR is intended to provide summary information of key concepts and to be read in conjunction with the EIR as a whole. The City Council of the City of San Diego is the responsible authority for adopting new or amended regulations, programs, and incentives; these activities are not the responsibility of individual development proposals. For example, Policy CE-A.2 calls for the City to "[d]evelop and adopt new or amended regulations, programs, and incentives." However, as Table 5.5-1 demonstrates, the Project would be consistent with current, applicable General Plan policies and City regulations that aim to reduce the City's carbon footprint, as highlighted in the remainder of this response. The Project would comply with all applicable City regulations related to energy efficiency, and as indicated on EIR page 5.5-9, would implement cool roofs, which is a requirement of the CAP Consistency Checklist. Additional discussion regarding compliance with this policy has been added to Table 5.5-1.

Additional discussion of the Project's support for transit is addressed in numerous other locations in the draft EIR. For example, page 5.1-17 explains, "The proposed revitalization of commercial services would provide improved services to residents and businesses within the Urban Node. This, combined with the provision of additional employment opportunities, would help to reduce the number and distance of auto trips, which would in turn help reduce GHG emissions. Additionally, the proposed hotel would not only have access to the commercial uses on the site, but also be able to have direct access to transit via the Mid-Coast Trolley Station and UTC Transit Center, with connections to UCSD and employment centers. The Project also would include improvements to pedestrian and bicycle connections to transit for users of the site and residents of the surrounding area. These connections would incorporate a series of public spaces, including public plazas. Thus, the Project would contribute to the goal of focusing growth into mixed-use activity centers that are pedestrian-friendly, centers of the community, and linked to the regional transit system."

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- Reduce waste by improving management and recycling programs;
- Plan for water supply and emergency reserves.

Refer to Table CE-1, Issues Related to Climate Change Addressed in the General Plan, for a comprehensive list of policies related to each of the above issues.

carbon footprint. Moreover, the DEIR also fails to discuss the proposed Project's potential to *further* reduce vehicular trips, preserve open space, reduce fuel emission levels, improve energy efficiency, reduce the Urban Heat Island effect, reduce waste, and plan for water supply and emergency reserves more than is currently being included. As a result, we cannot verify that the proposed Project is implementing this measure to the full extent of its feasibility. Finally, the DEIR fails to mention or evaluate any of the specific policies mentioned in Table CE-1, and as a result, the proposed Project fails to demonstrate compliance with this measure.

E50

CE-A.9. Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:

- Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
- Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system;
- Removing code and obstacles to using recycled materials in buildings and for construction; and

Implementing effective economic incentives to recycle construction and demolition debris.

Here, the DEIR claims to be consistent with this measure because "[t]he Project would utilize recycled construction materials where feasible, with a minimum target of 5 percent and a goal of 10 percent" (p. 5.5-10, Table 5.5-1). However, the DEIR fails to elaborate upon the feasibility of utilizing different types of recycled construction materials or the calculations utilized to estimate a 5 percent target and 10 percent goal. Without any further information on these metrics, we are unable to verify if they are achievable and reasonable estimations for the proposed Project. Furthermore, the DEIR fails to evaluate the "extent possible" of implementing the factors included in measure CE-A.9, such as scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases, using life cycle costing in decision-making, removing code and obstacles to using recycled materials in building construction, and implementing effective economic incentives to recycle construction and demolition debris. As a result, we cannot verify that this measure will actually be implemented, monitored, and enforced on the Project site to the full extent of its feasibility and thus, the DEIR failed to demonstrate consistency with this measure.

E51

CE-A.10. Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.

- Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.
- Provide a recyclables and collection area that serves the entire building or project.

Here, the DEIR claims to be consistent with this measure because "Recycling facilities and bins would be provided throughout the building and parking areas in compliance with the City's Storage ordinance" (p. 5.5-10, Table 5.5-1). However, the DEIR fails to elaborate on how this will be achieved on the Project site. The DEIR also fails to indicate that the space would allow for the separation, collection and storage of paper, glass, plastic,

E49

(cont.) The Project includes Transportation Demand Management measures, as detailed in Mitigation Measure TRA-5. As the project site is entirely developed, there are no opportunities for the Project to preserve open space. Refer to the analysis in Table 5.5-1 regarding the Project's consistency with Policies CE-A.12 regarding the Urban Heat Island, CE-A.10 regarding waste management and recycling, and CE-I.4 regarding water conservation. Refer to the responses to Comments E27 and E46 through E48 regarding consistency with applicable General Plan policies.

E50

Detailed analysis of consistency with the City's waste management requirements is detailed in draft EIR Section 5.11.2.2 and the Waste Management Plan provided as Appendix H3. As noted therein, the Waste Management Plan conditions would be included in the as a condition of approval and thus would be implemented, monitored, and enforced.

E51

Refer to the response to Comment E50 regarding compliance with the City's recycling requirements. The San Diego Municipal Code (Table 142 08C) specifies the minimum exterior refuse and recyclable material storage areas for non-residential development. For non-residential development in excess of 100,001 square feet (SF), the required minimum refuse storage area and recyclable material storage area are each 192+48 SF for every 25,000 SF of building area over that size. The Project would be required to provide storage areas in compliance with this code requirement.

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cont.

The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed.

metals, and yard materials. As a result, we cannot verify that this measure would actually be implemented, monitored, and enforced on the Project site, and thus, the DEIR failed to demonstrate consistency with this measure.

E52

CE-A.11. Implement sustainable landscape design and maintenance.

- a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.
- b. Encourage composting efforts through education, incentives, and other activities.
- c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas, and amenities are proposed to serve as recreation opportunities.
- d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.
- e. Reduce use of lawn types that require high levels of irrigation.
- f. Strive to incorporate existing mature trees and native vegetation into site designs.
- g. Minimize the use of landscape equipment powered by fossil fuels.
- h. Implement water conservation measures in site/building design and landscaping.
- i. Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible (see CE-A.12.)

Here, the DEIR claims to be consistent with this measure because "[t]he Project would use a drought-tolerant plant palette appropriate for U.S. Department of Agriculture Plant Hardiness Zone 10a. The landscaping would be hydrozoned and irrigated with weather-based irrigation systems to comply with the California Model Water Efficient Landscape Ordinance" (p. 5.5-10, Table 5.5-1). However, the DEIR fails to indicate how this measure will be implemented, monitored, and enforced on the Project site. Furthermore, the DEIR fails to mention or evaluate the feasibility of implementing integrating pest management techniques, composting, decreasing the amount of impervious surfaces, incorporating existing mature trees and native plants, minimizing landscape equipment powered by fossil fuels, or using recycled water for irrigation. As a result, the proposed Project is not consistent with this measure and further analysis evaluating the feasibility of these suggested measures is recommended for an updated CEQA evaluation.

E53

CE-A.12. Reduce the San Diego Urban Heat Island, through actions such as:

- Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up;
- Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to

Here, the DEIR claims to be consistent with this measure because "[t]he strategic locations of Project trees throughout the Project site would provide shade that would increase pedestrian usability, and would also provide protection for pavement as described in the Urban Forest Management Plan. Palm trees would be replaced with canopy trees to provide increased canopy cover and shade. The number of trees on site would be increased, which would increase carbon

E52

The information contained in Table 5.5-1 is intended to provide a brief summary of compliance. A more detailed analysis of consistency with Policy CE-A.11 is contained in Table 5.1-1 of the draft EIR. The San Diego Municipal Code includes a number of requirements related to landscaping, with which the Project must comply. Such requirements include grouping plants into hydrozones; selecting plant materials to meet a Maximum Applied Water Allowance; using automatic irrigation controllers with evapotranspiration or soil moisture sensor data; including climate adapted plants; minimizing turf; and including trees.

E53

The Project is required to use cool roofing materials in accordance with CAP Consistency Checklist requirements; analysis of the feasibility of implementing this common building technique is not required. As suggested by the policy, trees would be planted to provide shade and cool air temperatures, including through placement of trees to shade buildings and parking lots (see Figure 3-6). The San Diego Municipal Code requires placement of 1 tree within 30 feet of each parking space in vehicular use; satisfaction of at least one half of the required "plant points" with trees; and placement of street trees at a minimum of one 24-inch box canopy tree for every 30 linear feet of street frontage. As these are project design features and Municipal Code requirements, monitoring and enforcement measures need not be detailed.

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cont.

shade buildings, air conditioning units, and parking lots; and

- Reduce heat building up in parking lots through increased shading or use of cool paving materials as feasible.

sequestration" (p. 5.5-11, Table 5.5-1). However, this is incorrect, as the DEIR fails to evaluate the feasibility of implementing cool roofing materials or using cool paving materials. Furthermore, while the DEIR claims that trees would be planted strategically, but fails to elaborate on what the "strategy" being implemented is, or how the strategy helps combat the Urban Heat Island phenomenon. As a result, we cannot verify how this measure will be implemented, monitored, and enforced on the Project site, and thus, the proposed Project is not consistent with this measure of the General Plan.

E54

Sustainable Energy

CE-I.4. Maintain and promote water conservation and waste diversion programs to conserve energy.

Here, the DEIR claims to be consistent with this measure because "[t]he Project would implement a water conservation strategy that would reduce water consumption by 20 percent, and would implement waste diversion programs" (p. 5.5-11, Table 5.5-1). However, this is incorrect. Review of the DEIR and associated documents reveals that the proposed Project fails to otherwise mention this "water conservation strategy" or elaborate upon how it would achieve a 20 percent reduction in water consumption for the Project site. Thus, we cannot verify what specific actions this measure will include or that will actually be implemented, monitored, and enforced on the Project site. Without further analysis detailing the calculations for a 20 percent reduction, we also cannot verify this decrease in water consumption for the Project. Furthermore, while the DEIR states that the County's Strategic Energy Plan includes waste diversion programs, the State has the Integrated Waste Management Act, administered by CalRecycle, the City's Zero Waste Plan includes waste diversion goals, and Assembly Bill 341 increases solid waste diversion, the DEIR fails to indicate any measures actually being implemented at the Project-level (p. 5.5-5, 5.6-16, 5.11-6,7). As a result, we cannot verify that this measure is actually being implemented, monitored, and enforced on the Project site. Thus, the proposed Project is not consistent with this measure of the General Plan.

As you can see in the excerpt above, the DEIR fails to adequately demonstrate consistency with the six measures described in the DEIR of the City of San Diego General Plan's Conservation Element. As a

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The strategies that the Project would use to reduce water consumption are discussed in Section 5.11 of the draft EIR. Refer to the response to Comment E40 regarding the source of the 20-percent reduction. Refer to the response to Comment E50 regarding the Project's Waste Management Plan and to the responses to Comments E49 through E52 for details regarding the Project's consistency with the cited measures.

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result, we cannot verify that the proposed Project is consistent with these, or any other climate change-related elements of the General Plan. The DEIR's GHG General Plan consistency analysis should not be relied upon to determine the Project's GHG impact.

Feasible Mitigation Measures Available to Reduce Emissions

In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the Project from NEDC's *Diesel Emission Controls in Construction Projects*.⁴⁵ Therefore, to reduce the Project's emissions, consideration of the following measures, and addition to the MMRP, should be made:

NEDC's Diesel Emission Controls in Construction Projects ⁴⁶	
Measures – Diesel Emission Control Technology	
a. Diesel Onroad Vehicles	All diesel nonroad vehicles on site for more than 10 total days must have either (1) engines that meet EPA onroad emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
b. Diesel Generators	All diesel generators on site for more than 10 total days must be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
c. Diesel Nonroad Construction Equipment	<ul style="list-style-type: none"> i. All nonroad diesel engines on site must be Tier 2 or higher. Tier 0 and Tier 1 engines are not allowed on site ii. All diesel nonroad construction equipment on site for more than 10 total days must have either (1) engines meeting EPA Tier 4 nonroad emission standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines 50hp and greater and by a minimum of 20% for engines less than 50hp.
d. Upon confirming that the diesel vehicle, construction equipment, or generator has either an engine meeting Tier 4 non road emission standards or emission control technology, as specified above, installed and functioning, the developer will issue a compliance sticker. All diesel vehicles, construction equipment, and generators on site shall display the compliance sticker in a visible, external location as designated by the developer.	
e. Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.	
f. All diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend ⁴⁷ approved by the original engine manufacturer with sulfur content of 15 ppm or less.	

⁴⁵ "Diesel Emission Controls in Construction Projects." Northeast Diesel Collaborative (NEDC), December 2010, available at: <https://www.epa.gov/sites/production/files/2015-09/documents/nedc-model-contract-sepcification.pdf>.

⁴⁶ "Diesel Emission Controls in Construction Projects." Northeast Diesel Collaborative (NEDC), December 2010, available at: <https://www.epa.gov/sites/production/files/2015-09/documents/nedc-model-contract-sepcification.pdf>.

⁴⁷ Biodiesel blends are only to be used in conjunction with the technologies which have been verified for use with biodiesel blends and are subject to the following requirements: <http://www.arb.ca.gov/diesel/verdev/reg/biodieselcompliance.pdf>.

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The Project would be consistent with the City's CAP and with applicable, plans, policies, and regulations adopted for the purpose of reducing greenhouse gas emissions, therefore resulting in less than significant impacts as detailed in Section 5.5, *Greenhouse Gas Emissions*, of the draft EIR. Similarly, as detailed in Section 5.4, *Air Quality*, the Project's impacts related to air pollutant emissions would be less than significant. Because impacts would be less than significant, no additional mitigation measures are necessary.

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Measures – Idling Requirements	
During periods of inactivity, idling of diesel onroad vehicles and nonroad equipment shall be minimized and shall not exceed the time allowed under state and local laws.	
Measures – Additional Diesel Requirements	
a.	Construction shall not proceed until the contractor submits a certified list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following: <ul style="list-style-type: none"> i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
b.	If the contractor subsequently needs to bring on site equipment not on the list, the contractor shall submit written notification within 24 hours that attests the equipment complies with all contract conditions and provide information.
c.	All diesel equipment shall comply with all pertinent local, state, and federal regulations relative to exhaust emission controls and safety.
d.	The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
Reporting	
a.	For each onroad diesel vehicle, nonroad construction equipment, or generator, the contractor shall submit to the developer's representative a report prior to bringing said equipment on site that includes: <ul style="list-style-type: none"> i. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, and engine serial number. ii. The type of emission control technology installed, serial number, make, model, manufacturer, and EPA/CARB verification number/level. iii. The Certification Statement signed and printed on the contractor's letterhead.
b.	The contractor shall submit to the developer's representative a monthly report that, for each onroad diesel vehicle, nonroad construction equipment, or generator onsite, includes: <ul style="list-style-type: none"> i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date. ii. Any problems with the equipment or emission controls. iii. Certified copies of fuel deliveries for the time period that identify: <ol style="list-style-type: none"> 1. Source of supply 2. Quantity of fuel 3. Quality of fuel, including sulfur content (percent by weight)

Furthermore, in an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the Project from CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures*, which attempt to reduce emissions.⁴⁸ Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

⁴⁸ <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

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CAPCOA's Quantifying Greenhouse Gas Mitigation Measures ⁴⁹	
Measures – Energy	
Building Energy Use	
BE-1 Exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code) by X%	
<i>Range of Effectiveness:</i> See document for specific improvement desired.	
BE-2 Install Programmable Thermostat Timers	
<i>Range of Effectiveness:</i> Best Management Practice – Influences building energy use for heating and cooling.	
BE-3 Obtain Third-party HVAC Commissioning and Verification of Energy Savings (to be grouped with BE-1)	
<i>Range of Effectiveness:</i> Not applicable on its own. This measure enhances the effectiveness of BE-1.	
BE-4 Install Energy Efficient Appliances	
<i>Range of Effectiveness:</i> Residential 2-4% GHG emissions from electricity use. Grocery Stores: 17-22% of GHG emissions from electricity use. See document for other land use types.	
BE-5 Install Energy Efficient Boilers	
<i>Range of Effectiveness:</i> 1.2-18.4% of boiler GHG emissions.	
Lighting	
LE-1 Install Higher Efficacy Public Street and Area Lighting	
<i>Range of Effectiveness:</i> 16-40% of outdoor lighting.	
LE-2 Limit Outdoor Lighting Requirements	
<i>Range of Effectiveness:</i> Best Management Practice, but may be quantified.	
LE-3 Replace Traffic Lights with LED Traffic Lights	
<i>Range of Effectiveness:</i> 90% of emissions associated with existing traffic lights.	
Alternative Energy Generation	
AE-1 Establish Onsite Renewable or Carbon-Neutral Energy Systems – Generic	
<i>Range of Effectiveness:</i> 0-100% of GHG emissions associated with electricity use.	
AE-2 Establish Onsite Renewable Energy System – Solar Power	
<i>Range of Effectiveness:</i> 0-100% of GHG emissions associated with electricity use.	
AE-3 Establish Onsite Renewable Energy System – Wind Power	
<i>Range of Effectiveness:</i> 0-100% of GHG emissions associated with electricity use.	
AE-4 Utilize a Combined Heat and Power System	
<i>Range of Effectiveness:</i> 0-46% of GHG emissions associated with electricity use.	
AE-5 Establish Methane Recovery in Landfills	
<i>Range of Effectiveness:</i> 73-77% reduction in GHG emissions from landfills without methane recovery.	
AE-6 Establish Methane Recovery in Wastewater Treatment Plants	
<i>Range of Effectiveness:</i> 95-97% reduction in GHG emissions from wastewater treatment plants without recovery.	
Measures – Transportation	
Land Use/Location	

⁴⁹ "Quantifying Greenhouse Gas Mitigation Measures." California Air Pollution Control Officers Association (CAPCOA), August 2010, available at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

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LUT-1 Increase Density
<i>Range of Effectiveness:</i> 0.8-30% vehicle miles traveled (VMT) reduction and therefore a 0.8-30% reduction in GHG emissions.
LUT-2 Increase Location Efficiency
<i>Range of Effectiveness:</i> 10% vehicle miles traveled (VMT) reduction and therefore 10-65% reduction in GHG emissions.
LUT-3 Increase Diversity of Urban and Suburban Developments (Mixed Use)
<i>Range of Effectiveness:</i> 9-30% vehicle miles traveled (VMT) and therefore 9-30% reduction in GHG emissions.
LUT-4 Increase Destination Accessibility
<i>Range of Effectiveness:</i> 6.7-20% vehicle miles traveled (VMT) reduction and therefore 6.7-20% reduction in GHG emissions.
LUT-5 Increase Transit Accessibility
<i>Range of Effectiveness:</i> 0.5-24.6% VMT reduction and therefore 0.5-24.6% reduction in GHG emissions.
LUT-6 Integrate Affordable and Below Market Rate Housing
<i>Range of Effectiveness:</i> 0.04-1.20% vehicle miles traveled (VMT) reduction and therefore 0.04-1.20% reduction in GHG emissions.
LUT-7 Orient Project Toward Non-Auto Corridor
<i>Range of Effectiveness:</i> Grouped strategy (see LUT-3).
LUT-8 Locate Project near Bike Path/Bike Lane
<i>Range of Effectiveness:</i> Grouped strategy (see LUT-4).
Neighborhood/Site Enhancements
SDT-1 Provide Pedestrian Network Improvements, such as:
<ul style="list-style-type: none"> • Compact, mixed-use communities • Interconnected street network • Narrower roadways and shorter block lengths • Sidewalks • Accessibility to transit and transit shelters • Traffic calming measures and street trees • Parks and public spaces • Minimize pedestrian barriers
<i>Range of Effectiveness:</i> 0-2% vehicle miles traveled (VMT) reduction and therefore 0-2% reduction in GHG emissions.
SDT-2 Provide Traffic Calming Measures, such as:
<ul style="list-style-type: none"> • Marked crosswalks • Count-down signal timers • Curb extensions • Speed tables • Raised crosswalks • Raised intersections • Median islands • Tight corner radii • Roundabouts or mini-circles • On-street parking • Planter strips with trees

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<ul style="list-style-type: none"> Chicanes/chokers
<i>Range of Effectiveness:</i> 0.25-1% vehicle miles traveled (VMT) reduction and therefore 0.25-1% reduction in GHG emissions.
SDT-3 Implement a Neighborhood Electric Vehicle (NEV) Network.
<i>Range of Effectiveness:</i> 0.5-12.7% vehicle miles traveled (VMT) reduction since NEVs would result in a mode shift and therefore reduce the traditional vehicle VMT and GHG emissions. Range depends on the available NEV network and support facilities, NEV ownership levels, and the degree of shift from traditional.
SDT-4 Create Urban Non-Motorized Zones
<i>Range of Effectiveness:</i> Grouped strategy (see SDT-1).
SDT-5 Incorporate Bike Lane Street Design (on-site)
<i>Range of Effectiveness:</i> Grouped strategy (see LUT-9).
SDT-6 Provide Bike Parking in Non-Residential Projects
<i>Range of Effectiveness:</i> Grouped strategy (see LUT-9).
SDT-7 Provide Bike Parking with Multi-Unit Residential Projects
<i>Range of Effectiveness:</i> Grouped strategy (see SDT-3).
SDT-8 Provide Electric Vehicle Parking
<i>Range of Effectiveness:</i> Grouped strategy (see SDT-3).
SDT-9 Dedicate Land for Bike Trails
<i>Range of Effectiveness:</i> Grouped strategy (see LUT-9).
Parking Policy/Pricing
PDT-1 Limit Parking Supply through: <ul style="list-style-type: none"> Elimination (or reduction) of minimum parking requirements Creation of maximum parking requirements Provision of shared parking
<i>Range of Effectiveness:</i> 5-12.5% vehicle miles traveled (VMT) reduction and therefore 5-12.5% reduction in GHG emissions.
PDT-2 Unbundle Parking Costs from Property Cost
<i>Range of Effectiveness:</i> 2.6-13% vehicle miles traveled (VMT) reduction and therefore 2.6-13% reduction in GHG emissions.
PDT-3 Implement Market Price Public Parking (On-Street)
<i>Range of Effectiveness:</i> 2.8-5.5% vehicle miles traveled (VMT) reduction and therefore 2.8-5.5% reduction in GHG emissions.
PDT-4 Require Residential Area Parking Permits
<i>Range of Effectiveness:</i> Grouped strategy (see PPT-1, PPT-2, and PPT-3).
Commute Trip Reduction Programs
TRT-1 Implement Commute Trip Reduction (CTR) Program – Voluntary <ul style="list-style-type: none"> Carpooling encouragement Ride-matching assistance Preferential carpool parking Flexible work schedules for carpools Half time transportation coordinator Vanpool assistance Bicycle end-trip facilities (parking, showers and lockers)

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<ul style="list-style-type: none"> • New employee orientation of trip reduction and alternative mode options • Event promotions and publications • Flexible work schedule for employees • Transit subsidies • Parking cash-out or priced parking • Shuttles • Emergency ride home <p><i>Range of Effectiveness:</i> 1-6.2% commute vehicle miles traveled (VMT) reduction and therefore 1-6.2% reduction in commute trip GHG emissions.</p>
<p>TRT-2 Implement Commute Trip Reduction (CTR) Program – Required Implementation/Monitoring</p> <ul style="list-style-type: none"> • Established performance standards (e.g. trip reduction requirements) • Required implementation • Regular monitoring and reporting <p><i>Range of Effectiveness:</i> 4.2-21% commute vehicle miles traveled (VMT) reduction and therefore 4.2-21% reduction in commute trip GHG emissions.</p>
<p>TRT-3 Provide Ride-Sharing Programs</p> <ul style="list-style-type: none"> • Designate a certain percentage of parking spaces for ride sharing vehicles • Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles • Providing a web site or messaging board for coordinating rides • Permanent transportation management association membership and funding requirement. <p><i>Range of Effectiveness:</i> 1-15% commute vehicle miles traveled (VMT) reduction and therefore 1-15% reduction in commute trip GHG emissions.</p>
<p>TRT-4 Implement Subsidized or Discounted Transit Program</p> <p><i>Range of Effectiveness:</i> 0.3-20% commute vehicle miles traveled (VMT) reduction and therefore a 0.3-20% reduction in commute trip GHG emissions.</p>
<p>TRT-5 Provide Ent of Trip Facilities, including:</p> <ul style="list-style-type: none"> • Showers • Secure bicycle lockers • Changing spaces <p><i>Range of Effectiveness:</i> Grouped strategy (see TRT-1 through TRT-3).</p>
<p>TRT-6 Encourage Telecommuting and Alternative Work Schedules, such as:</p> <ul style="list-style-type: none"> • Staggered starting times • Flexible schedules • Compressed work weeks <p><i>Range of Effectiveness:</i> 0.07-5.5% commute vehicle miles traveled (VMT) reduction and therefore 0.07-5.5% reduction in commute trip GHG emissions.</p>
<p>TRT-7 Implement Commute Trip Reduction Marketing, such as:</p> <ul style="list-style-type: none"> • New employee orientation of trip reduction and alternative mode options • Event promotions • Publications <p><i>Range of Effectiveness:</i> 0.8-4% commute vehicle miles traveled (VMT) reduction and therefore 0.8-4% reduction in commute trip GHG emissions.</p>
<p>TRT-8 Implement Preferential Parking Permit Program</p> <p><i>Range of Effectiveness:</i> Grouped strategy (see TRT-1 through TRT-3).</p>
<p>TRT-9 Implement Car-Sharing Program</p>

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<i>Range of Effectiveness:</i> 0.4-0.7% vehicle miles traveled (VMT) reduction and therefore 0.4-0.7% reduction in GHG emissions.
TRT-10 Implement School Pool Program
<i>Range of Effectiveness:</i> 7.2-15.8% in school vehicle miles traveled (VMT) reduction and therefore 7.2-15.8% reduction in school trip GHG emissions.
TRT-11 Provide Employer-Sponsored Vanpool/Shuttle
<i>Range of Effectiveness:</i> 0.3-13.4% commute vehicle miles traveled (VMT) reduction and therefore 0.3-13.4% reduction in commute trip GHG emissions.
TRT-12 Implement Bike-Sharing Programs
<i>Range of Effectiveness:</i> Grouped strategy (see SDT-5 and LUT-9).
TRT-13 Implement School Bus Program
<i>Range of Effectiveness:</i> 38-63% School VMT reduction and therefore 38-63% reduction in school trip GHG emissions.
TRT-14 Price Workplace Parking, such as: <ul style="list-style-type: none"> • Explicitly charging for parking for its employees; • Implementing above market rate pricing; • Validating parking only for invited guests; • Not providing employee parking and transportation allowances; and • Educating employees about available alternatives.
<i>Range of Effectiveness:</i> 0.1-19.7% commute vehicle miles traveled (VMT) reduction and therefore 0.1-19.7% reduction in commute trip GHG emissions.
TRT-15 Implement Employee Parking "Cash-Out"
<i>Range of Effectiveness:</i> 0.06-7.7% commute vehicle miles traveled (VMT) reduction and therefore 0.6-7.7% reduction in commute trip GHG emissions.
Transit System Improvements
TST-1 Transit System Improvements, including: <ul style="list-style-type: none"> • Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route. • Frequent, high-capacity service • High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride. • Pre-paid fare collection to minimize boarding delays. • Integrated fare systems, allowing free or discounted transfers between routes and modes. • Convenient user information and marketing programs. • High quality bus stations with Transit Oriented Development in nearby areas. • Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services.
<i>Range of Effectiveness:</i> 0.02-3.2% vehicle miles traveled (VMT) reduction and therefore 0.02-3% reduction in GHG emissions.
TST-2 Implement Transit Access Improvements, such as: <ul style="list-style-type: none"> • Sidewalk/crosswalk safety enhancements • Bus shelter improvements
<i>Range of Effectiveness:</i> Grouped strategy (see TST-3 and TST-4)
TST-3 Expand Transit Network

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<i>Range of Effectiveness:</i> 0.1-8.2% vehicle miles traveled (VMT) reduction and therefore 0.1-8.2% reduction in GHG emissions.
TST-4 Increase Transit Service Frequency/Speed
<i>Range of Effectiveness:</i> 0.02-2.5% vehicle miles traveled (VMT) reduction and therefore 0.02-2.5% reduction in GHG emissions.
TST-5 Provide Bike Parking Near Transit
<i>Range of Effectiveness:</i> Grouped strategy (see TST-3 and TST-4).
TST-6 Provide Local Shuttles
<i>Range of Effectiveness:</i> Grouped strategy (see TST-4 and TST-5).
Road Pricing/Management
RPT-1 Implement Area or Cordon Pricing
<i>Range of Effectiveness:</i> 7.9-22% vehicle miles traveled (VMT) reduction and therefore 7.9-22% reduction in GHG emissions.
RPT-2 Improve Traffic Flow, such as: <ul style="list-style-type: none"> • Signalization improvements to reduce delay; • Incident management to increase response time to breakdowns and collisions; • Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions; and • Speed management to reduce high free-flow speeds.
<i>Range of Effectiveness:</i> 0-45% reduction in GHG emissions.
RTP-3 Required Project Contributions to Transportation Infrastructure Improvement Projects
<i>Range of Effectiveness:</i> Grouped strategy (see RPT-2 and TST-1 through 7).
RTP-4 Install Park-and-Ride Lots
<i>Range of Effectiveness:</i> Grouped strategy (see RPT-1, TRT-11, TRT-3, and TST-1 through 6).
Vehicles
VT-1 Electrify Loading Docs and/or Require Idling-Reduction Systems
<i>Range of Effectiveness:</i> 26-71% reduction in TRU Idling GHG emissions.
VT-2 Utilize Alternative Fueled Vehicles, such as: <ul style="list-style-type: none"> • Biodiesel (B20) • Liquefied Natural Gas (LNG) • Compressed Natural Gas (CNG)
<i>Range of Effectiveness:</i> Reduction in GHG emissions varies depending on vehicle type, year, and associated fuel economy.
VT-3 Utilize Electric or Hybrid Vehicles
<i>Range of Effectiveness:</i> 0.4-20.3% reduction in GHG emissions.
Measures – Water
Water Supply
WSW-1 Use Reclaimed Water
<i>Range of Effectiveness:</i> Up to 40% in Northern California and up to 81% in Southern California.
WSW-2 Use Gray Water
<i>Range of Effectiveness:</i> Up to 100% of outdoor water GHG emissions if outdoor water use is replaced completely with graywater.
WSW-3 Use Locally Sourced Water Supply

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<i>Range of Effectiveness:</i> 0-60% for Northern and Central California, 11-75% for Southern California.	
Water Use	
WUW-1 Install Low-Flow Water Fixtures	
<i>Range of Effectiveness:</i> 20% of GHG emissions associated with indoor Residential water use; 17-31% of GHG emissions associated with Non-Residential indoor water use.	
WUW-2 Adopt a Water Conservation strategy	
<i>Range of Effectiveness:</i> Varies depending on Project Applicant and strategies selected. It is equal to the Percent Reduction in water commitment.	
WUW-3 Design Water-Efficient Landscapes (see California Department of Water Resources Model Water Efficient Landscape Ordinance), such as:	
<ul style="list-style-type: none"> • Reducing lawn sizes; • Planting vegetation with minimal water needs, such as native species; • Choosing vegetation appropriate for the climate of the project site; • Choosing complimentary plants with similar water needs or which can provide each other with shade and/or water. 	
<i>Range of Effectiveness:</i> 0-70% reduction in GHG emissions from outdoor water use.	
WUW-4 Use Water-Efficient Landscape Irrigation Systems ("Smart" irrigation control systems)	
<i>Range of Effectiveness:</i> 6.1% reduction in GHG emissions from outdoor water.	
WUW-5 Reduce Turf in Landscapes and Lawns	
<i>Range of Effectiveness:</i> Varies and is equal to the percent commitment to turf reduction, assuming no other outdoor water use.	
WUW-6 Plant Native or Drought-Resistant Trees and Vegetation	
<i>Range of Effectiveness:</i> Best Management Practice; may be quantified if substantial evidence is available.	
Measures – Area Landscaping	
Landscaping Equipment	
A-1 Prohibit Gas Powered Landscape Equipment	
<i>Range of Effectiveness:</i> Best Management Practice, influences Area GHG emissions from landscape equipment.	
A-2 Implement Lawnmower Exchange Program	
<i>Range of Effectiveness:</i> Best Management Practice, influences Area GHG emissions from landscape equipment.	
A-3 Electric Yard Equipment Compatibility	
<i>Range of Effectiveness:</i> Best Management Practice, influences Area GHG emissions from landscape equipment. Not applicable on its own. This measure enhances effectiveness of A-1 and A-2.	
Measures – Solid Waste	
Solid Waste	
SW-1 Institute Recycling and Composting Services	
<i>Range of Effectiveness:</i> Varies depending on Project Applicant and strategies selected. Best Management Practice.	
SW-2 Recycle Demolished Construction Material	
<i>Range of Effectiveness:</i> Varies depending on Project Applicant and strategies selected. Best Management Practice.	
Measures – Vegetation	
Vegetation	
V-1 Urban Tree Planting	
<i>Range of Effectiveness:</i> CO ₂ reduction varies by number of trees. VOC emissions may increase.	
V-2 Create New Vegetated Open Space	

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<i>Range of Effectiveness: Varies based on amount and type of land vegetated.</i>	
Measures – Construction	
Construction	
C-1 Use Alternative Fuels for Construction Equipment	
<i>Range of Effectiveness: 0-22% reduction in GHG emissions.</i>	
C-1 Urban Tree Planting	
<i>Range of Effectiveness: CO₂ reduction varies by number of trees. VOC emissions may increase.</i>	
C-2 Use Electric and Hybrid Construction Equipment	
<i>Range of Effectiveness: 2.5-80% of GHG emissions from equipment that is electric or hybrid if used 100% of the time.</i>	
C-3 Limit Construction Equipment Idling Beyond Regulation Requirements	
<i>Range of Effectiveness: Varies with the amount of Project Idling occurring and the amount reduced.</i>	
C-4 Institute a Heavy-Duty Off-Road Vehicle Plan, including:	
<ul style="list-style-type: none"> • Construction vehicle inventory tracking system; • Requiring hour meters on equipment; • Document the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment; and • Daily logging of the operating hours of the equipment. 	
<i>Range of Effectiveness: Not applicable on its own. This measure ensures compliance with other mitigation measures.</i>	
C-5 Implement a Construction Vehicle Inventory Tracking System	
<i>Range of Effectiveness: Not applicable on its own. This measure ensures compliance with other mitigation measures.</i>	
Measures – Miscellaneous	
Miscellaneous	
Misc-1 Establish a Carbon Sequestration Project, such as:	
<ul style="list-style-type: none"> • Geologic sequestration or carbon capture and storage techniques, in which CO₂ from point sources is captured and injected underground; • Terrestrial sequestration in which ecosystems are established or preserved to serve as CO₂ sinks; • Novel techniques involving advanced chemical or biological pathways; or • Technologies yet to be discovered. 	
<i>Range of Effectiveness: Varies depending on Project Applicant and projects selected. The GHG emissions reduction is subtracted from the overall baseline project emissions inventory.</i>	
Misc-2 Establish Off-Site Mitigation	
<i>Range of Effectiveness: Varies depending on Project Applicant and projects selected. The GHG emissions reduction is subtracted from the overall baseline project emissions inventory.</i>	
Misc-3 Use Local and Sustainable Building Materials	
<i>Range of Effectiveness: Varies depending on Project Applicant and strategies selected. Best Management Practice.</i>	
Misc-4 Require best Management Practices in Agriculture and Animal Operations	
Misc-5 Require Environmentally Responsible Purchasing, such as:	
<ul style="list-style-type: none"> • Purchasing products with sustainable packaging; • Purchasing post-consumer recycled copier paper, paper towels, and stationary; • Purchasing and stocking communal kitchens with reusable dishes and utensils; • Choosing sustainable cleaning supplies; 	

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- Leasing equipment from manufacturers who will recycle the components at their end of life;
- Choosing ENERGY STAR appliances and Water Sense-certified water fixtures;
- Choosing electronic appliances with built in sleep-mode timers;
- Purchasing 'green power' (e.g. electricity generated from renewable or hydropower) from the utility; and
- Choosing locally-made and distributed products.

Range of Effectiveness: Varies depending on Project Applicant and strategies selected. Best Management Practice.

Misc-6 Implement an Innovative Strategy for GHG Mitigation

Range of Effectiveness: Varies depending on Project Applicant and strategies selected. Best Management Practice.

Measures – General Plans

General Plans

GP-1 Fund Incentives for Energy Efficiency, such as:

- Retrofitting or designing new buildings, parking lots, streets, and public areas with energy-efficient lighting;
- Retrofitting or designing new buildings with low-flow water fixtures and high-efficiency appliances;
- Retrofitting or purchasing new low-emissions equipment;
- Purchasing electric or hybrid vehicles;
- Investing in renewable energy systems

Range of Effectiveness: Varies depending on Project Applicant and strategies selected. Best Management Practice.

GP-2 Establish a Local Farmer's Market

Range of Effectiveness: Varies depending on Project Applicant and strategies selected. Best Management Practice.

GP-3 Establish Community Gardens

Range of Effectiveness: Varies depending on Project Applicant and strategies selected. Best Management Practice.

GP-4 Plant Urban Shade Trees

Range of Effectiveness: The reduction in GHG emissions is not quantifiable at this time, therefore this mitigation measure should be implemented as a Best Management Practice. If the study data were updated to account for Title 24 standards, the GHG emissions reductions could be quantified, but would vary based on location, building type, and building size.

GP-5 Implement Strategies to Reduce Urban Heat-Island Effect, such as:

- Planting urban shade trees;
- Installing reflective roofs; and
- Using light-colored or high-albedo pavements and surfaces.

Range of Effectiveness: The reduction in GHG emissions is not quantifiable at this time, therefore this mitigation measure should be implemented as a Best Management Practice. If the study data were updated to account for Title 24 standards, the GHG emissions reductions could be quantified, but would vary based on location, building type, and building size.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. A revised CEQA evaluation should be prepared to include all feasible mitigation measures, as well as include an updated air quality analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The revised CEQA evaluation should also



Technical Consultation, Data Analysis and
Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
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Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education:

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on VOC 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 is the Co-Founder and Principal Environmental Chemist at Soil Water Air Protection Enterprise (SWAPE). His focus is the fate and transport of environmental contaminants, risk assessment, and ecological restoration. Dr. Rosenfeld has a doctorate in soil chemistry and has evaluated odors from biosolids applications to soil and the effect of biosolids to agricultural crops. Dr. Rosenfeld has also evaluated odor emissions from the compost and food industry. His project experience ranges from monitoring and modeling of pollution sources as they relate to human and ecological health. Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing petroleum, chlorinated solvents, pesticides, radioactive waste, PCBs, PAHs, dioxins, furans, volatile organics, semi-volatile organics, perchlorate, heavy metals, asbestos, PFOA, unusual polymers, MtBE, fuel oxygenates and odor. Dr. Rosenfeld has also evaluated and modeled emissions from fracking, boilers, incinerators and other industrial and agricultural sources relating to nuisance and personal injury. Dr. Rosenfeld has evaluated greenhouse gas emissions using various modeling programs recommended by California Air Quality Management Districts.

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 H₂O 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

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E56 The Commenter's qualifications are noted. As this information does not pertain to the adequacy of the EIR, no further response is necessary.

Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist
Bureau of Land Management, Kremmling Colorado 1990; Scientist

Publications:

Chen, J. A., Zapata, A. R., Sutherland, A. J., Molmen, D. R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermid and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing.

Rosenfeld P.E., and Suffet, I.H. (Mel) (2007). Anatomy of an Odor Wheel. *Water Science and Technology*.

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Rosenfeld, P.E., Clark, J.J.J., Hensley A.R., Suffet, I.H. (Mel) (2007). The use of an odor wheel classification for evaluation of human health risk criteria for compost facilities. *Water Science And Technology*.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellev, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS-6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

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cont.**Presentations:**

Rosenfeld, P.E., Sutherland, A.; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane 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 Tucson, 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 Tucson, 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.

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cont.

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.

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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 Conference.* 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 Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action NO. 14-C-30000
Rosenfeld Deposition, June 2015

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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 Court of Common Pleas for the Second Judicial Circuit, State of South Carolina, County of Aiken
David Anderson, et al., *Plaintiffs*, vs. Norfolk Southern Corporation, et al., *Defendants*.
Case Number: 2007-CP-02-1584

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., *Plaintiffs*, vs. Drummond Company Inc., et al., *Defendants*
Civil Action No. CV 2008-2076
Rosenfeld Deposition: September 2010

In the Ninth Judicial District Court, Parish of Rapides, State of Louisiana
Roger Price, et al., *Plaintiffs*, vs. Roy O. Martin, L.P., et al., *Defendants*.
Civil Suit Number 224,041 Division G
Rosenfeld Deposition: September 2008

In the United States District Court, Western District Lafayette Division
Ackle et al., *Plaintiffs*, vs. Citgo Petroleum Corporation, et al., *Defendants*.
Case Number 2:07CV1052
Rosenfeld Deposition: July 2009

In the United States District Court for the Southern District of Ohio
Carolyn Baker, et al., *Plaintiffs*, vs. Chevron Oil Company, et al., *Defendants*.
Case Number 1:05 CV 227
Rosenfeld Deposition: July 2008

In the Fourth Judicial District Court, Parish of Calcasieu, State of Louisiana
Craig Steven Arabie, et al., *Plaintiffs*, vs. Citgo Petroleum Corporation, et al., *Defendants*.
Case Number 07-2738 G

In the Fourteenth Judicial District Court, Parish of Calcasieu, State of Louisiana

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Leon B. Brydels, *Plaintiffs*, vs. Conoco, Inc., et al., *Defendants*.
Case Number 2004-6941 Division A

In the District Court of Tarrant County, Texas, 153rd Judicial District
Linda Faust, *Plaintiff*, vs. Burlington Northern Santa Fe Rail Way Company, Witeco Chemical Corporation
A/K/A Witco Corporation, Solvents and Chemicals, Inc. and Koppers Industries, Inc., *Defendants*.
Case Number 153-212928-05
Rosenfeld Deposition: December 2006, October 2007
Rosenfeld Trial: January 2008

In the Superior Court of the State of California in and for the County of San Bernardino
Leroy Allen, et al., *Plaintiffs*, vs. Nutro Products, Inc., a California Corporation and DOES 1 to 100,
inclusive, *Defendants*.
John Loney, Plaintiff, vs. James H. Didion, Sr.; Nutro Products, Inc.; DOES 1 through 20, inclusive,
Defendants.
Case Number VCVVS044671
Rosenfeld Deposition: December 2009
Rosenfeld Trial: March 2010

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., *Plaintiffs*, vs. International Paper Company, *Defendant*.
Civil Action Number 2:09-cv-232-WHA-TFM
Rosenfeld Deposition: July 2010, June 2011

In the Superior Court of the State of California in and for the County of Los Angeles
Leslie Hensley and Rick Hensley, *Plaintiffs*, vs. Peter T. Hoss, as trustee on behalf of the Cone Fee Trust;
Plains Exploration & Production Company, a Delaware corporation; Rayne Water Conditioning, Inc., a
California Corporation; and DOES 1 through 100, *Defendants*.
Case Number SC094173
Rosenfeld Deposition: September 2008, October 2008

In the Superior Court of the State of California in and for the County of Santa Barbara, Santa Maria Branch
Clifford and Shirley Adelhelm, et al., all individually, *Plaintiffs*, vs. Unocal Corporation, a Delaware
Corporation; Union Oil Company of California, a California corporation; Chevron Corporation, a
California corporation; ConocoPhillips, a Texas corporation; Kerr-McGee Corporation, an Oklahoma
corporation; and DOES 1 through 100, *Defendants*.
Case Number 1229251 (Consolidated with case number 1231299)
Rosenfeld Deposition: January 2008

In the United States District Court for Eastern District of Arkansas, Eastern District of Arkansas
Harry Stephens Farms, Inc. and Harry Stephens, individual and as managing partner of Stephens
Partnership, *Plaintiffs*, vs. Helena Chemical Company, and Exxon Mobil Corp., successor to Mobil
Chemical Co., *Defendants*.
Case Number 2:06-CV-00166 JMM (Consolidated with case number 4:07CV00278 JMM)
Rosenfeld Deposition: July 2010

In the United States District Court for the Western District of Arkansas, Texarkana Division
Rhonda Brasel, et al., *Plaintiffs*, vs. Weyerhaeuser Company and DOES 1 through 100, *Defendants*.
Civil Action Number 07-4037
Rosenfeld Deposition: March 2010
Rosenfeld Trial: October 2010

In the District Court of Texas 21st Judicial District of Burleson County
Dennis Davis, *Plaintiff*, vs. Burlington Northern Santa Fe Rail Way Company, *Defendant*.
Case Number 25,151

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Rosenfeld CV

COMMENTS

RESPONSES

E56
cont.

Rosenfeld Trial: May 2009

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cammon, 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

COMMENTS

RESPONSES

E57 demonstrate commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

E58 SWAPE has received limited discovery regarding this project. 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.

E57 This comment appears to be a continuation of Comment E55. Refer to response to Comment E55.

E58 Comments regarding the Commenter's review of the EIR are noted. As this information does not pertain to the adequacy of the EIR, no further response is necessary.



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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 Certification:

California Professional Geologist
 California Certified Hydrogeologist
 Qualified SSWPP 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 – present;
- Senior Environmental Analyst, Komex H2O Science, Inc (2000 – 2003);

E59 The Commenter's qualifications are noted. As this information does not pertain to the adequacy of the EIR, no further response is necessary.

E59

E59
cont.

- 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 numerous environmental impact reports under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions and geologic hazards.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- 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.
- 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.

COMMENTS

RESPONSES

E59
cont.

- 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.

COMMENTS

RESPONSES

E59
cont.

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 currently teaches Physical Geology (lecture and lab) to students at Golden West College in Huntington Beach, California.

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, Colorado.

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.

COMMENTS

RESPONSES

E59
cont.

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 representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

COMMENTS

RESPONSES

E59
cont.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

COMMENTS

RESPONSES

E59
cont.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention..., Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

COMMENTS

RESPONSES

Start date and time 04/15/20 15:56:57

AERSCREEN 16216

Costa Verde Revitalization Construction

Costa Verde Revitalization Construction

----- DATA ENTRY VALIDATION -----

	METRIC	ENGLISH
** AREADATA ** -----		
Emission Rate:	0.221E-02 g/s	0.175E-01 lb/hr
Area Height:	3.00 meters	9.84 feet
Area Source Length:	351.50 meters	1153.22 feet
Area Source Width:	160.00 meters	524.93 feet
Vertical Dimension:	1.50 meters	4.92 feet
Model Mode:	URBAN	
Population:	1426000	
Dist to Ambient Air:	1.0 meters	3. feet
** BUILDING DATA **		

COMMENTS

RESPONSES

No Building Downwash Parameters

** TERRAIN DATA **

No Terrain Elevations

Source Base Elevation: 0.0 meters 0.0 feet

Probe distance: 5000. meters 16404. feet

No flagpole receptors

No discrete receptors used

** FUMIGATION DATA **

No fumigation requested

** METEOROLOGY DATA **

Min/Max Temperature: 250.0 / 310.0 K -9.7 / 98.3 Deg F

Minimum Wind Speed: 0.5 m/s

COMMENTS

RESPONSES

Anemometer Height: 10.000 meters

Dominant Surface Profile: Urban

Dominant Climate Type: Average Moisture

Surface friction velocity (u*): not adjusted

DEBUG OPTION ON

AERSCREEN output file:

2020.04.15_CostaVerde_Construction.out

*** AERSCREEN Run is Ready to Begin

No terrain used, AERMAP will not be run

SURFACE CHARACTERISTICS & MAKEMET

Obtaining surface characteristics...

COMMENTS

RESPONSES

Using AERMET seasonal surface characteristics for Urban with Average Moisture

Season	Albedo	Bo	zo
Winter	0.35	1.50	1.000
Spring	0.14	1.00	1.000
Summer	0.16	2.00	1.000
Autumn	0.18	2.00	1.000

Creating met files aerscreen_01_01.sfc & aerscreen_01_01.pfl

Creating met files aerscreen_02_01.sfc & aerscreen_02_01.pfl

Creating met files aerscreen_03_01.sfc & aerscreen_03_01.pfl

Creating met files aerscreen_04_01.sfc & aerscreen_04_01.pfl

Buildings and/or terrain present or rectangular area source, skipping probe

FLOWSECTOR started 04/15/20 15:58:27

Running AERMOD

Processing Winter

Processing surface roughness sector 1

COMMENTS

RESPONSES

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 10

***** WARNING MESSAGES *****

*** NONE ***

COMMENTS

RESPONSES

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 25

***** WARNING MESSAGES *****

*** NONE ***

COMMENTS

RESPONSES

<div>Running AERMOD</div> <div>Processing Spring</div> <div>Processing surface roughness sector 1</div> <div>*****</div> <div>Processing wind flow sector 1</div> <div>AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 0</div> <div>***** WARNING MESSAGES *****</div> <div>*** NONE ***</div> <div>*****</div> <div>Processing wind flow sector 2</div> <div>AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 5</div> <div>***** WARNING MESSAGES *****</div> <div>*** NONE ***</div> <div>*****</div> <div>Processing wind flow sector 3</div> <div>AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 10</div>	
---	--

COMMENTS

RESPONSES

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 25

COMMENTS

RESPONSES

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Summer

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 5

***** WARNING MESSAGES *****

*** NONE ***

COMMENTS

RESPONSES

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 20

***** WARNING MESSAGES *****

*** NONE ***

COMMENTS

RESPONSES

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 25

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Autumn

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 5

COMMENTS

RESPONSES

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 20

COMMENTS

RESPONSES

```
***** WARNING MESSAGES *****
*** NONE ***

*****

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 25

***** WARNING MESSAGES *****
*** NONE ***

FLOWSECTOR ended 04/15/20 15:58:40

REFINE started 04/15/20 15:58:40

AERMOD Finishes Successfully for REFINE stage 3 Winter sector 0

***** WARNING MESSAGES *****
*** NONE ***

REFINE ended 04/15/20 15:58:42

*****

AERSCREEN Finished Successfully
With no errors or warnings
```

COMMENTS

RESPONSES

Check log file for details

Ending date and time 04/15/20 15:58:44

COMMENTS

RESPONSES

Concentration H0	U*	W*	Distance DT/DZ	Elevation ZICNV	Diag ZIMCH	Season/Month M-O LEN	Zo Z0	sector BOWEN	ALBEDO	REF	Date WS HT
0.12189E+01			1.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.12787E+01			25.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.13332E+01			50.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.13810E+01			75.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.14238E+01			100.00	0.00	5.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.14782E+01			125.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.15154E+01			150.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.15495E+01			175.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
* 0.15508E+01			176.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.12831E+01			200.00	0.00	20.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.95717E+00			225.00	0.00	20.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.79782E+00			250.00	0.00	5.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.70127E+00			275.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.62366E+00			300.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.55963E+00			325.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	
310.0	2.0										
0.50637E+00			350.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000	1.50	0.35	0.50	10.0	

COMMENTS

RESPONSES

310.0	2.0											
	0.46139E+00	375.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.42292E+00	400.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.38943E+00	425.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.36063E+00	450.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.33516E+00	475.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.31282E+00	500.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.29267E+00	525.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.27487E+00	550.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.25899E+00	575.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.24446E+00	600.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.23131E+00	625.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.21938E+00	650.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.20852E+00	675.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.19845E+00	700.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.18923E+00	725.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.18078E+00	750.00	0.00	0.0	Winter	0-360	10011001					
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0			
310.0	2.0											
	0.17299E+00	775.00	0.00	0.0	Winter	0-360	10011001					

COMMENTS

RESPONSES

-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.16580E+00		800.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15906E+00		825.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15271E+00		850.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14680E+00		875.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14130E+00		900.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.13615E+00		925.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.13133E+00		950.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.12682E+00		975.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.12257E+00		1000.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.11857E+00		1025.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.11475E+00		1050.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.11114E+00		1075.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.10774E+00		1100.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.10451E+00		1125.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.10146E+00		1150.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.98547E-01		1175.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										

COMMENTS

RESPONSES

0.95769E-01	1200.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.93127E-01	1225.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.90612E-01	1250.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.88215E-01	1275.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.85928E-01	1300.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.83745E-01	1325.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.81659E-01	1350.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.79655E-01	1375.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.77721E-01	1400.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.75867E-01	1425.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.74091E-01	1450.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.72386E-01	1475.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.70750E-01	1500.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.69177E-01	1525.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.67666E-01	1550.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.66212E-01	1575.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			
310.0 2.0						
0.64812E-01	1600.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999.	21.	6.0 1.000 1.50	0.35 0.50 10.0			

COMMENTS

RESPONSES

310.0	2.0											
	0.63464E-01	1625.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.62164E-01	1650.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.60910E-01	1675.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.59700E-01	1700.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.58532E-01	1725.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.57404E-01	1750.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.56314E-01	1775.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.55259E-01	1800.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.54236E-01	1825.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.53243E-01	1850.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.52281E-01	1875.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.51349E-01	1900.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.50446E-01	1925.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.49570E-01	1950.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.48721E-01	1975.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.47897E-01	2000.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.47094E-01	2025.00	0.00	0.0		Winter	0-360	10011001				

COMMENTS

RESPONSES

-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.46312E-01		2050.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.45552E-01		2075.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.44814E-01		2100.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.44096E-01		2125.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.43398E-01		2150.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.42720E-01		2175.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.42059E-01		2200.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.41416E-01		2225.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.40791E-01		2250.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.40182E-01		2275.00		0.00	5.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.39590E-01		2300.00		0.00	5.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.39012E-01		2325.00		0.00	5.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.38448E-01		2350.00		0.00	5.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.37898E-01		2375.00		0.00	5.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.37362E-01		2400.00		0.00	5.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.36839E-01		2425.00		0.00	5.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										

COMMENTS

RESPONSES

0.36328E-01	2450.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.35830E-01	2475.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.35344E-01	2500.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.34869E-01	2525.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.34405E-01	2550.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.33952E-01	2575.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.33509E-01	2600.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.33076E-01	2625.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.32653E-01	2650.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.32239E-01	2675.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.31835E-01	2700.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.31439E-01	2725.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.31051E-01	2750.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.30671E-01	2775.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.30299E-01	2800.01	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.29935E-01	2825.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.29579E-01	2850.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0

COMMENTS

RESPONSES

310.0	2.0										
	0.29231E-01	2875.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.28890E-01	2900.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.28555E-01	2925.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.28228E-01	2950.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.27907E-01	2975.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.27592E-01	3000.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.27460E-01	3025.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.27152E-01	3050.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.26850E-01	3075.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.26555E-01	3100.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.26264E-01	3125.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.25979E-01	3150.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.25700E-01	3175.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.25425E-01	3200.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.25156E-01	3225.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.24891E-01	3250.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.24632E-01	3275.00	0.00	0.0	Winter	0-360	10011001				

COMMENTS

RESPONSES

-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.24377E-01		3300.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.24126E-01		3325.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.23880E-01		3350.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.23638E-01		3375.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.23401E-01		3400.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.23167E-01		3425.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.22938E-01		3450.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.22712E-01		3475.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.22490E-01		3500.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.22272E-01		3525.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.22058E-01		3550.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.21847E-01		3575.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.21640E-01		3600.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.21436E-01		3625.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.21235E-01		3650.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.21038E-01		3675.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										

COMMENTS

RESPONSES

0.20843E-01	3700.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.20652E-01	3725.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.20464E-01	3750.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.20279E-01	3775.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.20096E-01	3800.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.19917E-01	3825.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.19740E-01	3850.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.19566E-01	3875.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.19395E-01	3900.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.19226E-01	3925.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.19059E-01	3950.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.18896E-01	3975.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.18734E-01	4000.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.18575E-01	4025.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.18419E-01	4050.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.18264E-01	4075.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.18112E-01	4100.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				

COMMENTS

RESPONSES

310.0	2.0											
	0.17962E-01	4125.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17814E-01	4150.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17668E-01	4175.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17524E-01	4200.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17383E-01	4225.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17243E-01	4250.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17105E-01	4275.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16969E-01	4300.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16835E-01	4325.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16703E-01	4350.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16572E-01	4375.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16444E-01	4400.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16317E-01	4425.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16192E-01	4449.99	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16068E-01	4475.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.15946E-01	4500.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.15826E-01	4525.00	0.00	0.0		Winter	0-360	10011001				

COMMENTS

RESPONSES

-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15707E-01		4550.00		0.00	15.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15589E-01		4575.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15473E-01		4600.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15359E-01		4625.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15246E-01		4650.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15135E-01		4675.00		0.00	15.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15025E-01		4700.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14916E-01		4725.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14809E-01		4750.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14703E-01		4775.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14598E-01		4800.00		0.00	5.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14495E-01		4825.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14393E-01		4850.00		0.00	5.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14292E-01		4875.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14192E-01		4900.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14094E-01		4925.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										

COMMENTS

RESPONSES

0.13997E-01	4950.00	0.00	0.0	Winter	0-360	10011001	
-1.30 0.043 -9.000 0.020 -999. 21. 6.0 1.000 1.50 0.35 0.50 10.0							
310.0 2.0							
0.13900E-01	4975.00	0.00	0.0	Winter	0-360	10011001	
-1.30 0.043 -9.000 0.020 -999. 21. 6.0 1.000 1.50 0.35 0.50 10.0							
310.0 2.0							
0.13806E-01	5000.00	0.00	0.0	Winter	0-360	10011001	
-1.30 0.043 -9.000 0.020 -999. 21. 6.0 1.000 1.50 0.35 0.50 10.0							
310.0 2.0							

COMMENTS

RESPONSES

Start date and time 04/15/20 15:58:58

AERSCREEN 16216

Costa Verde Revitalization Operation

Costa Verde Revitalization Operation

----- DATA ENTRY VALIDATION -----

METRIC

ENGLISH

** AREADATA ** -----

Emission Rate: 0.267E-02 g/s 0.212E-01 lb/hr

Area Height: 3.00 meters 9.84 feet

Area Source Length: 351.50 meters 1153.22 feet

Area Source Width: 160.00 meters 524.93 feet

Vertical Dimension: 1.50 meters 4.92 feet

Model Mode: URBAN

Population: 1426000

Dist to Ambient Air: 1.0 meters 3. feet

** BUILDING DATA **

COMMENTS

RESPONSES

No Building Downwash Parameters

** TERRAIN DATA **

No Terrain Elevations

Source Base Elevation: 0.0 meters 0.0 feet

Probe distance: 5000. meters 16404. feet

No flagpole receptors

No discrete receptors used

** FUMIGATION DATA **

No fumigation requested

** METEOROLOGY DATA **

Min/Max Temperature: 250.0 / 310.0 K -9.7 / 98.3 Deg F

Minimum Wind Speed: 0.5 m/s

COMMENTS

RESPONSES

<div>Anemometer Height: 10.000 meters</div> <div>Dominant Surface Profile: Urban</div> <div>Dominant Climate Type: Average Moisture</div> <div>Surface friction velocity (u*): not adjusted</div> <div>DEBUG OPTION ON</div> <div>AERSCREEN output file: 2020.04.15_CostaVerde_Operation.out</div> <div>*** AERSCREEN Run is Ready to Begin</div> <div>No terrain used, AERMAP will not be run</div> <div>*****</div> <div>SURFACE CHARACTERISTICS & MAKEMET</div> <div>Obtaining surface characteristics...</div>	
--	--

COMMENTS

RESPONSES

Using AERMET seasonal surface characteristics for Urban with Average Moisture

Season	Albedo	Bo	zo
Winter	0.35	1.50	1.000
Spring	0.14	1.00	1.000
Summer	0.16	2.00	1.000
Autumn	0.18	2.00	1.000

Creating met files aerscreen_01_01.sfc & aerscreen_01_01.pfl

Creating met files aerscreen_02_01.sfc & aerscreen_02_01.pfl

Creating met files aerscreen_03_01.sfc & aerscreen_03_01.pfl

Creating met files aerscreen_04_01.sfc & aerscreen_04_01.pfl

Buildings and/or terrain present or rectangular area source, skipping probe

FLOWSECTOR started 04/15/20 16:00:13

Running AERMOD

Processing Winter

Processing surface roughness sector 1

COMMENTS

RESPONSES

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 10

***** WARNING MESSAGES *****

*** NONE ***

COMMENTS

RESPONSES

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 25

***** WARNING MESSAGES *****

*** NONE ***

COMMENTS

RESPONSES

Running AERMOD

Processing Spring

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 5

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 10

COMMENTS

RESPONSES

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 20

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 25

COMMENTS

RESPONSES

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Summer

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 5

***** WARNING MESSAGES *****

*** NONE ***

COMMENTS

RESPONSES

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 20

***** WARNING MESSAGES *****

*** NONE ***

COMMENTS

RESPONSES

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 25

***** WARNING MESSAGES *****

*** NONE ***

Running AERMOD

Processing Autumn

Processing surface roughness sector 1

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 0

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 5

COMMENTS

RESPONSES

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 10

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 15

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 20

COMMENTS

RESPONSES

***** WARNING MESSAGES *****

*** NONE ***

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 25

***** WARNING MESSAGES *****

*** NONE ***

FLOWSECTOR ended 04/15/20 16:00:26

REFINE started 04/15/20 16:00:26

AERMOD Finishes Successfully for REFINE stage 3 Winter sector 0

***** WARNING MESSAGES *****

*** NONE ***

REFINE ended 04/15/20 16:00:28

AERSCREEN Finished Successfully

With no errors or warnings

COMMENTS

RESPONSES

Check log file for details

Ending date and time 04/15/20 16:00:30

COMMENTS

RESPONSES

Concentration	Distance	Elevation	Diag	Season/Month	Zo sector	Date						
H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF	WS	HT
REF	TA	HT										
0.14715E+01			1.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.15437E+01			25.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.16095E+01			50.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.16672E+01			75.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.17188E+01			100.00	0.00	5.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.17845E+01			125.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.18294E+01			150.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.18706E+01			175.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
* 0.18722E+01			176.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.15490E+01			200.00	0.00	20.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.11555E+01			225.00	0.00	20.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.96315E+00			250.00	0.00	5.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.84660E+00			275.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.75290E+00			300.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.67560E+00			325.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
0.61130E+00			350.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	

COMMENTS

RESPONSES

310.0	2.0											
	0.55700E+00	375.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.51056E+00	400.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.47014E+00	425.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.43537E+00	450.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.40461E+00	475.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.37764E+00	500.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.35333E+00	525.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.33184E+00	550.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.31266E+00	575.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.29512E+00	600.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.27924E+00	625.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.26485E+00	650.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.25173E+00	675.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.23957E+00	700.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.22845E+00	725.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.21824E+00	750.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.20884E+00	775.00	0.00	0.0		Winter	0-360	10011001				

COMMENTS

RESPONSES

-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.20016E+00		800.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.19203E+00		825.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18436E+00		850.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17723E+00		875.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17058E+00		900.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.16436E+00		925.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15855E+00		950.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.15310E+00		975.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14797E+00		1000.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.14314E+00		1025.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.13853E+00		1050.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.13418E+00		1075.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.13006E+00		1100.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.12617E+00		1125.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.12248E+00		1150.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.11897E+00		1175.00	0.00	0.0		Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										

COMMENTS

RESPONSES

0.11562E+00	1200.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.11243E+00	1225.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.10939E+00	1250.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.10650E+00	1275.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.10373E+00	1300.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.10110E+00	1325.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.98581E-01	1350.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.96162E-01	1375.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.93827E-01	1400.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.91589E-01	1425.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.89444E-01	1450.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.87387E-01	1475.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.85411E-01	1500.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.83513E-01	1525.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.81688E-01	1550.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.79933E-01	1575.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.78243E-01	1600.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0

COMMENTS

RESPONSES

310.0	2.0									
	0.76615E-01	1625.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.75046E-01	1650.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.73532E-01	1675.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.72072E-01	1700.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.70662E-01	1725.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.69300E-01	1750.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.67984E-01	1775.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.66711E-01	1800.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.65475E-01	1825.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.64276E-01	1850.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.63115E-01	1875.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.61990E-01	1900.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.60900E-01	1925.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.59843E-01	1950.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.58818E-01	1975.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.57823E-01	2000.00	0.00	0.0	Winter	0-360	10011001			
-1.30	0.043 -9.000	0.020 -999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0									
	0.56853E-01	2025.00	0.00	0.0	Winter	0-360	10011001			

COMMENTS

RESPONSES

-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.55909E-01		2050.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.54992E-01		2075.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.54100E-01		2100.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.53234E-01		2125.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.52392E-01		2150.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.51572E-01		2175.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.50775E-01		2200.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.49999E-01		2225.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.49244E-01		2250.00	0.00	0.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.48508E-01		2275.00	0.00	5.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.47794E-01		2300.00	0.00	5.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.47096E-01		2325.00	0.00	5.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.46416E-01		2350.00	0.00	5.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.45752E-01		2375.00	0.00	5.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.45104E-01		2400.00	0.00	5.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.44473E-01		2425.00	0.00	5.0			Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										

COMMENTS

RESPONSES

0.43857E-01	2450.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.43256E-01	2475.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.42668E-01	2500.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.42095E-01	2525.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.41535E-01	2550.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.40988E-01	2575.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.40453E-01	2600.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.39931E-01	2625.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.39420E-01	2650.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.38920E-01	2675.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.38431E-01	2700.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.37954E-01	2725.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.37486E-01	2750.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.37028E-01	2775.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.36578E-01	2800.01	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.36139E-01	2825.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0
310.0 2.0						
0.35709E-01	2850.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.			6.0 1.000 1.50		0.35	0.50 10.0

COMMENTS

RESPONSES

310.0	2.0										
0.35289E-01		2875.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.34877E-01		2900.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.34473E-01		2925.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.34077E-01		2950.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.33690E-01		2975.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.33310E-01		3000.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.33150E-01		3025.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.32779E-01		3050.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.32415E-01		3075.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.32058E-01		3100.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.31707E-01		3125.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.31363E-01		3150.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.31025E-01		3175.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.30694E-01		3200.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.30369E-01		3225.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.30050E-01		3250.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
0.29736E-01		3275.00	0.00	0.0	Winter	0-360	10011001				

COMMENTS

RESPONSES

-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.29428E-01		3300.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.29126E-01		3325.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.28829E-01		3350.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.28537E-01		3375.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.28250E-01		3400.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.27968E-01		3425.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.27691E-01		3450.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.27419E-01		3475.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.27151E-01		3500.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.26888E-01		3525.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.26629E-01		3550.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.26375E-01		3575.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.26124E-01		3600.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.25878E-01		3625.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.25636E-01		3650.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.25397E-01		3675.00		0.00	0.0		Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										

COMMENTS

RESPONSES

0.25163E-01	3700.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.24932E-01	3725.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.24705E-01	3750.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.24481E-01	3775.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.24261E-01	3800.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.24044E-01	3825.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.23831E-01	3850.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.23621E-01	3875.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.23414E-01	3900.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.23210E-01	3925.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.23009E-01	3950.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.22812E-01	3975.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.22617E-01	4000.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.22425E-01	4025.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.22235E-01	4050.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.22049E-01	4075.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				
310.0 2.0						
0.21865E-01	4100.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35 0.50 10.0				

COMMENTS

RESPONSES

310.0	2.0										
	0.21684E-01	4125.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.21506E-01	4150.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.21330E-01	4175.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.21156E-01	4200.00	0.00	10.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.20985E-01	4225.00	0.00	5.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.20816E-01	4250.00	0.00	10.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.20650E-01	4275.00	0.00	5.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.20486E-01	4300.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.20324E-01	4325.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.20164E-01	4350.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.20007E-01	4375.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.19852E-01	4400.00	0.00	10.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.19698E-01	4425.00	0.00	5.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.19547E-01	4450.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.19398E-01	4475.00	0.00	5.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.19250E-01	4500.00	0.00	0.0	Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.19105E-01	4525.00	0.00	0.0	Winter	0-360	10011001				

COMMENTS

RESPONSES

-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18962E-01		4550.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18820E-01		4575.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18680E-01		4600.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18542E-01		4625.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18406E-01		4650.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18271E-01		4675.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18138E-01		4700.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.18007E-01		4725.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17878E-01		4750.00		0.00	5.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17750E-01		4775.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17624E-01		4800.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17499E-01		4825.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17376E-01		4850.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17254E-01		4875.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17133E-01		4900.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										
	0.17014E-01		4925.00		0.00	0.0	Winter		0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0										

COMMENTS

RESPONSES

0.16897E-01	4950.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.16781E-01	4975.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						
0.16666E-01	5000.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000	0.020 -999.	21.	6.0 1.000 1.50	0.35	0.50	10.0
310.0 2.0						

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	40.00	1000sqft	0.92	40,000.00	0
Research & Development	360.00	1000sqft	8.28	360,000.00	0
Parking Lot	1,673.00	Space	16.91	751,000.00	0
Hotel	200.00	Room	0.95	125,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	40
Climate Zone	13			Operational Year	2024
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	720.49	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

CalEEMod Version: CalEEMod.2016.3.2

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Costa Verde Center Revitalization Project - San Diego County, Annual

Project Characteristics -

Land Use - See SWAPE comment about parking, pedestrian oriented promenade, and sidewalks.

Construction Phase - See SWAPE comment about construction schedule.

Off-road Equipment - See SWAPE comment about construction equipment list.

Trips and VMT - Consistent with DEIR's model.

Demolition - Consistent with DEIR's model.

Grading - See SWAPE comment about acres of grading.

Architectural Coating - Consistent with DEIR's model.

Vehicle Trips - Consistent with DEIR's model.

Area Coating - Consistent with DEIR's model.

Solid Waste - Consistent with DEIR's model.

Sequestration - Consistent with DEIR's model.

Construction Off-road Equipment Mitigation - See SWAPE comments about Tier 4 Final Equipment, "Water Exposed Area," "Water Unpaved Roads", and "Reduce Vehicle Speeds on Unpaved Roads."

Mobile Land Use Mitigation - Consistent with DEIR's model.

Water Mitigation - See SWAPE comment about "Apply Water Conservation Strategy."

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	50.00
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	50.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	50
tblAreaCoating	Area_EF_Nonresidential_Interior	250	50
tblGrading	AcresOfGrading	112.50	11.50
tblGrading	MaterialExported	0.00	276,514.00
tblGrading	MaterialExported	0.00	28,000.00
tblLandUse	LandUseSquareFeet	290,400.00	125,000.00
tblLandUse	LotAcresage	6.67	0.95
tblSequestration	NumberNewTrees	0.00	197.00

tblSolidWaste	SolidWasteGenerationRate	37.20	40.80
tblSolidWaste	SolidWasteGenerationRate	109.50	337.50
tblSolidWaste	SolidWasteGenerationRate	27.36	367.20
tblTripsSolidWMT	Hauling Trip/number	0.00	187,520.00
tblTripsSolidWMT	Vendor Trip/number	209.00	0.00
tblTripsSolidWMT	Worker Trip/number	466.00	600.00
tblVehicleTrips	DV_Trip	18.00	0.00
tblVehicleTrips	DV_Trip	38.00	0.00
tblVehicleTrips	DV_Trip	15.00	0.00
tblVehicleTrips	PR_Trip	4.00	0.00
tblVehicleTrips	PR_Trip	4.00	0.00
tblVehicleTrips	PR_Trip	3.00	0.00
tblVehicleTrips	PR_Trip	77.00	100.00
tblVehicleTrips	PR_Trip	58.00	100.00
tblVehicleTrips	PR_Trip	82.00	100.00
tblVehicleTrips	ST_Trip	2.46	18.36
tblVehicleTrips	ST_Trip	8.19	6.70
tblVehicleTrips	ST_Trip	1.50	6.96
tblVehicleTrips	SU_Trip	1.05	16.36
tblVehicleTrips	SU_Trip	5.95	6.70
tblVehicleTrips	SU_Trip	1.11	6.96
tblVehicleTrips	WD_Trip	11.03	18.36
tblVehicleTrips	WD_Trip	8.17	6.70
tblVehicleTrips	WD_Trip	6.11	6.96

2.0 Emissions Summary

Costa Verde Center Revitalization Project - San Diego County, Annual

2.1 Overall Construction
Unmitigated Construction

Year	RCS	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio CO2	NH3 CO2	Total CO2	CH4	N2O	CO2e
2020	0.3142	6.7248	2.2787	0.0165	0.7848	0.1035	0.8883	0.2780	0.0560	0.3320	0.0000	1,507,750	1,507,750	0.1772	0.0000	1,512,180
2021	0.8489	17.4384	7.7872	0.0531	2.3328	0.1780	2,510.8	0.6172	0.1678	0.7850	0.0000	5,184,844	5,184,844	0.4839	0.0000	5,186,941
2022	2.1519	11.2862	5.6882	0.0372	1.8408	0.1164	1,957.0	0.4810	0.1097	0.5908	0.0000	3,650,481	3,650,481	0.3440	0.0000	3,650,962
Maximum	2.1519	17.4384	7.7872	0.0531	2.3328	0.1780	2,510.8	0.6172	0.1678	0.7850	0.0000	5,184,844	5,184,844	0.4839	0.0000	5,186,941

Mitigated Construction

Year	RCS	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio CO2	NH3 CO2	Total CO2	CH4	N2O	CO2e
2020	0.3142	6.7248	2.2787	0.0165	0.7848	0.1035	0.8883	0.2780	0.0560	0.3320	0.0000	1,507,750	1,507,750	0.1772	0.0000	1,512,180
2021	0.8489	17.4384	7.7872	0.0531	2.3328	0.1780	2,510.8	0.6172	0.1678	0.7850	0.0000	5,184,844	5,184,844	0.4839	0.0000	5,186,941
2022	2.1519	11.2862	5.6882	0.0372	1.8408	0.1164	1,957.0	0.4810	0.1097	0.5908	0.0000	3,650,481	3,650,481	0.3440	0.0000	3,650,962
Maximum	2.1519	17.4384	7.7872	0.0531	2.3328	0.1780	2,510.8	0.6172	0.1678	0.7850	0.0000	5,184,844	5,184,844	0.4839	0.0000	5,186,941

RESPONSES

COMMENTS

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOx (cons:quarter)										Maximum Mitigated ROG + NOx (cons:quarter)			
1	9-1-2020	11-30-2020	3.7843										3.7843			
2	12-1-2020	2-28-2021	6.4433										6.4433			
3	3-1-2021	5-31-2021	4.4553										4.4553			
4	6-1-2021	8-31-2021	4.4450										4.4450			
5	9-1-2021	11-30-2021	4.4328										4.4328			
6	12-1-2021	2-28-2022	4.1178										4.1178			
7	3-1-2022	5-31-2022	4.0774										4.0774			
8	6-1-2022	8-31-2022	4.0635										4.0635			
9	9-1-2022	8-30-2022	0.8925										0.8925			
		Highset	6.4433										6.4433			

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**2.2 Overall Operational
Unmitigated Operational**

Category	NO _x	NO _x	CO	SO ₂	Formaldehyde PM10	Formaldehyde PM10	PM10 Total	Formaldehyde PM2.5	Formaldehyde PM2.5	PM2.5 Total	Bio- CO ₂	MBio- CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
Area	2.2489	2.1000e-006	0.0227	0.0000		8.0000e-006	8.0000e-006		8.0000e-006	8.0000e-006	0.0000	0.0443	0.0443	1.2000e-006	0.0000	0.0472
Energy	0.0661	0.8013	0.5051	0.0000		0.0457	0.0457		0.0457	0.0457	0.0000	2.422896	2.422896	0.0357	0.0000	2.432564
Mobile	1.2463	5.0987	16.2323	0.0069	5.4114	0.0442	5.4556	1.4489	0.0411	1.4900	0.0000	4	4	0.2597	0.0000	5.531754
Vehicle						0.0000	0.0000		0.0000	0.0000	151.5298	0.0000	151.5298	0.8433	0.0000	354.9151
Water						0.0000	0.0000		0.0000	0.0000	60.0221	622.9631	682.9751	6.1980	0.1524	1,060.246
Total	3.5613	5.8982	15.7601	0.0065	5.4114	0.0889	5.5013	1.4489	0.0899	1.5358	211.5318	8,501.158	8,712.508	15.4848	0.1792	9,153.013

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**2.2 Overall Operational
Mitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Nbio-CO2	Total CO2	CH4	N2O	CO2e
bentley																
Area	2.2489	2.1000e-05	0.0227	0.0000	0.0000e-05	8.0000e-05	8.0000e-05	0.0000e-05	8.0000e-05	8.0000e-05	0.0000	0.0443	0.0443	1.2000e-04	0.0000	0.0472
Energy	0.0961	0.0019	0.0061	0.0000	0.0457	0.0457	0.0457	0.0457	0.0457	0.0457	0.0000	2.432896	2.432896	0.0937	0.0067	2.432894
Mobile	1.2842	5.2781	18.0963	0.0000	5.7902	0.0486	6.8571	1.5503	0.0437	1.5940	0.0000	5.601282	5.601282	0.2746	0.0000	5.608117
Vehicle						0.0000	0.0000	0.0000	0.0000	0.0000	161.3298	0.0000	161.3298	6.8433	0.0000	374.5131
Water					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	60.0221	822.8531	882.8751	6.1980	0.1824	1.062345
Total	3.5992	5.8773	18.5941	0.0042	5.7902	0.0927	5.8529	1.5503	0.0884	1.6388	211.3318	8.817146	9.058498	15.4897	0.1792	8.4496379
											1	0	0			4
Percent Reduction	-1.06	-3.37	-5.29	-6.19	-7.00	-3.05	-6.04	-7.00	-2.94	-6.77	0.00	-4.07	-3.97	-0.10	6.00	-3.78

2.3 Vegetation

Vegetation

CO2e	
Category	MT
New Trees	111,1560
Total	111,1560

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	9/1/2020	10/1/2020	5	30	
2	Site Preparation	Site Preparation	10/1/2020	11/9/2020	5	20	
3	Grading	Grading	11/10/2020	1/1/2021	5	45	
4	Building Construction	Building Construction	1/12/2021	9/19/2022	5	440	
5	Paving	Paving	9/20/2022	11/7/2022	5	38	
6	Architectural Coating	Architectural Coating	11/9/2022	12/8/2022	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 11.9

Acres of Paving: 16.91

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 787,500; Non-Residential Outdoor: 282,500; Striped Parking Area: 46,096 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.23
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	0.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractor/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	0.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	0.00	347	0.46
Grading	Tractor/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Cranes	3	0.00	69	0.20
Building Construction	Generator Sets	1	8.00	84	0.24
Building Construction	Tractor/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	0.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	0.00	60	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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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	1,179.00	10.80	7.30	20,000 LD_Mix	HDT_Mix	HHDT
Site Preparation		7	18.00	0.00	3,500.00	10.80	7.30	20,000 LD_Mix	HDT_Mix	HHDT
Grading		8	20.00	0.00	34,814.00	10.80	7.30	20,000 LD_Mix	HDT_Mix	HHDT
Building Construction		5	600.00	0.00	687,020.00	10.80	7.30	20,000 LD_Mix	HDT_Mix	HHDT
Paving		6	15.00	0.00	0.00	10.80	7.30	20,000 LD_Mix	HDT_Mix	HHDT
Architectural Coating		1	99.00	0.00	0.00	10.80	7.30	20,000 LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2020

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Nbio-CO2	Total CO2	CH4	N2O	CO2e
Transp																
Fugitive Dust					0.1292	0.0000	0.1292	0.0196	0.0000	0.0196	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off Road	0.3467	0.4490	0.3263	0.0000	0.0246	0.0246	0.0246	0.0231	0.0231	0.0231	0.0000	50.8979	50.8979	0.0144	0.0000	51.3578
Total	0.3467	0.4490	0.3263	0.0000	0.1732	0.0246	0.1541	0.0196	0.0231	0.0427	0.0000	50.8979	50.8979	0.0144	0.0000	51.3578
MTrpf																

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3.2 Demolition - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NBac CO2	Total CO2	CH4	N2O	CO2e
b1a1y1																
Heating	4.7100e-003	0.1877	0.0394	1.8000e-004	0.0101	3.3000e-004	0.0106	2.7700e-003	5.1000e-004	3.2800e-003	0.0000	45.4481	45.4481	4.0000e-004	0.0000	45.5875
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.3000e-004	8.1000e-004	8.1000e-003	2.0000e-005	1.8000e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.6310	1.6310	5.0000e-005	0.0000	1.6322
Total	5.5400e-003	0.1883	0.0444	1.8000e-004	0.0119	5.4000e-004	0.0124	3.2900e-003	5.2000e-004	3.7700e-003	0.0000	47.0961	47.0961	4.1400e-004	0.0000	47.1987

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NBac CO2	Total CO2	CH4	N2O	CO2e
b1a1y1																
Fugitive Dust					0.1292	0.0000	0.1292	0.0196	0.0000	0.0196	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0487	0.4980	0.3283	5.8000e-004		0.0249	0.0249		0.0231	0.0231	0.0000	50.9979	50.9979	0.0144	0.0000	51.3578
Total	0.0487	0.4980	0.3283	5.8000e-004	0.1292	0.0249	0.1541	0.0196	0.0231	0.0427	0.0000	50.9979	50.9979	0.0144	0.0000	51.3578

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3.2 Demolition - 2020

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NRBio-CO2	Total CO2	CH4	N2O	CO2e
t/yr																
Hauling	4.710E-003	0.1877	0.0384	4.620E-004	0.0101	5.582E-004	0.0106	2.770E-003	5.108E-004	3.352E-003	0.0000	45.4851	45.4851	4.080E-003	0.0000	45.5875
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.500E-004	6.100E-004	6.020E-003	2.000E-005	1.800E-003	1.000E-005	1.820E-003	4.800E-004	1.000E-005	4.900E-004	0.0000	1.6310	1.6310	6.000E-005	0.0000	1.6327
Total	5.540E-003	0.1883	0.0444	4.800E-004	0.0119	5.480E-004	0.0124	3.290E-003	5.208E-004	3.770E-003	0.0000	47.0961	47.0961	4.140E-003	0.0000	47.1997

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NRBio-CO2	Total CO2	CH4	N2O	CO2e
t/yr																
Fugitive Dust					0.1826	0.0000	0.1826	0.0966	0.0000	0.0966	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0408	0.4342	0.2161	3.820E-004	0.0220	0.0220	0.0220	0.0202	0.0202	0.0202	0.0000	33.4307	33.4307	0.0108	0.0000	33.7010
Total	0.0408	0.4342	0.2161	3.800E-004	0.1826	0.0220	0.2046	0.0966	0.0202	0.1168	0.0000	33.4307	33.4307	0.0108	0.0000	33.7010

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3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	Netto CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0140	0.4878	0.1140	1.3600e-003	0.0300	1.5700e-003	0.0315	8.2200e-004	1.6500e-003	8.7200e-004	0.0000	134.8888	134.8888	0.0122	0.0000	135.2724
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.8000e-004	4.8000e-003	4.8000e-003	1.0000e-005	1.4400e-003	1.0000e-005	1.4500e-003	3.8000e-004	1.0000e-005	3.8000e-004	0.0000	1.3048	1.3048	4.0000e-005	0.0000	1.3068
Total	0.0147	0.4933	0.1148	1.3700e-003	0.0314	1.5800e-003	0.0330	8.6000e-004	1.6100e-003	0.0101	0.0000	136.2733	136.2733	0.0122	0.0000	136.5752

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	Netto CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.1826	0.0000	0.1826	0.0596	0.0000	0.0596	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0408	0.4242	0.2151	3.8200e-004	0.0220	0.0220	0.0220	0.0202	0.0202	0.0202	0.0000	33.4306	33.4306	0.0108	0.0000	33.7098
Total	0.0408	0.4242	0.2151	3.8000e-004	0.1826	0.0220	0.2046	0.0596	0.0202	0.1198	0.0000	33.4306	33.4306	0.0108	0.0000	33.7098

3.3 Site Preparation - 2020
Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NSR CO2	Total CO2	CH4	N2O	CO2e
Heating	0.0140	0.4878	0.1140	1.3600e-003	0.0300	1.5700e-003	0.0315	8.2200e-003	1.5000e-003	8.7200e-003	0.0000	134.8888	134.8888	0.0122	0.0000	135.2724
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Motorist	6.8000e-004	4.8000e-004	4.8000e-003	1.0000e-005	1.4400e-003	1.0000e-005	1.4500e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.3048	1.3048	4.0000e-005	0.0000	1.3058
Total	0.0142	0.4883	0.1148	1.3700e-003	0.0314	1.5800e-003	0.0330	8.5000e-003	1.5100e-003	0.0101	0.0000	136.2733	136.2733	0.0122	0.0000	136.5782

3.4 Grading - 2020
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NSR CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.1403	0.0000	0.1403	0.0895	0.0000	0.0895	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0846	0.8539	0.6072	1.1800e-003		0.0413	0.0413		0.0380	0.0387	0.0000	103.5202	103.5202	0.0335	0.0000	104.3572
Total	0.0846	0.8539	0.6072	1.1800e-003	0.1403	0.0413	0.1816	0.0895	0.0380	0.1045	0.0000	103.5202	103.5202	0.0335	0.0000	104.3572

3.4 Grading - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NSB CO2	Total CO2	CH4	N2O	CO2e
b1a1y1																
Heating	0.1178	4.1813	0.9577	0.0114	0.2883	0.0132	0.2996	0.0778	0.0128	0.0906	0.0000	1,133.677	1,133.677	0.1021	0.0000	1,136.228
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.4000e-003	1.9400e-003	0.0102	3.0000e-005	3.0500e-003	2.0000e-005	3.0700e-003	8.1000e-004	2.0000e-005	8.3000e-004	0.0000	2.7545	2.7545	8.0000e-005	0.0000	2.7666
Total	0.1180	4.1823	0.9678	0.0115	0.2884	0.0132	0.2998	0.0784	0.0127	0.0911	0.0000	1,133.677	1,133.677	0.1022	0.0000	1,136.498

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NSB CO2	Total CO2	CH4	N2O	CO2e
b1a1y1																
Fugitive Dust					0.1403	0.0000	0.1403	0.0695	0.0000	0.0695	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0846	0.9539	0.6072	1.1800e-003	0.0413	0.0413	0.0413	0.0390	0.0390	0.0780	0.0000	103.5200	103.5200	0.0335	0.0000	104.3571
Total	0.0846	0.9539	0.6072	1.1800e-003	0.1403	0.0413	0.1816	0.0985	0.0380	0.1045	0.0000	103.5200	103.5200	0.0335	0.0000	104.3571

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3.4 Grading - 2020

Mitigated Construction Off-Site

Category	ROD	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NSB-CO2	Total CO2	CH4	N2O	CO2e
t/year																
Hauling	0.1176	4.1813	0.0677	0.0114	0.2863	0.0132	0.2995	0.0778	0.0126	0.0903	0.0000	1,135.677	1,135.677	0.1021	0.0000	1,136.258
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.4000e-003	1.0400e-003	0.0102	3.0000e-006	3.0500e-003	2.0000e-005	3.0700e-003	8.1000e-004	2.0000e-005	8.3000e-004	0.0000	2.7546	2.7546	8.0000e-005	0.0000	2.7596
Total	0.1180	4.1823	0.0678	0.0115	0.2864	0.0132	0.3000	0.0784	0.0127	0.0911	0.0000	1,136.432	1,136.432	0.1022	0.0000	1,136.888

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	ROD	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NSB-CO2	Total CO2	CH4	N2O	CO2e
t/year																
Fugitive Dust					0.0470	0.0000	0.0470	0.0152	0.0000	0.0152	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0147	0.1824	0.1081	0.04		6.5000e-003	6.5000e-003	6.3900e-003	6.3900e-003	6.3900e-003	0.0000	19.0732	19.0732	6.1700e-003	0.0000	19.2275
Total	0.0147	0.1824	0.1081	0.04	0.0470	6.5000e-003	0.0039	0.0152	6.3900e-003	0.0216	0.0000	19.0732	19.0732	6.1700e-003	0.0000	19.2275

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3.4 Grading - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Estimated PM10	Estimated PM10 Total	Fugitive PM2.5	Estimated PM2.5	Estimated PM2.5 Total	Bac CO2	NEBac CO2	Total CO2	CH4	N2O	CO2e
Heavy																
Hauling	0.0203	0.1072	0.1744	2.0700e-003	0.2354	2.1400e-003	0.2375	0.0581	2.0400e-003	0.0512	0.0000	206.2284	206.2284	0.0186	0.0000	206.6837
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.4000e-004	1.7000e-004	1.7500e-003	1.0000e-005	5.6000e-004	0.0000	5.7000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.4804	0.4804	0.0000	0.0000	0.4807
Total	0.0203	0.1072	0.1742	2.0800e-003	0.2354	2.1400e-003	0.2381	0.0583	2.0400e-003	0.0513	0.0000	206.7188	206.7188	0.0186	0.0000	207.1644

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Estimated PM10	Estimated PM10 Total	Fugitive PM2.5	Estimated PM2.5	Estimated PM2.5 Total	Bac CO2	NEBac CO2	Total CO2	CH4	N2O	CO2e
Heavy																
Fugitive Dust					0.0470	0.0000	0.0470	0.0152	0.0000	0.0152	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0147	0.1824	0.1081	2.2000e-004		6.5500e-003	6.5500e-003		6.5500e-003	6.5500e-003	0.0000	19.0732	19.0732	6.1700e-003	0.0000	19.2274
Total	0.0147	0.1824	0.1081	2.2000e-004	0.0470	6.5500e-003	0.0539	0.0152	6.5500e-003	0.0216	0.0000	19.0732	19.0732	6.1700e-003	0.0000	19.2274

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3.4 Grading - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NSR-CO2	Total CO2	CH4	N2O	CO2e
t/year																
Hauling	0.0203	0.1072	0.1744	2.0700e-003	0.2354	2.1400e-003	0.2375	0.0551	2.0400e-003	0.0612	0.0000	206.2284	206.2284	0.0186	0.0000	206.6937
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.4000e-004	1.7700e-004	1.7500e-003	1.0000e-005	5.4600e-004	0.0000	5.7700e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.4604	0.4604	1.0000e-005	0.0000	0.4607
Total	0.0203	0.1072	0.1742	2.0800e-003	0.2359	2.1400e-003	0.2381	0.0553	2.0400e-003	0.0613	0.0000	206.7188	206.7188	0.0186	0.0000	207.1844

3.5 Building Construction - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NSR-CO2	Total CO2	CH4	N2O	CO2e
t/year																
Off-Road	0.2414	2.2139	2.1051	3.4550e-003		0.1217	0.1217		0.1145	0.1145	0.0000	294.1793	294.1793	0.0710	0.0000	295.9537
Total	0.2414	2.2139	2.1051	3.4550e-003		0.1217	0.1217		0.1145	0.1145	0.0000	294.1793	294.1793	0.0710	0.0000	295.9537

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3.5 Building Construction - 2021
Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NetBac CO2	Total CO2	CH4	N2O	CO2e
	b1a1y1															
Heating	0.4073	14.1658	3.4842	0.0415	1.4388	0.0428	1.4817	0.3803	0.0410	0.4212	0.0000	-4,133.074	4,133.074	0.3728	0.0000	4,140.395
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.2848	0.1880	1.8037	5.6000e-003	0.8111	4.3200e-003	0.8154	0.1624	3.8800e-003	0.1684	0.0000	533.7882	533.7882	0.0151	0.0000	534.1807
Total	0.6922	14.3547	5.2879	0.0414	2.2499	0.0471	2.0871	0.5427	0.0445	0.5876	0.0000	-4,554.873	4,664.873	0.3884	0.0000	4,674.576

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NetBac CO2	Total CO2	CH4	N2O	CO2e
	b1a1y1															
Off-Road	0.2414	2.2138	2.1051	3.4200e-003		0.1217	0.1217		0.1145	0.1145	0.0000	-294.1790	294.1790	0.0710	0.0000	295.5533
Total	0.2414	2.2138	2.1051	3.4200e-003		0.1217	0.1217		0.1145	0.1145	0.0000	-294.1790	294.1790	0.0710	0.0000	295.5533

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3.5 Building Construction - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bec CO2	NEB CO2	Total CO2	CH4	N2O	CO2e
Heating	0.4073	14.9558	3.4842	0.0415	1.4388	0.0428	1.4817	0.3803	0.0410	0.4212	0.0000	4,133.074	4,133.074	0.3728	0.0000	4,140.395
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.2848	0.1880	1.8037	5.6000e-003	0.8111	4.3200e-003	0.8154	0.1624	3.8800e-003	0.1684	0.0000	533.7882	533.7882	0.0151	0.0000	534.1807
Total	0.6922	14.9547	5.3079	0.0414	2.2499	0.0471	2.0871	0.5427	0.0443	0.5870	0.0000	4,664.872	4,664.872	0.3884	0.0000	4,674.576

3.5 Building Construction - 2022

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bec CO2	NEB CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1947	1.4531	1.6218	2.5000e-003		0.0752	0.0752		0.0708	0.0708	0.0000	215.5045	215.5045	0.0518	0.0000	216.7952
Total	0.1947	1.4531	1.6218	2.5000e-003		0.0752	0.0752		0.0708	0.0708	0.0000	215.5045	215.5045	0.0518	0.0000	216.7952

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3.5 Building Construction - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NBB CO2	Total CO2	CH4	N2O	CO2e
bousyl																
Heating	0.2801	9.4839	2.6400	0.0286	1.3771	0.0286	1.4057	0.3579	0.0284	0.3863	0.0000	2.888.434	2.888.434	0.2702	0.0000	2.892.198
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1636	0.1262	1.2842	4.1800e-003	0.4475	3.1000e-003	0.4508	0.1189	2.8600e-003	0.1218	0.0000	-378.9624	-378.9624	0.0103	0.0000	378.8199
Total	0.4437	9.6101	3.9242	0.0341	1.8246	0.0287	1.8543	0.4768	0.0283	0.5051	0.0000	3.361.697	3.361.697	0.2804	0.0000	3.368.697

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NBB CO2	Total CO2	CH4	N2O	CO2e
bousyl																
Off-Road	0.1587	1.4523	1.5218	2.5500e-003		0.0732	0.0732		0.0708	0.0708	0.0000	215.5042	215.5042	0.0518	0.0000	216.7949
Total	0.1587	1.4523	1.5218	2.5500e-003		0.0732	0.0732		0.0708	0.0708	0.0000	215.5042	215.5042	0.0518	0.0000	216.7949

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3.5 Building Construction - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Estimate PM10	PM10 Total	Fugitive PM2.5	Estimate PM2.5	PM2.5 Total	Bac-CO2	Netto-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.2801	0.4838	2.5400	0.0000	1.3771	0.0000	1.4037	0.3578	0.0000	0.3578	0.0000	2.885,434	2,885,434	0.2702	0.0000	2,882,198
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1836	0.1262	1.2842	0.0000	0.4475	3.1000e-003	0.4500	0.1189	2.8500e-003	0.1218	0.0000	378.6624	378.6624	0.0103	0.0000	378.6166
Total	0.4637	0.6101	3.8242	0.0000	1.8246	0.0000	1.8543	0.4768	0.0000	0.4768	0.0000	3,354,097	3,354,097	0.2804	0.0000	3,352,067

3.6 Paving - 2022

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Estimate PM10	PM10 Total	Fugitive PM2.5	Estimate PM2.5	PM2.5 Total	Bac-CO2	Netto-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.0193	0.1847	0.2522	4.0000e-004	8.5400e-003	8.5400e-003	8.5400e-003	9.1400e-003	9.1400e-003	9.1400e-003	0.0000	35.0482	35.0482	0.0113	0.0000	35.3316
Paving	0.0222					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0415	0.1847	0.2522	4.0000e-004	8.5400e-003	8.5400e-003	8.5400e-003	9.1400e-003	9.1400e-003	9.1400e-003	0.0000	35.0482	35.0482	0.0113	0.0000	35.3316

3.6 Paving - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NH3-CO2	Total CO2	CH4	N2O	CO2e
Heating	0.0000	0.0000	0.0000	0.0000	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	8.8000e-004	8.8000e-004	8.8000e-003	2.0000e-005	2.1100e-003	1.0000e-005	2.1300e-003	5.8000e-004	1.0000e-005	5.7000e-004	0.0000	1.7715	1.7715	5.0000e-005	0.0000	1.7727
Total	8.8000e-004	8.8000e-004	8.8000e-003	2.0000e-005	2.1100e-003	1.0000e-005	2.1300e-003	5.8000e-004	1.0000e-005	5.7000e-004	0.0000	1.7715	1.7715	5.0000e-005	0.0000	1.7727

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NH3-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.0193	0.1947	0.2652	1.0000e-004	5.6000e-003	9.6400e-003	9.6400e-003	9.1400e-003	9.1400e-003	9.1400e-003	0.0000	35.0482	35.0482	0.0113	0.0000	35.3316
Paving	0.0222				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0415	0.1947	0.2652	1.0000e-004	5.6000e-003	9.6400e-003	9.6400e-003	9.1400e-003	9.1400e-003	9.1400e-003	0.0000	35.0482	35.0482	0.0113	0.0000	35.3316

3.6 Paving - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	MSR-CO2	Total CO2	CH4	N2O	CO2e
15m3/yr																
Heating	0.0000	0.0000	0.0000	0.0000	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
08000a-004	8.8000e-004	8.8000e-004	8.8000e-003	2.0000e-005	2.1100e-003	1.0000e-005	2.1200e-003	5.8000e-004	1.0000e-005	5.7900e-004	0.0000	1.7715	1.7715	8.0000e-005	0.0000	1.7727
Total	8.8000e-004	8.8000e-004	8.8000e-003	2.0000e-005	2.1100e-003	1.0000e-005	2.1200e-003	5.8000e-004	1.0000e-005	5.7900e-004	0.0000	1.7715	1.7715	8.0000e-005	0.0000	1.7727

3.7 Architectural Coating - 2022

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	MSR-CO2	Total CO2	CH4	N2O	CO2e
15m3/yr																
Archit Coating	1.4780					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8800e-003	0.0247	0.0317	6.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003	0.0000	4.4882	4.4882	2.5000e-004	0.0000	4.4755
Total	1.4815	0.0247	0.0317	6.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003	0.0000	4.4882	4.4882	2.5000e-004	0.0000	4.4755

3.7 Architectural Coating - 2022
Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	MSB CO2	Total CO2	CH4	N2O	CO2e
Heating	0.0000	0.0000	0.0000	0.0000	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
Worster	5.7000e-003	3.9200e-003	0.0402	1.3600e-004	0.0139	1.0000e-004	0.0140	3.8900e-003	8.0000e-005	3.7800e-003	0.0000	11.6917	11.6917	3.2000e-004	0.0000	11.6996
Total	5.7000e-003	3.9200e-003	0.0402	1.3600e-004	0.0139	1.0000e-004	0.0140	3.8900e-003	8.0000e-005	3.7800e-003	0.0000	11.6917	11.6917	3.2000e-004	0.0000	11.6996

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	MSB CO2	Total CO2	CH4	N2O	CO2e
Archit Coating	1.4780					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8600e-003	0.0247	0.0317	5.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003	0.0000	4.4882	4.4882	2.9000e-004	0.0000	4.4755
Total	1.4815	0.0247	0.0317	5.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003	0.0000	4.4882	4.4882	2.9000e-004	0.0000	4.4755

3.7 Architectural Coating - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Base CO2	Net CO2	Total CO2	CH4	N2O	CO2e
Heating	0.0000	0.0000	0.0000	0.0000	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
Motorist	5.7000e-003	3.8200e-003	0.0402	1.3000e-004	0.0139	1.0000e-004	0.0140	3.8900e-003	9.0000e-005	3.7800e-003	0.0000	11.6917	11.6917	0.04	0.0000	11.6996
Total	5.7000e-003	3.8200e-003	0.0402	1.3000e-004	0.0139	1.0000e-004	0.0140	3.8900e-003	9.0000e-005	3.7800e-003	0.0000	11.6917	11.6917	3.2000e-004	0.0000	11.6996

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Density

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Nbio-CO2	Total CO2	GHG	NO2	CO2e
Mitigated	1.2842	5.2761	18.0863	0.0606	5.7802	0.0468	5.8271	1.5503	0.0437	1.5940	0.0000	5.601232	15,601.232	0.2748	0.0000	16,608.1171
Unmitigated	1.2463	5.0847	16.2323	0.0586	5.4114	0.0442	5.4556	1.4489	0.0411	1.4900	0.0000	5.255282	15,255.282	0.2597	0.0000	16,261.734

4.2 Trip Summary Information

Land Use	Weekday	Saturday	Sunday	Unmitigated Annual VMT	Mitigated Annual VMT
General Office Building	735.20	735.20	735.20	2,147,860	2,296,211
Hotel	1,740.00	1,740.00	1,740.00	4,803,846	5,236,415
Residential	0.00	0.00	0.00	0	0
Research & Development	2,503.80	2,503.80	2,503.80	7,360,026	7,892,422
Total	4,980.80	4,980.80	4,980.80	14,309,727	15,367,047

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diversified	Passby
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	100	0	0
Hotel	9.50	7.30	7.30	19.40	61.80	19.00	100	0	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Research & Development	9.50	7.30	7.30	33.00	48.00	19.00	100	0	0

4.4 Fleet Mix

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Land Use	LDA	LD1	LD2	MDV	LH01	LH02	MHD	HHD	CBUS	UBUS	MCV	SBUS	MH
General Office Building	0.606234	0.039465	0.179154	0.102841	0.044388	0.005359	0.016820	0.024508	0.001929	0.007167	0.005669	0.000761	0.000986
Hotel	0.006234	0.039465	0.179154	0.102841	0.044388	0.005359	0.016820	0.024508	0.001929	0.007167	0.005669	0.000761	0.000986
Parking Lot	0.606234	0.039465	0.179154	0.102841	0.044388	0.005359	0.016820	0.024508	0.001929	0.007167	0.005669	0.000761	0.000986
Research & Development	0.606234	0.039465	0.179154	0.102841	0.044388	0.005359	0.016820	0.024508	0.001929	0.007167	0.005669	0.000761	0.000986

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NSB-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Electricity Mitigated					0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	1,798,396	1,798,396	0.0712	0.0147	1,774,533
Electricity Unmitigated					0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	1,798,396	1,798,396	0.0712	0.0147	1,774,533
NaturalGas Mitigated	0.0681	0.6013	0.0051	0.0000	0.0457	0.0457	0.0457	0.0457	0.0457	0.0457	0.0000	654,531	654,531	0.0128	0.0170	659,4207
NaturalGas Unmitigated	0.0681	0.6013	0.0051	0.0000	0.0457	0.0457	0.0457	0.0457	0.0457	0.0457	0.0000	654,531	654,531	0.0128	0.0170	659,4207

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5.2 Energy by Land Use - NaturalGas
Unmitigated

Land Use	Heating Oil Btu/y	CO ₂	NO _x	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bp- CO2	MB- CO2	Total CO2	CH ₄	N ₂ O	CO ₂ e
General Office	807500	4.3500e-003	0.0396	0.033	2.4000e-003	3.0100e-003	3.0100e-003	3.0100e-003	3.0100e-003	3.0100e-003	3.0100e-003	0.000	43.086	43.086	8.5000e-003	7.8000e-003	43.927
Hotel	729625e+006	0.0393	0.3577	0.304	2.1900e-003	0.0272	0.0272	0.0272	0.0272	0.0272	0.0272	0.000	368.3627	368.3627	7.4600e-003	7.1600e-003	391.694
Parking Lot	0	0.0000	0.0000	0.000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000	0.0000	0.0000	0.0000	0.000	0.000
Development	4.4616e+006	0.0234	0.2040	0.174	1.2200e-003	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.000	222.0798	222.0798	4.2600e-003	4.0700e-003	223.5965
Total		0.0661	0.6013	0.3053	3.6100e-003	0.0457	0.0457	0.0457	0.0457	0.0457	0.0457	0.000	651.5311	651.5311	0.0128	0.0120	658.4207

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**5.2 Energy by Land Use - NaturalGas
Mitigated**

Land Use	Heating & Use kBtu/yr	CO ₂	NO _x	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO ₂	MBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
General Office	807500	4.3500e-001	0.0396	0.033	2.4000e-003	0.000	3.0100e-003	3.0100e-003	0.000	3.0100e-003	3.0100e-003	0.000	43.0866	43.0866	8.3000e-003	0.000	43.3527
Hotel	728625e+006	0.0393	0.3577	0.304	2.1500e-003	0.000	0.0272	0.0272	0.000	0.0272	0.0272	0.000	389.3557	389.3557	7.4600e-003	0.000	391.6684
Parking Lot	0	0.0000	0.0000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Residential Development	4.4616e+006	0.0234	0.2040	0.1714	1.2000e-003	0.000	0.0156	0.0156	0.000	0.0156	0.0156	0.000	222.0788	222.0788	4.2600e-003	0.000	223.5985
Total		0.0661	0.6013	0.2050	3.4100e-003		0.0457	0.0457		0.0457	0.0457	0.0000	664.3311	664.3311	0.0126	0.0000	668.4207

5.3 Energy by Land Use - Electricity
Unmitigated

Land Use	Electricity Use kWh/yr	Total CO2 lb/yr	GHG MT/yr	NO2 lb/yr	CO2e lb/yr
General Office	531760.0	1715.6924	7.0023e-003	1.4806e-003	1715.3652
Hotel	1,618,915e+006	5239.0217	0.0213	4.4100e-003	530.8999
Parking Lot	263900.0	85.9703	3.4603e-003	7.2000e-004	89.2702
Research & Development	2,8516e+006	977.9811	0.0384	8.1400e-003	981.0812
Total		1,148,390.9	0.0712	6.6147e-003	1,174,133.4

5.3 Energy by Land Use - Electricity
Mitigated

Land Use	Electricity Use kWh/yr	Total CO2 MT/yr	GHG MT/yr	NEO MT/yr	CO2e MT/yr
General Office	537900	175.8524	7.1023e-003	1.4800e-003	178.3052
Hotel	1,618,750	529.0217	0.0213	4.4100e-003	530.8989
Parking Lot	263000	86.8703	3.4603e-003	7.2000e-004	86.2702
Development	2,350,000	877.6811	0.0384	8.1400e-003	881.8593
Total		1,748,363.5	0.0712	6.6142e-003	1,754,353.4

6.0 Area Detail

6.1 Mitigation Measures Area

Category	ROG	NOK	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bis-CO2	Nbisc-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	2.2489	2.1000e-004	0.0227	0.0000		8.0000e-006	8.0000e-006		8.0000e-006	8.0000e-006	0.0000	0.0443	0.0443	1.2000e-004	0.0000	0.0472
Unmitigated	2.2489	2.1000e-004	0.0227	0.0000		8.0000e-006	8.0000e-006		8.0000e-006	8.0000e-006	0.0000	0.0443	0.0443	1.2000e-004	0.0000	0.0472

6.2 Area by SubCategory
Unmitigated

SubCategory	ROG	NOK	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bis-CO2	Nbisc-CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating Products	0.1418					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0950					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	2.2489	2.1000e-004	0.0227	0.0000		8.0000e-006	8.0000e-006		8.0000e-006	8.0000e-006	0.0000	0.0443	0.0443	1.2000e-004	0.0000	0.0472

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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	Net Bio CO2	Total CO2	CH4	N2O	CO2e
	lb/day										MT/yr					
Architectural	0.1478					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.0990					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.1000e-003	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0472
Total	2.2468	2.1800e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0472

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	882.8751	6.1980	0.1624	1,083.345
Unmitigated	882.8751	6.1980	0.1624	1,083.345

7.2 Water by Land Use
Unmitigated

Land Use	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
MT/yr					
General Office Building	7,10083 / 4,35734	48.3283	0.2335	8.8500e-003	58.8715
Total	0.663706	53.2425	0.1963	0.03	58.6239
Parking lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Research & Development	777.01 / 0	809.4008	5.73882	0.14425	898.8087
Total		882.8751	6.1980	0.1624	1,083.345

7.2 Water by Land Use
Mitigated

Land Use	Meqal	Total CO2	CH4	N2O	CO2e
MT/yr					
General Office Building	7,485.27	48.2283	0.2335	5.6520e-003	55.9715
H-06H	5,073.557	25.2453	0.1683	4.1000e-003	30.0239
Parking lot	0	0.0000	0.0000	0.0000	0.0000
Research & Development	777.0170	409.4008	5.7582	0.1425	998.0097
Total		882.9791	6.1980	8.1324e-003	1,482.343

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/Y			
Mitigated	151.3298	8.6433	0.0000	374.9131
Unmitigated	151.3298	8.6433	0.0000	374.9131

8.2 Waste by Land Use
Unmitigated

Land Use	Waste Disposed tons	Total CO2	CH4	N2O	CO2e
		MT/Y			
General Office Building	40.8	8.2020	0.4885	0.0000	20.5184
Total	367.2	88.6985	4.6488	0.0000	189.7283
Parking lot	0	0.0000	0.0000	0.0000	0.0000
Research & Development	367.2	74.5383	4.4051	0.0000	184.8654
Total		151.3298	8.6433	0.0000	374.9131

8.2 Waste by Land Use
Mitigated

	Waste Disposed tons	Total CO2 M/T/yr	CH4 M/T/yr	NEO M/T/yr	CO2e M/T/yr
General Office	40.8	8.2023	0.4895	0.0000	20.5194
Hotel	337.5	68.0065	4.0488	0.0000	199.7293
Parking lot	0	0.0000	0.0000	0.0000	0.0000
Development	367.2	74.6393	4.4051	0.0000	194.6054
Total	745.5	151.2298	8.9433	0.0000	374.8131

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

	Total CO2	CH4	N2O	CO2e
Category	MT			
Unmitigated	111,1560	0.0000	0.0000	111,1560

11.2 Net New Trees

Species Class

	Number of Trees	Total CO2	CH4	N2O	CO2e
		MT			
Miscellaneous	157	111,1560	0.0000	0.0000	111,1560
Total		111,1560	0.0000	0.0000	111,1560

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Ld Average	Floor Surface Area	Population
General Office Building	40.00	1000sqft	0.92	40,000.00	0
Research & Development	360.00	1000sqft	0.26	360,000.00	0
Parking Lot	1,679.00	Space	16.91	751,600.00	0
Hotel	200.00	Room	0.95	125,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	40
Climate Zone	13			Operational Year	2024
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	720.45	CH4 Intensity (lb/MWhr)	0.025	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

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Project Characteristics -

Land Use - See SWAPE comment about parking, pedestrian oriented promenade, and sidewalks.

Construction Phase - See SWAPE comment about construction schedule.

Off-road Equipment - See SWAPE comment about construction equipment list.

Trips and VMT - Consistent with DEIR's model.

Demolition - Consistent with DEIR's model.

Grading - See SWAPE comment about acres of grading.

Architectural Coating - Consistent with DEIR's model.

Vehicle Trips - Consistent with DEIR's model.

Area Coating - Consistent with DEIR's model.

Solid Waste - Consistent with DEIR's model.

Sequestration - Consistent with DEIR's model.

Construction Off-road Equipment Mitigation - See SWAPE comments about Tier 4 Final Equipment, "Water Exposed Area," "Water Unpaved Roads", and "Reduce Vehicle Speeds on Unpaved Roads."

Mobile Land Use Mitigation - Consistent with DEIR's model.

Water Mitigation - See SWAPE comment about "Apply Water Conservation Strategy."

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	50.00
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	50.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	50
tblAreaCoating	Area_EF_Nonresidential_Interior	250	50
tblGrading	AcresOfGrading	112.50	11.50
tblGrading	MaterialExported	0.00	276,514.00
tblGrading	MaterialImported	0.00	28,000.00
tblLandUse	LandUseSquareFeet	290,400.00	125,000.00
tblLandUse	LotAcresage	6.67	0.95
tblSequestration	NumberOfNewTrees	0.00	157.00

tbSolidWaste	SolidWasteGenerationRate	37.20	40.80
tbSolidWaste	SolidWasteGenerationRate	105.50	337.50
tbSolidWaste	SolidWasteGenerationRate	27.36	357.20
tbTripsSolidWMT	HaulingTripsNumber	0.00	187,520.00
tbTripsSolidWMT	VendorTripsNumber	209.00	0.00
tbTripsSolidWMT	WorkerTripsNumber	466.00	600.00
tbVehicleTrips	DV_Trip	19.00	0.00
tbVehicleTrips	DV_Trip	38.00	0.00
tbVehicleTrips	DV_Trip	15.00	0.00
tbVehicleTrips	PB_Trip	4.00	0.00
tbVehicleTrips	PB_Trip	4.00	0.00
tbVehicleTrips	PB_Trip	3.00	0.00
tbVehicleTrips	PR_Trip	77.00	100.00
tbVehicleTrips	PR_Trip	58.00	100.00
tbVehicleTrips	PR_Trip	82.00	100.00
tbVehicleTrips	ST_Trip	2.48	18.38
tbVehicleTrips	ST_Trip	8.19	6.70
tbVehicleTrips	ST_Trip	1.50	6.56
tbVehicleTrips	SU_Trip	1.05	18.38
tbVehicleTrips	SU_Trip	5.95	6.70
tbVehicleTrips	SU_Trip	1.11	6.56
tbVehicleTrips	WD_Trip	11.03	18.38
tbVehicleTrips	WD_Trip	8.17	6.70
tbVehicleTrips	WD_Trip	8.11	6.56

2.0 Emissions Summary

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2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

Year	RCO	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NetBac CO2	Total CO2	GHG	N2O	CO2e
2020	10.6396	266.0998	81.6288	0.6884	22.7381	2.8637	25.6028	10.8377	2.6698	13.0085	0.0000	72,423.65	72,423.65	7.7831	0.0000	72,418.22
2021	10.0030	244.7553	78.9242	0.6903	76.3808	2.6916	79.0724	20.8497	2.4065	23.2561	0.0000	71,595.51	71,595.51	7.7288	0.0000	71,788.69
2022	84.8633	117.0272	67.7799	0.3841	20.1027	1.1263	21.2279	5.2453	1.0625	6.3078	0.0000	42,908.75	42,908.75	3.8889	0.0000	43,006.22
Maximum	84.8633	266.0998	81.6288	0.6884	76.3808	2.8637	79.0724	20.8497	2.6698	23.2561	0.0000	72,423.65	72,423.65	7.7831	0.0000	72,418.22

Mitigated Construction

Year	RCO	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	NetBac CO2	Total CO2	GHG	N2O	CO2e
2020	10.6396	266.0998	81.6288	0.6884	22.7381	2.8637	25.6028	10.8377	2.6698	13.0085	0.0000	72,423.65	72,423.65	7.7831	0.0000	72,418.22
2021	10.0030	244.7553	78.9242	0.6903	76.3808	2.6916	79.0724	20.8497	2.4065	23.2561	0.0000	71,595.51	71,595.51	7.7288	0.0000	71,788.69
2022	84.8633	117.0272	67.7799	0.3841	20.1027	1.1263	21.2279	5.2453	1.0625	6.3078	0.0000	42,908.75	42,908.75	3.8889	0.0000	43,006.22
Maximum	84.8633	266.0998	81.6288	0.6884	76.3808	2.8637	79.0724	20.8497	2.6698	23.2561	0.0000	72,423.65	72,423.65	7.7831	0.0000	72,418.22

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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2.2 Overall Operational

Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Isday																
Area	12.3344	2.2802e-05	0.2627	2.0000e-06		9.0000e-06	9.0000e-06		9.0000e-06	9.0000e-06		0.5425	0.5425	1.4200e-05		0.5780
Energy	0.3624	3.2945	2.7674	0.0188		0.2504	0.2504		0.2504	0.2504		3.852408	3.852408	0.0726	0.0725	3.876361
Mobile	7.2464	27.1096	88.6157	0.3262	30.4474	0.2425	30.6900	8.1364	0.2557	8.3921		33,220.73	33,220.73	1.6841		33,260.53
Total	19.9472	30.4064	89.5358	0.3460	30.4474	0.4958	39.6912	8.1364	0.4779	8.6134		37,174.88	37,174.88	1.6813	0.0725	37,237.41
							79					79				80

Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Isday																
Area	12.3344	2.2802e-05	0.2627	2.0000e-06		9.0000e-06	9.0000e-06		9.0000e-06	9.0000e-06		0.5425	0.5425	1.4200e-05		0.5780
Energy	0.3624	3.2945	2.7674	0.0188		0.2504	0.2504		0.2504	0.2504		3.852408	3.852408	0.0726	0.0725	3.876361
Mobile	7.4575	28.0980	91.4832	0.3477	32.5788	0.2578	32.8364	8.7059	0.2388	8.9457		35,408.39	35,408.39	1.5768		35,450.31
Total	20.1543	31.5987	92.5133	0.3675	32.5788	0.4660	33.0877	8.7059	0.4810	9.1970		39,262.24	39,262.24	1.7466	0.0725	39,427.78
							78					78				82

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bldg-CO2	MBldg-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	-1.08	-3.28	-5.56	-6.22	-7.00	-3.08	-6.94	-7.00	-2.96	-6.78	0.09	-5.88	-5.88	-5.38	0.06	-5.88

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	9/17/2020	10/12/2020	5	30	
2	Site Preparation	Site Preparation	11/01/2020	11/16/2020	5	20	
3	Grading	Grading	11/10/2020	11/11/2021	5	45	
4	Building Construction	Building Construction	11/12/2021	9/18/2022	5	400	
5	Paving	Paving	6/20/2022	11/17/2022	5	35	
6	Architectural Coating	Architectural Coating	11/18/2022	12/28/2022	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 11.9

Acres of Paving: 16.91

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 787,500; Non-Residential Outdoor: 262,500; Striped Parking Area: 45,096 (Architectural Coating – sqft)

OffRoad Equipment

RESPONSES

COMMENTS

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Costa Verde Center Revitalization Project - San Diego 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	0.58
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Demolition	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Rubber Tied Dozers	3	8.00	247	0.40
Site Preparation	Tractor/Loader/Backhoes	4	8.00	97	0.57
Grading	Excavators	2	8.00	158	0.58
Grading	Excavators	1	8.00	157	0.41
Grading	Graders	1	8.00	247	0.40
Grading	Rubber Tied Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	357	0.48
Grading	Tractor/Loader/Backhoes	2	8.00	97	0.57
Building Construction	Tractor/Loader/Backhoes	3	7.00	231	0.53
Building Construction	Tractor/Loader/Backhoes	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractor/Loader/Backhoes	3	7.00	97	0.57
Building Construction	Welders	1	8.00	48	0.45
Building Construction	Saws	2	8.00	130	0.42
Paving	Saws	2	8.00	130	0.42
Paving	Rolling Equipment	2	8.00	130	0.38
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	8.00	78	0.48

Tips and VMT

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Costa Verde Center Revitalization Project - San Diego County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	61	15.00	0.00	1,179.00	10.80	7.30	20,000-LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	3,500.00	10.80	7.30	20,000-LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	34,814.00	10.80	7.30	20,000-LD_Mix	HDT_Mix	HHDT
Building Construction	91	600.00	0.00	187,520.00	10.80	7.30	20,000-LD_Mix	HDT_Mix	HHDT
Paving	61	15.00	0.00	0.00	10.80	7.30	20,000-LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	99.00	0.00	0.00	10.80	7.30	20,000-LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2020

Unmitigated Construction On-Site

Category	ROC	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	Total PM10	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio CO2	NBio CO2	Total CO2	CH4	N2O	CO2e
Indirect																
Fugitive Dust					8.6126	0.0000	8.6126	1.3043	0.0000	1.3043			0.0000			0.0000
On-Road	3.3151	33.2010	21.7502	0.0388	1.6687	1.6687	1.6687	1.5419	1.5419	1.5419	3,747,704 ⁹	3,747,704 ⁹	3,747,704 ⁹	1.0580		3,772,103 ⁸
Total	3.3171	33.2010	21.7502	0.0388	8.6126	1.6687	10.2713	1.3043	1.5419	2.8461		3,747,704 ⁹	3,747,704 ⁹	1.0580		3,774,153 ⁵

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Costa Verde Center Revitalization Project - San Diego County, Summer

3.2 Demolition - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bw CO2	MBw CO2	Total CO2	GHG	N2O	CO2e
Bldgwy																
Heating	0.3106	10.8633	2.4892	0.0388	0.6667	0.0580	0.7247	0.1862	0.0335	0.2217	3.365383	3.365383	3.365383	0.2848		3.372774
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0050	0.0371	0.4282	1.2700e-003	0.1232	8.6000e-004	0.1241	0.0327	8.6000e-004	0.0336	128.4121	128.4121	128.4121	3.7700e-003		128.5064
Total	0.3157	11.0004	2.9174	0.0388	0.6699	0.0588	0.8464	0.2209	0.0343	0.2552	3.491775	3.491775	3.491775	0.3002		3.498281

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bw CO2	MBw CO2	Total CO2	GHG	N2O	CO2e
Bldgwy																
Fugitive Dust					8.6128	0.0000	8.6128	1.3543	0.0000	1.3543			0.0000			0.0000
Off-Road	3.3171	33.2010	21.7532	0.0388		1.6687	1.6687		1.5419	1.5419	3.742704	3.742704	3.742704	1.0680		3.774153
Total	3.3171	33.2010	21.7532	0.0388	8.6128	1.6687	10.2713	1.3543	1.5419	2.8961	0.0000	3.742704	3.742704	1.0680		3.774153

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Costa Verde Center Revitalization Project - San Diego County, Summer

3.2 Demolition - 2020

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	MBac CO2	Total CO2	CH4	N2O	CO2e
	Bldg															
Hauling	0.3106	10.8633	2.4862	0.0036	0.6967	0.0560	0.7217	0.1862	0.0335	0.2217	3,365.383	3,365.383	0.2845			3,372.774
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000
Worker	0.0050	0.0071	0.4252	1.2700e-003	0.1232	8.0000e-004	0.1241	0.0027	8.0000e-004	0.0036	128.4121	128.4121	3.7700e-003			128.5064
Total	0.3157	11.0004	2.9114	0.0036	0.8099	0.0558	0.8656	0.2209	0.0343	0.2552	3,493.775	3,493.775	0.3002			3,498.281

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	MBac CO2	Total CO2	CH4	N2O	CO2e
	Bldg															
Fugitive Dust					18.2530	0.0000	18.2530	9.9605	0.0000	9.9605			0.0000			0.0000
Off-Road	4.0765	42.4173	21.5136	0.0036		2.1874	2.1874		2.0216	2.0216	3,685.101	3,685.101	1.1918			3,714.897
Total	4.0765	42.4173	21.5136	0.0036	18.2530	2.1874	20.4404	9.9605	2.0216	11.9821	3,685.101	3,685.101	1.1918			3,714.897

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3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Hauling	1.3852	48.8188	11.0843	0.1370	3.0579	0.1588	3.2157	0.8390	0.1480	0.9871	14,885.71	14,885.71	14,885.71	1.3200		15,018.71
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0961	0.0445	0.5102	1.5000e-003	0.1479	1.0400e-003	0.1489	0.0392	8.6000e-004	0.0402	151.6845	151.6845	151.6845	4.5200e-003		161.8877
Total	1.4813	48.8634	11.5945	0.1385	3.2058	0.1588	3.3656	0.8773	0.1580	1.0272	14,937.41	15,037.41	15,137.41	1.3248		15,170.42

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Fugitive Dust					18.2530	0.0000	18.2530	9.9905	0.0000	9.9905			0.0000			0.0000
Off-Road	4.0795	42.4173	21.5136	0.0380		2.1974	2.1974		2.0216	2.0216	0.0000	8	3,685.101	3,685.101	1.1918	3,714.857
Total	4.0795	42.4173	21.5136	0.0380	18.2530	2.1974	20.4504	9.9905	2.0216	11.9921	0.0000	8	3,685.101	3,685.101	1.1918	3,714.897

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3.3 Site Preparation - 2020

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
bldg																
Heating	1.3832	46.8718	11.0843	0.1370	3.0579	0.1588	3.2137	0.8580	0.1480	0.9871	14,985.71	14,985.71	1,3200			15,018.71
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0661	0.0445	0.5102	1.5200e-003	0.1479	1.0400e-003	0.1469	0.0382	8.6000e-004	0.0402	151.8845	151.8845	4.5300e-003			151.9077
Total	1.4493	48.854	11.5945	0.1385	3.2058	0.1568	3.3656	0.8773	0.1580	1.0272	15,137.41	15,137.41	1,3200	1.3245		15,172.32

3.4 Grading - 2020

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
bldg																
Fugitive Dust					7.1722	0.0000	7.1722	3.4722	0.0000	3.4722			0.0000			0.0000
Off-Road	4.4501	50.1975	31.9363	0.0620		2.1739	2.1739		2.0000	2.0000	6,005.886	6,005.886	1,9424			6,054.425
Total	4.4501	50.1975	31.9363	0.0620	7.1722	2.1739	9.3461	3.4722	2.0000	5.4722	6,005.886	6,005.886	1,9424			6,054.425

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3.4 Grading - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
bldgry																
Hauling	6.1150	215.8188	48.0016	0.0037	15.4428	0.6888	16.0912	4.1673	0.5588	4.8251		86.328 23	86.328 23	6.8556		86.356 12
												50	50			50.0000
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	0.0734	0.0465	0.5689	1.6600e-003	0.1843	1.1500e-003	0.1865	0.0438	1.0600e-003	0.0446		168.5464	168.5464	0.0300e-003		168.6762
Total	6.1884	215.8603	48.5665	0.0074	15.5668	0.6888	16.2567	4.2109	0.6596	4.8707		168.417 78	168.417 78	5.8807		168.553 10
												50	50			19

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
bldgry																
Fugitive Dust					7.1722	0.0000	7.1722	3.4722	0.0000	3.4722			0.0000			0.0000
Off-Road	4.4501	50.1975	31.9363	0.0020		2.1739	2.1739		2.0000	2.0000		6.005 886	6.005 886	1.9424		6.054 425
												3	3			7
Total	4.4501	50.1975	31.9363	0.0020	7.1722	2.1739	9.3461	3.4722	2.0000	5.4722	0.0000	6.005 886	6.005 886	1.9424		6.054 425
												3	3			7

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3.4 Grading - 2020

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Hauling	6.1190	215.6189	48.0016	0.0057	15.4028	0.6888	16.0912	4.1673	0.0588	4.8261	86,248.23	86,248.23	5.8856			86,396.12
											50	50				50
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000
Worker	0.0734	0.0465	0.0689	0.003	1.1690e+003	1.1690e+003	1.1690e+003	0.0438	1.0600e+003	1.0600e+003	168.5464	168.5464	5.0300e+003			168.6762
Total	6.1924	215.6653	48.0685	0.0074	15.4068	0.6888	16.2567	4.2109	0.0596	4.8797	86,417.78	86,417.78	5.8907			86,553.90
											50	50				19

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Fugitive Dust					7.1722	0.0000	7.1722	3.4722	0.0000	3.4722			0.0000			0.0000
Off-Road	4.1912	46.3968	30.8795	0.0620		1.9853	1.9853		1.8295	1.8295	6,007.043	6,007.043	1.9428			6,055.613
											4	4				4
Total	4.1912	46.3968	30.8795	0.0620	7.1722	1.9853	9.1576	3.4722	1.8295	5.2987	6,007.043	6,007.043	1.9428			6,055.613
											4	4				4

3.4 Grading - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Hauling																
	5.7427	108.5108	48.6193	0.5986	69.0443	0.6061	69.6504	17.3338	0.5798	17.9136		66.42539	66.42539	5.7784		66.570177
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0062	0.0448	0.5305	1.6500e-003	0.1843	1.1500e-003	0.1864	0.0436	1.0500e-003	0.0446		162.8882	162.8882	4.6500e-003		163.0044
Total	5.8119	108.5554	48.6658	0.5982	69.2086	0.6062	69.8368	17.3775	0.5799	17.9574		66.58847	66.58847	5.7840		66.733074

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust																
					7.1722	0.0000	7.1722	3.4722	0.0000	3.4722			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8795	0.0620		1.9853	1.9853		1.8265	1.8265		6.007043	6.007043	1.9428		6.055613
Total	4.1912	46.3998	30.8795	0.0620	7.1722	1.9853	9.1576	3.4722	1.8265	5.2987		6.007043	6.007043	1.9428		6.055613

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3.4 Grading - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Hauling	5.7427	188.3108	48.5153	0.5886	68.0443	0.6051	68.6494	17.3338	0.5788	17.9126		65.425 38	65.425 68	5.7794		65.570 07
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0692	0.0448	0.5305	1.6000e-003	0.1843	1.1000e-003	0.1864	0.0438	1.0500e-003	0.0446		162.8882	162.8882	4.6600e-003		163.0044
Total	5.8119	188.3554	49.0458	0.5882	68.2086	0.6052	69.8348	17.3775	0.5790	17.9574		65.458 47	65.458 47	5.7840		65.723 07

3.5 Building Construction - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Off-Road	1.9009	17.4321	16.5752	0.0268		0.5686	0.5686		0.5013	0.5013		2,553.383	2,553.383	0.6160		2,568.794
Total	1.9009	17.4321	16.5752	0.0268		0.5686	0.5686		0.5013	0.5013		2,553.383	2,553.383	0.6160		2,568.794

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3.5 Building Construction - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
Building																
Hauling	3.1703	108.4774	28.7828	0.2284	11.5878	0.3340	11.9218	3.0602	0.3198	3.3799		36,118,236	36,118,236	3.1805		36,157,988
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	2.0754	1.3483	15.9143	0.0450	4.5299	0.0341	4.5639	1.3074	0.0314	1.3387		4,888,645	4,888,645	0.1395		4,889,151
Total	5.2456	110.8258	44.6972	0.2734	16.5267	0.3681	16.8947	4.3675	0.3509	4.7185		41,006,881	41,006,881	3.3200		41,038,139

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
Building																
Off-Road	1.9009	17.4321	16.5752	0.0266		0.9686	0.9686		0.9313	0.9313	0.0000	2,553,363	2,553,363	0.6160		2,558,794
Total	1.9009	17.4321	16.5752	0.0266		0.9586	0.9586		0.9413	0.9413	0.0000	2,553,363	2,553,363	0.6160		2,558,794

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3.5 Building Construction - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	3.1703	108.4774	28.7828	0.2284	11.5878	0.3340	11.9218	3.0602	0.3198	3.3799		36,118,236	36,118,236	3.1805		36,137,288
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	2.0754	1.3483	16.8143	0.0450	4.5239	0.0341	4.5579	1.3074	0.0314	1.3387		4,898,645	4,898,645	0.1395		4,899,191
Total	5.2456	110.8258	45.6072	0.2734	16.5207	0.3681	16.8907	4.3675	0.3509	4.7185		41,006,881	41,004,881	3.3200		41,038,113

3.5 Building Construction - 2022

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	16.6156	16.3834	0.0266		0.8890	0.8890		0.7812	0.7812		2,554,333	2,554,333	0.6120		2,556,632
Total	1.7062	16.6156	16.3834	0.0266		0.8890	0.8890		0.7812	0.7812		2,554,333	2,554,333	0.6120		2,556,632

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Building																
Heating	2.9798	100.1821	28.6181	0.3242	15.1738	0.2829	15.4568	3.8378	0.2207	4.2086		35,647.06	35,647.06	3.1591		35,726.03
												29	30			29
Ventiler	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	1.9620	1.2269	14.7964	0.0472	4.9299	0.0330	4.9622	1.3074	0.0307	1.3380		4,707.398	4,707.398	0.1279		4,710.664
												5	5			6
Total	4.9398	101.4116	41.4165	0.3715	20.1027	0.3152	20.4189	5.2453	0.2514	5.5467		40,354.42	40,354.42	3.2869		40,438.39
												13	13			42

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Building																
Off-Road	1.7062	16.6159	16.3834	0.0269		0.8690	0.8690		0.7912	0.7912	0.0000	2,554.333	2,554.333	0.6120		2,559.632
												6	6			2
Total	1.7062	16.6159	16.3834	0.0269		0.8690	0.8690		0.7912	0.7912	0.0000	2,554.333	2,554.333	0.6120		2,559.632
												6	6			2

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3.5 Building Construction - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Bidday																
Heating	2.9788	100.1821	28.6181	0.3242	16.1738	0.2828	16.4566	3.8379	0.2707	4.2086	35.54746	35.54746	3.1591			36.72603
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000
Worker	1.9620	1.2266	14.7864	0.0472	4.5288	0.0533	4.5822	1.3074	0.0307	1.3380	4.707388	4.707388	0.1279			4.710664
Total	4.9388	101.4116	41.4165	0.3715	20.7027	0.3162	20.9189	5.2453	0.3014	5.5467	40.25442	40.25442	3.2869			40.43849

3.6 Paving - 2022

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Bidday																
Off-Road	1.1028	11.1249	14.5936	0.0228		0.8679	0.8679		0.5226	0.5226	2.207660	2.207660	0.7140			2.226510
Paving	1.2658					0.0000	0.0000		0.0000	0.0000		0.0000				0.0000
Total	2.3687	11.1249	14.5936	0.0228		0.8679	0.8679		0.5226	0.5226	2.207660	2.207660	0.7140			2.226510

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3.6 Paving - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
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
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0481	0.0307	0.3700	1.1800e-003	0.1232	8.3000e-004	0.1241	0.0327	7.7000e-004	0.0335	117.8840	117.8840	3.2000e-003			117.7659
Total	0.0481	0.0307	0.3700	1.1800e-003	0.1232	8.3000e-004	0.1241	0.0327	7.7000e-004	0.0335		117.8840	117.8840	3.2000e-003		117.7659

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.1028	11.1249	14.5905	0.0228		0.0679	0.0679		0.0228	0.0228	0.0000	2,207.680	2,207.680	0.7140		2,223.610
Paving	1.2628					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	2.3657	11.1249	14.5905	0.0228		0.0679	0.0679		0.0228	0.0228	0.0000	2,207.680	2,207.680	0.7140		2,223.610

3.6 Paving - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
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	0.0481	0.0007	0.3700	1.1800e-003	0.1232	8.9000e-004	0.1241	0.0327	7.7000e-004	0.0335		117.6840	117.6840	3.2000e-003		117.7539
Total	0.0481	0.0007	0.3700	1.1800e-003	0.1232	8.9000e-004	0.1241	0.0327	7.7000e-004	0.0335		117.6840	117.6840	3.2000e-003		117.7539

3.7 Architectural Coating - 2022
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Archit Coating	94.4650					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.5700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.5082
Total	94.6695	1.4085	1.8136	2.5700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.5082

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3.7 Architectural Coating - 2022

Unmitigated Construction Off-Site

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEBio-CO2	Total CO2	CH4	N2O	CO2e
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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

Mitigated Construction On-Site

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEBio-CO2	Total CO2	CH4	N2O	CO2e
Architect Coating	84.4650					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2046	1.4086	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.5062
Total	84.6696	1.4086	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.5062

Costa Verde Center Revitalization Project - San Diego County, Summer

3.7 Architectural Coating - 2022
Mitigated Construction Off-Site

Category	ROG	NOX	CO	SO2	Formaldehyde PM10	Estimate PM10	PM10 TMDL	Formaldehyde PM2.5	Estimate PM2.5	PM2.5 TMDL	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
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	0.3237	0.2029	2.4417	7.7900e-003	0.8133	5.6000e-003	0.8188	0.2157	5.6000e-003	0.2208	778.7142	778.7142	0.0211	777.2415		777.2415
Total	0.3237	0.2029	2.4417	7.7900e-003	0.8133	5.6000e-003	0.8188	0.2157	5.6000e-003	0.2208		778.7142	778.7142	0.0211		777.2415

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Density

Costa Verde Center Revitalization Project - San Diego County, Summer

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEC-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	7.4576	28.0999	91.4832	0.3477	32.6788	0.2578	32.8994	8.7059	0.2388	8.9457	35,408.36	35,408.36	1,6768			35,450.31
Unmitigated	7.2454	27.1066	88.5167	0.3266	30.4474	0.2425	30.6900	8.1564	0.2257	8.3821	33,220.73	33,220.73	1,5841			33,260.33
											67	67				66
											69	69				94

4.2 Trip Summary Information

Land Use	Weekly	Saturday	Sunday	Unmitigated Annual VMT	Mitigated Annual VMT
General Office Building	735.20	735.20	735.20	2,147,860	2,298,211
Hotel	1,740.00	1,740.00	1,740.00	4,893,846	5,236,415
Research & Development	0.00	0.00	0.00	0	0
	2,305.60	2,305.60	2,305.60	7,350,020	7,632,422
Total	4,980.80	4,980.80	4,980.80	14,391,727	15,397,047

4.3 Trip Type Information

	Miles		Trip %		Trip Purpose %			
Land Use	H-N or C-M	H-S or C-C	H-O or C-M	H-S or C-C	H-O or C-NM	Primary	Directed	Pass-by
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	100	0
Hotel	9.50	7.30	7.30	19.40	61.60	19.00	100	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0
Research & Development	9.50	7.30	7.30	33.00	48.00	19.00	100	0

4.4 Fleet Mix

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Land Use	LDA	LD1	LD2	MDV	LHD1	LHD2	MHD	HHH	OBUS	UBUS	MCY	SEBUS	MH
General Office Building	0.606234	0.039465	0.179154	0.102641	0.014388	0.005395	0.016620	0.024508	0.001929	0.001657	0.005689	0.000761	0.000936
Hotel	0.606234	0.039465	0.179154	0.102641	0.014388	0.005395	0.016620	0.024508	0.001929	0.001657	0.005689	0.000761	0.000936
Parking Lot	0.606234	0.039465	0.179154	0.102641	0.014388	0.005395	0.016620	0.024508	0.001929	0.001657	0.005689	0.000761	0.000936
Research & Development	0.606234	0.039465	0.179154	0.102641	0.014388	0.005395	0.016620	0.024508	0.001929	0.001657	0.005689	0.000761	0.000936

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net-CO2	Total CO2	CH4	N2O	CO2e
1b/day																
Manufacture/Mitigated	0.3624	3.2545	2.7874	0.0198		0.2504	0.2504		0.2504	0.2504	3.893408	5	3.893408	0.0758	0.0725	3.975861
Manufacture/Unmitigated	0.3624	3.2545	2.7874	0.0198		0.2504	0.2504		0.2504	0.2504	3.893408	5	3.893408	0.0758	0.0725	3.975861

Land Use	MBTU/y	Exhaust										Exhaust				Exhaust			
		NO _x	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	NO _x CO ₂	NO _x CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e			
General Office Building	2212.6	0.0238	0.2169	0.4623	1.9200e-003	0.0465	0.0185	0.0185	0.0185	0.0166	280.3062	280.3062	4.800e-003	4.7700e-003	281.8631				
Home	18989.7	0.2159	1.9598	1.8642	0.0118	0.1489	0.1489	0.1489	0.1489	0.1489	2,391,732.2	2,391,732.2	0.0451	0.00431	2,396,707				
Parking lot	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000				
Drainage	11401.8	0.1730	1.1178	0.8398	6.1710e-003	0.0800	0.0800	0.0800	0.0800	0.0800	1,341,389.8	1,341,389.8	0.0037	0.0046	1,346,344.6				
Total		0.3924	3.2943	2.7674	0.0188	0.2504	0.2504	0.2504	0.2504	0.2504	3,993,408.5	3,993,408.5	0.0738	0.00725	3,997,600.7				

**5.2 Energy by Land Use - NaturalGas
Mitigated**

Land Use	MBtu/y	NO _x	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO ₂	MBio- CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
Neighborhood Use																
General Office	2,2128	0.0238	0.2188	0.1822	1.500E-003	0.0165	0.0165	0.0165	0.0165	0.0165	260.3082	260.3082	4.800E-003	1.770E-003		261.1631
Hotel	19,9897	0.2156	1.9598	1.6462	0.0118	0.1489	0.1489	0.1489	0.1489	0.1489	2,351.732	2,351.732	0.0451	0.0431		2,396.707
Parking Lot	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Research & Development	11,4016	0.1230	1.1178	0.8930	6.7100E-003	0.0850	0.0850	0.0850	0.0850	0.0850	1,341.308	1,341.386	0.0257	0.0246		1,346.341
Total	0.3024	3.2845	2.7674	0.0196		0.2304	0.2504	0.2504	0.2504	0.2504	3,652.408	3,652.408	0.0738	0.0725		3,676.901

6.0 Area Detail

6.1 Mitigation Measures Area

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio CO2	Nbio CO2	Total CO2	CH4	N2O	CO2e
Mixed	12.3344	2.2906e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004			0.5425	1.4200e-003		0.5780
Unmitigated	12.3344	2.2906e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5425	0.5425	1.4200e-003		0.5780

6.2 Area by SubCategory Unmitigated

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
Architectural Coating	0.8008					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Products	11.6072					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0253	2.2906e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5425	0.5425	1.4200e-003		0.5780
TOTAL	12.3344	2.2906e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5425	0.5425	1.4200e-003		0.5780

6.2 Area by Subcategory

Mitigated

Subcategory	RCC	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Architectural	0.8038					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	11.5012					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0233	2.2900e-003	0.2927	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5425	0.5425	1.4200e-003		0.5780
Total	12.3344	2.2900e-003	0.2927	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5425	0.5425	1.4200e-003		0.5780

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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Costa Verde Center Revitalization Project - San Diego County, Summer

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Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

Costa Verde Center Revitalization Project - San Diego County, Winter

Costa Verde Center Revitalization Project

San Diego County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Ld Average	Floor Surface Area	Population
General Office Building	40.00	1000sqft	0.92	40,000.00	0
Research & Development	380.00	1000sqft	8.28	380,000.00	0
Parking Lot	1,579.00	Space	16.91	751,690.00	0
Hotel	200.00	Room	0.95	125,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.0	Precipitation Freq (Days)	40
Climate Zone	13			Operational Year	2024
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWH)	720.45	GHG Intensity (lb/MWH)	0.025	N2O Intensity (lb/MWH)	0.006

1.3 User Entered Comments & Non-Default Data

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Costa Verde Center Revitalization Project - San Diego County, Winter

Project Characteristics -
 Land Use - See SWAPE comment about parking, pedestrian oriented promenade, and sidewalks.
 Construction Phase - See SWAPE comment about construction schedule.
 Off-road Equipment - See SWAPE comment about construction equipment list.
 Trips and VMT - Consistent with DEIR's model.
 Demolition - Consistent with DEIR's model.
 Grading - See SWAPE comment about acres of grading.
 Architectural Coating - Consistent with DEIR's model.
 Vehicle Trips - Consistent with DEIR's model.
 Area Coating - Consistent with DEIR's model.
 Solid Waste - Consistent with DEIR's model.
 Sequestration - Consistent with DEIR's model.
 Construction Off-road Equipment Mitigation - See SWAPE comments about Tier 4 Final Equipment, "Water Exposed Area," "Water Unpaved Roads", and "Reduce Vehicle Speeds on Unpaved Roads".
 Mobile Land Use Mitigation - Consistent with DEIR's model.
 Water Mitigation - See SWAPE comment about "Apply Water Conservation Strategy."

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	50.00
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	50.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	50
tblAreaCoating	Area_EF_Nonresidential_Interior	250	50
tblGrading	AcresOfGrading	112.50	11.90
tblGrading	MaterialExported	0.00	278,514.00
tblGrading	MaterialImported	0.00	28,000.00
tblLandUse	LandUseSquareFeet	290,400.00	125,000.00
tblLandUse	LotAcres	6.67	0.95
tblSequestration	NumberNewTrees	0.00	157.00

Costa Verde Center Revitalization Project - San Diego County, Winter

ISolidWaste	SolidWasteGenerationRate	37.20	40.80
ISolidWaste	SolidWasteGenerationRate	109.50	337.50
ISolidWaste	SolidWasteGenerationRate	27.36	367.20
ISolidWaste	HeatingTriphNumber	0.00	187,500.00
ISolidWaste	VendorTriphNumber	209.00	0.00
ISolidWaste	VendorTriphNumber	486.00	600.00
ISolidWaste	DV_TP	19.00	0.00
ISolidWaste	DV_TP	38.00	0.00
ISolidWaste	DV_TP	15.00	0.00
ISolidWaste	PR_TP	4.00	0.00
ISolidWaste	PR_TP	4.00	0.00
ISolidWaste	PR_TP	3.00	0.00
ISolidWaste	PR_TP	77.00	100.00
ISolidWaste	PR_TP	58.00	100.00
ISolidWaste	PR_TP	62.00	100.00
ISolidWaste	ST_TP	2.46	18.56
ISolidWaste	ST_TP	8.19	6.70
ISolidWaste	ST_TP	1.50	9.96
ISolidWaste	SU_TP	1.05	18.56
ISolidWaste	SU_TP	5.95	6.70
ISolidWaste	SU_TP	1.11	9.96
ISolidWaste	WD_TP	11.03	18.56
ISolidWaste	WD_TP	8.17	6.70
ISolidWaste	WD_TP	6.11	9.96

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NRB-CO2	Total CO2	CH4	N2O	CO2e
2020	10.8177	288.1482	84.7316	0.6388	22.7391	2.8780	25.6171	10.8377	2.6735	13.5124	0.0000	71,276.74	71,276.74	7.8827	0.0000	71,478.31
2021	10.1710	246.4715	82.5488	0.6488	76.3808	2.6044	78.9852	20.8457	2.4188	23.2684	0.0000	70,455.16	70,455.16	7.9145	0.0000	70,653.07
2022	82.0275	117.8287	58.4845	0.3888	20.1027	1.1317	21.2343	5.2453	1.0888	6.3140	0.0000	44,988.47	44,988.47	3.8808	0.0000	42,088.25
Maximum	83.0275	288.1482	84.7316	0.6388	76.3808	2.8780	78.9852	20.8457	2.6735	23.2684	0.0000	71,276.74	71,276.74	7.8827	0.0000	71,478.31

Mitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NRB-CO2	Total CO2	CH4	N2O	CO2e
2020	10.8177	288.1482	84.7316	0.6388	22.7391	2.8780	25.6171	10.8377	2.6735	13.5124	0.0000	71,276.74	71,276.74	7.8827	0.0000	71,478.31
2021	10.1710	246.4715	82.5488	0.6488	76.3808	2.6044	78.9852	20.8457	2.4188	23.2684	0.0000	70,455.16	70,455.16	7.9145	0.0000	70,653.07
2022	82.0275	117.8287	58.4845	0.3888	20.1027	1.1317	21.2343	5.2453	1.0888	6.3140	0.0000	44,988.47	44,988.47	3.8808	0.0000	42,088.25
Maximum	83.0275	288.1482	84.7316	0.6388	76.3808	2.8780	78.9852	20.8457	2.6735	23.2684	0.0000	71,276.74	71,276.74	7.8827	0.0000	71,478.31

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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2.2 Overall Operational

Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NH3-CO2	Total CO2	CH4	N2O	CO2e
Isday																
Area	12.3344	2.2802e-026	0.2627	2.0000e-026		8.0000e-026	8.0000e-026		8.0000e-026	8.0000e-026		0.5425	0.5425	1.4200e-026		0.5780
Energy	0.3624	3.2945	2.7874	0.0198		0.2504	0.2504		0.2504	0.2504		3.592408	3.592408	0.0726	0.0725	3.979501
Mobile	7.0088	27.8786	84.4480	0.3206	30.4474	0.2490	30.6911	8.1384	0.2288	8.3682		37.52442	37.52442	1.6875		39.074116
Total	19.6736	31.1754	87.4681	0.3202	30.4474	0.4680	30.6923	8.1384	0.4780	8.6164		35.48237	35.48237	1.6847	0.0725	35.55149
												97	97			47

Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NH3-CO2	Total CO2	CH4	N2O	CO2e
Isday																
Area	12.3344	2.2802e-026	0.2627	2.0000e-026		8.0000e-026	8.0000e-026		8.0000e-026	8.0000e-026		0.5425	0.5425	1.4200e-026		0.5780
Energy	0.3624	3.2945	2.7874	0.0198		0.2504	0.2504		0.2504	0.2504		3.592408	3.592408	0.0726	0.0725	3.979501
Mobile	7.2188	28.9348	88.8838	0.3206	32.5788	0.2687	32.8975	8.7059	0.2408	8.9468		38.61624	38.61624	1.6777		39.65818
Total	19.9136	32.2316	92.0639	0.3406	32.5788	0.5100	33.0883	8.7059	0.4921	9.1980		37.57819	37.57819	1.7348	0.0725	37.63346
												49	49			48

	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bldg-CO2	MBldg-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	-1.06	-3.39	-3.19	-6.21	-7.00	-3.05	-6.84	-7.00	-2.94	-4.77	0.09	-6.87	-6.87	-5.42	0.09	-5.86

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	9/1/2020	10/7/2020	5	30	
2	Site Preparation	Site Preparation	10/13/2020	11/6/2020	5	20	
3	Grading	Grading	11/10/2020	1/11/2021	5	45	
4	Building Construction	Building Construction	1/12/2021	9/19/2022	5	440	
5	Paving	Paving	6/20/2022	11/7/2022	5	35	
6	Architectural Coating	Architectural Coating	11/8/2022	12/8/2022	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 11.9

Acres of Paving: 16.91

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 787,500; Non-Residential Outdoor: 262,500; Striped Parking Area: 45,096 (Architectural Coating – sqft)

Off-Road Equipment

RESPONSES

COMMENTS

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Costa Verde Center Revitalization Project - San Diego County, Winter

Phase Name	Official Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	138	0.36
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Radial Loaders/Bulldozers	4	8.00	97	0.37
Grading	Excavators	2	8.00	138	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	Radial Loaders/Bulldozers	2	8.00	97	0.37
Grading	Compactors	1	7.00	231	0.20
Building Construction	Formlifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Radial Loaders/Bulldozers	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	8.00	78	0.48

Tips and VMT

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Costa Verde Center Revitalization Project - San Diego County, Winter

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	61	15.00	0.00	1,129.00	10.80	7.30	20,000	LD_Mix	HDT_Mix	HHDT
Site Preparation	71	18.00	0.00	3,500.00	10.80	7.30	20,000	LD_Mix	HDT_Mix	HHDT
Grading	81	20.00	0.00	34,814.00	10.80	7.30	20,000	LD_Mix	HDT_Mix	HHDT
Building Construction	91	600.00	0.00	187,520.00	10.80	7.30	20,000	LD_Mix	HDT_Mix	HHDT
Paving	61	15.00	0.00	0.00	10.80	7.30	20,000	LD_Mix	HDT_Mix	HHDT
Architectural Coating	11	90.00	0.00	0.00	10.80	7.30	20,000	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2020

Unmitigated Construction On-Site

Category	ROC	NOC	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Non-CO2	Total CO2	CH4	N2O	CO2e
bldg																
Fugitive Dust					8.6126	0.0000	8.6126	1.3043	0.0000	1.3043			0.0000			0.0000
Off Road	3.3171	33.2010	21.7502	0.0388	1.6607	1.6607	1.6607	1.5419	1.5419	1.5419	3,747.704	9	3,747.704	1.0680		3,774.103
Total	3.3171	33.2010	21.7502	0.0388	8.6126	1.6607	10.2733	1.3043	1.5419	2.8461	3,747.704	9	3,747.704	1.0680		3,774.103

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Costa Verde Center Revitalization Project - San Diego County, Winter

3.2 Demolition - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.3182	11.0688	2.6537	0.0302	0.6957	0.0357	0.7224	0.1882	0.0342	0.2224	3,307.627	3,307.627	3,307.627	0.3066		3,315.282
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0023	0.5418	0.4009	1.1900e-003	0.1232	8.6000e-004	0.1241	0.0327	8.0000e-004	0.0326	118.6688	118.6688	3,5700e-003			118.7591
Total	0.3205	11.6106	3.0545	0.0314	0.8099	0.0361	0.8465	0.2209	0.0346	0.2556	3,426.287	3,426.287	3,426.287	0.3102		3,434.651

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6126	0.0000	8.6126	1.3543	0.0000	1.3543			0.0000			0.0000
Off-Road	3.3121	33.2070	21.7532	0.0388		1.8687	1.8687		1.5419	1.5419	3,747.704	3,747.704	3,747.704	1.0580		3,774.153
Total	3.3121	33.2070	21.7532	0.0388	8.6126	1.8687	10.2713	1.3543	1.5419	2.8961	0.0000	3,747.704	3,747.704	1.0580		3,774.153

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3.2 Demolition - 2020

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	MBac CO2	Total CO2	CH4	N2O	CO2e
Bldgwy																
Hauling	0.3182	11.0888	2.6837	0.0000	0.6967	0.0587	0.7224	0.1882	0.0342	0.2224	3.307	627	3.307	0.3088		3,315.282
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0023	0.0418	0.4009	1.1900e-003	0.1232	8.0000e-004	0.1241	0.0327	8.0000e-004	0.0335	118.0668	118.0668	3.6700e-003			118.7261
Total	0.3205	11.1306	3.0846	0.0000	0.8200	0.0586	0.8845	0.2209	0.0350	0.2558	3.426	627	3.426	0.3102		3,434.651

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bac CO2	MBac CO2	Total CO2	CH4	N2O	CO2e
Bldgwy																
Fugitive Dust					18.2530	0.0000	18.2530	9.9605	0.0000	9.9605			0.0000			0.0000
Off-Road	4.0765	42.4173	21.5136	0.0386		2.1874	2.1874		2.0216	2.0216	3.685	101	3.685	1.1918		3,714.897
Total	4.0765	42.4173	21.5136	0.0386	18.2530	2.1874	20.4604	9.9605	2.0216	11.9821	6	101	3.685	1.1918		3,714.897

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Costa Verde Center Revitalization Project - San Diego County, Winter

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bw CO2	MBw CO2	Total CO2	GH4	N2O	CO2e
Bldgdy																
Heating	1.4216	48.2883	11.8165	0.1347	3.0579	0.1580	3.2168	0.8580	0.1521	0.9902	14,728.51	14,728.61	1,3852			14,827.75
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000
Worker	0.0728	0.0000	0.4810	1.4500e-003	0.1473	1.0400e-003	0.1488	0.0352	8.6000e-004	0.0402	142,4038	142,4038	4,3900e-003			142,5109
Total	1.4984	48.2883	12.2976	0.1361	3.2058	0.1600	3.3656	0.8773	0.1531	1.0303	14,871.02	14,871.02	1,3865			14,952.26

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bw CO2	MBw CO2	Total CO2	GH4	N2O	CO2e
Bldgdy																
Fugitive Dust					18.2530	0.0000	18.2530	9.9905	0.0000	9.9905			0.0000			0.0000
Off-Road	4.0705	42.4173	21.5136	0.0380		2.1974	2.1974		2.0216	2.0216	3,685.101	3,685.101	1,1918			3,714.957
Total	4.0705	42.4173	21.5136	0.0380	18.2530	2.1974	20.4504	9.9905	2.0216	11.9921	0.0000	3,685.101	3,685.101	1,1918		3,714.957

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Costa Verde Center Revitalization Project - San Diego County, Winter

3.3 Site Preparation - 2020
Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	GHG	N2O	CO2e
Bldgdy																
Heating	1.4216	48.2883	11.8165	0.1347	3.0579	0.1580	3.2168	0.8580	0.1521	0.9802	14,728.51	14,728.61	1,3852			14,827.75
Ventiler	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000
Monter	0.0728	0.0200	0.4810	1.4500e-003	0.1473	1.0400e-003	0.1488	0.0352	8.6000e-004	0.0402	142,4038	142,4038	4,3500e-003			142,5109
Total	1.4984	48.3383	12.2976	0.1361	3.2058	0.1600	3.3658	0.8732	0.1531	1.0203	14,871.02	14,871.02	1,3865			14,952.26

3.4 Grading - 2020
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	GHG	N2O	CO2e
Bldgdy																
Fugitive Dust					7.1722	0.0000	7.1722	3.4722	0.0000	3.4722			0.0000			0.0000
Off-Road	4.4501	50.1975	31.9983	0.0620		2.1739	2.1739		2.0000	2.0000		8,005.886	8,005.886	1,9424		8,054.425
Total	4.4501	50.1975	31.9983	0.0620	7.1722	2.1739	9.3461	3.4722	2.0000	5.4722	8,005.886	8,005.886	1,9424			8,054.425

3.4 Grading - 2020

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Bldgwy																
Hauling	6.2845	217.8652	62.2388	0.5833	15.4028	0.7028	16.1055	4.1673	0.6725	4.8398	168,112.657	168,112.657	6,035.54	0.0000	0.0000	65,325.54
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Winter	0.0851	0.0255	0.5345	1.5600e-003	0.1843	1.1600e-003	0.1655	0.0436	1.0600e-003	0.0446	168,2284	168,2284	4,7600e-003	0.0000	0.0000	168,3445
Total	6.3696	217.8907	62.7733	0.5866	15.5869	0.7041	16.2718	4.2109	0.6735	4.8844	168,270.8839	168,270.8839	6,040.02	0.0000	0.0000	65,421.4855

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Bldgwy																
Fugitive Dust					7.1722	0.0000	7.1722	3.4722	0.0000	3.4722			0.0000			0.0000
Off-Road	4.4501	50.1975	31.9983	0.0620		2.1739	2.1739		2.0000	2.0000	6,005.8863	6,005.8863	1,9424			6,054.4257
Total	4.4501	50.1975	31.9983	0.0620	7.1722	2.1739	9.3461	3.4722	2.0000	5.4722	6,005.8863	6,005.8863	1,9424			6,054.4257

3.4 Grading - 2020

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
Heating	6.2845	217.9862	62.2388	0.9933	15.4428	0.1028	16.1055	4.1673	0.6725	4.8398	165,112.657	165,112.657	6,0355	1		65,355.54
Vehicle	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0831	0.0265	0.1345	1.5600e-003	0.1843	1.1600e-003	0.1665	0.0438	1.0600e-003	0.0446	169.2264	169.2264	4.7600e-003	0.03		169.3465
Total	6.3676	217.9907	62.7733	0.9966	15.5669	0.1041	16.2719	4.2109	0.6751	4.8844	165,270.8639	165,270.8639	6.0402	1		65,421.1895

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					7.1722	0.0000	7.1722	3.4722	0.0000	3.4722			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8795	0.0620		1.9853	1.9853		1.8265	1.8265	6,007.043	6,007.043	1.9428			6,055.613
Total	4.1912	46.3998	30.8795	0.0620	7.1722	1.9853	9.1676	3.4722	1.8265	5.2987	6,007.043	6,007.043	1.9428	1		6,055.613

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3.4 Grading - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Estimate PM10	PM10 Total	Fugitive PM2.5	Estimate PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling																
	5.8014	200.0212	51.6865	0.2883	88.0443	0.6180	68.8622	17.3338	0.5912	17.9251	64,286.20	64,286.20	5.8883			64,444.44
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0795	0.0505	0.4897	1.6300e-003	0.1843	1.1300e-003	0.1654	0.0438	1.0500e-003	0.0446	152.8065	152.8065	4.3900e-003			153.0163
Total	5.8795	200.0717	52.0861	0.2872	88.2686	0.6191	69.0277	17.3775	0.5923	17.9697	64,444.11	64,444.11	5.9072	0.0000	0.0000	64,597.45

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Estimate PM10	PM10 Total	Fugitive PM2.5	Estimate PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust																
					7.1722	0.0000	7.1722	3.4722	0.0000	3.4722			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8795	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	0.007043	0.007043	1.9428		0.055613
Total	4.1912	46.3998	30.8795	0.0620	7.1722	1.9853	9.1576	3.4722	1.8265	5.2987	0.0000	0.007043	0.007043	1.9428	0.0000	0.055613

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3.4 Grading - 2021

Mitigated Construction Off-Site

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Hauling	5.9814	200.0212	61.5586	0.9893	66.0443	0.6180	66.6622	17.3338	0.5912	17.9251		64,286.20	64,286.20	5.8893		64,444.44
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0795	0.0006	0.4987	1.5000e-003	0.1843	1.1000e-003	0.1664	0.0438	1.0500e-003	0.0446		162.9066	162.9095	4.3800e-003		163.0163
Total	5.9798	200.0717	62.0681	0.9873	66.2086	0.6191	66.8277	17.3775	0.5923	17.9697		64,448.11	64,448.11	5.8737		64,527.45

3.5 Building Construction - 2021

Unmitigated Construction On-Site

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Off-Road	1.9009	17.4321	16.5752	0.0266		0.9696	0.9696		0.5013	0.9013		2,553.393	2,553.393	0.6160		2,568.794
Total	1.9009	17.4321	16.5752	0.0266		0.9596	0.9596		0.5013	0.9013		2,553.393	2,553.393	0.6160		2,568.794

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3.5 Building Construction - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bldg CO2	Mobile CO2	Total CO2	CH4	N2O	CO2e
Building																
Heating	3.2978	110.4218	28.4880	0.3238	11.5878	0.3411	11.9288	3.0602	0.3264	3.3866		58,484.211	58,484.211	3.2853		25,578.58
Ventiler	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Winter	2.3526	151.35	14.8666	0.0460	4.9289	0.0341	4.9629	1.3074	0.0314	1.3387		4,687.286	4,687.286	0.1318		4,680.680
Total	5.6513	111.9353	43.4485	0.3697	16.5067	0.3752	16.9018	4.3675	0.3577	4.7253		43,881.48	43,881.48	3.4171		40,159.17

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bldg CO2	Mobile CO2	Total CO2	CH4	N2O	CO2e
Building																
Off-Road	1.9009	17.4321	16.5732	0.0268		0.9686	0.9686		0.9313	0.9313	0.0000	2,253.383	2,253.383	0.6160		2,268.744
Total	1.9009	17.4321	16.5732	0.0268		0.9686	0.9686		0.9313	0.9313	0.0000	2,253.383	2,253.383	0.6160		2,268.744

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3.5 Building Construction - 2021
Mitigated Construction Off-Site

Category	Library										Library					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio CO2	Nbio CO2	Total CO2	CH4	N2O	CO2e
Heating	3.2578	110.4218	28.4880	0.2238	11.5878	0.3411	11.9289	3.0602	0.3364	3.3966	55.4842	211.5548	2.11	3.2853	1.5657	8.58
											44					
Ventilation	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Winter	2.3535	1.5135	14.8665	0.0460	4.5289	0.0341	4.5629	1.3074	0.0314	1.3387	4.6872	286.14	0.1518			4.6880
											4					2
											4					
Total	5.6113	111.9353	43.3545	0.2697	16.1167	0.3752	16.4918	4.3675	0.3677	4.7353	60.1714	111.5548	2.11	3.4271	1.5657	8.58

3.5 Building Construction - 2022
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	16.6156	16.3854	0.0268		0.8090	0.8090		0.7912	0.7912		2,554.333	2,554.333	0.6720		2,559.032
Total	1.7062	16.6156	16.3854	0.0268		0.8090	0.8090		0.7912	0.7912		2,554.333	2,554.333	0.6720		2,559.032

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3.5 Building Construction - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bldg CO2	MBldg CO2	Total CO2	CH4	N2O	CO2e
Building																
Heating	3.0600	100.8333	28.2201	0.3186	13.1738	0.2883	13.4622	3.3578	0.2788	4.2146		35,024.88	35,024.88	3.2583		35,106.44
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Winter	2.2593	1.3798	13.8810	0.0443	4.9289	0.0553	4.9832	1.3074	0.0307	1.3381		4,419.153	4,419.153	0.1207		4,422.170
Total	5.2893	102.2131	42.1011	0.3629	28.1027	0.3227	28.4253	5.2453	0.3095	5.5528		39,444.14	39,444.14	3.3790		39,528.61

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bldg CO2	MBldg CO2	Total CO2	CH4	N2O	CO2e
Building																
Off-Road	1.7062	15.6159	16.3634	0.0269		0.8090	0.8090		0.7912	0.7912	0.0000	2,554.333	2,554.333	0.6120		2,559.632
Total	1.7062	15.6159	16.3634	0.0269		0.8090	0.8090		0.7912	0.7912	0.0000	2,554.333	2,554.333	0.6120		2,559.632

3.5 Building Construction - 2022
Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Bldgwy																
Heating	3.0680	100.8333	28.2201	0.3186	15.1758	0.2883	15.4642	3.3579	0.2788	4.2146	35.024 98	35.024 98	35.024 98	3.2583		35.152 44
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	2.2353	1.3728	13.8810	0.0443	4.5288	0.0353	4.5642	1.3074	0.0307	1.3381	-4 419 153	-4 419 153	-4 419 153	0.1207		4 422 170
Total	5.2863	102.2151	42.1011	0.3629	20.1027	0.3227	20.4523	5.2453	0.3075	5.5528	35 444 14	35 444 14	35 444 14	3.3790		39 528 61

3.6 Paving - 2022
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Bldgwy																
Off-Road	1.1028	11.1248	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	2 207 680	2 207 680	2 207 680	0.7140		2 225 610
Paving	1.2658					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	2.3687	11.1248	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	2 207 680	2 207 680	2 207 680	0.7140		2 225 610

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3.6 Paving - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
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
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0058	0.0045	0.0470	1.1100e-003	0.1232	8.9000e-004	0.1241	0.0327	7.7000e-004	0.0335	110.4788	110.4788	110.4788	3.0200e-003		110.6643
Total	0.0058	0.0045	0.0470	1.1100e-003	0.1232	8.9000e-004	0.1241	0.0327	7.7000e-004	0.0335	110.4788	110.4788	110.4788	3.0200e-003		110.5543

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NI Bio-CO2	Total CO2	CH4	N2O	CO2e
Bldg																
Off-Road	1.1028	11.1249	14.5905	0.0228		0.0679	0.0679		0.0228	0.0228	0.0000	2,207,690	2,207,690	0.7140		2,223,610
Paving	1.2658					0.0000	0.0000		0.0000	0.0000		0.0000	0.0000			0.0000
Total	2.3687	11.1249	14.5905	0.0228		0.0679	0.0679		0.0228	0.0228	0.0000	2,207,690	2,207,690	0.7140		2,223,610

3.6 Paving - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
ibidary																
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
Winter	0.0058	0.0345	0.3470	1.1100e-003	0.1232	8.3000e-004	0.1241	0.0327	7.7000e-004	0.0335		110.4788	110.4788	3.0200e-003		110.5543
Total	0.0058	0.0345	0.3470	1.1100e-003	0.1232	8.3000e-004	0.1241	0.0327	7.7000e-004	0.0335		110.4788	110.4788	3.0200e-003		110.5543

3.7 Architectural Coating - 2022
Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
ibidary																
Archit. Coating	\$4,4620					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2046	1.4095	1.8136	2.5700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.5082
Total	\$1.6696	1.4095	1.8136	2.5700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.5082

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3.7 Architectural Coating - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Heating	0.0000	0.0000	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	0.3690	0.2277	2.2804	7.3200e-003	0.8133	5.6000e-003	0.8188	0.2157	5.0600e-003	0.2208		728.1603	728.1603	0.0198		728.6640
Total	0.3690	0.2277	2.2804	7.3200e-003	0.8133	5.6000e-003	0.8188	0.2157	5.0600e-003	0.2208		728.1603	728.1603	0.0198		728.6640

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NIbio-CO2	Total CO2	CH4	N2O	CO2e
Archit Coating	\$4.4620					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4086	1.8136	2.5700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.5092
Total	\$4.6665	1.4086	1.8136	2.5700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.5092

3.7 Architectural Coating - 2022
Mitigated Construction Off-Site

Category	ROD	NOR	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 TdR	Fugitive PM2.5	Exhaust PM2.5	PM2.5 TdR	Bio-CO2	NEC-CO2	Total CO2	CH4	N2O	CO2e
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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Density

Costa Verde Center Revitalization Project - San Diego County, Winter

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEC-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	7.2188	28.8348	88.9858	0.3289	32.6788	0.2567	32.8975	8.7059	0.2408	8.9488	33,616.34	33,816.34	1,6777	33,668.18		52
Unmitigated	7.0098	27.6786	84.4460	0.3084	30.4474	0.2430	30.6911	8.1584	0.2286	8.3852	31,634.42	31,534.42	1,5675	31,594.15		1

4.2 Trip Summary Information

Land Use	Weekly	Saturday	Sunday	Unmitigated Annual VMT	Mitigated Annual VMT
General Office Building	735.20	735.20	735.20	2,147,860	2,298,211
Hotel	1,740.00	1,740.00	1,740.00	4,893,846	5,236,415
Research & Development	0.00	0.00	0.00	0	0
Total	2,305.60	2,305.60	2,305.60	7,350,020	7,852,422

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-M or C-M	H-S or C-C	H-O or C-M	H-M or C-M	H-S or C-C	H-O or C-M	Primary	Diversed	Pass-by
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	100	0	0
Hotel	9.50	7.30	7.30	19.40	61.80	19.00	100	0	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Research & Development	9.50	7.30	7.30	33.00	48.00	19.00	100	0	0

4.4 Fleet Mix

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Land Use	LDA	LD1	LD2	LD3	MDV	LHD1	LHD2	MHD	HHH	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.006234	0.039465	0.179154	0.102641	0.074368	0.005395	0.076820	0.024508	0.001529	0.001857	0.005689	0.000761	0.000998	
	0.006234	0.039465	0.179154	0.102641	0.074368	0.005395	0.076820	0.024508	0.001529	0.001857	0.005689	0.000761	0.000998	
Parking Lot	0.006234	0.039465	0.179154	0.102641	0.074368	0.005395	0.076820	0.024508	0.001529	0.001857	0.005689	0.000761	0.000998	
Research & Development	0.006234	0.039465	0.179154	0.102641	0.074368	0.005395	0.076820	0.024508	0.001529	0.001857	0.005689	0.000761	0.000998	

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Site CO2	Net CO2	Total CO2	CH4	N2O	CO2e
Manufacturing	0.3524	3.2545	2.7874	0.0198		0.2504	0.2504		0.2504	0.2504	3.883408	3.883408	3.883408	0.0758	0.0725	3.974807
Mitigated	0.3524	3.2545	2.7874	0.0198		0.2504	0.2504		0.2504	0.2504	3.883408	3.883408	3.883408	0.0758	0.0725	3.974807
Unmitigated	0.3524	3.2545	2.7874	0.0198		0.2504	0.2504		0.2504	0.2504	3.883408	3.883408	3.883408	0.0758	0.0725	3.974807

Costa Verde Center Revitalization Project - San Diego County, Winter

5.2 Energy by Land Use - NaturalGas

Unmitigated

Land Use	Activity	Bldg										Bldg				CH	N2O	CO2e
NonEnergy Use	ROO	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2					
General Office	22712.8	0.0238	0.2168	0.1622	1.5200e-003	0.0165	0.0165	0.0165	0.0165	0.0165	260.3062	260.3062	4.5200e-003	4.7120e-003	261.8631			
Hotel	15989.7	0.2156	1.9598	1.6642	0.0118	0.1489	0.1489	0.1489	0.1489	0.1489	2,351.732	2,351.732	0.0451	0.0431	2,396.707			
Parking lot	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			
Research & Development	11401.6	0.1230	1.1178	0.8930	6.7100e-003	0.0850	0.0850	0.0850	0.0850	0.0850	1,341.366	1,341.366	0.0257	0.0246	1,366.341			
Total	0.3924	3.2815	2.8714	0.0186	0.2304	0.2304	0.2304	0.2304	0.2304	0.2304	3,082.668	3,082.668	0.0738	0.0725	3,097.907			

5.2 Energy by Land Use - NaturalGas Mitigated

Land Use	RENVGAS 5.195	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	Fugitive PM2.5	Exhaust PM2.5	PM2.5 TSM	Bio-CO2	NRBC-CO2	Total CO2	CH4	N2O	CO2e
General Office Building	2.2128	0.0038	0.2188	0.1822	1.3000E-06		0.0165	0.0165	0.0165	0.0165		280.3082	280.3082	4.8800E-05	4.7700E-05	281.8531
Hotel	19.8897	0.2158	1.9598	1.9462	0.0118		0.1489	0.1489	0.1489	0.1489		2,351.732	2,351.732	0.0451	0.0431	2,346.707
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Development	11.4616	0.1230	1.1178	0.8395	6.7100E-06		0.0850	0.0850	0.0850	0.0850		1,341.348	1,341.348	0.0257	0.0248	1,343.541
Total		0.3024	3.2845	2.7174	6.0198		0.2504	0.2504	0.2504	0.2504		3,053.408	3,053.408	0.0738	0.0725	3,076.407

6.0 Area Detail

6.1 Mitigation Measures Area

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio CO2	Nbio CO2	Total CO2	CH4	N2O	CO2e
Multiplex	12.3344	2.2900e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5426	0.5426	1.4200e-003		0.5780
Landscaping	12.3344	2.2900e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5426	0.5426	1.4200e-003		0.5780
Unmitigated	12.3344	2.2900e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5426	0.5426	1.4200e-003		0.5780

6.2 Area by SubCategory
Unmitigated

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
Architectural Coating	0.8808					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Products	11.5072					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0233	2.2900e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5426	0.5426	1.4200e-003		0.5780
TOTAL	12.3344	2.2900e-003	0.2627	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5426	0.5426	1.4200e-003		0.5780

6.2 Area by SubCategory
Mitigated

SubCategory	ECG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day										lb/day					
Architectural	0.8038					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	11.5012					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0233	2.2900e-003	0.2027	2.0000e-005		9.0000e-004	8.0000e-004		9.0000e-004	9.0000e-004		0.5425	0.5425	1.4200e-003		0.5780
Total	12.3344	2.2900e-003	0.2027	2.0000e-005		9.0000e-004	9.0000e-004		9.0000e-004	9.0000e-004		0.5425	0.5425	1.4200e-003		0.5780

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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1.1.0 Vegetation

COMMENTS

RESPONSES

EXHIBIT B



WILSON IHRIG

ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

26 May 2020

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Subject: *Costa Verde Center Revitalization Project*
Draft Environmental Impact Report (DEIR)
March 2020, SCH No. 2016071031
Review and Comment on Noise Analysis

Dear Ms. Caro,

Per your request, I have reviewed the subject matter document and associated supporting documents with respect to the noise analysis.

1. Noise Analysis Fails to Assess Increase in Ambient Noise and Contains Inadequate Baseline Data to Do So.

Appendix G to the California *State CEQA Guidelines* states that an environmental study must consider, among other things, “whether a project would result in . . . [g]eneration of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project . . .”. “Temporary” is typically assumed to apply to construction noise.¹ Not only does the DEIR fail to make this assessment, the baseline ambient noise data collect for the DEIR is inadequate to allow reviewers to even comment on it.

To establish ambient noise levels at the Project site, the DEIR relies on two, 10-minute, on-site noise measurements conducted on a single day: April 12, 2016. One measurement was near the intersection of Genesee Avenue and Esplanade Court, and the second was near the Project site driveway off Nobel Drive. The recorded noise levels at those site visits were 68.5 dBA L_{EQ} and 67.6 dBA L_{EQ}, respectively. [DEIR at p. 5.7-2 and Acoustical Analysis Report, Appendix E at p. 6] These data are inadequate to establish existing ambient noise levels at all relevant areas in the vicinity of the Project site.

¹ All phase of demolition and construction are expected to take approximately three years which is more aptly characterized as “pseudo-permanent” from the perspective of residential neighbors. [DEIR at p. 5.6-12]

E60 Refer to the response to Comment E5 for discussion on the baseline noise and its relation to the ambient noise measurements.

E60



Costa Verde Center Revitalization DEIR
Review of Noise Analysis

E60
cont.

In particular, the DEIR preparer failed to take any ambient baseline noise measurements from areas identified as “Noise and Vibration Sensitive Land Uses”, uses which include existing and under-construction residences, a continuing care retirement community, and a pocket park. [DEIR at p. 5.7-2] Critically, the DEIR’s baseline noise measurements do not establish ambient noise levels for the most noise-sensitive receptors in the project vicinity: residents at Vi at La Jolla Village (a continuing care retirement facility) and Towers at Costa Verde.

The DEIR’s baseline ambient noise measurements therefore fail to establish existing noise levels at relevant noise-sensitive receptors in the vicinity of the Project site and the DEIR likewise fails to assess the temporary increase in ambient noise levels at those receptors for the three years during which demolition and construction will occur. The DEIR should be revised to correct these deficiencies.

2. Noise Analysis Fails to Establish a Reasonable Threshold of Significance for Construction Noise Impacts.

CEQA does not set a uniform standard for determining the significance of a project’s noise impacts. Lead agencies may select their own method but must support the method with evidence and analysis. The DEIR utilizes the City’s Noise Ordinance² as its threshold of significance for construction noise, as follows:

A significant noise impact would occur from construction of a project if it would result in temporary construction noise that exceeds 75 dBA L_{eq} (12 hour) at the property line of a residentially zoned property from 7:00 a.m. to 7:00 p.m. (as identified in SDMC Section 59.0404 [sic]) or if non-emergency construction occurs during the 12-hour period from 7:00 p.m. to 7:00 a.m. Monday through Saturday. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as day care facilities, a significant noise impact may be identified. [DEIR at p. 5.7-4]

E61

The DEIR’s exclusive reliance on the numeric limits established in the City’s Noise Ordinance does not provide a complete picture of the noise impacts that may result from the Project, particularly to the most sensitive receptors near the Project site, whose noise exposure will be exacerbated during the Project’s 3-year construction period. The quantitative method of relying on Noise Ordinance limits does not consider the magnitude of the increase in noise caused by the Project on local receptors. The DEIR therefore fails to accurately describes how changes in ambient noise levels during Project construction will affect human beings, as required by CEQA.

For example, by specifying the construction noise limit in terms of a 12-hour average, the effective limit for an 8-hour period is effectively 76.8 dBA because 4 hours of “construction silence” will be averaged along with the 8 hours of construction noise.³ This is an unusual way to specify a noise limit

² SDMC, Chapter 5, Article 9.5, Division 4, §59.5.0404 (see DEIR, p. 5.7-4).

³ Because the decibel scale is logarithmic, decibel levels do not add or average arithmetically (i.e., as number typically do). For example, 60 dBA plus 60 dBA equals 63 dBA, not 120 dBA. See DEIR, p. 5.7-1. By the same

E61 Refer to the response to Comment E20.



E61
cont.

because most construction days are 8 hours long. The DEIR's construction noise analysis repeatedly references an 8-hour day, e.g., "The pieces of equipment would be expected to operate for 40 percent of an 8-hour construction day." [DEIR at p. 5.7-6]. In the extreme, under the DEIR's construction noise threshold, if construction were to occur for only 1 hour during a day, it could create 85.8 dBA L_{EQ} (1-hour) during that hour and still comply with the 75 dBA L_{EQ} (12-hour) average. As this example shows, using a 12-hour average creates an illusory measure of assessing actual noise impacts.

The DEIR's construction noise analysis significance threshold takes full advantage of the unusual metric used by the San Diego Municipal Code to limit construction noise, while failing to measure the actual human impacts that noise exposure that would cause during the Project's construction hours. The DEIR should be revised and recirculated to include a realistic threshold which measures the impact of construction noise on human receptors during the Project's actual construction hours, rather than relying on an unusual, unrealistic, and unsubstantiated numeric limit stated in the Noise Ordinance.

3. The Noise Analysis Substantially Underestimates Construction Noise Impacts.

The DEIR's noise analysis makes a major error even in applying the San Diego 75 dBA L_{EQ} (12-hour) construction noise limit: The limit is applied to each piece of construction equipment separately, rather than to assess the totality of construction noise coming from the project site. For example,

At a distance of 85 feet, a breaker would generate a noise level of 79.7 dBA L_{EQ} (12-hour). The 75 dBA L_{EQ} noise contour would be 145 feet. [DEIR at p. 5.7-6]

The DEIR later bases the noise mitigation in its Mitigation Monitoring and Reporting Program ("MMRP") on this and other analyses done for separate pieces of equipment. For example,

For demolition of the underground parking garage and ground level slabs, if a breaker is used within 145 feet or if a concrete saw is used within 139 feet of the pocket park, a temporary 12-foot-high noise control barrier shall be erected between the breaker and concrete saw and the pocket park to reduce noise levels below the City Noise Ordinance construction threshold of 75 dBA L_{EQ} (12 hour). [DEIR at p. 5.7-9]

Using information about the construction equipment presented in the DEIR [Table 5 of Acoustical Analysis Report, Appendix E at p. 9], information in the Acoustical Analysis Report text [Appendix E at pp. 16-17], and the same Roadway Construction Noise Model that the preparers of the DEIR used, we have calculated for the three loudest phases the distances required for the totality of construction noise for have a 12-hour L_{RQ} of 75.0 dBA and an 8-hour L_{RQ} of 75 dBA:

logarithmic-based math, the 12-hour average of 76.8 dBA for 8 hours along with "0 dBA" for 4 hours is 75.0 dBA L_{EQ} .

The denotation " L_{EQ} " comes from the fact that the steady sound level that has the same amount of energy as the time-varying levels of the measurement period is called the *equivalent level*. Technically, this is the energy-averaged noise level, but, for all intents and purposes, it may simply be thought of as the average noise level.

E62 Refer to the response to Comments E21 and E22 for further discussion of modeled construction equipment and mitigation measures.



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Review of Noise Analysis

Phase	Distance to 75 dBA L _{EQ} (12-hour)	Distance to 75 dBA L _{EQ} (8-hour)	Table Showing Calculation Details
Demolition	221 feet	271 feet	Table 1
Grading	188 feet	230 feet	Table 2
Construction	135 feet	165 feet	Table 3

TABLE 1 12-HOUR AVERAGE DEMOLITION NOISE LEVEL USING ALL EQUIPMENT

Equipment	Reference Noise Level at 50 ft	Typical Time of Use	Number on Site	Maximum Noise Level at 221 ft	L _{EQ} (12-hour) at 221 ft
Excavator	80.7 dBA	40%	2	67.8 dBA	65.1 dBA
Breaker	90.0 dBA	40%	1	77.1 dBA	71.4 dBA
Concrete saw	89.6 dBA	40%	1	76.7 dBA	71.0 dBA
Loader	79.1 dBA	40%	1	66.2 dBA	60.5 dBA
Dump Truck	76.5 dBA	40%	2	63.6 dBA	60.9 dBA
Maximum / Total				77.1 dBA	75.0 dBA

TABLE 2 12-HOUR AVERAGE GRADING NOISE LEVEL USING ALL EQUIPMENT

Equipment	Reference Noise Level at 50 ft	Typical Time of Use	Number on Site	Maximum Noise Level at 188 ft	L _{EQ} (12-hour) at 188 ft
Excavator	80.7 dBA	40%	1	69.2 dBA	63.5 dBA
Grader	85.0 dBA	40%	1	73.5 dBA	67.8 dBA
Dozer	81.7 dBA	40%	1.0	70.2 dBA	64.5 dBA
Loader	79.1 dBA	40%	3.0	67.6 dBA	66.6 dBA
Scraper	84.0 dBA	40%	3.0	72.5 dBA	71.5 dBA
Dump Truck	76.5 dBA	40%	2.0	65.0 dBA	62.3 dBA
Maximum / Total				73.5 dBA	75.0 dBA



TABLE 3 12-HOUR AVERAGE CONSTRUCTION NOISE LEVEL USING ALL EQUIPMENT

Equipment	Reference Noise Level at 50 ft	Typical Time of Use	Number on Site	Maximum Noise Level at 135 ft	L _{eq} (12-hour) at 135 ft
Crane	80.6 dBA	40%	1	72.0 dBA	66.2 dBA
Excavator (Drill)	80.7 dBA	40%	1	72.1 dBA	66.3 dBA
Rough Forklift	79.1 dBA	40%	4	70.5 dBA	70.8 dBA
Loader	79.1 dBA	40%	1	70.5 dBA	64.7 dBA
Welder	74.0 dBA	40%	3	65.4 dBA	64.4 dBA
Cement Truck	78.8 dBA	40%	2	70.2 dBA	67.4 dBA
Maximum / Total				72.1 dBA	75.0 dBA

These calculated distances aren't just academic because of a second error in the DEIR's noise analysis. It ignores the fact that the most noise-sensitive receptors in the Project vicinity are the residents of the Vi at La Jolla Village and Towers at Costa Verde buildings. These buildings are 19 and 15-stories high, respectively, which puts their heights at approximately 205 feet and 165 feet, respectively. Residences in both buildings have balconies that have a birds-eye views of the entire project site. The minimum distances from construction to receptors necessary to meet the DEIR's own noise significance threshold are 221 feet during demolition activities, 188 feet during grading activities, and 135 feet during the remainder of the construction period. The nearest Vi building is 70 feet from the Project boundary and the nearest Towers building is 110 feet, both within these minimum distances. Project construction activities are therefore likely to create a significant noise impact on receptors at the Vi at La Jolla Village and Towers at Costa Verde buildings which the DEIR fails to disclose. The DEIR must be revised to identify this impact.

4. Construction Noise Mitigation is Inadequate.

The primary construction noise mitigation measure included in the MMRP is a "12-foot high noise control barrier". [DEIR at p. 5.7-9] This will do nothing for most of the balconies of the residences at Vi at La Jolla Village and Towers at Costa Verde buildings that face the Project site. The DEIR's proposed 12-foot high noise control barrier is inadequate to reduce construction noise levels to less than significant levels because it will not block the line-of-sight from the balconies to most of the construction activity.

For example, for residents on their 5th-floor balconies, a 12-foot wall would block their line-of-sight to only about the first 20 feet of the project site. The underground garage, which is to be demolished with a breaker and concrete saw, extends 320 feet from the project site property line.⁴ So (accounting for the elevation of the receptors), noise levels from demolition from 20 ft to about 100 feet from the project site property will exceed the DEIR threshold of significance. This is about

⁴ The character of the noise from breaking and sawing concrete is particularly irritating because the first involves impacts (like a jackhammer) and the latter produces a high-pitched whine.

E63 Refer to the response to Comment E25, which discusses the mitigation measure's performance standard for noise levels to not exceed 75 dBA L_{eq} (12 hour).

COMMENTS

RESPONSES



Costa Verde Center Revitalization DEIR
Review of Noise Analysis

E63
cont.

25% of the time it takes to demolish the expansive underground parking structure. A wall to break the line-of-sight from the balcony to 100 feet from the project property line would have to be about 30 feet tall, which is obviously infeasible, and even that wall would still allow residents on higher floors to see some demolition directly.

The tower building at 8517 Costa Verde Blvd, Vi at La Jolla Village, is not as near to the underground parking garage as the Tower at Costa Verde building, but it is closer to the project property line, about 70 feet. The residential balconies in this building look down on the area that currently has a 41,700 sq ft building that will be demolished using a bulldozer and an excavator and that will be the site of Building D of the revitalization project. The 12-foot wall proposed in the MMRP would block the line-of-sight from a 5th-floor balcony to only the first 16 feet of the Project site. Given that the distance to the 75 dBA L_{eq} (12-hour) contour for grading is 188 feet, noise from grading within between 16 feet and 105 feet from the Project property line will exceed the threshold of significance. The farthest extent of Building D is about 230 feet from the project property line, so grading will exceed the threshold about 40% of the time. A wall to break the line-of-sight from the balcony to 105 feet from the project property line would have to be about 40 feet tall, which is obviously infeasible.

Construction is an inherently noisy endeavor. Demolition requires breaking concrete and other materials apart quickly. All phases of construction utilize heavy equipment predominantly powered by large, diesel engines – noisy even with mufflers. The subject property is very close to residential developments which overlook the site, so there are very few, if any feasible mitigation measures for construction noise.

As discussed above, a wall that would block the line-of-sight from the balconies would have to be on the order of 30 to 50 feet tall, which is technically infeasible. An option that may be technically feasible, but which is probably aesthetically and economically infeasible, would be to erect scaffolding next to (and attached to) the residential buildings and hang sound control blankets from the scaffolding. While this would reduce noise levels on the balconies, it would be aesthetically unpleasing from both sides and would diminish the utility of the balcony during the construction period – even when there is no construction. It may also be economically infeasible.

A third option which may be feasible would be to install heavy Plexiglass or other clear panels around the edges of the balconies to act as sound barriers without much affecting the light or view. Because noise would reflect off the bottom of the balcony above, the panels would likely need to extend from floor to floor with only small openings for ventilation. The panels would need to be able to withstand wind loads, and there may be other code requirements. The exact number of balconies that would require treatment would be subject to a detailed noise analysis, but there appear to be over 100 balconies in the Vi building and over 50 in the Towers building that might require treatment.

If Plexiglass panels prove to be infeasible and the project sponsor is not able to devise another mitigation measure for the elevated balconies to reduce construction noise levels to the San Diego Municipal Code limit and/or the DEIR threshold of significance, construction noise should be identified as a significant and unavoidable noise impact of the Project.

COMMENTS

RESPONSES



Costa Verde Center Revitalization DEIR
Review of Noise Analysis

* * * * *

E64

Please contact me if you have any question about this review of the Costa Verde Revitalization Project DEIR noise analysis.

Very truly yours,

WILSON IHRIG

Derek L. Watry
Principal

2020-05-18 costa verde - noise review - wilson-ihrig.docx

E64

This comment has been noted; no further response is necessary.



DEREK L. WATRY

Principal

Since joining Wilson Ihrig in 1992, Derek has gained experienced in many areas of practice including environmental, construction, forensic, architectural, and industrial. For all of these, he has conducted extensive field measurements, established acceptability criteria, and calculated future noise and vibration levels. In the many of these areas, he has prepared CEQA and NEPA noise technical studies and EIR/EIS sections. Derek has a thorough understanding of the technical, public relations, and political aspects of environmental noise and vibration compliance work. He has helped resolve complex community noise issues, and he has also served as an expert witness in numerous legal matters.

Education

- M.S. Mechanical Engineering, University of California, Berkeley
- B.S. Mechanical Engineering, University of California, San Diego
- M.B.A. Saint Mary's College of California

Project Experience

12th Street Reconstruction, Oakland, CA

Responsible for construction noise control plan from pile driving after City received complaints from nearby neighbors. Attendance required at community meetings.

525 Golden Gate Avenue Demolition, San Francisco, CA

Noise and vibration monitoring and consultation during demolition of a multi-story office building next to Federal, State, and Municipal Court buildings for the SFDPPW.

911 Emergency Communications Center, San Francisco, CA

Technical assistance on issues relating to the demolition and construction work including vibration monitoring, developing specification and reviewing/recommending appropriate methods and equipment for demolition of Old Emergency Center for the SFDPPW.

Central Contra Costa Sanitary District, Grayson Creek Sewer, Pleasant Hill, CA

Evaluation of vibration levels due to construction of new sewer line in hard soil.

City of Atascadero, Review of Walmart EIR Noise Analysis, Atascadero, CA

Review and Critique of EIR Noise Analysis for the Del Rio Road Commercial Area Specific Plan.

City of Fremont, Ongoing Environmental Services On-Call Contract, Fremont, CA

Work tasks primarily focus on noise insulation and vibration control design compliance for new residential projects and peer review other consultant's projects.

City of Fremont, Patterson Ranch EIR, Fremont, CA

Conducted noise and vibration portion of the EIR.

City of King City, Silva Ranch Annexation EIR, King City, CA

Conducted the noise portion of the EIR and assessed the suitability of the project areas for the intended development. Work included a reconnaissance of existing noise sources and receptors in and around the project areas, and long-term noise measurements at key locations.

E65

The Commenter's qualifications are noted. As this information does not pertain to the adequacy of the EIR, no further response is necessary.

E65



Conoco Phillips Community Study and Expert Witness, Rodeo, CA

Investigated low frequency noise from exhaust stacks and provided expert witness services representing Conoco Phillips. Evaluated effectiveness of noise controls implemented by the refinery.

Golden Gate Park Concourse Underground Garage, San Francisco, CA

Noise and vibration testing during underground garage construction to monitor for residences and an old sandstone statue during pile driving for the City of San Francisco.

Laguna Honda Hospital, Clarendon Hall Demolition, San Francisco, CA

Project manager for performed vibration monitoring during demolition of an older wing of the Laguna Honda Hospital.

Loch Lomond Marina EIR, San Rafael, CA

Examined traffic noise impacts on existing residences for the City of San Rafael. Provided the project with acoustical analyses and reports to satisfy the requirements of Title 24.

Mare Island Dredge and Material Disposal, Vallejo, CA

EIR/EIS analysis of noise from planned dredged material off-loading operations for the City of Vallejo.

Napa Creek Vibration Monitoring Review, CA

Initially brought in to peer review construction vibration services provided by another firm, but eventually was tapped for its expertise to develop a vibration monitoring plan for construction activities near historic buildings and long-term construction vibration monitoring.

San Francisco DPW, Environmental Services On-Call, CA

Noise and vibration monitoring for such tasks as: Northshore Main Improvement project, and design noise mitigation for SOMA West Skate Park.

San Francisco PUC, Islais Creek Clean Water Program, San Francisco, CA

Community noise and vibration monitoring during construction, including several stages of pile driving. Coordination of noise and ground vibration measurements during pile driving and other construction activity to determine compliance with noise ordinance. Coordination with Department of Public Works to provide a vibration seminar for inspectors and interaction with Construction Management team and nearby businesses to resolve noise and vibration issues.

San Francisco PUC, Richmond Transport Tunnel Clean Water Program, San Francisco, CA

Environmental compliance monitoring of vibration during soft tunnel mining and boring, cut-and-cover trenching for sewer lines, hard rock tunnel blasting and site remediation. Work involved long-term monitoring of general construction activity, special investigations of groundborne vibration from pumps and bus generated ground vibration, and interaction with the public (homeowners).

Santa Clara VTA, Capitol Expressway Light Rail (CELR) Bus Rapid Transit (BRT) Update EIS, CA

Reviewed previous BRT analysis and provide memo to support EIS.

**Shell Oil Refinery, Martinez, CA**

Identified source of community noise complaints from tonal noise due to refinery equipment and operations. Developed noise control recommendations. Conducted round-the-clock noise measurements at nearby residence and near to the property line of the refinery and correlated results. Conducted an exhaustive noise survey of the noisier pieces of equipment throughout the refinery to identify and characterize the dominant noise sources that were located anywhere from a quarter to three-quarters of a mile away. Provided a list of actions to mitigate noise from the noisiest pieces of refinery equipment. Assisted the refinery in the selection of long-term noise monitoring equipment to be situated on the refinery grounds so that a record of the current noise environment will be documented, and future noise complaints can be addressed more efficiently.

Tyco Electronics Corporation, Annual Noise Compliance Study, Menlo Park, CA

Conducted annual noise compliance monitoring. Provided letter critiquing the regulatory requirements and recommending improvements.

University of California, San Francisco Mission Bay Campus Vibration Study, CA

Conducted measurements and analysis of ground vibration across site due to heavy traffic on Third Street. Analysis included assessment of pavement surface condition and propensity of local soil structure.

COMMENTS

RESPONSES

EXHIBIT C



SMITH ENGINEERING & MANAGEMENT

May 18, 2020

Ms. Christina Caro
 Adams Broadwell Joseph & Cardozo
 601 Gateway Boulevard, Suite 1000
 South San Francisco, CA 94080-7037

Subject: Costa Verde Center Revitalization Project DEIR (SCH 2016071031)
 P20007

Dear Ms. Caro:

Per your request, I reviewed the Draft Environmental Impact Report (the "DEIR") for the Costa Verde Center Revitalization Project (the "Project") in the City of San Diego (the "City"). My review is with respect to transportation and circulation considerations.

My qualifications to perform this review include registration as a Civil and Traffic Engineer in California and over 50 years of professional consulting practice in these fields. I have both prepared and reviewed the transportation and circulation sections of numerous documents related to compliance with the California Environmental Quality Act ("CEQA").

My comments on the subject DEIR follow.

Concerns Re Relative Shares of Project Presumed Research and Development Versus Office

The DEIR Project Description chapter indicates that the Commercial/Office uses in the project would be 40,000 square feet of office and 360,000 square feet of scientific research and development ("R&D") uses. Relying on the San Diego Trip Generation Manual, DEIR Appendix B, Table 8-1 calculates the gross trip generation of the R&D component at what works out to be a rate of 1.28 trips per thousand square feet ("KSF") in the AM peak hour and 1.12 per KSF in the PM peak hour. However, the gross trip generation of the office component is estimated in the same table, based on the same data source as what works out

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E66 Introductory comments regarding review of the EIR and the Commenter's qualifications are noted. As these comments do not address the adequacy of the EIR, no further response is necessary.

E67 Refer to the response to Comment E2 regarding the trip generation rates used for project traffic analysis.

Ms. Christina Caro
Adams Broadwell Joseph & Cardozo
May 18, 2020
Page 2

E67
cont.

to be 2.75 trips per KSF in the AM peak and 2.95 trips per KSF in the PM peak.¹ That is to say, relying on the actual estimated trip totals and square footages in DEIR Appendix B, Table 8-1, office space generates trips at roughly 2.15 times the rate of R&D in the AM peak and 2.63 times the rate of R&D in the PM peak. The difficulty is that R&D is an ambiguous use descriptor as applied in the development industry. While true scientific R&D, which has some office space and meeting areas typical of office space, but also large areas devoted to laboratories, product assembly, fabrication and testing, employee density tends to be low, approaching or exceeding 1 thousand square feet per person. However, buildings described in development applications as R&D facilities are used as 'back-office' functions with employee densities at or approaching those characteristic of maximally dense office functions, about 4 employees per thousand square feet. In order to comply with the good faith effort to disclose impact that CEQA demands, the DEIR should reanalyze the project with more of the space characterized as R&D assumed in the trip generation estimate at 'office' rates or propose a condition that limits employee density in the portion of the project characterized as R&D to levels characteristic of true scientific R&D and below that of ordinary office use.

Assumption that Future Retail Would Have the Same Trip Generation as the Existing Retail Is Flawed

E68

The DEIR traffic analysis assumes that because the retail component of the Project is the same square footage as what exists, there would be not net increase in trips for that component. This interpretation ignores the realities of the current economy and the transformation of the retail component that the Project is actually proposing. Increasingly, brick and mortar stores selling durable goods are being undermined by internet sales and going vacant or are underperforming. What the Project is doing is replacing these failed or failing with varieties of restaurants, services, boutique retail, entertainment and other popular uses. Since the traffic from vacant and underperforming retail floor area is not represented in the existing conditions traffic counts, the DEIR cannot reasonably assume that the traffic from the existing use and the future retail component use would be the same. It must credit only traffic from an actual measured traffic count of the existing retail use or discount traffic estimated at normal trip generation rate based on fair estimates of vacancy and underperformance.

Ambiguity in Discount for Prior Approval

E69

The DEIR at page 5.2-14 correctly (the flaws in the trip generation estimates noted above ignored for the purposes of this discussion) states that Table 5-2.6

¹ It is acknowledged the office rates are estimated by fitted curve equation so the rates per KSF for a different size of office component would work out to be slightly different.

E68

Refer to the response to Comment E23 regarding trips generated by existing retail uses on the site.

E69

Refer to the response to Comment E6 regarding the number of trips analyzed under the study scenarios versus the number of trips associated with the original planning process for the Costa Verde Specific Plan.

COMMENTS

RESPONSES

Ms. Christina Caro
Adams Broadwell Joseph & Cardozo
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Page 3

E69
cont.

indicates that the project would generate 4,981 net new trips. The narrative on 5.2-14 continues, stating that Table 3, Land Use and Development Intensity, of the UCP indicates that 1,615 unused ADT remain within the CVSP Area and therefore, the net excess of trips from the CVSP with the Project relative to what was envisioned by the UCP is only 3,366 ADT. It is unclear both in the DEIR text and that of the DEIR Appendix B (the Traffic Impact Study) whether a further 1,615 trip discount was taken before assigning Project trips to the street and highway network or whether the assignments and consequent findings of impact reflect the full 4,981 trip increase or whether the paragraph is merely indicating the amount of increase in allowable ADT that must be reflected in Amendments to the University Community Plan and Costa Verde Specific Plan. This must be clarified. If the first interpretation (that there has been a further discounting of trips before assignment) is what has been done, this raises issues of improper baseline similar to those adjudicated in *Citizens for a Better Environment v. South Coast Air Quality Management District*.

Impact and Mitigation

E70

The DEIR identifies transportation impacts at the existing + Project scenario, the Near Term + Project (2023 opening year of the Project) scenario and the Long Term + Project (2035 Community Buildout) scenario. In the Existing + Project identifies significant Project impacts at 4 intersections, no street segments, 3 freeway mainline segments and 1 metered freeway on ramp. By the 2023 scenario, locations impacted by the Project grow to 5 intersections, 1 street segment 3 freeway mainline segments and 1 metered freeway on ramp. By the 2035 Community Buildout, impacted locations reach 9 intersections, 5 street segments, 3 freeway mainline segments and 2 metered freeway on ramps.

E71

In the case of the intersections disclosed as impacted Existing + Project scenario, fully feasible mitigation is proposed at 1 location, and seemingly feasible mitigations at 2 other intersections are labeled 'significantly impacted and unmitigated' solely due to jurisdictional issues (requiring Caltrans approval). However, at the fourth impacted intersection (Genesee Avenue and Governor Drive, a seemingly feasible mitigation is dismissed as infeasible because it would eliminate what is already problematic and U-turn access to a gasoline service station and very small convenience mart located at the northwest corner of the intersection. This U-turn access to that property is likely very minimally used since there are gas stations located on all of the other 3 corners of the intersection. The Project should be required to bond implementation of the measure including whatever compensation to the affected property and business is negotiated or adjudicated.

E72

In the 2023 scenario, one intersection, that of Genesee Avenue with Decoro Street, is added to the impacted intersection list. Effective mitigation is proposed

E70

The Commenter's summary of the impact analysis presented in the draft EIR is noted. As this comment does not address the adequacy of the information presented, no further response is necessary.

E71

Regarding the mitigation measures TRA-3 (Genesee Avenue/SR 52 Westbound Ramps) and TRA-4 (Genesee Avenue/SR 52 Eastbound Ramps), the Project proposes improvements to mitigate the corresponding significant impacts to below a level of significance. However, as explained in the draft EIR Section 5.2.2.4, *Transportation/Circulation*, because these improvements require Caltrans approval, the project applicant and City are unable to independently assure their timely implementation and therefore these improvements may not be in place prior to the development of the Project. The applicant would continue to work with Caltrans to address project impacts within Caltrans' jurisdiction and expect that improvements will be implemented. However, these impacts are appropriately assessed at this time as significant and unmitigated due to the uncertainty of whether the mitigations will be completed at the time of impact.

Regarding the significant impact at the Genesee Avenue/Governor Drive intersection, the mitigation measure to restrict U-turns for eastbound vehicles is not recommended because it would not only affect access to the gas station at

COMMENTS

RESPONSES

	<p>E71 (cont.) the northwest corner of the intersection, but would also affect the egress of customers intending to travel westbound from the gas station and convenience store on the south side of Governor Drive.</p> <p>The mitigation measure at the Genesee Avenue/Governor Drive intersection is not recommended.</p> <p>E72 Refer to the response to Comment E71 regarding Genesee Avenue/Governor Drive mitigation.</p> <p>With regard to the significant impact identified in the Year 2023 scenario at the intersection of Genesee Avenue/Decoro Street, the Project would implement mitigation measure TRA-10 to restripe the westbound approach to include a shared through left-turn lane and an exclusive right-turn lane, along with associated traffic signal modifications, as described in Section 5.2.2.4 of the draft EIR.</p> <p>With regard to impacts to Genesee Avenue from Decoro Street to Governor Drive, EIR Section 5.2.2.4 references the University Community Plan Amendment that removed widening of Genesee Avenue to six lanes and the Regents Road bridge from the Transportation Element. Following a planning and environmental review process, the City Council adopted the Final Program EIR Findings and approved the Community Plan Amendment on December 5, 2016 (R 2017-275).</p> <p>The planning process that led to this decision included a review by the City of potential measures to mitigate traffic impacts on Genesee Avenue from Nobel Drive to the SR 52 Westbound Ramps. This detailed planning and environmental review process resulted in a Finding by the City Council that mitigation of the noted impacts was not feasible “because the removal of this center median will result in the loss of the trees located within the median, which is not consistent with the Climate Action Plan (CAP) Strategy 5: Climate Resiliency goal to increase urban tree canopy coverage. In addition, the trees within the Genesee Avenue median are a distinctive feature to the University community. As expressed by the University community during public hearing, this loss of trees would change the overall aesthetic of the roadway, which would affect neighborhood character. This loss of vegetation from removal of the median would also result in an increase in hardscape area (impervious surfaces) that would impede water from otherwise infiltrating into the soil and being filtered naturally, increasing runoff and thereby changing drainage patterns and the potential for flooding.” As these City Council conclusions were made during the environmental review process for the</p>
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COMMENTS

RESPONSES

E72	<p>(cont.) Costa Verde project, they are considered to remain valid and no evidence to the contrary has been presented. As a partial mitigation measure, as discussed in EIR Section 5.2.2.4, the Project would upgrade and/or repair signal interconnect, communications, detection, and controller equipment on Genesee Avenue between Esplanade Court and Governor Drive. Based on the above, it can be concluded that a good faith effort was made to propose mitigation measures to the extent feasible.</p>
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COMMENTS

RESPONSES

Ms. Christina Caro
Adams Broadwell Joseph & Cardozo
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E72
cont.

for this location. However, the DEIR repeats the same unsupported excuse discussed above claiming infeasibility of mitigation for the intersection of Genesee with Governor. The Project should be required to permit and bond this improvement including whatever severance damage is negotiated or adjudicated.

One street segment is disclosed as impacted at the 2023 analysis scenario, that of Genesee Avenue from Decoro Street to Governor Drive. However, the only mitigation proposed is one that was already known to the City and its consultants as infeasible, as the City had previously rejected it in 2016. Clearly, the City and its consultants have not made a good faith effort to propose feasible mitigation in this instance.

E73

In the 2035 Build-out scenario, 9 intersections are disclosed as impacted. Effective feasible mitigation is proposed for 5. Another 2 are regarded as significantly impacted and unmitigated solely based on jurisdictional control (Caltrans involvement). At 2 locations, potentially effective mitigations are dismissed as infeasible due to minor access restrictions. One is at Genessee and Governor which has been discussed extensively above. However, the severity of impact at the 2035 + Project level (average AM peak hour delays per vehicle of 530 seconds per vehicle – almost 9 minutes per vehicle at just this one intersection – should prompt at least discussion of reconsideration as a mitigation measure of the proposal to grade separate the northbound and southbound through lanes from the other movements at this intersection that was dismissed as infeasible at the time of the UCPA.

The other intersection impacted in the 2035 scenario is that of Genessee with Nobel Drive. Here, the DEIR deems a marginally effective signal modification (Appendix B, Table 15-1 shows it would only return the 2035 + Project condition to essentially the same defective 2035 condition that would prevail without the Project) infeasible because of modest inconvenience to access to a residential complex. In fact, alternative access to this complex can be had from northbound Genessee by turning and circulation on other blocks about as conveniently as making a U-turn through the impacted intersection in the unmitigated condition. The DEIR's conclusion that this mitigation is infeasible is therefore unsupported.

With regard to street segments disclosed as impacted in the 2035 scenario, the only mitigation measures are ones briefly described and quickly dismissed because the City had previously considered them infeasible. Little evident effort has been devoted to determining whether there are other feasible physical or operational solutions.

E74

With regard to impacts on freeway segments and ramps under Caltrans control, the DEIR identifies these as 'significant and unmitigated' because of the jurisdictional issue and because improvement projects are not defined or

E73

Refer to the response to Comment E71 regarding the Genessee Avenue /Caltrans SR 52 ramp intersections and the Genessee Avenue/Governor Drive intersection.

Potential grade separation of Genessee Avenue/Governor Drive intersection was analyzed as part of the No Construction of Regents Road Bridge and Reconfiguration of Genessee Avenue Alternative (which would restripe Genessee Avenue to a six-lane roadway without widening) in the University Community Plan Amendment EIR. The Findings adopted by the City Council related to this alternative state, "it is rejected as infeasible because it would not substantially reduce the significant impacts associated with the proposed project related to transportation (Issues 1 through 5), air quality (Issue 1), GHG emissions (Issues 1 and 2), and public services and facilities (Issue 1). Impacts to emergency services under the No Construction of Regents Road Bridge and Reconfiguration of Genessee Avenue Alternative would be similar when compared to the proposed project [which removed the previously planned Genessee Avenue widening and Regents Road extension from the Transportation Element]. In addition, it would result in additional significant but mitigable impacts related to visual effects and neighborhood character (Issues 1 through 6), air quality (Issue 2 – construction), noise (Issue 1 and 2 - construction), public utilities (Issues 1 and 2), and health and safety (Issue 2 and 4 - hazardous materials) that would not occur under the proposed project." As these City Council conclusions were made during the environmental review process for the Costa Verde project, they are considered to remain valid and no evidence to the contrary has been presented. Therefore, as partial mitigation, as shown in EIR Section 5.2.2.4, the Project would upgrade and/or repair signal interconnect, communications, detection and controller equipment on Genessee Avenue between Esplanade Court and Governor Drive.

COMMENTS

RESPONSES

E74
cont.

Ms. Christina Caro
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programed for funding. However, the City has not demonstrated that all feasible mitigation has been adopted to reduce this impact before declaring it significant and unavoidable. Given the severity of the Project's traffic impacts, the City should initiate a discussion of development funding solutions for regional facilities under Caltrans control, and include mitigation fees related to these improvements as a binding condition for the Project.

Conclusion

E75

Given the foregoing, the transportation section of the DEIR for this Project should be revised with careful consideration of the trip generation issues raised and further focus on defining feasible mitigation measures.

Sincerely,

Smith Engineering & Management
A California Corporation



Daniel T. Smith Jr., P.E.
President

At the intersection of Genesee Avenue/Nobel Drive, eastbound right-turn overlap phasing and the associated restriction of northbound U-turns is not recommended due to the adjacent residential complex. This restriction of U-turns, would require out-of-direction travel for the tenants of the residential complex to travel either eastbound or westbound on Nobel Drive and thereby increase their travel time and vehicle miles traveled. The mitigation measure at the Genesee Avenue/Nobel Drive intersection is not recommended.

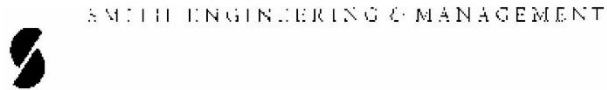
Regarding street segment impacts in Year 2035, refer to the response to Comment E72 of this letter.

E74

Refer to the response to Comment E71 regarding Caltrans intersections. The Regional Transportation Plan (RTP) Plan and Regional Transportation Improvement Plan (RTIP) does not identify funding for regional improvements in the project area. Therefore, absent these programs, the EIR correctly concludes that the project's impacts to regional facilities are significant and unmitigated while proposing Transportation Demand Management as partial mitigation.

E75

Based on the above responses, it is concluded that no changes are no needed to the transportation/circulation analysis. The TIA (Appendix B) was prepared in accordance with City requirements and standards, and the draft EIR adequately identified impacts and feasible mitigation measures. As disclosed in the draft EIR, the Project would result in significant unmitigated impacts.



DANIEL T. SMITH, Jr.
President

EDUCATION

Bachelor of Science, Engineering and Applied Science, Yale University, 1967
 Master of Science, Transportation Planning, University of California, Berkeley, 1968

PROFESSIONAL REGISTRATION

California No. 21913 (Civil) Nevada No. 7969 (Civil) Washington No. 29337 (Civil)
 California No. 938 (Traffic) Arizona No. 22131 (Civil)

PROFESSIONAL EXPERIENCE

Smith Engineering & Management, 1993 to present, President.
 DKS Associates, 1979 to 1993, Founder, Vice President, Principal Transportation Engineer.
 De Leuw, Cather & Company, 1968 to 1979, Senior Transportation Planner.
 Personal specialties and project experience include:

Litigation Consulting. Provides consultation, investigations and expert witness testimony in highway design, transit design and traffic engineering matters including condemnations involving transportation access issues; traffic accidents involving highway design or traffic engineering factors; land use and development matters involving access and transportation impacts; parking and other traffic and transportation matters.

Urban Corridor Studies/Alternatives Analysis. Principal-in-charge for State Route (SR) 102 Feasibility Study, a 35-mile freeway alignment study north of Sacramento. Consultant on I-280 Interstate Transfer Concept Program, San Francisco, an AA/EIS for completion of I-280, demolition of Embarcadero freeway, substitute light rail and commuter rail projects. Principal-in-charge, SR 238 corridor freeway/expressway design/environmental study, Hayward (Calif.) Project manager, Sacramento Northeast Area multi-modal transportation corridor study. Transportation planner for I-80N West Terminal Study, and Harbor Drive Traffic Study, Portland, Oregon. Project manager for design of surface segment of Woodward Corridor LRT, Detroit, Michigan. Directed staff on I-80 National Strategic Corridor Study (Sacramento-San Francisco), US 101-Sonoma freeway operations study, SR 92 freeway operations study, I-880 freeway operations study, SR 152 alignment studies, Sacramento RTD light rail systems study, Tasman Corridor LRT AA/EIS, Fremont-Warm Springs BART extension plan/EIR, SRs 70/99 freeway alternatives study, and Richmond Parkway (SR 93) design study.

Area Transportation Plans. Principal-in charge for transportation element of City of Los Angeles General Plan Framework, shaping nations largest city two decades into 21st century. Project manager for the transportation element of 300-acre Mission Bay development in downtown San Francisco. Mission Bay involves 7 million gsf office/commercial space, 8,500 dwelling units, and community facilities. Transportation features include relocation of commuter rail station; extension of MUNI-Metro LRT; a multi-modal terminal for LRT, commuter rail and local bus; removal of a quarter mile elevated freeway; replacement by new ramps and a boulevard; an internal roadway network overcoming constraints imposed by an internal tidal basin; freeway structures and rail facilities; and concept plans for 20,000 structured parking spaces. Principal-in-charge for circulation plan to accommodate 9 million gsf of office/commercial growth in downtown Bellevue (Wash.). Principal-in-charge for 64 acre, 2 million gsf multi-use complex for FMC adjacent to San Jose International Airport. Project manager for transportation element of Sacramento Capitol Area Plan for the state governmental complex, and for Downtown Sacramento Redevelopment Plan. Project manager for Napa (Calif.) General Plan Circulation Element and Downtown Riverfront Redevelopment Plan, on parking program for downtown Walnut Creek, on downtown transportation plan for San Mateo and redevelopment plan for downtown Mountain View (Calif.), for traffic circulation and safety plans for California cities of Davis, Pleasant Hill and Hayward, and for Salem, Oregon.

FRANK J. D'AMICO, P.E., S.E., S.D.
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5311 Lowry Road, Union City, CA 94587 tel: 510.489.9477 fax: 510.489.9478

E76 The Commenter's qualifications are noted. As this information does not address the adequacy of the EIR, no further response is necessary.

Page 2

Transportation Centers. Project manager for Daly City Intermodal Study which developed a \$7 million surface bus terminal, traffic access, parking and pedestrian circulation improvements at the Daly City BART station plus development of functional plans for a new BART station at Colma. Project manager for design of multi-modal terminal (commuter rail, light rail, bus) at Mission Bay, San Francisco. In Santa Clarita Long Range Transit Development Program, responsible for plan to relocate system's existing timed-transfer hub and development of three satellite transfer hubs. Performed airport ground transportation system evaluations for San Francisco International, Oakland International, Sea-Tac International, Oakland International, Los Angeles International, and San Diego Lindberg.

Campus Transportation. Campus transportation planning assignments for UC Davis, UC Berkeley, UC Santa Cruz and UC San Francisco Medical Center campuses; San Francisco State University; University of San Francisco; and the University of Alaska and others. Also developed master plans for institutional campuses including medical centers, headquarters complexes and research & development facilities.

Special Event Facilities. Evaluations and design studies for football/baseball stadiums, indoor sports arenas, horse and motor racing facilities, theme parks, fairgrounds and convention centers, ski complexes and destination resorts throughout western United States.

Parking. Parking programs and facilities for large area plans and individual sites including downtowns, special event facilities, university and institutional campuses and other large site developments; numerous parking feasibility and operations studies for parking structures and surface facilities; also, resident preferential parking.

Transportation System Management & Traffic Restraint. Project manager on FHWA program to develop techniques and guidelines for neighborhood street traffic limitation. Project manager for Berkeley, (Calif.), Neighborhood Traffic Study, pioneered application of traffic restraint techniques in the U.S. Developed residential traffic plans for Menlo Park, Santa Monica, Santa Cruz, Mill Valley, Oakland, Palo Alto, Piedmont, San Mateo County, Pasadena, Santa Ana and others. Participated in development of photo/radar speed enforcement device and experimented with speed humps. Co-author of Institute of Transportation Engineers reference publication on neighborhood traffic control.

Bicycle Facilities. Project manager to develop an FHWA manual for bicycle facility design and planning, on bikeway plans for Del Mar, (Calif.), the UC Davis and the City of Davis. Consultant to bikeway plans for Eugene, Oregon, Washington, D.C., Buffalo, New York, and Skokie, Illinois. Consultant to U.S. Bureau of Reclamation for development of hydraulically efficient, bicycle safe drainage inlets. Consultant on FHWA research on effective retrofits of undercrossing and overcrossing structures for bicyclists, pedestrians, and handicapped.

MEMBERSHIPS

Institute of Transportation Engineers Transportation Research Board

PUBLICATIONS AND AWARDS

Residential Street Design and Traffic Control, with W. Homburger *et al.* Prentice Hall, 1989.

Co-recipient, Progressive Architecture Citation, *Mission Bay Master Plan*, with I.M. Pei WRT Associated, 1984.

Residential Traffic Management, State of the Art Report, U.S. Department of Transportation, 1979.

Improving The Residential Street Environment, with Donald Appleyard *et al.*, U.S. Department of Transportation, 1979.

Strategic Concepts in Residential Neighborhood Traffic Control, International Symposium on Traffic Control Systems, Berkeley, California, 1979.

Planning and Design of Bicycle Facilities: Pitfalls and New Directions, Transportation Research Board, Research Record 570, 1976.

Co-recipient, Progressive Architecture Award, *Livable Urban Streets, San Francisco Bay Area and London*, with Donald Appleyard, 1979.

COMMENTS

RESPONSES



May 26, 2020

San Diego Development Services Department
101 Ash Street
San Diego, CA 92101

RE: Climate Action Campaign Comments on Costa Verde Redevelopment Draft EIR

To Whom It May Concern,

F1 Climate Action Campaign is a nonprofit organization with a simple mission: to stop the climate crisis. We have played an active role in the development and implementation of the City's landmark Climate Action Plan (CAP), and release an annual [Report Card](#) evaluating the strength of cities' CAPs and best practices to implement those strategies. We regularly engage the City with recommendations related to CAP strategy.

F2 After review of the Draft EIR, we are concerned over four key aspects of the proposed development, which are as follows:

- F2 • **The amount of proposed parking supply is exceptionally high**, estimated at between 1,837 to 2,076 in the [traffic analysis](#). For a development sitting directly next to a trolley station, a regional transit facility with multiple express and local bus services, and adjacent bike infrastructure, and at a time when the City is actively seeking ways to reduce VMT and meet its CAP mode share targets, proposing over 2,000 parking spaces next to a regional transit hub, jobs, housing and amenities, is unconscionable. Some of the identified mitigations in the [CAP consistency check-list](#) are commendable, but they do not make up for the fact that the City and the developer need to reconsider parking minimums that will have a negative impact on reducing VMT and GHG emissions from vehicular traffic, as required by local and state mandates.
- F3 • **The project may benefit from a more robust Transportation Demand Management (TDM) program** that can help increase transit, bike and pedestrian mode share projections, which, according to the DEIR, are at a paltry 13%. The City's CAP calls for 50% of commuters to travel by biking, walking and/or taking transit by 2035 in Transit Priority Areas. A more built out TDM program can help the project and the City reach that target, especially as adjacent transit, bicycle and pedestrian infrastructure is installed in the coming years.

F1 Comments regarding the mission and activities of the Climate Action Campaign are noted. As the comments do not pertain to the adequacy of the EIR, no further response is necessary.

F2 As described in Chapter 24 of the Traffic Impact Analysis (EIR Appendix B), the minimum required parking rates for the Project are consistent with the requirements of the San Diego Municipal Code for projects within a Transit Priority Area. The Project includes flexibility to allow up to 239 additional spaces.

F3 The projected 13 percent non-vehicular mode share is a conservative assumption that was used in the Transportation Impact Analysis. It was calculated by running a SANDAG Mixed-Use Development (MXD) model to account for non-vehicular and internal capture trip reductions. The Climate Action Plan (CAP) mode share goal reflects a citywide goal for mode share in Transit Priority Areas, and is not a standard or threshold used for individual project analysis, nor is it directly comparable to the 13 percent Project-specific mode share estimate made for the purposes of the Transportation Impact Analysis. While the City encourages and incentivizes non-vehicular travel, there is no requirement imposed by the City or CEQA mandating that land development projects meet a specific mode share percentage. Each project evaluated is context-specific, and dependent on project location, land use mix, and accessibility to transit, among other factors.

COMMENTS

RESPONSES

F3	<p>(cont.) Also, the Transportation Impact Analysis was conducted conservatively by using the lower non-vehicular mode share calculated by the SANDAG MXD Model (13 percent). This conservative approach ensures that potential traffic congestion is not underestimated.</p> <p>Further, the project applicant will be required to implement the following TDM measures which have been incorporated into Mitigation Measure TRA-5:</p> <ul style="list-style-type: none">• Provide a 25 percent transit subsidy to hourly employees working on the property. The subsidy value will be limited to the equivalent value of 25 percent of the cost of a Metropolitan Transit System "Regional Adult Monthly/30-Day Pass" (currently \$72 for a subsidy value of \$18 per month). Subsidies will be available to 75 percent of the hourly employees. The subsidy will be offered at the Opening Day of the project and will be provided for a period of three years.• Charge salaried employees market-rate for single-occupancy vehicle parking and provide reserved, discounted, or free spaces for registered carpools or vanpools.• Provide carpool/vanpool parking spaces as part of the overall project parking requirements at the project site. These spaces will be signed and striped "carpool/vanpool only."• Provide showers and locker facilities located within the parking structure adjacent to the security office, as shown on Exhibit "A."• Maintain an employer network in the SANDAG iCommute program for all tenants/employees.• Provide on-site carsharing and/or bike sharing.• Provide transit pass sales at the site's concierge.• Provide a shuttle for workers in the research and development and office buildings to access other properties within the community that are owned by the same entity. If a public zero-emission shuttle is established in the community in the future, provide a stop within the project site.• Implement smart parking technologies to provide real-time space availability, carpool/vanpool priority, and the option to reserve spaces in advance.• Install micromobility parking to accommodate a variety of micromobility forms, near the elevators to the Trolley.• Provide additional bicycle and micromobility amenities, such as tire pump/repair stands as well as electric bike and scooter charging stations.• Consider enhanced wayfinding investments as part of the final design process.
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COMMENTS

RESPONSES

- F4
- The [project outlined](#) does not include any housing, even though it sits directly in the middle of the largest employment center in the region, and is 900 feet away from a regional transit hub. We understand it is up to the discretion of the property owner to decide what land uses to propose and build, however, the climate and housing crises demand we rethink our land-use patterns to provide more climate-friendly, affordable housing options near transit and jobs. The developer does note housing opportunities nearby, but many of these projects do not include many affordable options, and with average rents in the UTC area [exceeding \\$2,400](#), this location should not be lost to exclusive high-priced office and retail.
- F5
- The project includes new natural gas infrastructure, which runs counter to long-term state goals to reach Zero Carbon by 2045. Aside from exacerbating the climate crisis, natural gas pollutes our air, [indoors and out](#), and can be explosively dangerous. There are many new technologies and realized savings from all-electric buildings, and we encourage the developer and City review this [2018 report](#) from the Rocky Mountain Institute on the economic benefits of electrification.
- F6
- Moving forward, we recommend the developer and the City work to reduce the amount of proposed parking and build out a more robust TDM program to encourage alternative transportation use above the projected 13%. The developer should also reconsider adding back the original housing component, which must include deed-restricted affordable housing instead of paying an in-lieu fee. We also encourage the developer to explore all-electric construction to end the proliferation of dangerous natural gas infrastructure. We are encouraged that the developer sought to highlight the environmental elements of their proposal, and hope they will take further steps to truly make this project a gold standard for climate-friendly development.

Sincerely,



Matthew Vasilakis
Co-Director of Policy,
Climate Action Campaign

- F4
- Commenter's preference for inclusion of residential use in the project is noted. An alternative that includes housing, referred to as the Retail, Hotel, and Residential Alternative, is addressed in draft EIR Section 8.4.2.
- F5
- Commenter's preference for all-electric buildings is noted. Natural gas service is currently provided at the site and would continue to be provided with implementation of the Project; no new natural gas infrastructure to the site is proposed. No significant environmental impact associated with proposed natural gas use has been identified.
- F6
- Comment noted.

COMMENTS

RESPONSES

G1

April 13, 2020

Elizabeth Shearer-Nguyen
Environmental Planner
City of San Diego
Development Services Center
1222 1st Ave, MS 501
San Diego, CA 92101

Re: Costa Verde Revitalization – Project No. 477943

Dear Ms. Shearer-Nguyen,

We have worked with the applicant and successfully resolved all our previous concerns regarding design, traffic, parking, and other adjacency issues. As a result, we support the project as proposed and described in the DEIR.

Best Regards,



Stuart Posnock



9110 Judicial Drive
San Diego, CA 92122

(858) 558-9573 Phone
(858) 558-9483 Fax

www.GardenCommunitiesCA.com

G1

Commenter's support of the Project is noted. As the comments do not pertain to the adequacy of the EIR, no further response is necessary.

KIMPTON®
 HOTELS & RESTAURANTS

222 Kearny St., Suite 200
 San Francisco, CA 94108
 (415) 397-5572

KIMPTONHOTELS.COM

May 22, 2020

E. Shearer-Nguyen
 Environmental Planner
 City of San Diego Development Services Center
 1222 1st Avenue, MS 501 San Diego, CA 92101

Subject: Support for Costa Verde Revitalization Project No. 477943 / SCH No. 2016071031

Dear Ms. Shearer-Nguyen,

On behalf of Kimpton Hotels & Restaurants, I am writing in support of Regency Centers' Costa Verde Shopping Center Revitalization Project. I understand the project is currently in the public review phase for the EIR and will be coming to City Council for approval later this year.

As you might know, Kimpton is the leading brand of individually-designed and positioned boutique hotels and restaurants, which provides investors a high level of customization when developing a property. Kimpton is acknowledged as the industry pioneer that first introduced the boutique hotel concept to the United States. We are renowned for making travelers feel genuinely cared for through thoughtful perks and amenities, inventive meetings and events, bold, playful design and a sincerely personal style of guest service.

Kimpton Hotels & Restaurants would be delighted to bring our design-led, lifestyle brand to the University Town Center market. Home to many of the world's biggest trailblazers in the biotech, high tech and telecom sectors with proximity to UCSD, Scripps Research, and Birch Aquarium, as well as the gateway to the North County coastline, this central location offers quick access to the villages of La Jolla and Del Mar, and its business-friendly climate makes this opportunity an ideal location for our iconic boutique hotel brand. Please let us know how we can assist efforts to move this exciting project forward.

Kind Regards,



Tiffany Cooper
 Senior Vice President, Development – Americas

H1 Commenter's support of the Project is noted. As the comments do not pertain to the adequacy of the EIR, no further response is necessary.

COMMENTS

RESPONSES

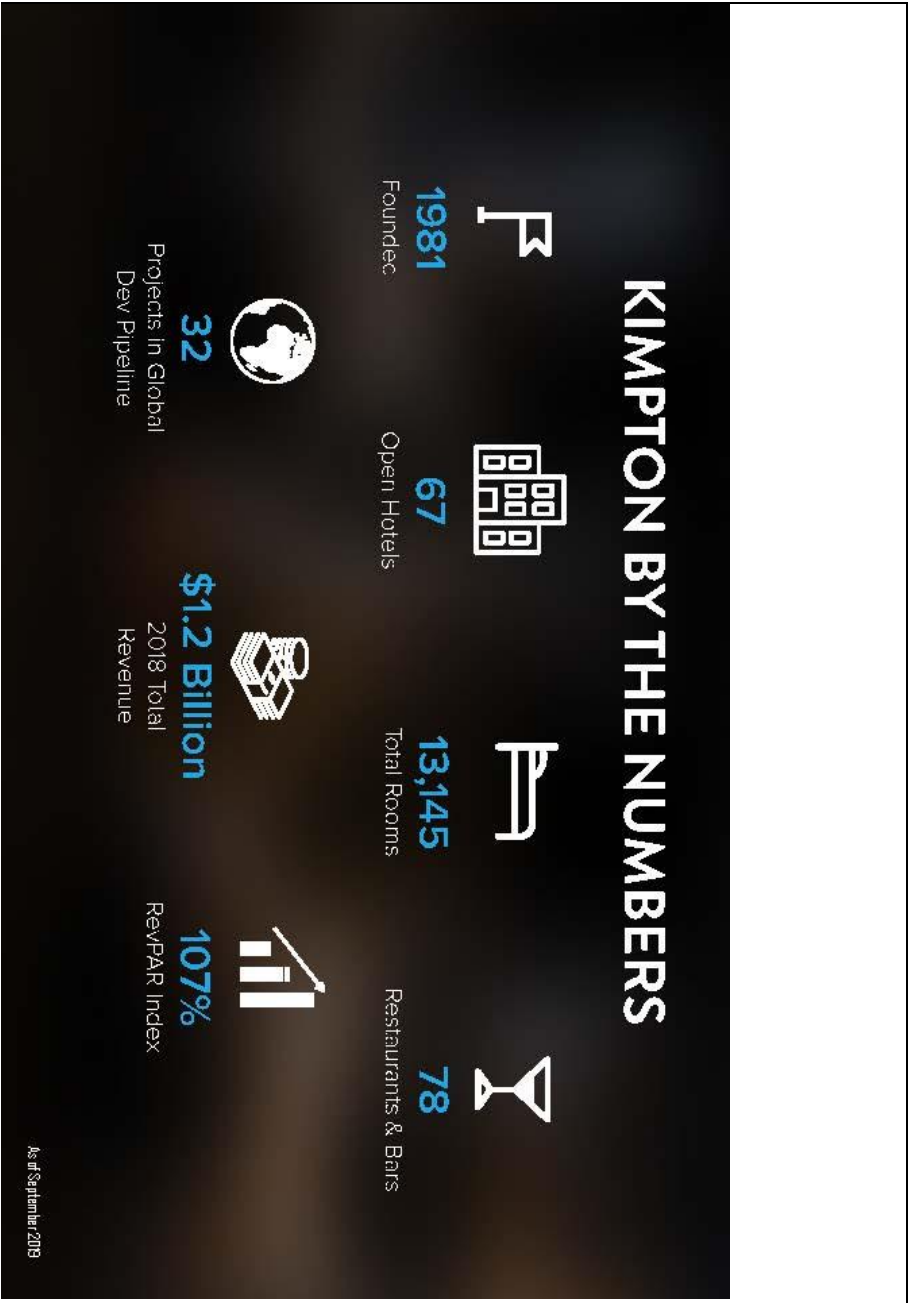


WHERE IT ALL BEGAN

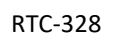
- Bill Kimpton opened the **first boutique** hotel in the U.S. in 1981
- He developed restaurants and bars **to serve the local community.**
- He pioneered a culture focused on **heart-felt human connections** with guests, employees and the community.
- The brand still takes inspiration from his original vision today.



RTC-326



RESPONSES





KIMPTON INTERNATIONAL EXPANSION







	<div><div><div><div>HEARTFELT</div><div>GUEST CARE</div><div></div></div><ul style="list-style-type: none">• Kimpton is a heart-centered, people-focused brand.• Our heartfelt service is built around the individual needs of our guests - no scripts or checklists here.• Employees are empowered to act from their heart to create ridiculously personal experiences for guests and each other.• Guest experience focuses on emotional touch points that build connection + sense of belonging.</div></div>
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**FIRST-CLASS
RESTAURANTS + BARS**

- Kimpton is the largest multi-concept operator in the country.
- We design and operate independent restaurants that stand alone from the hotel.
- Concept, design and execution of our restaurants and bars are anchored in the local communities.
- Our restaurants and bars are led by experts in their craft – award-winning chefs and bartenders.





MEMORABLE MEETINGS & EVENTS



Kimpton creates highly personalized meetings & events designed to achieve the specific goal of the client.

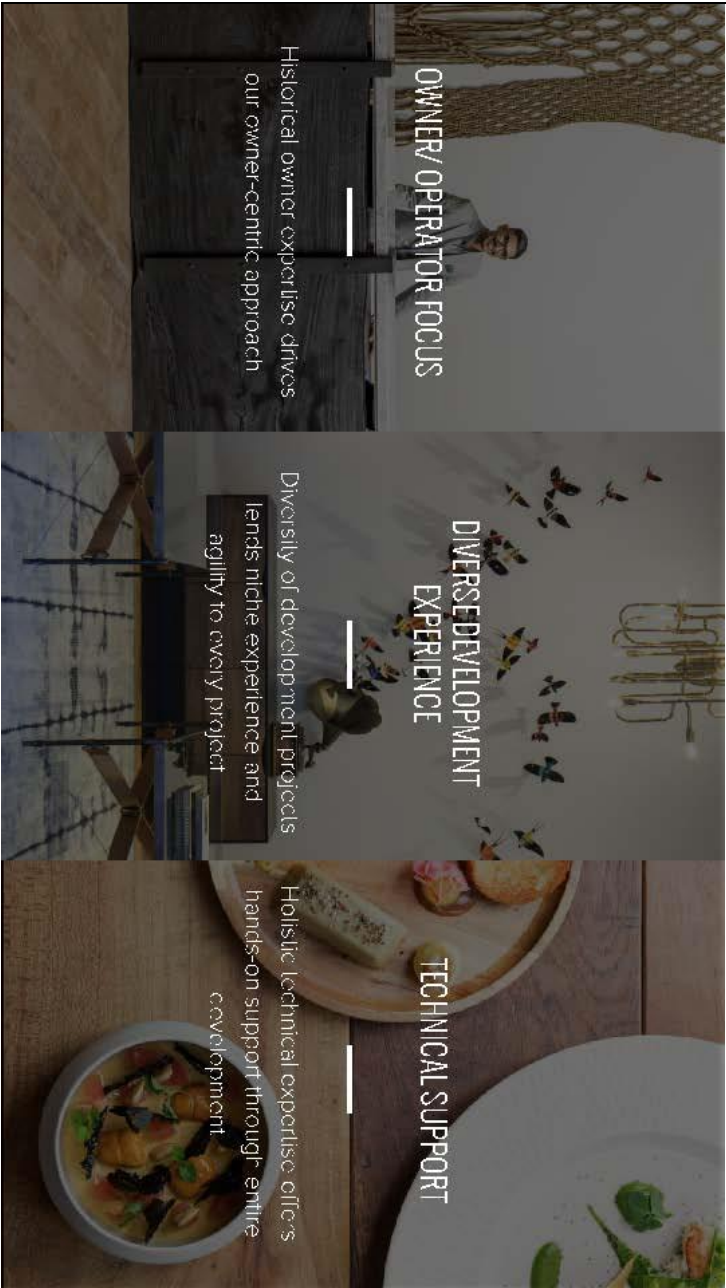
Creative chefs craft menus that are delicious and serve to energize a meeting or event.

Our distinctive spaces inspire guests and elevate the experience.

Kimpton pays attention to the small but meaningful details to make events long remembered after it ends.

A meeting or event at Kimpton is personalized, one-of-a-kind, and immersive.









Our Muse

Global traveler + well educated + strong personal style + gracious host + tastemaker + socially responsible + active + healthy + socially engaged + cultural adventurer + lover of life + connoisseur + experience seeker + inclusive + witty + curated life + free spirit

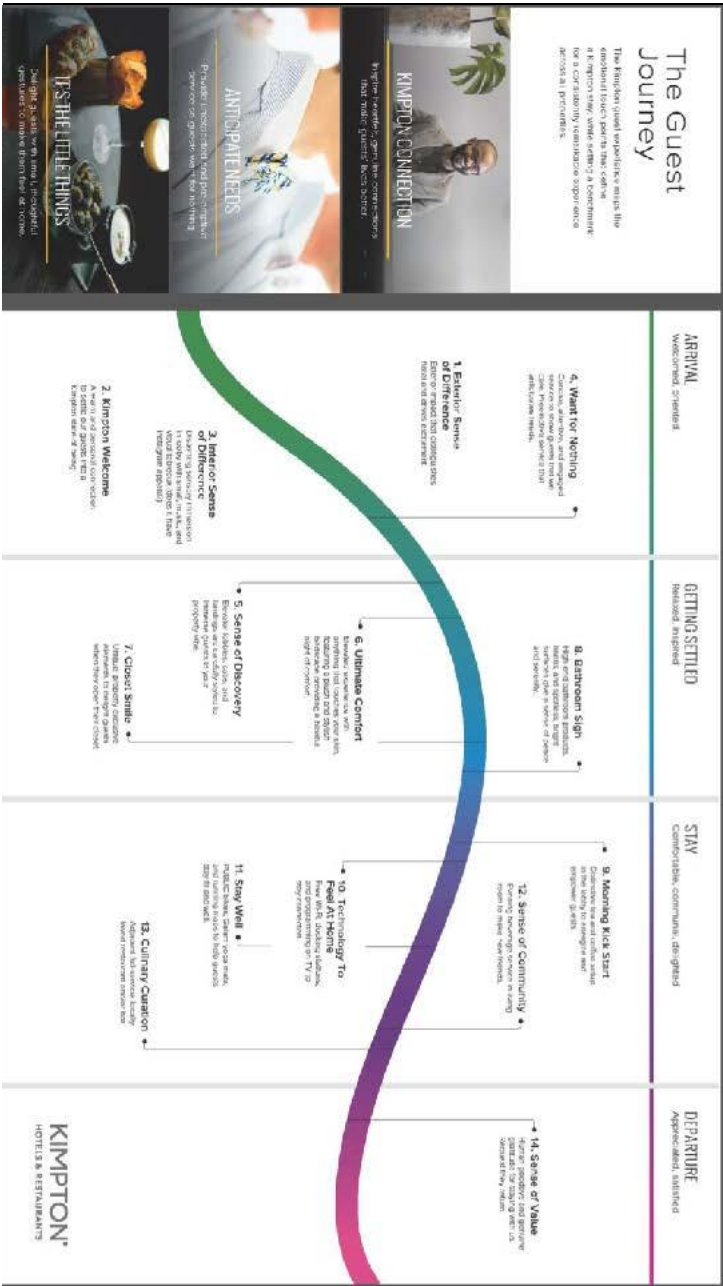
KIMPTON[®]
HOTELS & RESTAURANTS

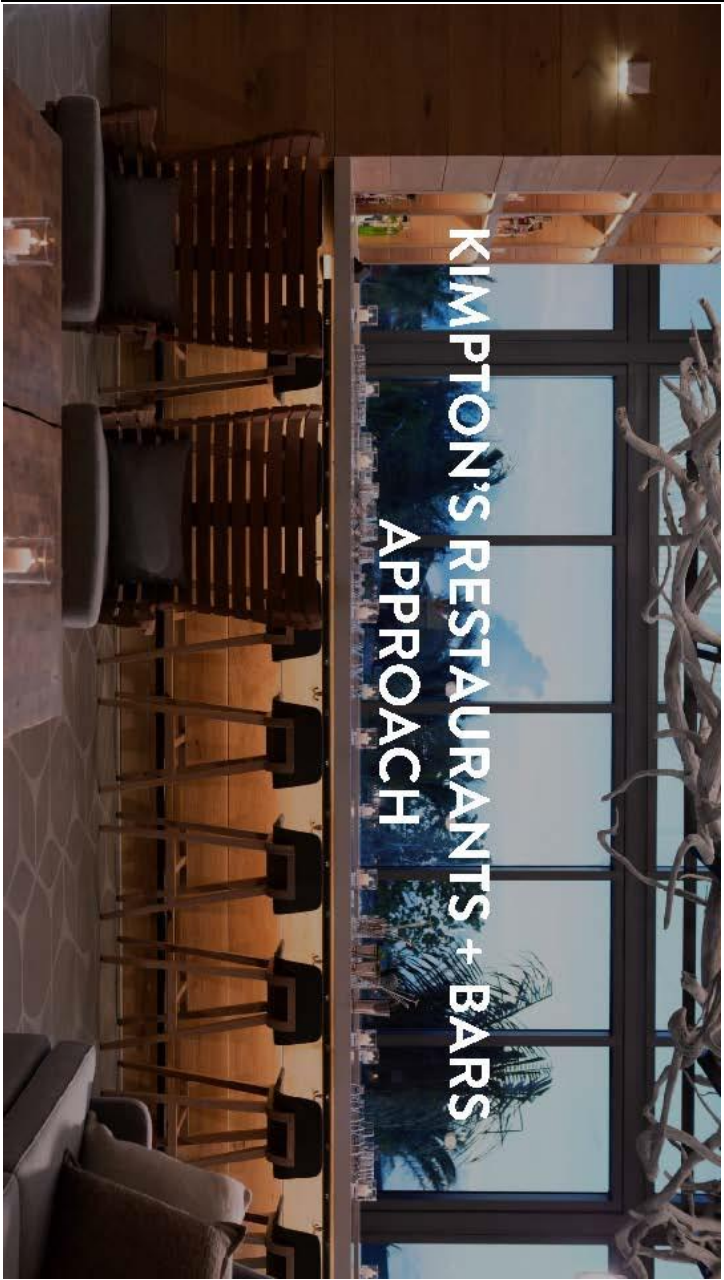
INTERESTS

- | | | | | |
|--------------|--------------------|--------------|-------------------|-----------------------|
| Entertaining | Great Food & Drink | Social Media | Health & Wellness | Social Responsibility |
| Music | Art Enthusiast | Events | Boutique Shopping | Cycling |


BRAND ALLEGIANCE

- | | | | |
|--|-----------------------|--------------|---------------------|
| Instagram | bon appétit | TED | soulcycle |
| LE LABO
<small>by David Laundy</small> | The Daily | gasol | Spotify |
| Pilsner | NEW YORK TIMES | Apple | AFAR |
| | | | NET A PORTER |












Economies of scale: purchasing power, and operational efficiency




Sophisticated technology & reservation platforms




Global presence and international travelers



Lower cost of acquisition: Lower OTA, GDS, and direct bookings




Global sales organization



Strong loyalty program – 120M+ members

IHG: THE POWER OF SCALE



KIMPTON SALES
Powered By IHG

2,100+ corporate accounts managed

\$4.9B+ room revenue generated

40M+ room nights generated

107%+ increase in RFPs received

106%+ increase in RFPs accepted

KIMPTON DISTRIBUTION
Powered By IHG

IHG website and mobile app in 17 languages

Social presence in over 200 countries

9 call centers and 2,900+ agents

XXX% contribution through IHG channels

KIMPTON LOYALTY
Powered By IHG

127.4M IHG Rewards Club members

21% YoY growth in enrollees

Luxury/lifestyle focus

Lower cost of customer acquisition

Highly personal Kimpton overlay to reward club members

KIMPTON IS BEST IN-CLASS

FORTUNE
100
BEST
COMPANIES
TO WORK FOR
2011

Best Workplaces for Women
Best Places to Work for Women
50 Best Workplaces for Parents
Best Workplaces for Diversity

Forbes | **2019**
THE BEST
EMPLOYERS
for DIVERSITY
POWER RANKING

50 Best Workplaces for Parents
55 Best Companies in Chicago

THE
100
BEST
PLACES TO WORK
2019
for LGBTQ Equality
100% CORPORATE EQUALITY INDEX

Recipient of a 100% Score
(2004 - 2019)

glassdoor
BEST PLACES TO WORK 2020
EMPLOYER CHOICE
2019-2020

100 Best Companies to work For
100 Best Workplaces for Women

19 Properties

Traveler
Readers'
Choice Awards
2019

Best Hotels
U.S. News
2019


29 Properties

Kimpton Seafire Resort + Spa

42 Properties

San Diamond
Shore

San Diamond
Shore



2018 PERFORMANCE



Occupancy

Average Daily Rate

Revenue per Available Room

RevPAR Index

79.9%

\$241

\$192

105%



System Contribution: % Room Nights

IHG Rewards Contribution: % Rev

IHG Rewards: ADR Premium

77.8%

36.2%

8.0%

Guest Satisfaction

93.0%

2019 FORTUNE "100 Best Companies to Work For"

#5 Kimpton Hotels & Restaurants

Results based on same store Kimpton hotels in the Americas as of December 31, 2018.

NEW DESTINATIONS

2020

NEW ORLEANS

SAN FRANCISCO

EAST CAPE

MIAMI

KEY WEST

BOZEMAN

OMAHA

DALLAS DEEP ELLUM

BROOKLYN

ATLANTA, BUCKHEAD

MEXICO CITY (2)

2021-2022

DENVER TECH CENTER

LOS ANGELES, KOREATOWN

GRENADA

ROATAN

FORT WORTH

ANAHEIM

Houston

RENO

SAN ANTONIO

ATLANTA, MID-TOWN

GLOBAL

ROTTERDAM

PARIS

SANYA

SHANGHA|

BALI

TOKYO

FRANKFURT

HONG KONG

MANCHESTER

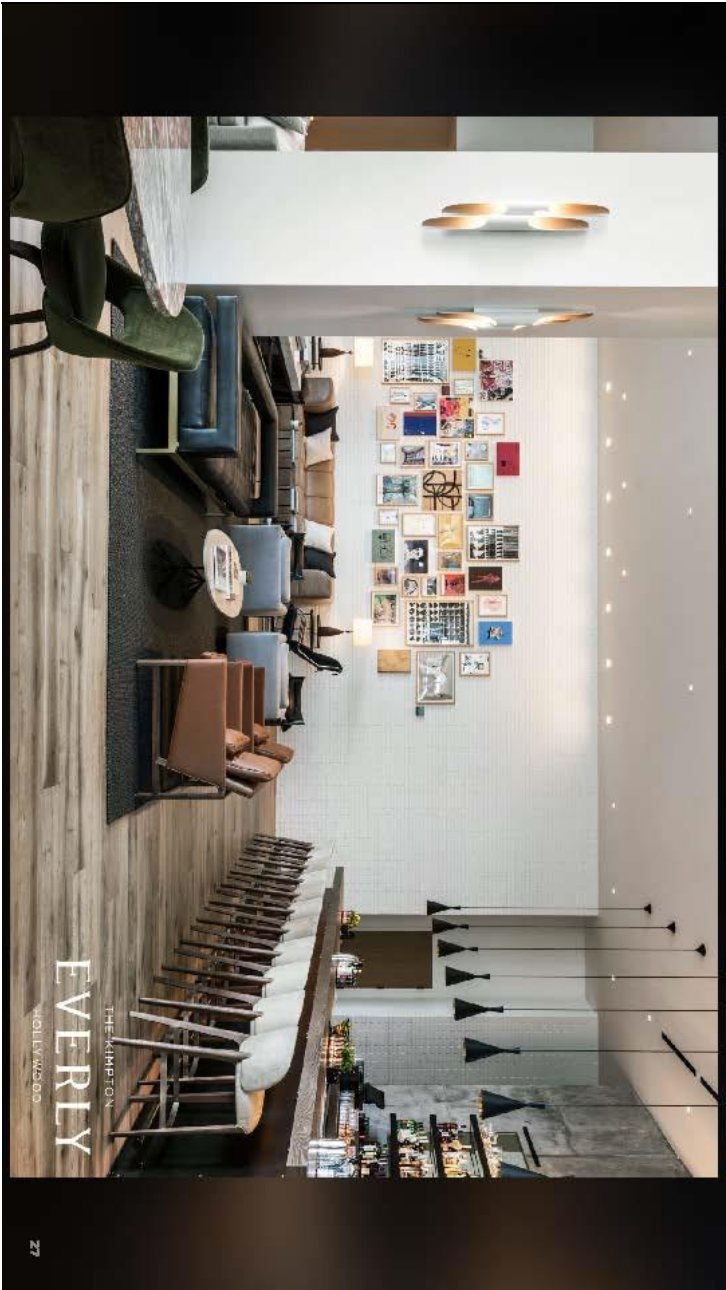
KUALA LUMPUR

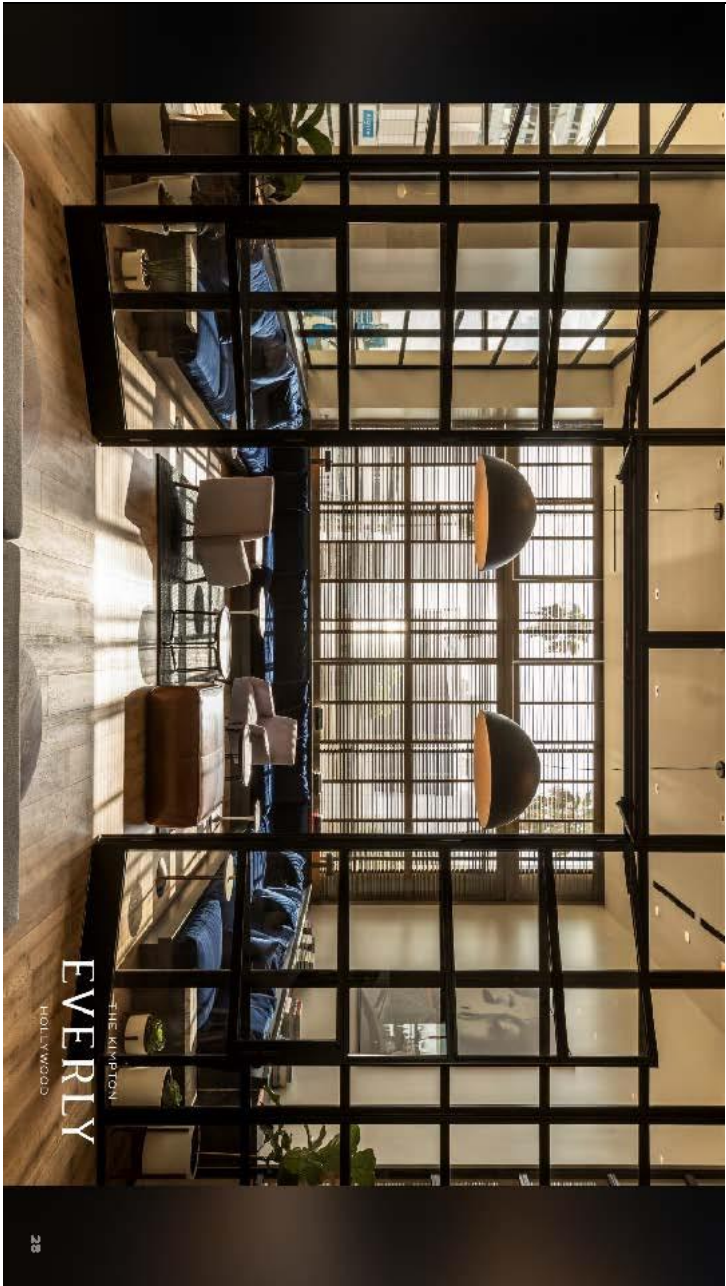
BANGKOK



COMMENTS

RESPONSES



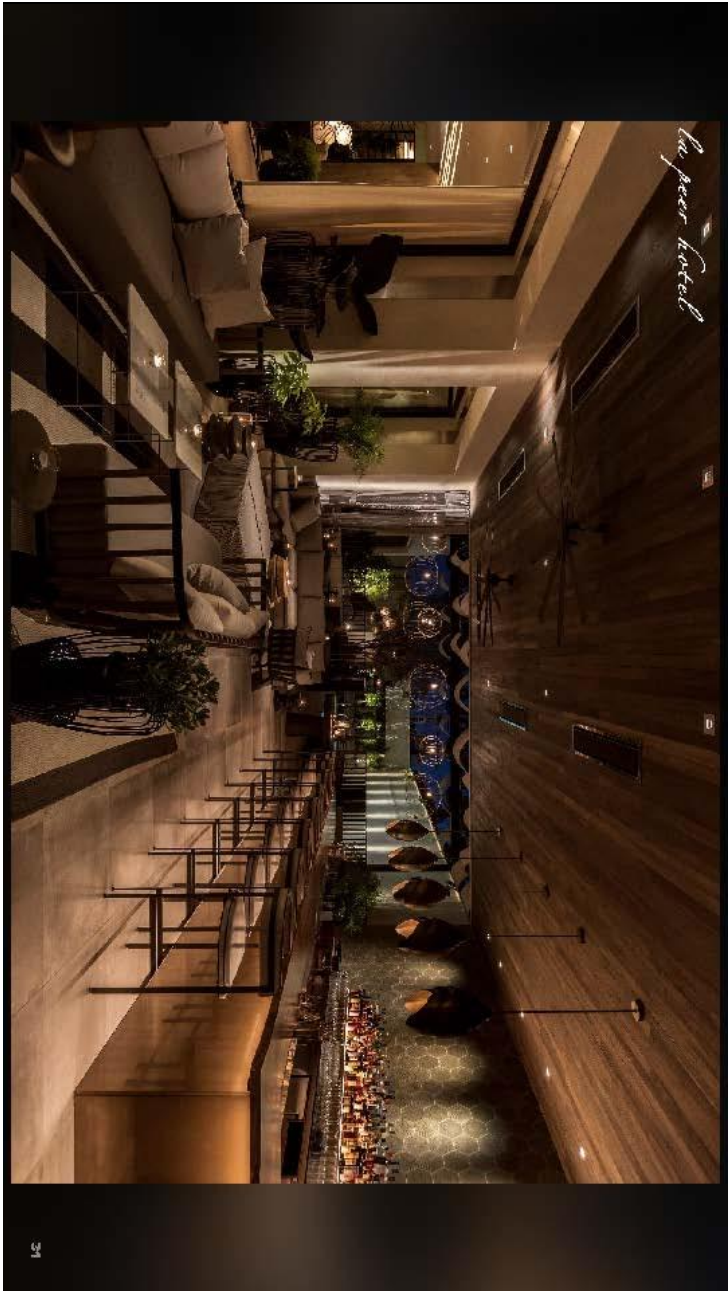






COMMENTS

RESPONSES



COMMENTS

RESPONSES



COMMENTS

RESPONSES

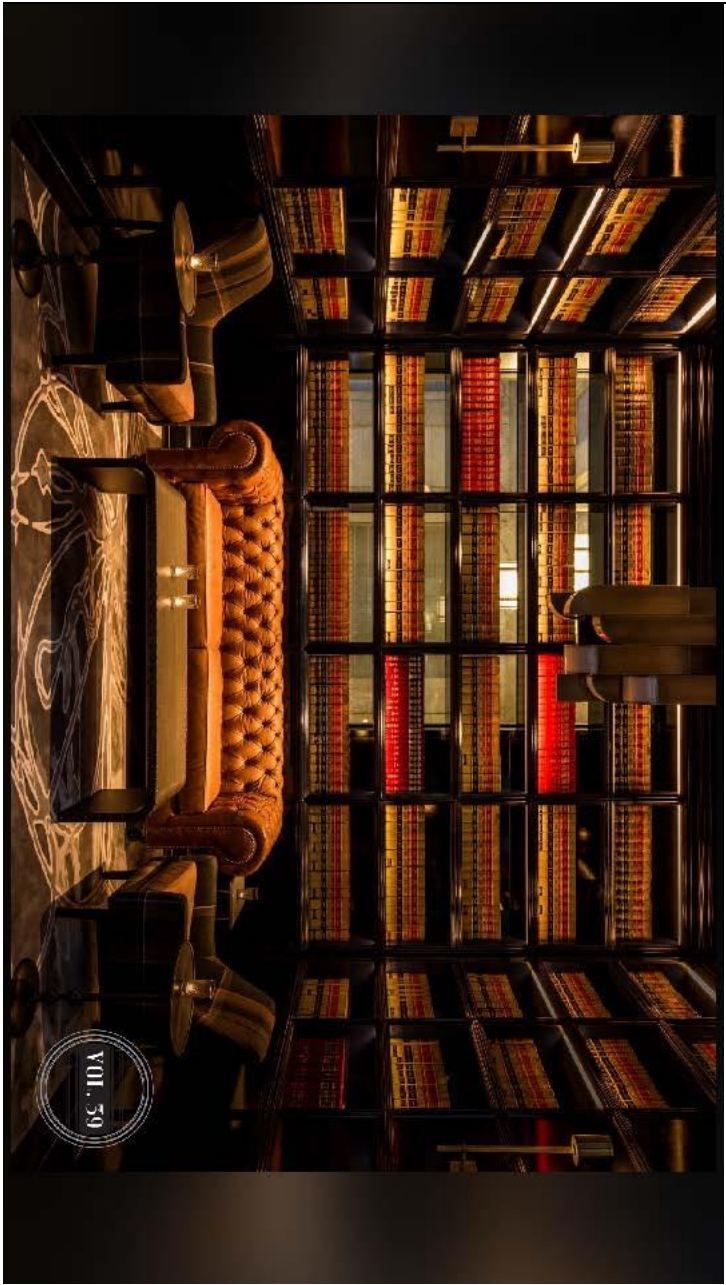


COMMENTS

RESPONSES







COMMENTS

RESPONSES



COMMENTS

RESPONSES



COMMENTS

RESPONSES



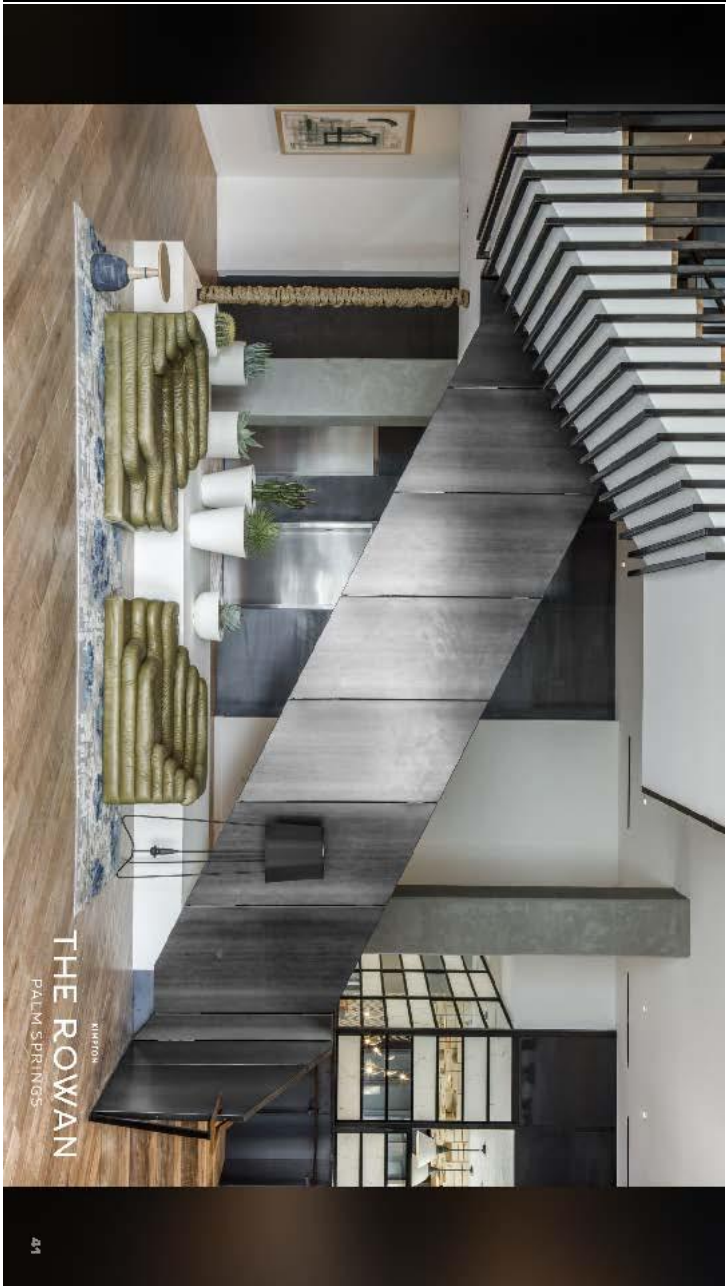
COMMENTS

RESPONSES



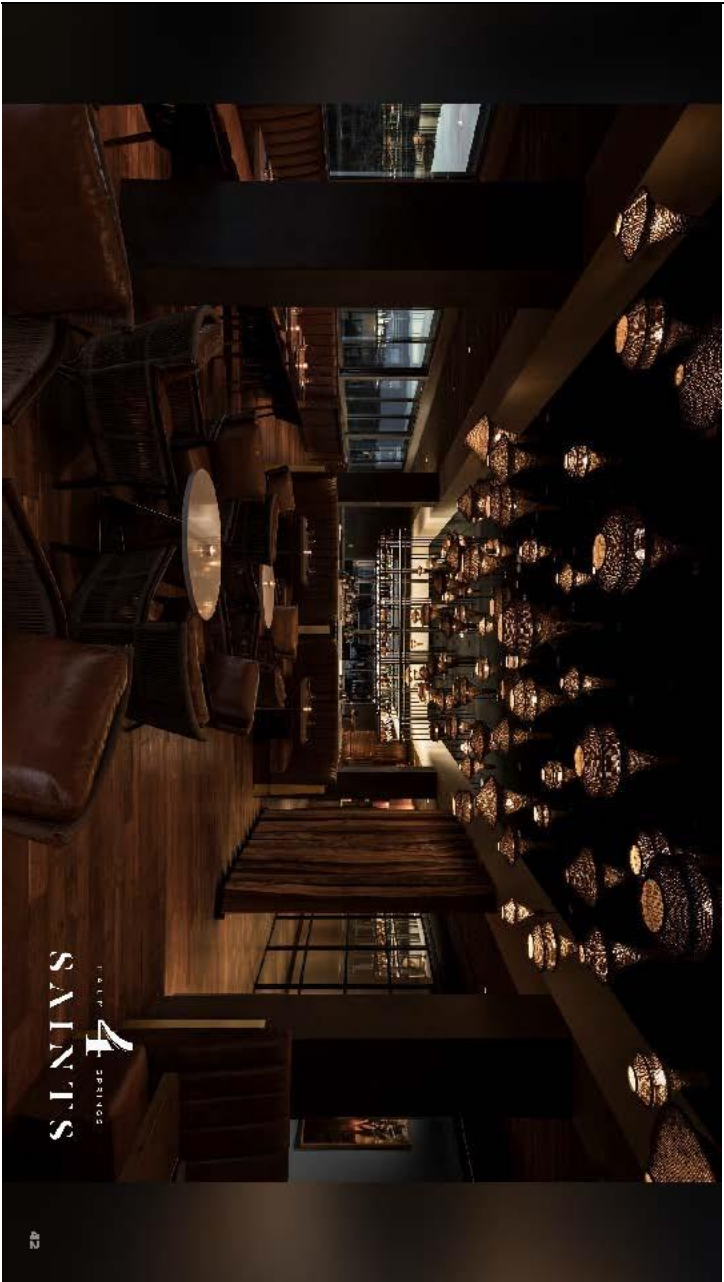
COMMENTS

RESPONSES



COMMENTS

RESPONSES



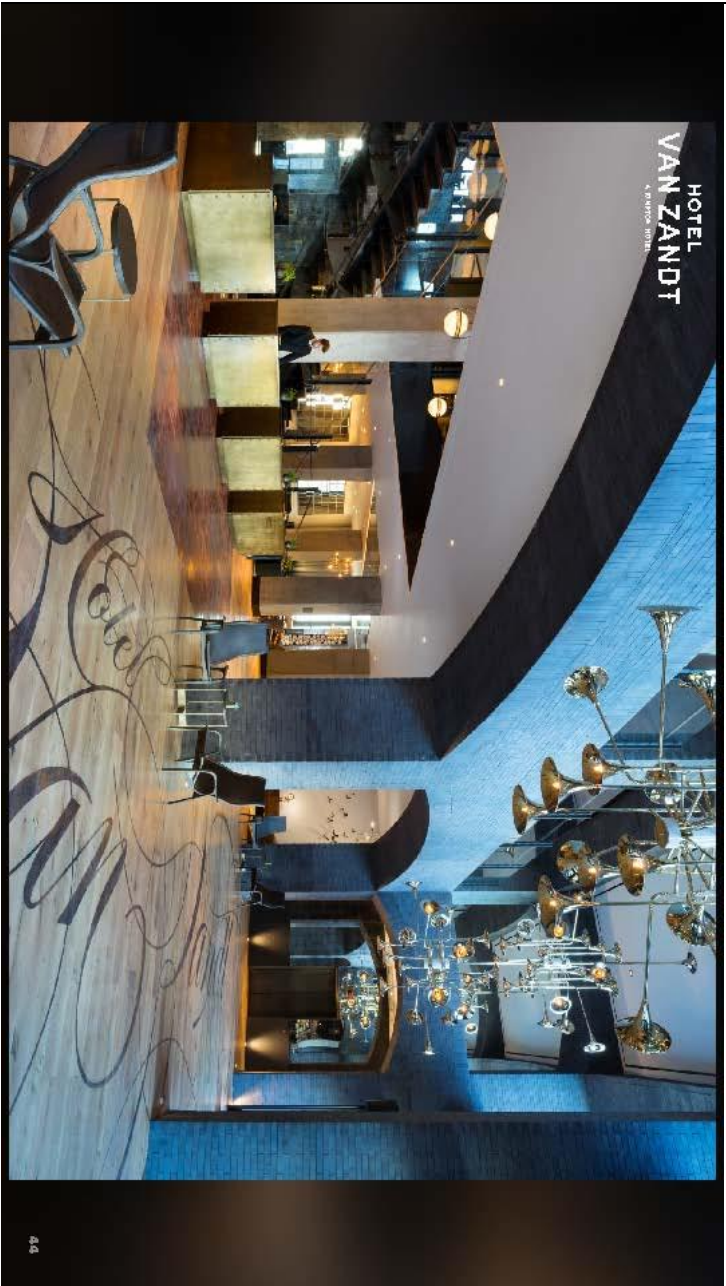
COMMENTS

RESPONSES



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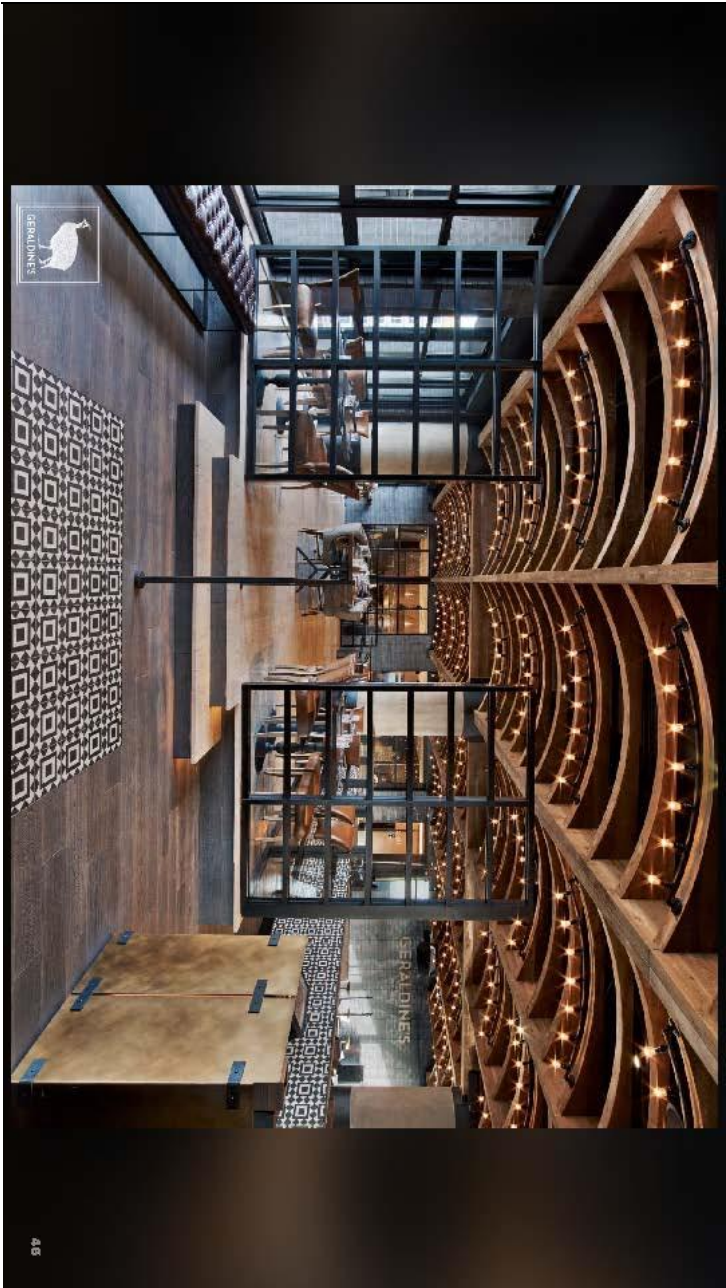
RESPONSES



COMMENTS

RESPONSES







COMMENTS

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COMMENTS

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COMMENTS

RESPONSES



COMMENTS

RESPONSES



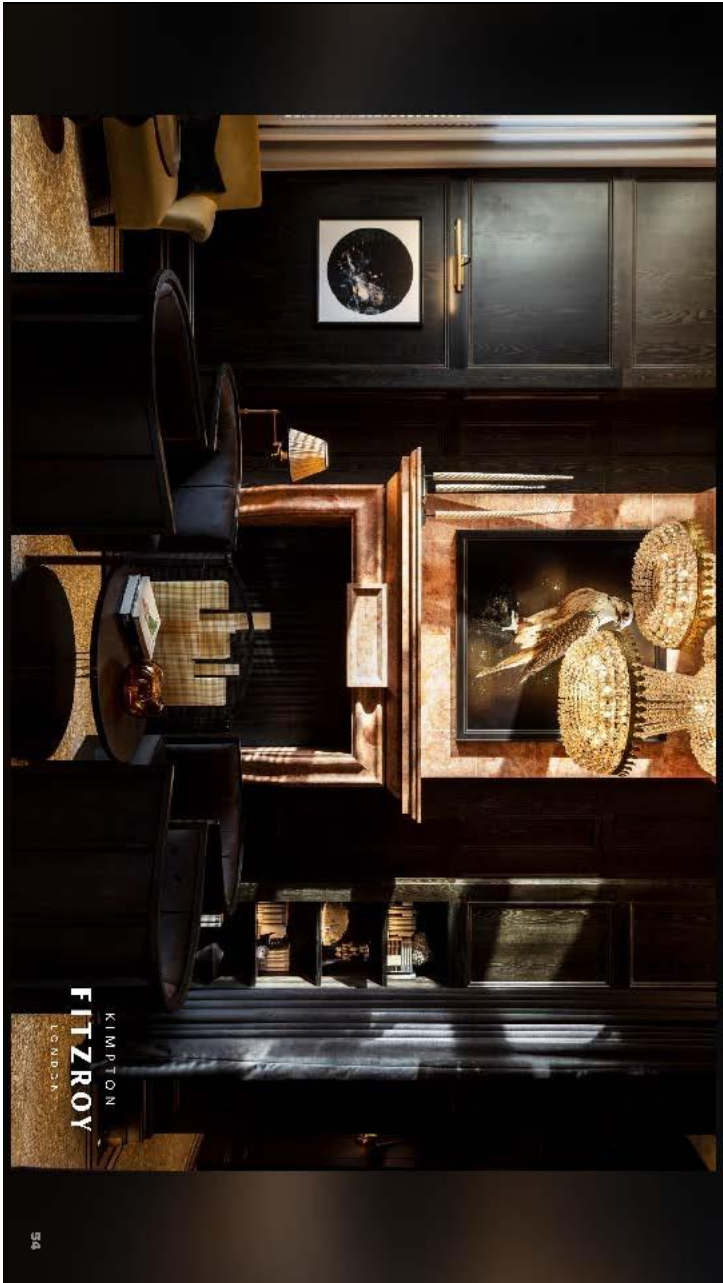
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COMMENTS

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COMMENTS

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COMMENTS

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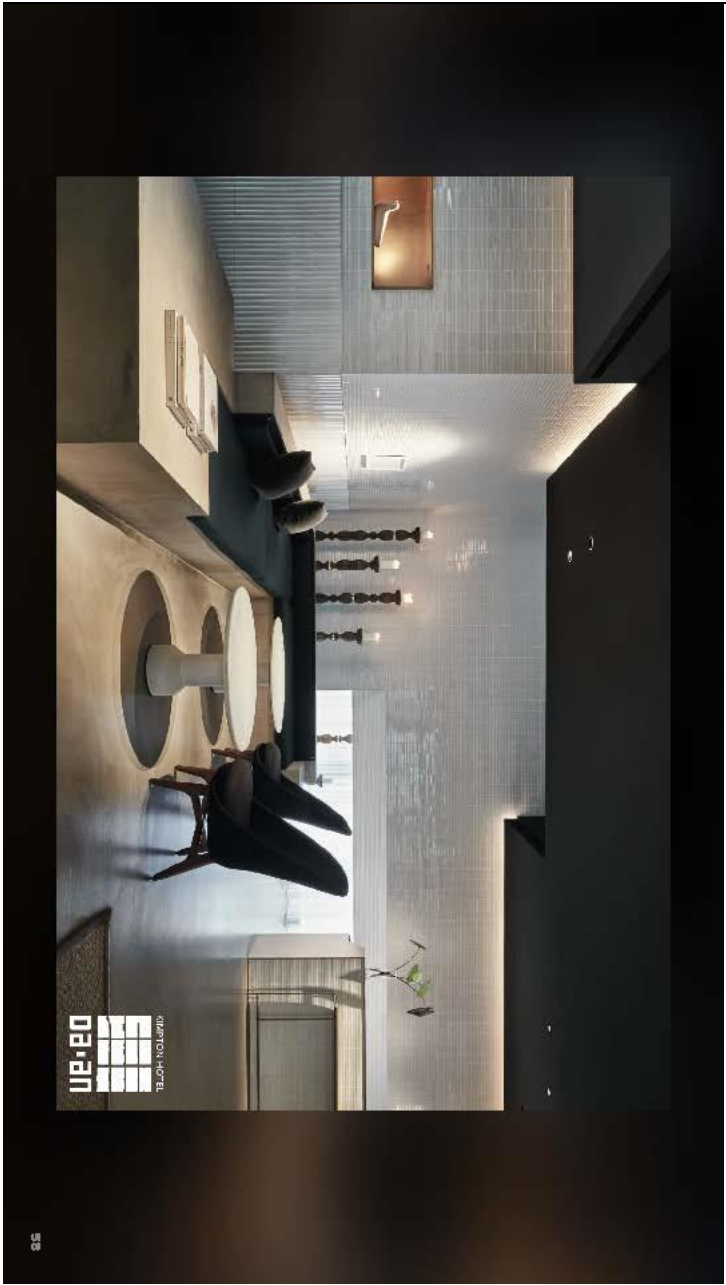
COMMENTS

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COMMENTS

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COMMENTS

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COMMENTS

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COMMENTS

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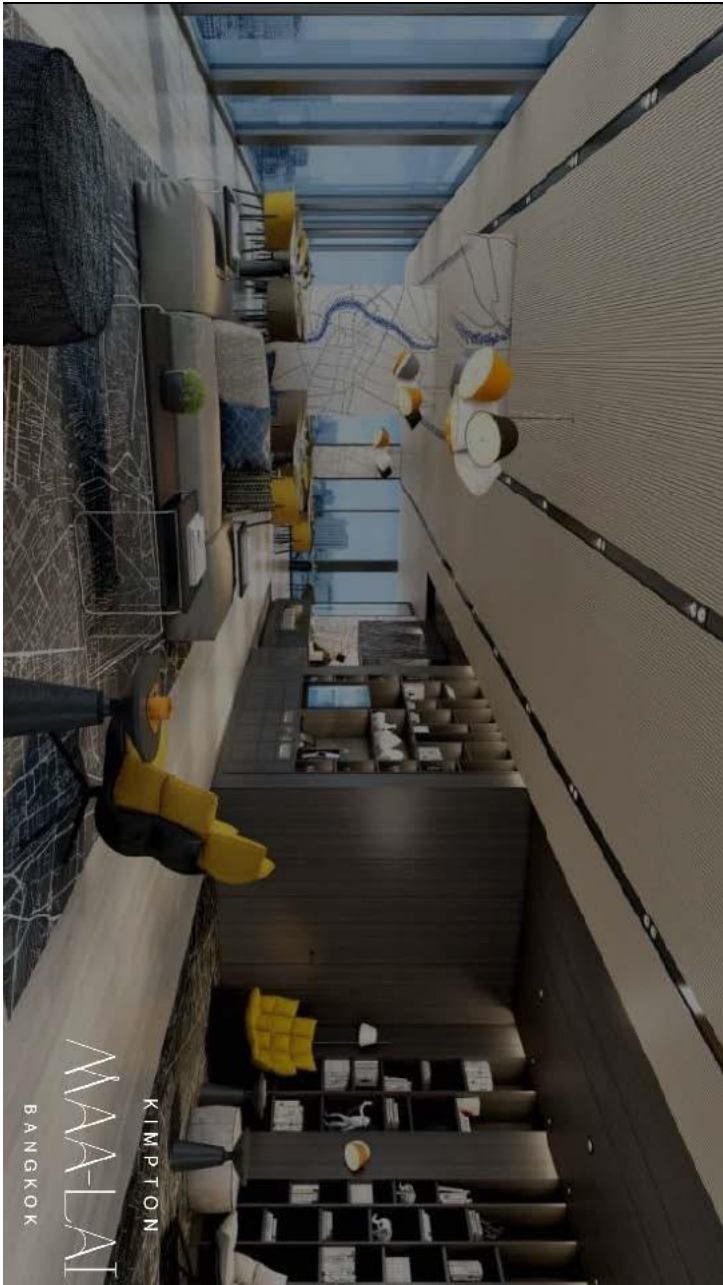
COMMENTS

RESPONSES



COMMENTS

RESPONSES



COMMENTS

RESPONSES





COMMENTS

RESPONSES

Adrienne Jubb
Vice President
Lodging Development

701 Palomar Airport Boulevard, Suite 300
Carlsbad, CA 92011
(760) 331-4666 mobile
adrienne.jubb@marriott.com



May 22, 2020

Ms. E. Shearer-Nguyen
Environmental Planner City of San Diego Development Services Center
1222 1st Avenue, MS 501
San Diego, CA 92101

Subject: Support for Hotel at the Costa Verde Revitalization Project

Ms. Shearer-Nguyen,

On behalf of Marriott International, I am writing to express our continued support of a ~200-key AC by Marriott hotel in Regency Centers' Costa Verde Shopping Center Revitalization Project. It is my understanding that Regency's vision includes an exciting mix of complementary uses that optimizes its adjacency to the new Mid-Coast trolley, and would be a welcome addition of new hotel rooms to the market. The Costa Verde Revitalization Project will create a modern walkable mixed-use environment that is perfectly suited to include the AC's classic modern design.

As you may know, we have three hotels in the University Town Center (UTC) submarket: the 376-room full-service Marriott that opened in 1985, the 288-room Residence Inn that opened in 1986, and the 252-room Sheraton that opened in 1963. Despite their age, each of these hotels performs among the best in the entire San Diego market, and the UTC district has demonstrated hotel demand depth and growth to support a new hotel. For example, these hotels sell out between approximately 125- 180 days a year, a strong indication of demand and generator of TOT to the City. The five hotels in the UTC submarket have performed at annual occupancy levels that average 83% over the past six years even though the newest hotel in the market opened in 1989. In contrast, the annual occupancy for the U.S. on average was 65.8% over the same time period. With more than 7,000 hotels globally and approximately 140 million loyal Bonvoy members, Marriott International is the world's largest travel company. Our strong, long-term commitment to the market and this project have not changed based on recent world events, and we believe our loyal members would welcome the opportunity to stay at this location.

The team at Marriott believes that including a hotel within the reimagined Costa Verde Center will provide an integral piece to reinforce the City's objectives to create an urban and pedestrian friendly mixed-use environment that is highly connected to the regional transit system. Please reach out to me directly if you have any questions or would like to discuss.

Kind Regards,

Adrienne Jubb

11 Commenter's support of the Project is noted. As the comments do not pertain to the adequacy of the EIR, no further response is necessary.



8304 Clairemont Mesa Blvd. Suite 101
San Diego Ca 92111-1115

Council President Georgette Gómez (D-9)
georgettegomez@sandiego.gov

Council President Pro Tem Barbara Bry (D-1)
barbarabry@sandiego.gov

Councilmember Jennifer Campbell (D-2)
jennifercampbell@sandiego.gov

Councilmember Chris Ward (D-3)
christopherward@sandiego.gov

Councilmember Monica Montgomery (D-4)
monicamontgomery@sandiego.gov

Councilmember Mark Kersey (D-5)
markkersey@sandiego.gov

Councilmember Chris Cate (D-6)
chriscate@sandiego.gov

Councilmember Scott Sherman (D-7)
scottsherman@sandiego.gov

Councilmember Vivian Moreno (D-8)
vivianmoreno@sandiego.gov
Elizabeth Shearer-Nguyen eshearer@sandiego.gov

05-29-2020

RE: Costa Verde Revitalization Project No. 477943 / SCH No. 2016071031

J1 Sierra Club San Diego welcomes the opportunity to provide commentary regarding the Costa Verde Revitalization project and its University City location. The terms *existing* and *planned* are called to your attention as key elements in the discussion of the Costa Verde Revitalization, bringing special significance when analyzing the regional and project-level impacts of Vehicle Miles Traveled (VMT).

Please consider the intricately linked relationship with Vehicle Miles Traveled and the corresponding generation of greenhouse gas (GHG) CO₂ and resulting air pollution compounds of carbon monoxide, nitrogen oxides, particulate matter, and unburned hydrocarbons.

**From page 3 of the December 2018 Office of Planning and Research
TECHNICAL ADVISORY ON EVALUATING TRANSPORTATION IMPACTS IN CEQA**

VMT and Other Impacts to Health and Environment. VMT mitigation also creates substantial benefits (sometimes characterized as “co-benefits” to GHG reduction) in both in the near-term and the longterm. Beyond GHG emissions, increases in VMT also impact human health and the natural environment. Human health is impacted as increases in vehicle travel lead to more vehicle crashes, poorer air quality, increases in chronic diseases associated with reduced physical activity, and worse mental health. Increases in vehicle travel also negatively affect other road users, including pedestrians, cyclists, other motorists, and many transit users. The natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Additionally, development that leads to more vehicle travel also tends to consume more energy, water, and open space (including farmland and sensitive habitat). This increase in impermeable surfaces raises the flood risk and pollutant transport into waterways.

J2 Up to 50% of San Diego’s GHG is generated by the transportation sector. Reduction of GHG is the primary thrust behind Senate Bill 743 (Steinberg 2013) and prompts Sierra Club to comment on the Costa Verde Revitalization. As preface, we remind City Staff that the

2

J1 The comment letter provided by the Sierra Club was submitted after the close of the public review comment period. Under CEQA Guidelines Section 15105, the City is legally required to provide a 45-day public review period on the draft EIR. However, additional time was requested by the recognized community group and the City extended the public review thereby providing a total of 75 days for public review and comment. The public comment period for the draft EIR began on March 12, 2020 and ended on May 26, 2020. Comment letters received after expiration of the public review and comment period are considered late comments. A lead agency is only required to consider comments on the draft EIR and to prepare written responses if a comment is received within the public comment period (Public Resources Code [PRC] Section 21091(d); CEQA Guidelines Section 15088). When a comment letter is received after the close of the public comment period, however, a lead agency does not have an obligation to respond (PRC Section 21091(d)(1); PRC Section 21092.5(c)). Nonetheless, the City has incorporated the comment letter and responded accordingly. Introductory comments regarding the relationship between Vehicle Miles Traveled (VMT) and greenhouse gas (GHG) emissions are noted. Please refer to the responses to the more detailed comments that follow.

J2 Introductory comments regarding the linkage between VMT and other environmental impacts, Senate Bill (SB) 743, and the CEQA Guidelines are noted. These general comments do not address the adequacy of the draft EIR. It should, however, be noted that as of July 1, 2020, lead agencies are required to evaluate transportation impacts under CEQA using VMT as the appropriate metric instead of automobile delay as described solely by Level of Service (LOS). The draft EIR was circulated for public comment prior to July 1, 2020. CEQA Guideline 15064.3(c), Determining the Significance of Transportation Impacts, identifies the applicability of the new transportation criteria for determining impacts and further clarifies that “this section shall apply prospectively as described in Section 15007.” More specifically, CEQA Section 15007(c), Amendments, identifies that if a document meets the content requirement in effect when the document is set out for public review, the document shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved.

COMMENTS

RESPONSES

J2
cont.

California Environmental Quality Act (CEQA) is imbued in the Steinberg legislation with CEQA guidelines implemented by the Governor's Office of Planning and Research and the Natural Resources Agency.

While Regency claims no significant impacts from the developer's estimate of 50,719 VMT daily average miles, this highly significant impact represents only the Costa Verde **employee average daily miles traveled**. What this significant number of daily miles does not reveal is the **total VMT impacts** of any customers or ancillary service providers in the reality of the marketplace. By the applicant selecting this virtually unknown and non-revealing employee-based metric, the total VMT impacts are not disclosed to the community, PDS or decisionmakers.

J3

The unknown **total of planned VMT daily miles** presents a compounding of yet unidentified and unspecified new VMT additions to the already highly congested transportation sector of the University City Community. As a key element of CEQA, disclosure of foreseeable impacts is a cardinal requirement, representing the adequacy of a DEIR and thoroughness of the Lead Agency and applicant.

Unfortunately for the residents, commuters and decisionmakers, the quantity of new VMT generated is not revealed by the developer's VMT analysis. Please see EIR page 169 (TABLE 22-1 PROJECT VMT ANALYSIS) for the Developer's statement. Instead of revealing how much total new VMT will be generated by their project, the applicant instead produces traffic formularies referencing thresholds of significance in an attempt to exempt the project from in-depth VMT analysis and resulting mitigation to the local University City neighborhoods and impacted major intersections. This results in an inadequate project description, a lack of mitigation alternatives and a required recirculation of the draft EIR.

3

J2

(cont.) The CEQA Guidelines expressly intended VMT to be prospectively applied and environmental documents circulated for review prior to July 1, 2020 are subject to the "old" LOS metric, even if those environmental documents are certified after July 1, 2020. The environmental document was circulated for public review on March 12, 2020. The applicability of the new metric went into effect on July 1, 2020. Although not required, the Project's transportation impacts were also evaluated using a VMT methodology in recognition that the City was in the process of transitioning to the VMT metric in Section 5.2.6 of the draft EIR. Under the VMT metric, the Project would not be expected to result in significant transportation impacts. However, the draft EIR concluded the Project would have significant transportation impacts utilizing the City's LOS standards applicable at the time of draft EIR public circulation.

J3

The Project does not propose an increase to the retail square footage or change in the retail type from that currently on site. However, the VMT of the existing retail use was included in the analysis summarized in Table 5.2-22 as part of a conservative estimate of total project VMT. Footnote 4 was added to this table to clarify this information. Therefore, as explained in draft EIR's Transportation/Circulation Section 5.2.6.1, for large land use plans such as Specific Plans or Master Plans such as the project, the analysis would be to aggregate all Proposed Commercial Employment use (Scientific Research and Development, Office, and Hotel) and compare the resulting VMT/Employee to the regional average. The significance threshold is 15 percent below the regional average of VMT/Employee. This procedure is consistent with the City's draft Transportation Study Manual (dated 6/10/20) and the Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (2018). Therefore, based on the above information, the VMT analysis was adequately conducted.

Refer to response to Comment J2. The draft EIR contains a thorough analysis of potential transportation significant impacts within the project study area for roadways and intersections in Section 5.2 and identifies feasible mitigation measures. The analysis was performed in accordance with City standards and procedures and evaluated using the LOS metric under CEQA thresholds that were applicable when the draft EIR was circulated for public review, as detailed in response to Comment J2.

J3
cont.

La Jolla Village Drive, Regents Road, Executive Drive and Governor Drive along with Gilman Drive to Nobel Drive, Interstate 805 / Nobel Drive Interchange: SB Ramps, Interstate 5/La Jolla Village Drive Interchange: NB Ramps, Genesee Avenue to I-805 and Governor Drive to SR52 will all sustain lasting significant and unmitigated impacts as detailed in

TABLE D SUMMARY OF NEAR-TERM (OPENING DAY 2023) + PROJECT IMPACTS AND MITIGATION MEASURES

<https://ceqanet.opr.ca.gov/2016071031/3/Attachment/XP3weK>

While Development Services Department identifies such features as tandem commercial parking spaces being functional equivalents of conserving parking spaces, they instead act as additional vehicle parking capacity, which is calculated to reach up to 114 % in excess parking over the existing project. The parking on the existing project is cited as 968 spaces, with the proposed parking more than doubling to up to 2076 spaces. The City parking requirements for this project are 1837 spaces, with the applicant instead selecting 2076 spaces, resulting in an excessive parking capacity of 239 spaces. The governor's office of Planning and Research addresses excessive parking capacity below.

J4

OPR ON EVALUATING TRANSPORTATION IMPACTS IN CEQA

http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Offers guidance on excessive parking: Proposed CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT.

This presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT.

4

J4

The Project proposes between 1,837 and 2,076 parking spaces. The parking requirements of the Project are required to be met on site and cannot assume off-street parking is available to meet the Project's parking demand. The commenter's opinion of the number of proposed parking spaces is noted.

The Introduction to the OPR technical advisory referenced by the Commenter states, "The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA" (Governor's Office of Planning and Research 2018: 1). As explained in the draft EIR Section 5.2.6.2, in its discretion as a CEQA Lead Agency, the City has released draft VMT guidelines and significance thresholds. Regardless of any presumption, a detailed VMT analysis was conducted, which concluded that the Project would have a less than significant impact related to VMT. While a VMT analysis was conducted, refer to the response to Comment J2 regarding the appropriate CEQA metric for traffic. Comments on malls and transit ridership are noted.

J4
cont.

For example, the presumption might not be appropriate if the project:

- ***Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)***

The Costa Verde Revitalization project would already qualify for 239 *reduced* parking spaces due to its proximity to the future Blue Line Trolley and existing bus service. However the project, by its very mass, requires vast parking capacity, possibly including the unstated potential of Costa Verde Revitalization tenants or customers parking at University Town Center, dependent on the competitive parking pricing at UTC which, is directly east across Genesee Avenue.

Reducing actual parking spaces apparently has not been seriously considered, regardless of consistent claims regarding building in a transit priority area and thus being “screened out” and exempted from an actual lead agency VMT analysis. There are already 6,685 existing parking places within a 20-minute walk to Costa Verde 8650 Genesee Avenue San Diego, CA 92122
https://en.parkopedia.com/parking/garage/westfield_utc_shopping_center/92122/san_diego/?arriving=202005252030&leaving=202005252230

Excessive parking spaces is a primary indication that a presumption of a 15% reduction of VMT is erroneous because **“location-specific information indicates that the project will still generate significant levels of VMT”** Please also consider that San Diego Trolley ridership is utilized by only 4% of the population. The impacts of the Covid-19 pandemic have resulted in an estimates a 60-70% loss of ridership, which under pandemic fears could become permanent. It should be noted that the trolley stops referenced are not at ground level, but 50-feet above the Costa Verde Revitalization. The height factor, outdoor security concerns, weather conditions and required walking do not provide compelling reasons for drivers to abandon their cars for transit.

J4
cont.

Pedestrian status in a towering shopping mall does not convey the sense of community of a complete street venue or the complexity of adhering to transit schedules.

This is immediately evident entering malls, where anti-transit enticements include the first two hours of parking being free along with merchant extensions of free parking time offered by movie theaters and other extended time special events. Free parking is routinely utilized as competitive inducements to sustain or increase auto traffic customers. Mall operators are keenly aware that transit prices are non-competitive with auto-based shoppers, and that free parking may entice entire families “car loads” of customers to arrive by autos. Excessive parking spaces is a primary indication that a presumption of a 15% reduction of VMT is incorrect because **“location-specific information indicates that the project will still generate significant levels of VMT”**

Emerging from the 2,334 employee VMT (daily miles traveled per employee) totaling 50,719 daily VMT is the defining fatal flaw modeling metric in the project.

TABLE 22-1 PROJECT VMT ANALYSIS

Land Use Project	VMT	Employee Estimate	VMT (daily) per employee
Scientific R&D	29,316	1,440	20.2583333
Office	6,469	160	40.43125
Hotel	4,581	225	20.36
Retail	10,353	509	20.3398821
Total Project	50,719 Total daily VMT	2,334 total employees	21.73 miles per day
Significance Threshold (85% of Region VMT)		22.0 miles per day	Project average 21.73
Transportation Impact? (Over Threshold) NO (according to the proponent)			

J5

Section 5.2.6, *Impact 5: Vehicle Miles Traveled*, of the draft EIR includes the calculation and reference to the VMT calculations, with additional detail provided in the Transportation Impact Analysis (Appendix T of EIR Appendix B). Trip lengths for each use type were based on published SANDAG trip lengths per SANDAG's Not So Brief Guide for Vehicular Traffic Generation Rates for the San Diego Region. As shown in Appendix T and discussed in Comment J7, the average trip length (round-trip) for office employee was assumed as 17.6 miles as compared to 23.4 miles for the other uses, which does not equate to office workers' trip length to be twice as other uses.

COMMENTS

RESPONSES

J5
cont.

The applicant's modeling identified Office Workers as traveling nearly twice as many daily miles as the Scientific R&D, Hotel and Retail classified employees, without describing why the three trailing categories would be so mileage restricted. This extreme reduction of VMT by employees of three predominate employee categories is offered with no explanation, evidence, substantiation, documentation, or logic. In short, where did these VMT modeling numbers come from? The underlying basis of these models needs to be provided.

J6

Significantly, Employee daily VMT is the sole criteria the developer has selected to claim the Regency project actually accomplishes the OPR CEQA requirement of a 15% reduction of Vehicle Miles Traveled. Readers are further required to imagine that the selected developer modeling falls under the 15% threshold by a mere 27/100 of a mile per employee, despite the marked disparity in employee daily VMT found in the applicant's modeling assumptions and calculations. Selection of the Employee daily VMT metric exemplifies the unusual degree of modeling latitude of options demonstrated in the Costa Verde Revitalization project and accepted by City Staff.

J7

Below in the chart from page 714, the applicant loses all continuity to the prior VMT/employee schedule, TABLE 22-1 PROJECT VMT ANALYSIS, page 169 including a radical change for OFFICE WORKERS daily VMT located on EIR page 714, taking OFFICE WORKERS from 40.43125 daily VMT to 17.6 daily VMT. These data distortions or errors revoke the credibility of achieving the claim of a 15% reduction in VMT for the project.

Below, page 714 increases the daily Employee average VMT to 23.4 miles (from 20.25 VMT low base in Table 22-1 Project VMT analysis), with the exception of the Office Workers, who were previously rated at a high 40.43125 VMT in table 22-1, now to a mere 17.6 daily VMT. This

7

J6

Refer to response to Comment J3 regarding VMT per employee as the appropriate VMT metric for Commercial Employment uses.

J7

The comment incorrectly compares average trip length presented on page 714 of draft EIR Appendix B with VMT, but these metrics are not comparable. The calculation of VMT, as indicated on the second table of that page, accounts for number of employees, number of daily trips, and trip length. The average round-trip trip length (per SANDAG) assumed for the Scientific R&D use is 23.4 miles, which is used as one input among others to the VMT calculations. Furthermore, Commenter has incorrectly calculated 20.25 as the VMT per employee (the correct calculation of VMT per employee for R&D is 20.35). Similar incorrect comparisons between average trip length and VMT per employee were made for the office use.

data is inconsistent and contradictory as presented, opaque in methodology, devoid of meaningful analysis and any readily validated sourcing to the public, city and decisionmakers. Convincing and substantive project employee daily VMT proof is absent in the Traffic Impact analysis (TIA) and disputed by the applicant's own conflicting two tables.

Page 714 TIA.2408 FINAL Report_v2_clean

<https://ceqanet.opr.ca.gov/2016071031/3/Attachment/XP3weK>

Land Use Type	Site Population	Estimate Daily Auto Trips (per TIA)	Average Trip Length (one-way, miles)	Average Trip Length (round trip, miles)	Total VMT
Retail *	509	885	11.7	23.4	10,353
Research & Development ^b	1,440	2,506	11.7	23.4	29,316
Office *	160	735	8.8	17.6	6,469
Hotel *	225	992	11.7	23.4	4,561
VMT / employee	21.73				50,719 daily VMT

Footnotes:

- a. Retail employees trip generations assumes 2 trip ends and VOR of 1.0 and MID credit of 13% consistent with Table 8-1 of TIA.
b. R&D employees trip generation (sic) per TIA trip generation Table 8-1.
c. Office employees trip generation (sic) per TIA trip generation Table 8-1.
d. Hotel employees trip generations assumes 2 trip ends and VOR of 1.0 and MID credit of 13% consistent with Table 8-1 of TIA.
e. Trip Lengths were obtained from SANDAG Trip Generation Manual. For hotel and retail employees, trip lengths assumed to be similar to R&D use to be conservative.

SB 743 Analysis				
Scenario	Regional VMT per employee	Significance Threshold (85% of Region VMT)	OSTA VERDE	Transportation Impact? (Over Threshold)
VMT per employee	25.90	22.0	21.73	NO

Here the applicant claims a Regional VMT daily per employee of 25.90 miles, with a 15% reduction to a goal of 22.0 VMT per employee described as the Threshold of Significance, achieving a modeled 21.73 employee daily VMT along with a "presumed" exemption from Lead Agency VMT analysis.

We could locate no such SANDAG VMT modeling. Below are some SANDAG VMT examples, none of which align with the applicant's

J8

Per the City's draft TSM, the project's VMT per employee is compared to the regional average VMT per employee per the screening maps to evaluate a transportation VMT significant impact. At the time the VMT analysis was prepared, the SANDAG 2012 Regional Mean for VMT/Employee was 25.90 per the SANDAG SB 743 Concept Map for the San Diego Region.

The comment includes an example from SANDAG that states a SANDAG Regional Average of 26.25 VMT/Employee but does not provide a source for this number. Furthermore, the link provided in the comment is to a white paper published by SANDAG in May 2013, which was prior to SB 743 being approved (September 2013) and furthermore, the white paper does not relate to using VMT as a metric for transportation impacts. The white paper is not an applicable reference and does not address the adequacy of the document.

COMMENTS

RESPONSES

J8
cont.

model. Please document where there are any areas with comparable average daily employee VMT trip averages as proposed by the applicant for the Costa Verde Revitalization in the SANDAG Master-Geographic Reference Area (MGRA) zone system.

SANDAG Regional Average = 26.25 Vehicle Miles Traveled/Employee

*Based on the SANDAG Series 13 Base Year Model

San Diego County VMT Per Employee by TAZ Relative to SANDAG Regional Average*

For additional information on SANDAG's modeling please see:

VEHICLE MILES TRAVELED CALCULATIONS USING THE SANDAG REGIONAL TRAVEL DEMAND MODEL

https://www.sandag.org/uploads/publicationid/publicationid_1795_16802.pdf

J9

Are the applicant's VMT studies sufficiently credible to be considered as part of the Lead Agency's overall evaluation? The answer here is clearly no. The applicant then shifts focus to City PDS and Councilmembers having not yet provided formal guidance by adopting a VMT threshold.

Given that the City of San Diego has yet to adopt VMT thresholds, the OPR's Advisory describes the analysis for the following circumstances: If any of these exceptions to the presumption might apply, the lead agency should conduct a detailed VMT analysis to determine whether the project would exceed VMT thresholds.

While the community is forced to reconstruct the project's non-disclosed **existing daily VMT** puzzle pieces, what is obviously emerging in this development is an urban ultra-density commercial project cascading into one of the highest density populated areas in the County of San Diego. Please reference that the 578,000 ft² Costa Verde Revitalization project is directly across the street from the Westfield University Town Center, a 1,066,842 ft² shopping mall. These geographically identical locations together create San Diego County's largest shopping area and a regional shopping attraction.

In not disclosing the **existing** VMT impacts compared to the modeled **planned** findings of 50,751 total daily employee VMT, the applicant fails to inform existing residential communities of the full spectrum of

9

J8

(cont.) While the VMT analysis was conducted, refer to the response to Comment J2 regarding the appropriate CEQA metric for this project. No further response is necessary.

J9

Commenter's opinion on the VMT studies is noted. Per the City's draft TSM, for Commercial Employment projects such as Costa Verde, the Project's VMT per employee is compared to the regional average VMT per employee to evaluate a significant transportation VMT impact. Existing VMT/Employee is already included as a part of the regional baseline. While the VMT analysis was conducted, refer to the response to Comment J2 regarding the appropriate CEQA metric for this project.

COMMENTS

RESPONSES

J9
cont.

impacts they can anticipate, depriving resident taxpayers of common-sense evaluation metrics. Does the project double/triple/quadruple the **existing** daily employee VMT traffic? What is the percentage of daily employee VTM increase over **existing** daily employee VMT?

What additional modeled **future** daily employee VMT traffic can residents expect in a year? Or over next Christmas? Clearly the VMT modeling results must relate to common-sense understanding of these crucial disclosure numbers. We have been unable to locate evidence of any such communication attempt in the Costa Verde Revitalization.

J10

Adhering to CEQA communication requirements under § 15006. (Reducing Delay and Paperwork) (q) Writing environmental impact reports in plain language. (15140) (r) Following a clear format for environmental impact reports. (15120) could have made the DEIR a reference of use to the general public. At this juncture, the DEIR has instead proven to be an obstacle to understanding foreseeable impacts.

Please consider that the additional 50,751 total daily VMT represents only the **employee segment of the increased VMT** which will impact University City and La Jolla. This base VMT number does not include actual retail and commercial customers, or required services such as landscaping, trash hauling, lot cleaning, janitorial and onsite security personnel. Mall commerce is largely composed of customers and services utilizing autos. To ignore this enormous segment of total daily VMT deprives the reader of realistic and major project impacts.

The cumulative impacts of the project's **total planned increased VMT** daily trips, in conjunction with the list of eight significant and unmitigated impacts to surrounding transportation infrastructure in nearly every major avenue must also be disclosed. Non-disclosure of the **existing total** VMT and the **total planned** project VMT effectively (and adversely) impacts local homeowners' intrinsic quality of life in the

10

J10 Refer to the response to Comment J3.

COMMENTS

RESPONSES

J10
cont.

majority of University City communities along with significant portions of La Jolla.

J11

In a word, the Costa Verde Revitalization proposal is immense. Any human sense of scale in the existing project will be dwarfed in the vast increases to the existing property in this development, in the shadows of a fifty-foot high overhead trolley tracks. With the existing center constructed to 178,000 sf² of commercial and retail, residents are now required to accept an additional 360,000 sf² of research and development, in addition to 40,000 sf² of commercial and office uses. 400,000 additional sf² plus the existing center size of 178,000 sf² is now 578,000 sf², a 224.719% increase in square footage in the project footprint, compounded by the project's height/scale/ and immediate entrance-to-entrance proximity to University Town Center.

In addition, there is a 10-story, 135-foot, 200 room hotel proposed, adding another massive structure to the project location. This Visitor and Commercial addition to the existing Costa Verde Center further ratchets up the scale and mass on local residents, their already overburdened communities, business, and drivers. The developed 13.9-acre project site will have a ground surface area of 605,484 sf².

J12

Regardless of the intense density, parking increases and readily attributable increase in **total** Vehicle Miles Traveled over the **existing** project VMT, the applicant goes on to make the claim of "NO SIGNIFICANT VMT IMPACTS", which is all centered on a future 50-foot high trolley stop which will somehow ameliorate the resulting traffic impacts of Costa Verde Revitalization.

The proposed project is located in a Transit Priority Area (TPA), which the revised CEQA Guidelines, OPR Technical Advisory note are areas where new land use projects generally are exempt from project-level VMT assessment. Nonetheless, a project-level VMT analysis was performed, which concluded that no significant VMT transportation impact was calculated for the proposed project.

11

J11

Comments regarding the Project's bulk and scale are noted. The proposed development and visual patterns would be compatible with the highly urbanized character of surrounding development within this area, which is identified as an Urban Node in the Community Plan, an area with high propensity for village site development in the City's General Plan, a City-designated Transit Priority Area, and an Urban Center smart growth area on the SANDAG Smart Growth Concept Map. As described in the Strategic Framework of the City's General Plan, "[N]ew policies have been created to support changes in development patterns to emphasize combining housing, shopping, employment uses, schools, and civic uses, at different scales, in village centers. By directing growth primarily toward village centers, the strategy works to preserve established residential neighborhoods and open space, and to manage the City's continued growth over the long term" (page SF-6). As detailed in Section 5.1, *Land Use*, of the EIR, the Project would be consistent with applicable land use plans and policies. Commenter is correct that 13.9 acres equates to 605,484 square feet; this calculation remains the same regardless of development.

J12

The preparation of the draft EIR and associated analysis was conducted pursuant to CEQA. For the purposes of CEQA, the proposed land use applications that are under review by the City constitute a new land use project, regardless of whether a use has existed at the site. The addition of Scientific Research and Development, Office and Hotel are considered new land uses as these uses currently do not exist at the Costa Verde Center. Therefore, while the project site may be existing, the Project is considered a new land use project. Refer to draft EIR Section 5.2.6 for the analysis for transportation significant impacts for the project and response to Comment J3 regarding total VMT and thresholds.

J12
cont.

The audacity of laying claim to a new land use project is amazing. Costa Verde opened in 1989. As is the project-level VMT analysis being performed. More amazing still is the VMT Impacts Summary, which in 110 words which found absolutely zero impacts, despite 50,712 daily employee VMT.

22.3 VMT Impacts Summary This section presents an overall summary of potential transportation impacts of the Costa Verde based on the VMT analysis. VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. VMT is a measure of the use and efficiency of the transportation network. A VMT screening review was conducted and it is expected that the proposed project would be screened out given its location within a Transit Priority Area (TPA). In addition, a project-specific VMT analysis was also conducted, which concluded that, no project VMT impacts are calculated. Therefore, no mitigation measures are required or proposed.

The **Total planned** VMT daily trip traffic is not described to the community, PDS or decisionmakers. The Draft EIR provides no indication the anticipated **Total Planned** daily VMT impacts are described to existing residents and businesses, repeatedly failing the key CEQA requirement for disclosure of known or anticipated project impacts. CEQA requires environmental analyses to reflect a “good faith effort at full disclosure.” (CEQA Guidelines, § 15151.)

From the Governor’s Office of Planning and Research regarding the critical requirement of disclosure of environmental impacts

http://opr.ca.gov/docs/20181228-Discussion_Draft_Climate_Change_Adivsory.pdf

Requirements of CEQA and CEQA Guidelines Section 15064.4

CEQA is a public disclosure law that requires public agencies to make a good-faith, reasoned effort, based upon available information, to identify the potentially significant direct and indirect environmental impacts—including cumulative impacts—of proposed project activity. The CEQA process is intended to inform the public of the potential environmental effects of proposed government decisions and to encourage informed decision-making by public agencies. In addition, CEQA obligates public agencies to consider less environmentally

12

J13

Comments regarding general CEQA and VMT analysis guidance are noted. The analysis presented is consistent with OPR and the draft City of San Diego Transportation Study Manual per CEQA requirements.

J13
cont.

damaging alternatives and adopt feasible mitigation measures to reduce or avoid a project's significant impacts.

Considerations for All Projects. Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, by failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT from a trip that crosses a jurisdictional boundary. CEQA requires environmental analyses to reflect a "good faith effort at full disclosure." (CEQA Guidelines, § 15151.) Thus, where methodologies exist that can estimate the full extent of vehicle travel from a project, the lead agency should apply them to do so. Where those VMT effects will grow over time, analyses should consider both a project's short-term and long-term effects on VMT.

From the CA Dept of Fish and Wildlife

<https://wildlife.ca.gov/Conservation/CEQA/Purpose>

The purpose of CEQA is to:

- *Disclose to the public the significant environmental effects of a proposed discretionary project, through the preparation of an Initial Study (IS), Negative Declaration (ND), or Environmental Impact Report (EIR).*
- *Prevent or minimize damage to the environment through development of project alternatives, mitigation measures, and mitigation monitoring.*
- *Failure to comply with CEQA to provide full disclosure of information during the CEQA process, which would result in relevant information not being presented to the public agency,*

COMMENTS

RESPONSES

J13
cont.

would constitute prejudicial abuse of discretion leaving the project proponent open to possible lawsuits.

To reiterate Sierra Club concerns regarding CEQA disclosure requirements:

J14

1. The applicant fails to reveal the **existing** VMT of the Costa Verde shopping mall. Neither the existing total shopping center daily VMT nor the obscure **existing** Employee daily average VMT modeling formulary are disclosed to the residents, PDS or Decisionmakers. Such intentional actions leave the University City community unable to discern a viable VMT benchmark to evaluate the potential vast increases in VMT daily miles which will impact the communities of the Costa Verde Revitalization project. Failing to adequately inform the public of potential impacts is a fundamental CEQA factor in requiring recirculation of Draft Environmental Impact Reports.

J15

2. The applicant does not disclose the project's **total planned** daily VMT generated by the project, including not only the peculiar mode of modeling assumptions by employee daily VMT selected by the applicant. Far more meaningful are the daily VMT impacts of actual customers, vendors, service providers, delivery trucks, street sweepers, landscapers, security, and janitorial workers along with numerous others seasonal staff required during high demand shopping seasons. The applicant declines forthright disclosure and providing the community a realistic understanding of the traffic impacts residents will be forced to contend with. Should the project's **total planned** daily VMT not have been quantified by the applicant, those circumstances would stand as confirmation of our inadequacy of disclosure concerns.

J14

Refer to the response to Comment J3.

J15

Refer to the response to Comment J3.

COMMENTS

RESPONSES

<p>J16</p> <p>3. The ability of the applicant to select their own choice of VMT modeling assumptions speaks to an unexpected lack of interest by City PDS when determining what the most effective guidance for evaluating daily VMT objectives should be practiced. It would seem natural that great care would be applied to the initial determination methods for such an important and newly required traffic evaluation standard.</p> <p>Unfortunately, the applicant has several times in the DEIR pointed to the City's <i>draft</i> VMT standards status as not providing <i>approved</i> guidance. The Costa Verde Revitalization consultant selected an obscure anomaly to most residents or decisionmakers who may not be traffic engineers; the daily VMT averages for project employees. The reasoning for this odd metrics selection is unidentified, nor are the significant variations of daily VMT by employee group attempted to be explained. In fact the VMT tables require readers to check and evaluate basic but missing arithmetic functions to establish employee group VMT. The VMT numbers for most employee groups is exceptionally low, fitting easily into the applicant's self-selected model standards. So low that the cited daily employee VMT in TABLE 22-1 PROJECT VMT ANALYSIS for three employee groups' highest VTM (20.33 daily VMT) is not anticipated by SANDAG to occur until 2050.</p>	<p>J16</p> <p>The Project EIR and Transportation Impact Analysis have both been reviewed by qualified technical staff of the City's Development Services Department. Refer to draft EIR Section 5.2.6 and Chapter 21 of Appendix B for VMT Methodology, as well as to the response to Comment J3 regarding the appropriateness of the metric used for analysis.</p>
<p>J17</p> <p>We could not locate any SANDAG studies which confirm the VMT analytic modeling assumptions of the previously noted subject tables in the DEIR.</p> <p>Moreover, SANDAG's transportation model is the typical and standard model used to estimate VMT in the San Diego Region.</p>	<p>J17</p> <p>The Costa Verde Project draft EIR and associated Transportation Impact Analysis have been in process for over five years with Planning Commission initiation in 2015 and a release of the prior project draft EIR for public review in 2018. Given this timeline, the forecast volumes and associated traffic analysis were conducted in Series 12 for several reasons. The Series 12 traffic model included the University City Community Plan Amendment (UCCPA) land uses and roadway network as well as calibration parameters that were conducted as a part of the UCCPA EIR. Land use assumptions reflect planned buildout of the community and are unaffected by downturns in the economy. Based on discussions between City of San Diego Transportation staff and the traffic engineering consultant, continued usage of Series 12 modeling was deemed appropriate to ensure that the UCCPA</p>

COMMENTS

RESPONSES

J17
cont.

The Costa Verdi Revitalization appears to have been completed in SANDAG's series 12 model. The series 12 model was a 4-step model utilizing a different structure than the presently used Series 13 and Series 14 Activity-Based Models (ABM). The ABM models have proven far more sophisticated, with detail and accuracy that eclipsed Series 12, making the model Series 13 and 14 capable of tract capacity down to the individual in representative populations.

SANDAG produced the Service Bureau model run for the Costa Verdi Revitalization, however the VMT analysis and regional thresholds would likely have been derived by the consultant as SANDAG did not produce SB 743 VMT/Employee estimates in the Series 12 model. As is SANDAG Board policy, the Series 12 was retired when SANDAG adopted the 2019 Federal RTP. It appears the Costa Verdi Revitalization project model is a remnant Series 12 model. The Costa Verdi Revitalization project was a 2020 forecast from Series 12. The surrounding land use assumptions were produced in 2008 and were completed during the initial stages of the "Great Recession", which may vary significantly than what is currently on the ground today, i.e., pre-Covid-19 VMT values. What these circumstances call for is reviewing the land use assumptions surrounding the project to determine what impact that would have on the project VMT assumptions.

No new projects are allowed to start up in the Series 12 model version. As the CEQA requirements for VMT analysis are not in effect until July of 2020, there is no reason that the project's VMT analysis should be constructed with outdated and now obsolete VMT models no longer authorized for use. The specifications of

16

J17

(cont.) buildout land use projections and model calibration parameters are captured and that there is consistency with the analysis and results between the prior project and current project. Furthermore, a calibrated University Community Plan Series 13 model that includes the UCCPA land use buildout projections was and continues to be unavailable to run VMT outputs.

The lead agency is responsible for determining the methodology for assessing impacts. Therefore, consistent with OPR Technical Advisory and CEQA Section 15064.3, which defers to lead agencies on the choice of methodology to analyze VMT impacts, a trip-based approach was used to conduct the project's VMT analysis.

Refer to the response to Comment J9 regarding use of a baseline VMT per employee of 26.25.

Based on the above, it is concluded that the VMT analysis contained in the draft EIR was appropriately conducted. While the VMT analysis was conducted, refer to the response to Comment J2 regarding the appropriate CEQA metric for this project.

COMMENTS

RESPONSES

J17
cont.

Series 13 and Series 14 models utilizing ABM have data collection capabilities of a higher level due to recalibration of the models with new household travel survey data collected in 2016. The new survey did a superior job of capturing short distance trips than the 2006 survey. Additional travel was discovered in the 2016 survey, resulting in additional VMT to assigned to residential travel than prior surveys. This resulted in a jump in VMT from 25.36 to 27.31 in the region.

The City of San Diego as Lead Agency must insure that applicants are utilizing the most current VMT data. The process and data should be made available to the impacted public. If the applicant relies on older series survey models the public is deprived of the actual and current day conditions. If the project applicant utilized VMT for employees using up to date VMT survey data, the project would not be able to claim a 15% VMT reduction.

SANDAG Regional Average = 26.25 Vehicle Miles Traveled/Employee

85% of 26.25 = 22.3125, exceeding the applicant's target of 22% or a 15% reduction

J18

4. The project illustrates its true VMT status with 239 additional and unrequired parking spaces it has intentionally and specifically planned in the DEIR. Such actions are identified by California Office of Planning and Research (OPR) as an indicator that the project will not meet the standards of a 15% reduction in VMT. For example, the presumption of exemption may not prove appropriate if the project: • ***Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)*** which is true of Costa Verde where the city requires 1837

17

J18

Refer to the response to Comment J4 regarding to parking.

COMMENTS

RESPONSES

J18
cont.

but Costa Verde Revitalization instead plans for 2076 spaces. With parking spaces one of the most expensive and unproductive mall requirements, exceeding the basic requirements speaks to a future VMT need only the applicant has knowledge of. Increasing parking capacity by 13.01034% in a claimed transit priority area addresses the developer's continued bet on automobile traffic, not individuals arriving by bus and trolley rides.

J19

5. It becomes strikingly clear perusing the DEIR that the singular goal of the applicant's VMT analysis is to attempt to reach a status of being excluded from Lead Agency analysis and scrutiny. The concept of the project being "screened out" by virtue of location in a transit priority area is repeatedly suggested to the reader. Or, likewise being exempted by presumption that the Costa Verde Revitalization will deliver a project where the daily VMT average for employees can be somehow modeled to achieve a 15% reduction below the regional employee daily VMT. We could not locate any SANDAG studies which confirm the analytic modeling assumptions of the previously cited subject tables in the DEIR. Stunningly, the applicant actually presents a claim of **New land use project** exemption in the following (page xiv DEIR)

The proposed project is located in a Transit Priority Area (TPA), which the revised CEQA Guidelines, OPR Technical Advisory note are areas where new land use projects generally are exempt from project-level VMT assessment. Nonetheless, a project-level VMT analysis was performed, which concluded that no significant VMT transportation impact was calculated for the proposed project.

The project is of course a "revitalization" of an existing shopping center from 1989 with 31 years in operation in one of the most

J19

Refer to the response to Comment J4 regarding to the Project's location within a TPA, Comments J6 and J9 regarding the source of the analytic modeling assumptions, and Comment J13 regarding the Project constituting a new land use for the purposes of CEQA analysis.

COMMENTS

RESPONSES

J19
cont.

densely populated areas of San Diego. Costa Verdi revitalization is definitely not a “new land use project” under any definition.

J20

The questions surrounding the Costa Verde Revitalization project requires the City of San Diego as Lead Agency to perform a detailed CEQA-based VMT analysis to assure residents and decisionmakers that every VMT representation is based on credible circumstances with soundly reasoned and repeatable updated SANDAG modeling assumptions which the residents and impacted businesses readily understand.

Sincerely,

George Courser, Chair
Sierra Club San Diego
Conservation Committee

J20

The VMT analysis for the Project was adequately conducted per the draft Transportation Study Manual. Based on the above responses, no changes to the VMT analysis are required. While the VMT analysis was conducted, refer to the response to Comment J2 regarding the appropriate CEQA metric for this Project.

COMMENTS

RESPONSES


UNIBAIL-RODAMCO-WESTFIELD
2049 Century Park East, 41st Fl
Los Angeles, CA 90067
Telephone -- 310-575-5979

May 6, 2020

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 1st Avenue, MS 501
San Diego, CA 92101

Subject: Support for Costa Verde Revitalization Project No. 477943 / SCH No. 2016071031

Dear Ms. Shearer-Nguyen,

On behalf of Westfield, I am writing in support of Regency Centers' Costa Verde Shopping Center Revitalization Project. I understand the project is currently in the public review phase for the EIR and will be coming to City Council for approval later this year.

As you might know, Westfield recently completed the expansion of Westfield UTC. Costa Verde Center sits directly across Genesee Avenue from Westfield UTC, and our centers will be connected via the planned Mid-Coast Trolley station platform, which will be located south of Esplanade Court within the median of Genesee Avenue. While planning for the UTC revitalization, we knew it was important to consider how to integrate the new Mid-Coast Trolley station into our project.

Now that the Mid-Coast Trolley is under construction, Westfield believes that Regency Centers has designed a project that successfully integrates the station, providing more direct connections to transit for nearby residents and customers. The Costa Verde Revitalization Project will be a model for mixed-use transit-oriented development throughout the region and help the City achieve its Climate Action Plan goals.

Westfield also believes the timing of Regency Centers' project is important. With all the planned improvements in University City moving forward, Regency Centers is hopeful their project will help to complement and reinforce the City's desired urban "City of Villages" approach for University City by creating a mixed-use center that is pedestrian-friendly and connected to our regional transit system.

Sincerely,


Kimberly Brewer
Senior Vice President - Development

K1 Commenter's support of the Project is noted. As the comments do not pertain to the adequacy of the EIR, no further response is necessary.

From: jenab@earthlink.net
Sent: Sunday, April 19, 2020 11:05 PM
To: DSD EAS
Cc: Councilmember Barbara Bry
Subject: [EXTERNAL] Costa Verde Redevelopment Project 477943

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

- L1 ☐ I am a resident of University City, and we have already been dealing with massive amounts of development, traffic, closed roads, and disruption due to the construction of the new UTC Mall, the new trolley, and new office buildings in the area.
- L2 ☐ The new development in Costa Verde should not be able to move forward without the UC community input and questions in a public hearing (in person). This project will not only impact the community more during the demolition and build of a new complex, which will take a long period of time, but we will certainly be impacted by additional traffic and congestion both during and after the construction.
- L3 ☐
- L4 ☐ In addition there are several stores many shop at that will be torn down and would likely leave the area that many residents count on.
- L5 ☐ The project should not be allowed to move forward, and should be put on hold until the community has the opportunity to review the project and discuss the impact on our community, in person at a time in the future.

Regards,

Jena Bellin
92122

- L1 Comments regarding other development in the vicinity are noted.
- L2 Refer to the response to Comment D2.
- L3 Construction-related impacts are detailed in applicable sections of Chapter 5 in the EIR with respect to traffic, air quality, noise, hydrology/water quality, and mitigation measures are identified for associated significant impacts. The draft EIR analyzed potential effects to study area intersections and street segments during construction in Section 5.2, *Transportation/Circulation*. No significant intersection impacts are identified with implementation of the project construction. Significant transportation impacts associated with the project during Near-Term (Year 2023) and Build-Out (Year 2035) are addressed in Section 5.2.
- L4 Comments regarding stores potentially leaving the area are noted; however, concerns regarding economic activity, in the absence of a tangible environmental impact, are not issues required to be addressed under CEQA and do not address the adequacy of the document. Therefore, no response is necessary.
- L5 Comment noted. Refer to the response to Comment L2.

From: barry <apdrfn@aol.com>
Sent: Wednesday, March 25, 2020 2:07 PM
To: DSD EAS
Cc: johnmurphy@regencycenters.com; jstraw@swspr.com
Subject: [EXTERNAL] Costa Verde Revitalization #477943

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

TO: San Diego Development Services
FROM: Barry Bernstein
SUBJECT: EIR comments
DATE: March 18, 2020

- M1 [As I read/perused this HUGE document I was very impressed with the many detailed reports/photos to substantiate the MANY issues related to this project. I must mention, that by carefully reading some specific major identified areas, that many mitigations are reflected as NOT being fully addressed.
Admittedly, I have not read the entire document carefully so if my comments below have been addressed in the document then I apologize for bringing them to your attention.
Here are my preliminary reactions/comments:...more to follow.
- M2 [1. I did NOT see any specific mention of the City Climate Action plan as it relates to FIRE/EVACUATION concerns, which I thought was a new mandatory category for California EIR's.
- M3 [Because what appears to be an emphasis on providing attention to potential bicyclists having access and facilities, (lockers/showers), I have added the following comment:
2. I did not see reflected "safe" bicycle lanes on Genesee, OR, plans for safe bicycle lanes, with emergency/first responder access, that would be connecting/bridging the north and south U.C. community and providing the needed fire protection for this project and other businesses in the UTC area.
This particular concept was recommended by the City's Housing Commission and SD Fire for many years in their planning for safety and mobility, as well as the City's planning recommendations for safe bicycle/pedestrian lanes for communities.
- M4 [Thank you, as I go through other portions of the EIR, additional comments will be forwarded to your office. Thank you, Barry Bernstein, UCCA president

- M1 Comments noted. Mitigation measures are identified for each identified significant impact in the document. The required mitigation measures would reduce impacts at five intersections and one metered freeway ramp to below a level of significance. However, transportation/circulation impacts at four intersections, six roadway segments, three freeway segments, and one metered freeway ramp would remain significant even after implementation of the identified mitigation requirements.
- M2 While the City's Climate Action Plan (CAP) is intended to ameliorate the impacts of climate change, including the potential for wildfire size and frequency, it does not provide requirements for individual projects to implement related to fire or evacuation concerns. Consistency with the requirements of the CAP is addressed in EIR Section 5.5, *Greenhouse Gas Emissions*, and Appendix D, *CAP Consistency Checklist*.
- M3 Existing and proposed bicycle facilities and amenities within the study area are discussed in Section 5.2.1.1 and Section 5.2.4.2, respectively, of the draft EIR. The previously existing Class II bicycle lanes that were eliminated during Mid-Coast Trolley construction activities will be replaced along the project site's frontage on Genesee Avenue by the Mid-Coast Trolley. The Project would construct a Class IV one-way Cycle-Track on Nobel Drive between Genesee Avenue and Regents Road, consistent with the planned bicycle network per the draft University Community Plan Update (March 2020). Refer to the response to Comment E72 regarding connectivity between the northern and southern portions of the University City community.
- M4 Comment noted.

From: Tony Glaser <tandbglaser@comcast.net>
Sent: Thursday, March 26, 2020 9:37 PM
To: DSD EAS
Subject: [EXTERNAL] Project Name: Costa Verde Revitalization; Project No.: 477943/SCH No. 2016071031

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N1

The draft EIR appears to be complete and adequate. The environmental impact on residents in the area during and after construction – e.g., noise, traffic, pollution, visual effects – will be felt. Several good tenants have already left the center and there will be more to come.

Anthony Glaser and Barbara Glaser

N1

Comments indicating that the draft EIR appears complete and accurate are noted. Construction-related impacts pertaining to noise, traffic, pollution, and visual effects are considered in the draft EIR. Noise impacts from demolition, grading, and building construction associated with the Project are discussed in Section 5.7.2.2 of the draft EIR. As described in that section, the Project would comply with the City's construction noise limits of 75 dBA L_{EQ} (12 hour) with implementation of mitigation measures NOI-4 and NOI-5. These measures would reduce impacts to below a level of significance. Transportation/circulation impacts during construction activities are addressed in Section 5.2.2.2 of the draft EIR and would be less than significant. Section 5.4, *Air Quality*, addresses emissions of air pollutants. As shown in Table 5.4-5, construction emissions of these pollutants would be substantially below the screening thresholds that have been established by the San Diego Air Pollution Control District to protect the public's health and welfare. Visual effects are addressed in Section 5.3, *Visual Effects/Neighborhood Character*, which concludes that these effects would be less than significant. With regard to tenants leaving the center, concerns regarding economic activity, in the absence of a tangible environmental impact, are not issues required to be addressed under CEQA.

From: Henry Kerlick <klaxonhonker@aim.com>
Sent: Thursday, April 23, 2020 4:57 PM
To: DSD EAS
Subject: [EXTERNAL] RE: Costa Verde replacement project

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

- O1 Dear Sirs:
With the massive project proposed for the replacement of the Costa Verde Shopping Center with a 135' tall series of high-density office and commercial buildings, the destruction of University City as a desirable residential area will be complete.
- O2 When I moved into the neighborhood as a UCSD resident in 1984, University City was a highly-desirable area, part of the "Golden Triangle" of San Diego, a fitting eastern companion to La Jolla. Efforts to turn it into a high-density series of high-rise block structures began in the mid-Eighties, intensifying under former City Councilman Harry Mathis. Residences in University City had been restricted to a four-story height limit, but variances were handed out like candy. The older, park-like areas of the community are now dwarfed by several high-rise offices and apartment structures. UTC has been partially torn down, and replaced by an ugly pillbox structure with minimal greenery or parking capacity. The footbridge linking Costa Verde Center and UTC has been torn down in an effort to impede pedestrian access.
- O3 It seems as if a malignant influence has had long-term plans to destroy the community, and turn it into a squalid urban nightmare. On multiple occasions, residents rose to block plans to build a trolley line through the neighborhood. Now, a huge raised trolley line strangles University City like a concrete anaconda. Only months ago, high-powered transmitter towers were authorized for construction ringing Doyle Park, a children's playground with a nearby elementary school.
- Now, with the city's citizens confined to their homes during a global pandemic, developers are rushing through the approval process to complete their malicious plans for the neighborhood. I believe that the cynical decision to push through this project while the public fears for their lives to venture out of their homes will prove legally actionable. If there are no decision makers in the city who are not influenced by the development industry, then at least those decision makers must see that their aggressiveness is laying ample grounds for a long legal battle.
- Sincerely,
H. Kerlick

- O1 Regarding the heights of the proposed buildings, please note that retail buildings, which would continue to comprise the majority of buildings on the site, would be a maximum of 45 feet tall. One of the proposed office buildings would be 90 feet tall (including the mechanical screen). Three buildings (two office buildings and the hotel) are proposed to reach a maximum of 135 feet. It should also be noted that the project site is located in the Urban Node of the University Community, which is intended to be developed as a dense, mixed-use core of the community. Comments regarding the desirability of this area as a residential area are noted but are not relevant to the adequacy of the draft EIR; therefore, no further response is necessary.
- O2 Comments regarding prior changes to the character of the community are noted, and do not address the adequacy or accuracy of the draft EIR. The pedestrian bridge linking Costa Verde Center and UTC was demolished to allow for Mid-Coast Trolley construction, and a new connection will be constructed to link these two centers across the Trolley platform.
- O3 Comment noted. Refer to comment D2. Please also note that the Project has undergone a lengthy environmental review process, beginning with Planning Commission approval of initiation of the amendments to the University Community Plan and Costa Verde Specific Plan in March 2015. Public review of the Draft EIR began on March 12, 2020 at which time the local effects of the pandemic were not foreseen.

From: Lucy Lehman <lehmanlucy@yahoo.com>
Sent: Thursday, April 9, 2020 1:46 PM
To: DSD EAS
Subject: [EXTERNAL] Project Name : COSTA VERDE REVITALIZATION #477943 / SCH #2016071031

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

- P1 ☐ In view of the present crisis of the COVID pandemic, I think it very unwise to approve the above project. I wonder if the business that originally requested approval can even get the necessary funding at present, in which case my letter would be extraneous. Nevertheless, I'm stating the objections I have to the renovation.
- P2 ☐ First, the existing small businesses onsite need a chance to recoup their losses suffered during this crisis. Secondly, the supermarket BRISTOL FARMS is a great resource for the surrounding community, comprised of many elderly people and Senior Citizen facilities. To deprive them of that resource for the years the proposed project would entail until completion would be a hardship to the community -- and to the owners of Bristol Farms as well. In the interest of fairness, I admit that the proposed renovation would provide jobs, but at what cost?
- P3 ☐ In addition it presents an extreme hardship for the apartment buildings surrounding the present Costa Verde Shopping center to have to live with a renovation which is projected to take around three years from tear down to rebuilding. Consider the dust and pollution that the surrounding buildings would be subject to during that time. It would be harmful to our health.
- P4 ☐ Do we need another hotel? Can the traffic sustain another large project involving many motor vehicles? I think not. We have the very large Westfield Mall to the east of the proposed development, which already brings many cars every day. How many more shops and restaurants can the present area of University City support? We have to consider the threat to clean air all this would entail for greater San Diego.
- P5 ☐ For all these reasons, I believe it would be extremely unwise to approve the above renovation of Costa Verde shopping center.
- Yours truly,
- Lucy Lehman
8515 Costa Verde Blvd.
apt. 1655
San Diego, CA 92122

- P1 The Commenter's objections to the Project and introductory comments are noted. The comment does not address the adequacy of the draft EIR and no further response is necessary.
- P2 Construction-related impacts are detailed in applicable sections of the draft EIR. Section 5.4, *Air Quality*, addresses both respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}), which are the forms of dust associated with potential health effects (see Section 5.4.1.2). As shown in Table 5.4-5, construction emissions of these pollutants would be substantially below the screening thresholds that have been established by the San Diego Air Pollution Control District to protect the public's health and welfare. Emissions of toxic air contaminants, including diesel particulate matter, during construction also would be less than significant (page Section 5.4.4.2).
- P3 The economic viability of a hotel and additional shops and restaurants is an economic consideration not required to be addressed under CEQA. The anticipated transportation significant impacts are detailed in draft EIR Section 5.2, *Transportation/Circulation*. Mitigation measures would reduce impacts at five intersections and one metered freeway ramp to below a level of significance; however, traffic impacts at four intersections, six roadway segments, three freeway segments, and one metered freeway ramp would remain significant and unmitigated after implementation of feasible mitigation measures.
- P4 As noted in the response to Comment P2, impacts related to air quality are described Section 5.4 of the draft EIR. As described therein, the Project is not expected to result in significant construction or operational air quality impacts.
- P5 Comment noted.

From: Lance Parker <parkeld@gmail.com>
Sent: Friday, April 24, 2020 9:23 AM
To: DSD EAS
Subject: [EXTERNAL] Subject line: Costa Verde Revitalization Project No. 477943

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Q1

I'm very disappointed that the housing units were removed from this project. This neighborhood has too many jobs and not enough housing, and this would make that disparity worse. The fact that there are residential units next door does not change the fact that UTC area is a huge morning commute traffic snarl due to our housing shortage. One new job per new housing unit would be a helpful compromise.

Lance Parker
Resident, property owner at 4175 Camino Islay, San Diego, CA 92122.

Q1

Commenter's preference for inclusion of housing in the project is noted. An alternative that includes housing, referred to as the Retail, Hotel, and Residential Alternative, is addressed in the draft EIR Section 8.4.2.

From: Louis Rodolico <lourodolico@yahoo.com>
Sent: Tuesday, April 28, 2020 1:19 PM
To: Bethany, Terek; SDAT City Attorney; San Diego Ethics Commission; Faulconer, Mayor Kevin; Barbara Bry; will@mooreforisd.com; Joe LaCava
Cc: DSD PlanningCommission; randy.wilde@asm.ca.gov
Subject: [EXTERNAL] Comments Costa Verde Shopping Center Expansion
Attachments: University Cities Unfinished Roads Map-WF+CV.jpg; 2010-04-6 Costa Verde Expansion, DEIR Comments, Rodolico.pdf

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

- R1 ☐ All:
The majority of South UC residents are disqualified from participation on the local planning group. West UC residents did not want the traffic associated with the Regents Road Bridge but the big retailers at the East end of UC on Genesee wanted to drive as much traffic as possible to their stores. The two parties got together and with their lobbyists, took over the planning group and for the past 10 years fixed elections to keep anyone east of Genesee from being voted onto their board. I got involved in local politics in 2015. What I did not know at first was that my location in East UC and my position on the Regents Road Bridge disqualified me from participation. I picked up on the hate right away eventually realizing it was necessary to keep eyes diverted away from the retailers on Genesee.
- R2 ☐ If you approach legal with this they will warn you that the city is vulnerable and much like seat belts in the 60's they will advise you not to try and change the status quo. The Costa Verde project should not go forward until the roads are completed.
- Thank You
Louis Rodolico
- Attachments: Comments & Graphic

- R1 Comments regarding participation in the University Community Planning Group do not pertain to the adequacy of the draft EIR; therefore, no further response is necessary.
- R2 Commenter's preference regarding timing of project implementation is noted. Refer to response to Comment E72 regarding previous removal of the Regents Road Bridge from the University Community Plan's Transportation Element through a City Council vote on December 5, 2016.

Costa Verde Shopping Center Expansion Comments

Number 477943 / SCH No. 2016071031

April 26, 2020

Louis Rodolico, UCPG Sub-Committee

Parking Garage Serving as Conflagration Shelter

Genesee is the only main road that has been completed in South UC. Both Regents Road and the Governor to Gilman connector have not been built. This leaves UC South with no west exit and only one north exit at Genesee during a conflagration. Thousands from South UC and Clairemont will find themselves heading North on Genesee seeking refuge. The Costa Verde parking garage is a very durable structure and is a prime candidate to become a conflagration shelter. We should ask the city to have Costa Verde address this during the design of the garage. Things like built in in roll down doors and ventilation that will allow several thousand people to survive for 12 hours or so. There will be logistical issues like; do excess cars go in the garage and which neighborhoods are assigned to which structures during a conflagration. Police & MTS should have an online plan available.

I am hopeful they will modify their garage to serve as a Conflagration Shelter. When asked CV gave an answer reminiscent of automobile manufacturers in the 1960's when it came to seat belts. In the 1970's property owners resisted handicapped considerations making the same type of claim that CV made when it comes to the new parking lot serving as a Conflagration Shelter. Basically: not our problem.

I would argue that retailers on Genesee created the problem by financing the removal of roads in UC (See attached E-Mail string). Being responsible parties they should participate in mitigation for the removal of the Regents Road Bridge. Conflagration aka Emergency Shelters are a good start for all the big garages on Genesee.

Residents seeking refuge should not be locked out of parking garages.



THE CITY OF SAN DIEGO
Emergency Shelter

Parking

The trolley mass transit discount has been used as evident by Appendix B, PDF Page 210 Abstract: *"The minimum required parking rates for the proposed project are based on the standards outlined in the City of San Diego Land Development Code (LDC, Chapter 14, Article 2 and Division 5).....Given that the proposed Mid-Coast trolley line will front the project, the following "transit" minimum parking rates (attached in Appendix V) were used in this parking analysis:*

- Retail: 4.3 spaces/1,000 SF within a transit area
- Scientific R&D: 2.1 spaces/1,000 SF within a transit area
- Office: 2.9 spaces/1,000 SF within a transit area
- Hotel: 1 space/room"

R3

Commenter's preference that the project's proposed parking garage serve as a conflagration shelter is noted. As the comment does not pertain to the adequacy of the draft EIR, no further response is necessary.

R4

As Commenter notes, the minimum required parking rates for the Project are consistent with Chapter 14, Article 2, and Division 5 of the San Diego Municipal Code for projects located within a Transit Priority Area. In addition to the Trolley currently under construction, the project site is adjacent to the existing UTC Transit Station. As described in the draft EIR Section 3.2.6, while the minimum required number of parking spaces is 1,837, the Project proposes up to 2,076 spaces.

Comments regarding the design of the parking garage are noted, but do not address the adequacy of the document; therefore, no response is required.

R4 cont.	<p>The effects of the trolley will not be known for some time so the proposed parking garage may be inadequate. They appear low see attached section of the municipal code 14,2,5,35. Research 2.5 v 2.1 for transit area. In general transit areas need 85% of minimum parking but 93% of users are expected to arrive by car. Costa Verde may want to increase parking in order to secure permits for special events in the future and cover themselves in the event that their parking assumptions were low. This will be the last time for the foreseeable future that CV will be able to improve the site. If there is an overabundance of parking then building the garage as a flat plate will allow for other commercial uses. If the parking assumptions were too low then street parking in the area will need to go permit and or meter.</p>	<p>R5 The comment regarding time delays and increased traffic associated with implementation of the Project is noted. Refer to response to Comment E72 regarding previous removal of the widening of Genesee Avenue and extension of Regents Road from the University Community Plan's Transportation Element.</p>
R5	<p><u>Traffic</u></p> <p>The DEIR shows time delays and increased traffic volume. When the project is completed the added traffic will bring up the widening of Genesee and or building all planned UC roads.</p>	<p>R6 Impacts related to dust and noise are considered in the draft EIR. Noise impacts from demolition, grading, and building construction associated with the Project are discussed in Section 5.7.2.2 of the draft EIR. As described in that section, the Project would comply with the City's construction noise limits of 75 dBA _{Leq} (12-hour) with implementation of mitigation measures NOI-4 and NOI-5. These measures provide a description of possible scenarios for sound attenuation barrier construction. Consistent with CEQA requirements, however, mitigation measures are performance-based, such that other measures could be employed if they are demonstrated to reduce the noise levels to the allowable limit. These measures would reduce impacts to below a level of significance.</p>
R6	<p><u>Dust & Noise</u></p> <p>In San Diego dust and noise barriers are considered well after the EIR has been approved. This should change. Both dust and noise barriers should be clearly outlined in a separate appendix, along with details showing; barrier types, where they would be located and how they would be maintained.</p>	<p>Section 5.4, <i>Air Quality</i>, of the draft EIR addresses both respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}), which are forms of dust. As shown in Table 5.4-5, construction emissions of these pollutants would be well below the level of significance. With regard to larger-particle fugitive dust (i.e., that would be visible), the Project would be required to comply with San Diego Air Pollution Control District Rule 55, as noted in Section 3.3 of the draft EIR. This rule requires measures to control dust and prohibits discharge of visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60-minute period. Because the Project would comply with applicable regulations and would result in less-than-significant impacts, no mitigation (including installation of barriers for dust control) is required.</p>
R7	<p><u>Closing Streets and Sidewalks</u></p> <p>At the DEIR phase design professionals usually allow a budget for utility tie-ins but have not hired the engineers necessary to tell them exactly what needs to be done.</p> <p>During the midst of a hectic and complicated project like this any sub-contractor can go down to Development Services and pull a permit that allows them to close off a street or sidewalk. Owners do not always track everything. Development Services issues permits at little cost that can close off street lanes and sidewalks for several months. It is not uncommon for the builders to leave their barriers up during extended periods of inactivity. Not all of these disruptions will be known in advance but they still need to be addressed from a community interference standpoint. A separate appendix makes sense here as well.</p> <p>Municipalities that value minimizing disruption handle it by having a fixed cost for blocking off a sidewalk or street lane at say \$2,000 and then a cost per square foot over time say 20 cents per square foot per day determined by the size of the blocked off area, with a minimum of say \$1,000 per day. With this builders get in and out fast resulting in minimal disruption to the community. Every contractor will know this before they bid and it should be included in contracts between the owner and contractors at all levels.</p> <p>This will also cover additional connections that are currently unknown and existing utilities being in a location not shown on record as-built documents, which was a problem with the trolley. Ask SANDAG.</p>	

R7	<p>Comments regarding potential closures of streets and sidewalks during project construction are noted. As described in the draft EIR Section 3.3, construction-related traffic control plans (which would include pedestrian and bicycle traffic) would be reviewed and approved by the City Engineer prior to construction activities for all phases. The traffic control plans would ensure that appropriate access remains available. The establishment of fees for sidewalk and street closures is beyond the purview of this EIR and does not address the adequacy of this document; therefore, no response is necessary to this issue.</p>
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• RE: EIR Funding Source?

People  

Monroe, Daniel <DMMonroe@sandiego.gov>

03/30/16 at 12:49 PM

To: Louis Rodolico

Hi Louis,

The traffic analysis and associated environmental analysis are being funded through a contribution of \$500,000 by Westfield UTC as a condition of their permit for the Revitalization Plan. Here is the actual wording in the resolution approving use of these funds for this effort. I've also attached the complete City Council Resolution.

"WHEREAS, funding from developer contributions, specifically the University Towne Center Master Planned Development Permit No. 4103/Site Development Permit No. 293783, Condition 118, a contribution of \$500,000 toward the preparation of a mobility plan for the University Community area, has been identified for the purpose of developing the scope of work and costs for the technical and environmental analyses required to complete the CPA; NOW,"

Dan Monroe

Senior Planner

City of San Diego

Planning Department

1010 Second Ave, Suite 1200 East Tower, MS 413

San Diego, CA 92101

T (619) 236-5529

dmmunroe@sandiego.gov

From: Louis Rodolico [mailto:lourodolico@yahoo.com]

Sent: Wednesday, March 30, 2016 12:42 PM

To: Monroe, Daniel <DMMonroe@sandiego.gov>

Subject: EIR Funding Source?

Dan:

What is the source of funding for the Traffic Study EIR?

Thank you

Louis Rodolico

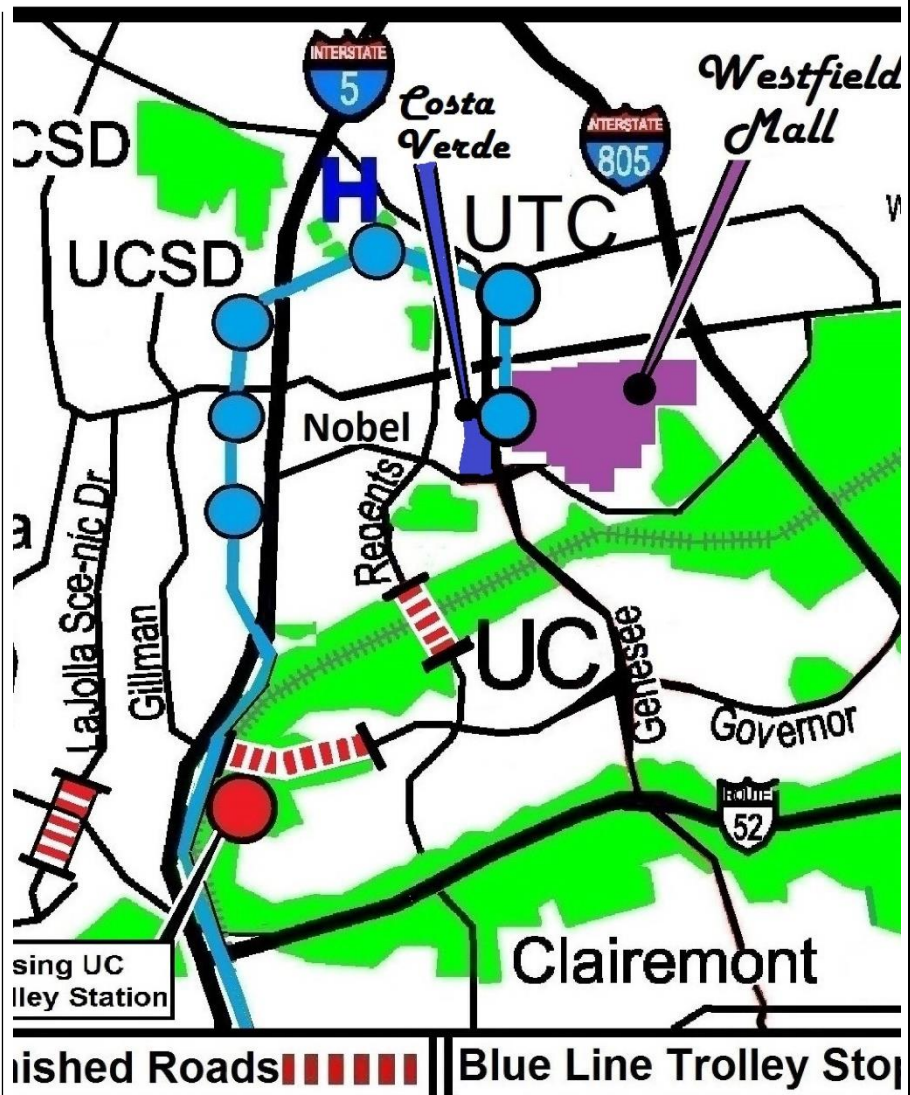
Use	Parking Spaces Required per 1,000 Square Feet of Floor Area Unless Otherwise Noted (Floor Area Includes Gross Floor Area plus below Grade Floor Area, and Excludes Floor Area Devoted to Parking)		
Required Automobile Parking Spaces ⁽¹⁾			
	Minimum Required Outside a Transit Area or Transit Priority Area	Minimum Required Within a Transit Area or Transit Priority Area ⁽²⁾	Maximum Permitted
Distribution and Storage ⁽⁴⁾			
All distribution and storage uses	1.0 ⁽⁵⁾	1.0 ⁽⁵⁾	4.0
Self Storage Facilities	1.0 space/10,000 sq ft plus 3.3 space per 1,000 square foot of accessory office space	N/A	N/A
Industrial			
Heavy Manufacturing (except in IS Zone)	1.5 ⁽⁶⁾	1.5 ⁽⁶⁾	4.0
Light manufacturing (except in IS Zone)	2.5 ⁽⁶⁾	2.1 ⁽⁶⁾	4.0
Research & development (except in IS Zone)	2.5	2.1	4.0
All industrial uses in the IS Zone	1.0 ⁽⁵⁾	1.0 ⁽⁵⁾	4.0

Footnotes For Table 142-05G

- ¹ Parking spaces for carpool vehicles and zero emissions vehicles are required in accordance with Section 142.0530(d). Bicycle parking is required in accordance with Section 142.0530(e).
- ² *Transit Area or Transit Priority Area.* The *transit area or transit priority area* minimum parking ratios apply in the *Transit Area Overlay Zone* (Chapter 13, Article 2, Division 10), *transit priority areas*, and in the *Urban Village Overlay Zone* (Chapter 13, Article 2, Division 11).
- ³ In the beach impact area, one parking space per *guest room* or 5.0, whichever is greater.
- ⁴ Accessory Retail Sales, Commercial Services, and Office Uses. On-site accessory retail sales, commercial services, and office uses that are not open to the public are subject to the same parking ratio as the primary use.
- ⁵ *Alley Access.* For properties with *alley* access, one parking space per 10 linear feet of *alley* frontage may be provided instead of the parking ratio shown in Table 142-05G. Within the beach impact area of the Parking Impact Overlay Zone, application of this policy shall not result in a reduction of required on-site parking.



Louis Rodolico



Costa Verde Shopping Center Revitalization DEIR

Comment: Costa Verde Revitalization: #477943 / SCH #2016071031 Louis Rodolico

S1 It has been pointed out that this project is more of an expansion than a revitalization. I am in favor of planned sensible development but we should complete the University road system first before we expand any facility. Which would include construction of the Regents Road Bridge and connecting Governor to Gillman as originally planned.

S2 On the previous version of the Costa Verde (CV) revitalization a few years ago, the primary concerns expressed by the Planning Sub-Committee and the public included; traffic, parking, safety of pedestrian access, construction dust, operational noise, visual resources, community character, air quality and inclusion of a hotel and housing. Three years ago the Planning Sub-Committee did not want to remove existing services like the Car Wash and McDonalds. They wanted these services not more housing. Not everyone on the Committee agreed with a new Hotel. The Hotel alternate is noted as up to 10 stories but the rendering shows 6 stories, DEIR pdf page 104. Operationally, we have consistently heard that 200 rooms is a minimum in order for a hotel to see a profit.

S4 To Costa Verde's credit they did provide underground parking, kept the car wash and McDonalds and moved the high rise buildings away from the Vi. All things the sub-committee asked for a few years ago. Also Costa Verde was floundering a few years ago and seems to have found a viable partner in Alexandria.

Traffic & Parking

The trolley mass transit discount has been used as evident by Appendix B, PDF Page 210 Abstract: *"The minimum required parking rates for the proposed project are based on the standards outlined in the City of San Diego Land Development Code (LDC, Chapter 14, Article 2 and Division 5).....Given that the proposed Mid-Coast trolley line will front the project, the following "transit" minimum parking rates (attached in Appendix V) were used in this parking analysis:*

- ☐ *Retail: 4.3 spaces/1,000 SF within a transit area*
- ☐ *Scientific R&D: 2.1 spaces/1,000 SF within a transit area*
- ☐ *Office: 2.9 spaces/1,000 SF within a transit area*
- ☐ *Hotel: 1 space/room"*

S5 There needs to be much more underground parking. Too little parking will result in employees parking in the neighborhoods which is what is happening at Westfield. Westfield Mall is the source of much of our local corruption. There should be much more Costa Verde underground parking, of flat plate construction, which can be converted into commercial space, in the event we ween ourselves off of owning cars

S6 The effects of the trolley will not be known for some time so the proposed parking garage may be inadequate. Parking appears low see section of the municipal code 14,2,5,35. Research 2.5 v 2.1 for transit area. In general transit areas need 85% of minimum parking but 93% of users are expected to arrive by car. Costa Verde may want to increase parking in order to secure permits for special events in the future and cover themselves in the event that their parking assumptions are low. This will be the last time for the foreseeable future that CV will be able to improve the site. If there is an overabundance of parking then building the garage as a flat plate will allow for other commercial uses. If the parking assumptions were too low then street parking in the area will need to go permit and or meter. Like all recent University engineering traffic reports

S1 Commenter's introductory remarks are noted. Please refer to the response to Comment R5 regarding the University community roadway network.

S2 Comments regarding the previously proposed project are noted. As they do not pertain to the adequacy of the current draft EIR, no further response is necessary.

S3 It should be noted that a hotel is included as an element of the Project, as well as two of the build alternatives. The rendering reflects the plans as submitted by the applicant to the City at the time of preparation of the Draft EIR and is intended for illustrative purposes only. The hotel is described and analyzed throughout the draft EIR based on a maximum allowable height of 135 feet.

S4 Comments regarding perceived improvements to the proposed project are noted; as they do not pertain to the adequacy of the current draft EIR no further response is necessary.

S5 Please refer to the response to Comment R4 regarding proposed parking.

S6 Refer to response to Comment E72 regarding previous removal of the Regents Road Bridge from the University Community Plan's Transportation Element. The draft EIR and Transportation Impact Analysis (Appendix B) analyze potential significant impacts that would be expected to occur on the existing and planned roadway network with the addition of Project traffic.

S6 cont.	<p>this one ignores how the addition of the Regents Road Bridge would save lives by relieving traffic and improving ambulance service times. Demonstrating once again Universities history of, secrecy, corruption and lobbyist's domination of local government. The folly of not completing Universities road system is addressed several times in this document.</p> <p>There is also no mention of improving the Costa Verde Blvd & Las Palmas Square intersection which has been flagged by residents as dangerous. Las Palmas Square and the exit to the shopping center are too close, there have been many accidents. These 2 streets should be combined into one common controlled approach to Costa Verde Blvd.</p>	S7	The Project does not propose any changes to the existing Las Palmas driveway on Costa Verde Boulevard. Las Palmas Square is a one-way southbound private driveway that serves the adjacent Vi development and not the Costa Verde project. Vehicles exiting Las Palmas Square are only allowed to turn right out of this driveway, which does not conflict with turning movements for the adjacent the Costa Verde driveway.
S7		S8	Refer to the response to Comment R3 regarding potential use of the proposed parking garage as a conflagration shelter.
S8	<p><u>Parking Garage Serving as Conflagration Shelter</u></p> <p>Genesee is the only main road that has been completed in South UC. Both the Regents Road Bridge and the Governor to Gilman connector have not been built. This leaves UC South with no west exit and only one north exit at Genesee. During a conflagration thousands from South UC and Clairemont will find themselves heading North on Genesee seeking refuge. The Costa Verde parking garage is a very durable structure and is a prime candidate to become a conflagration shelter. We should ask the city to have Costa Verde address this during the design of the garage. Things like built in in roll down doors and ventilation that will allow several thousand people to survive for 12 hours or so. There will be logistical issues like; do excess cars go in the garage and which neighborhoods are assigned to which structures during a conflagration. Police & MTS should have an online plan available.</p> <p>I am hopeful CV will modify their garage to serve as a Conflagration Shelter. When asked CV gave an answer reminiscent of automobile manufacturers in the 1960's when it came to seat belts. Basically: not our problem. In the 1970's property owners resisted handicapped considerations making the same type of claim that CV made when it comes to the new parking lot serving as a Conflagration Shelter. Basically: not our problem.</p> <p>I would argue that retailers on Genesee created the problem by financing the removal of roads in UC (See attached E-Mail string). Being responsible parties they should participate in mitigation for the removal of the Regents Road Bridge. Conflagration aka Emergency Shelters are a good start for all the big garages.</p> <p>Residents seeking refuge should not be locked out of parking garages.</p>	S9	Comments regarding potential closures of streets and sidewalks during project construction are noted. As described in the draft EIR Section 3.3, construction-period traffic control plans (which would address pedestrian and bicycle traffic) would be reviewed and approved by the City Engineer prior to construction activities for all phases. The traffic control plans would ensure that appropriate access remains available, therefore, impacts related to the increase of traffic hazards would be expected to be less than significant. The design of the site reflects the site's topography and does not provide an opportunity for pedestrian traffic to be placed over parking garage entries and exits. Pedestrian paths are illustrated on Figure 3-5, Circulation Plan, of the draft EIR.
S9	<p><u>Pedestrian Safety</u></p> <p>Construction should not impinge on existing roads and sidewalks. These considerations do not appear in this DEIR. Construction impingements on pedestrians harm the community and conflict with mass transit. With past projects these considerations have been addressed during the final permitting stage, where there is no community advocate. In the past builder compliance has lacked actual oversight. Also given this is a sloped site there are opportunities to give pedestrians the option to walk over traffic at parking garage vehicular entries and exits. Provide an additional appendix showing pedestrian paths for community review.</p>	S10	The City's Mitigation Monitoring Coordination staff are responsible for enforcement of mitigation measures, as detailed in Chapter 9.0, <i>Mitigation, Monitoring and Reporting Program</i> , of the draft EIR. Please refer to the response to Comment R6 regarding dust, noise, and air quality controls.
S10	<p><u>Dust, Noise, Air Quality</u></p> <p>Lowest bid wins, controls on these items are often trimmed from construction budgets. Violations are fleeting but can have long term consequences. The only option for residents is to pay for ongoing expensive technical monitoring to identify violations. That just doesn't happen. These items should be clearly addressed with; actual government oversight, fines and apologies delivered directly to residents. Provide an additional appendix showing types and locations of, dust, noise and air quality proposals, for community evaluation.</p>		

Unfinished Road System Effect Public Safety

The lack of completed roads in UC slows emergency vehicles and kills seven additional residents each year. Residents fleeing a conflagration will be concentrated heading north on Genesee fleeing a conflagration. The new Costa Verde parking garage should be designated as a conflagration shelter regardless.

If this project goes forward the added traffic will likely bring up widening Genesee to 6 lanes. Westfield's lobbyists want all traffic funneled up Genesee to Westfield's stores and pay-for parking garage. Lobbyists will press fire officials to testify in favor of 6 lanes, once again dangling fire fighter pensions, which were taken away in 2012, after fire officials testified to build the Regents Road Bridge in 2006. After losing their pensions in 2012 Fire officials learned their lesson and in 2016 did not testify at city council about public safety and the Regents Road Bridge. Like the rest of us fire officials have seen how lobbyists dominate San Diego government and the media. Also lobbyists are practiced at managing; planners law enforcement and the judiciary.

The Costa Verde Revitalization is likely going to be a large project with mixed community support. From a public safety standpoint it should not be built until parking is resolved and all roads are completed in University.

louisrodolico.com



Previous Costa Verde Article, March 2018 Clairemont Times, page 11:

https://issuu.com/theclairemonttimes/docs/clairemont_times_march_2018

2016 Regents Road Bridge Council Hearing

http://granicus.sandiego.gov/MediaPlayer.php?view_id=3&clip_id=6835

Universities Unfinished Roads; <https://clairemonttimes.com/universities-unfinished-roads-and-missing-train-station/>

S11 Refer to the response to Comment R3 regarding potential use of the proposed parking garage as a conflagration shelter and the response to Comment R5 regarding the University community's roadway network. The widening of Genesee Avenue to six lanes south of Nobel Drive is not proposed as a mitigation measure for the Project.

S12 Comments regarding potential community support for the Project are noted. Refer to the responses to Comment R5 regarding parking and Comments R6 and R11 regarding the community's roadway network. Articles regarding prior projects are noted; however, as they do not pertain to the adequacy of the draft EIR, no further response is necessary.

Versions of the following article have been published in multiple media outlets; Costa Verde is mentioned in several of them but not this one:

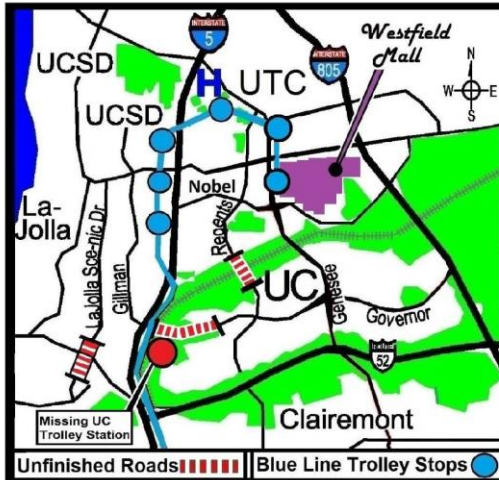
Published in Clairemont Times December 2019
page 11, reformatted as 8 1/2 x 11:

The Clairemont Times

Universities Unfinished Roads and Missing Train Station

Opinion: Louis Rodolico

In our area there are 3 unfinished roads. Which are represented in the graphic by the red and white dashed lines. City planning maps also showed a train station at the location of the red dot.



In 2000 the Governor to Gilman connection was taken off the plan in the run-up to the design of the Blue Line Trolley. Without this road SANDAG did not provide a west UC train station with the new Blue Line Trolley. Most trolley stops are a mile or two apart, the distance between Nobel and Balboa is 5 miles.

The Friends of Rose Canyon was created in the run-up to the 2006 Regents Road Bridge vote. This first attempt to remove the Regents Road Bridge failed, largely due to the extensive testimony of fire officials.

UCPG membership then came under control of well paid lobbyists and to this day the two thirds of the community who want the bridges built are systematically banned from their local community planning board.

In 2008 two rookie politicians Todd Gloria and Sherri Lightner were swept into office. Both were from districts with a Westfield Mall. Eager to please, the pair got control of a transportation subcommittee that voted against the Regents Road Bridge in 2010. Both Gloria and Lightner sat on the SANDAG board.

Unlike in 2006, public safety officials did not testify in 2016 during the second and successful attempt to take the Regents Road Bridge off the plan. Westfield Mall paid half a million dollars for an EIR which excluded ambulance service times (See Link). Ever careful to keep the bridge off the ballot, lobbyists pitted neighbor against neighbor, diverting eyes away from Westfield.

Westfield wanted something in return for agreeing to use union labor for its 600 million dollar expansion. What they got was all traffic funneled up Genesee to their new stores, cheating the shopping centers on Regents Road. Also by not building the west UC train

S12
cont.

S12
cont.

station Westfield's new parking structure will harvest south UC trolley commuters. Not finishing our road system increases driving miles by forcing residents onto freeways to travel within their own community adding millions of pounds of carbon to the atmosphere each year, along with wasted man hours and gasoline. Ambulance service times and risk to first responders are increased, conflagration egress paths removed along with bike and pedestrian access.

Many tell me "Lou University bridges are a dead issue" In one aspect they are correct. Based on county statistics, these missing roads/bridges delay ambulances proving fatal for 7 of us each year.

Unfortunately we cannot trust a foreign owned corporation like Westfield to put our safety above their profits. We need more transparency and less corporate dominance of government.

louisrodolico.com

Link: http://www.louisrodolico.com/uploads/7/5/2/2/75221087/dif_exhibits.pdf

End of Article

Closing Streets and Sidewalks

At the DEIR phase design professionals usually allow a budget for utility tie-ins but have not hired the engineers necessary to tell them exactly what needs to be done.

During the midst of a hectic and complicated project like this any sub-contractor can go down to Development Services and pull a permit that allows them to close off a street or sidewalk. Owners do not always track everything. Development Services issues permits at little cost that can close off street lanes and sidewalks for months. It is not uncommon for the builders to leave their barriers up during extended periods of inactivity. Not all of these disruptions will be known in advance but they still need to be addressed from a community interference standpoint. A separate appendix makes sense here as well.

Municipalities that value minimizing disruption handle it by having a fixed cost for blocking off a sidewalk or street lane at say \$2,000 and then a cost per square foot over time say 20 cents per square foot per day determined by the size of the blocked off area, with a minimum of say \$1,000 per day. With this builders get in and out fast resulting in minimal disruption to the community. Every contractor will know this before they bid and it should be included in contracts between the owner and contractors at all levels.

This will also cover additional connections that are currently unknown and existing utilities being in a location not shown on record as-build documents, which was a problem with the trolley. Ask SANDAG.

Conservancy Groups Harming Humans

Civilization is losing it's ongoing war with conservancy groups. Recently a pure water manager lied to the public and kept high pressure sewage lines out of canyons and on public streets, where if there is a failure people will be in harm's way. He was rewarded with a prestigious position at the Zoo. There is an ongoing pattern with conservancy groups; of harming humans to avenge nature. Not building bridges in University harms humans by delaying ambulances killing seven each year. Harming humans has become a badge of honor. If scores perish during a conflagration because of the lack of roads will that be a private another point of pride for conservationists? Conservancy groups are trying to eradicate Campland which is an affordable vacation venue. Conservancy groups

S13

Refer to the response to Comment R7 regarding potential street and sidewalk closures during project construction.

S14

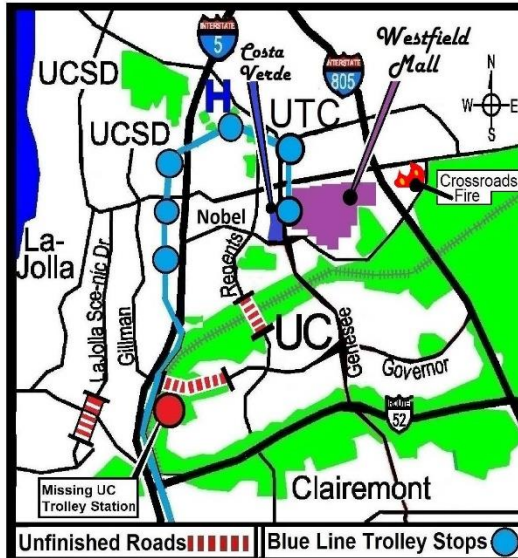
Comments do not address the adequacy of the draft EIR and no further response is necessary.

torched crossroads an affordable housing complex. Conservancy groups are bastions of white privilege and there was fear of the brown and black "other" coming to University if the Regents Road Bridge were built. There is no statute of limitations on crimes involving the killing of humans. You should engage with experts on human behavior and stop cow toying to conservancy groups even if they do threaten to torch your next project. Stop playing the coward.

Corruption in University

There are three uncompleted bridges in our area shown as the red and white striped roads on this map. For decades the big retailers on Genesee have financed closing down roads so all commuters are funneled up Genesee to their stores. We know they worked secretly with lobbyists, keeping the details of their meetings from the public eye and pitting neighbor against neighbor.

To the victors go the spoils. In this case the spoils are all traffic and therefore customers funneled up Genesee. The losers are the shopping centers on Regents Road and all residents saddled with additional traffic loads in east UC. Westfield paid a half million for an Environmental Impact Report to remove the Regents Road Bridge. A report that somehow did not include ambulance service times. Many tell me that the Regents Road Bridge is a dead issue, they are correct since, according to county statistics, 7 of us die prematurely each year due to extended emergency vehicle service times.



When the Regents Road Bridge was taken off the plan mitigation measures like conflagration egress were identified. Thousands of residents will be heading north on Genesee seeking refuge during a conflagration.

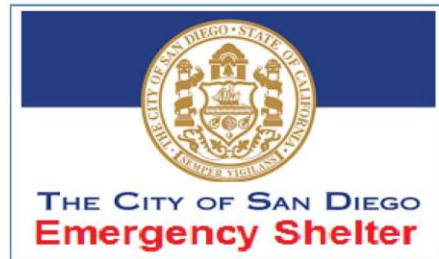
There will soon be three large concrete parking garages at Nobel and Genesee which should remain open as emergency conflagration shelters. Well paid lobbyists are trying to stop it. Lobbyists have loyalty to their benefactors' not public safety.

A conflagration shelter is not a wish for a fire. Like the hydrants on your street it is preparation for a fire. If you and your family are fleeing a conflagration your destination should be a San Diego Emergency Shelter.

S14
cont.

Today branches of municipal and federal government are unable to adequately respond to public safety measures. The state of California has performed best at maintaining a balanced moral center.

Since only one of the three major roads have been completed in UC south every parking garage at Nobel and Genesee should have this city sign to the right prominently displayed.

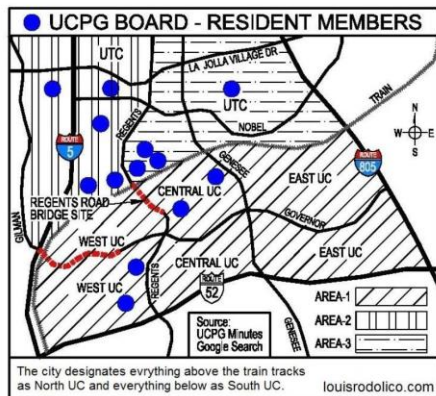


Well paid lobbyists ran the CV transportation committee and wrote the UCPG community response for the new Costa Verde Expansion. In service of their client lobbyists rejected public safety recommendations including making the new parking garage at Costa Verde a conflagration shelter. Why did lobbyists write the community UCPG response anyway?

Most residents believe that key Costa Verde decisions have already been made. Lobbyists get a piece, more development without roads endangers us further, while municipal managers remained stunned and ineffective from the 50 million dollar crossroads eco-terrorists fire. The private apologies from municipal managers fall hollow.

Maybe start with something small. I live in South East UC Area 1. I became involved in

local politics in 2015. I was told then because I lived in South East UC there is no way the lobbying firm Friends Of Rose Canyon would allow anyone from Southeast UC to get any vote on the community planning group. They were right, lobbyists have made lucrative arrangements and no one from Southeast UC has been on the UCPG board for over ten years. Our Planning Group excluded 2/3 of the community because of their support for the Regents Road Bridge, this is what can happen when we try to privatize democracy. The map to the left shows where UCPG members live and you can see East



UC has no sitting board member. Even having a vote on a sub-committee is something lobbyists will fight. It's not personal it's about money.

So here is a possible step, make; West, Central and East UC separate UCPG voting districts so someone from East finally has a vote. Lobbyists directly control UCPG

S14
cont.

S14
cont.

membership and they will fight it since I believe their compensation is linked to annexing East UC residents from the UCPG board.

I am a UCPG non-board member and when I tried to get on the Costa Verde sub-committee the UCPG chair lied about a rule that excluded me from the sub-committee. The chair pointed to a rule I proved does not exist. Planning managers tacitly approved of my exclusion with their silence. With the path cleared a paid lobbyist wrote the community traffic response, removing public safety concerns that would cost Costa Verde money. For what it's worth I'll get a private apology later.



Epilogue: Law enforcement and the judiciary are helpless in the face of hate in University as evidenced by their inability to solve the 2003 Crossroads Fire. By 2004 this fire brought the lobbying firm The Friends of Rose Canyon (FORC) into power. FORC continues to run University to this day. Kruger and Lightner bailed immediately after removing the Regents Road Bridge from the plan in 2016, leaving well paid lobbyist Knight to tend corporate needs.

On one level you have to recognize Westfield's sophisticated use of 3 citizens with the perfect age, gender & race requirements; well paid lobbyists; Janay Kruger & Deborah Knight also council member Sherri Lightner. If there is a lawsuit the 3; white, female, septuagenarians can show up to court with; walkers, silver hair and starched doily collars....case closed.

Unfortunately public safety doesn't come first in University. Will municipal agents continue to remain stunned and ineffective from the crossroads fire? Will they continue to green light expansive projects like Costa Verde while ignoring the deadly effects of Universities incomplete road system?



Louis Rodolico

May 24, 2020

Additional Articles:

Collisions at Governor & Genesee

http://www.louisrodolico.com/uploads/7/5/2/2/75221087/collisions-at-governor-genesee-cut-branches_orig.jpg

Council Action to up "Granny Flats" La Jolla Light 9-14-17 Page 22

https://issuu.com/lajollalight2010/docs/la_jolla_light_09.14.17

Pure Water Project Stinks, and Added Costs Are White-Collar Crime

<https://timesofsandiego.com/opinion/2019/03/07/opinion-pure-water-project-stinks-and-added-costs-are-white-collar-crime/>

How Would Pasteur Heal Today's Body Politic?

<https://clairemonttimes.com/how-would-pasteur-heal-todays-body-politic/>

End Comment: Costa Verde Revitalization: #477943 / SCH #2016071031 Louis Rodolico

S14
cont.

• RE: EIR Funding Source?

People  

Monroe, Daniel <DMMonroe@sandiego.gov>

03/30/16 at 12:49 PM

To: Louis Rodolico

Hi Louis,

The traffic analysis and associated environmental analysis are being funded through a contribution of \$500,000 by Westfield UTC as a condition of their permit for the Revitalization Plan. Here is the actual wording in the resolution approving use of these funds for this effort. I've also attached the complete City Council Resolution.

"WHEREAS, funding from developer contributions, specifically the University Towne Center Master Planned Development Permit No. 4103/Site Development Permit No. 293783, Condition 118, a contribution of \$500,000 toward the preparation of a mobility plan for the University Community area, has been identified for the purpose of developing the scope of work and costs for the technical and environmental analyses required to complete the CPA; NOW,"

Dan Monroe

Senior Planner

City of San Diego

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dmmunroe@sandiego.gov

From: Louis Rodolico [mailto:lourodolico@yahoo.com]

Sent: Wednesday, March 30, 2016 12:42 PM

To: Monroe, Daniel <DMMonroe@sandiego.gov>

Subject: EIR Funding Source?

Dan:

What is the source of funding for the Traffic Study EIR?

Thank you

Louis Rodolico

From: MJ Tichacek <mtichacek@mac.com>
Sent: Tuesday, April 21, 2020 6:26 PM
To: DSD EAS
Subject: [EXTERNAL] Costa Verde Devitalization

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T1

Why are you pushing this through without public comment. There are long-term residents trying to live in the vicinity of Costa Verde and the quality of life continues to deteriorate with excess population density, traffic gridlock, noise, and decreased air quality to come. It is amazing there is so little regard for residents here. Are there not enough hotels in the area that we need one in our back yard? The developers and the city profit while decreasing the quality of life of long term residents. That is not right. Where is the regard for public input?

MJ Tichacek

T1

The City believes strongly in the importance of public input as part of the environmental review process. As a result, it extended its public review period for the Draft EIR from the required 45 days to a total of 75 days to provide additional opportunity for public comment. All comments received during the extended public review period are addressed in this Final EIR and will be presented to decision-makers for their consideration. The public will also have the opportunity to participate in public hearings with the Planning Commission and City Council prior to a final decision being made regarding the Project.

Impacts with regard to land use, traffic, noise, and air quality are addressed in detail in the EIR (Sections 5.1, 5.2, 5.7, and 5.4, respectively), and mitigation measures are specified in association with identified significant impacts. Concerns regarding economic activity (e.g., need for additional hotels or profits), are not themselves issues required to be addressed under CEQA.