

EXHIBIT F

MITIGATED NEGATIVE DECLARATION

F1 – Hyperlinks to published MND Documents

F2 – Mitigation Monitoring Program

F3 – SCAQMD Comment Letter

F4 – Supplemental Air Quality Analysis

F5 – Caltrans Comment Letter

EXHIBIT F1 – HYPERLINKS TO PUBLISHED MND DOCUMENTS

MITIGATED NEGATIVE DECLARATION

<https://planning.lacity.org/odocument/d8f26260-ffee-4c3e-afa3-f7eb716ffad6/ENV-2018-7330.pdf>

APPENDIX A: AIR QUALITY AND GHG IMPACT ANALYSIS

<https://planning.lacity.org/odocument/6a41bc69-e417-4601-ae69-585755ecd336/ENV-2018-7330-A.pdf>

APPENDIX B1: SACRED LANDS FILE SEARCH

<https://planning.lacity.org/odocument/381308a9-e0ab-4a5d-9833-dc22c2c3c309/ENV-2018-7330-B1.pdf>

APPENDIX B2: HISTORICAL/ARCHAEOLOGICAL RESOURCES RECORDS REVIEW

<https://planning.lacity.org/odocument/23797fe4-3e27-4fcb-97fb-1d35cfec6860/ENV-2018-7330-B2.pdf>

APPENDIX B3: TRIBAL CORRESPONDENCE

<https://planning.lacity.org/odocument/4c2e4421-dcdb-47cc-9ed7-0d74d44318b8/ENV-2018-7330-B3.pdf>

APPENDIX C: DOGGR CONSTRUCTION SITE WELL REVIEW AND RECORDS

<https://planning.lacity.org/odocument/500cd7ad-8011-44fb-a794-eb9635fa0f13/ENV-2018-7330-C.pdf>

APPENDIX D: MEMORANDUM ON PROPOSED AND ANTICIPATED OIL WELL AND METHANE MITIGATION MEASURES

<https://planning.lacity.org/odocument/d8a6dc12-5ad1-409e-a1b6-00f87c2a56f7/ENV-2018-7330-D.pdf>

APPENDIX E: PHASE I ENVIRONMENTAL SITE ASSESSMENT

<https://planning.lacity.org/odocument/e86b9245-c309-4d77-8ca5-470f0c6f7e76/ENV-2018-7330-E.pdf>

APPENDIX F: LADOT CORRESPONDENCE

<https://planning.lacity.org/odocument/fc4b7fbc-8a6e-49f3-bc88-31cd2bf43d24/ENV-2018-7330-F.pdf>

APPENDIX G: BOS WASTEWATER ENGINEERING SERVICES DIVISION CORRESPONDENCE

<https://planning.lacity.org/odocument/e97d2a82-b584-41ed-84f6-a30122df89f1/ENV-2018-7330-G.pdf>

APPENDIX H: TREE MEMORANDUM

<https://planning.lacity.org/odocument/d383865d-f02e-4585-a9ff-a872f419a75a/ENV-2018-7330-H.pdf>

MITIGATION MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring Program, Section 15097 of the *CEQA Guidelines* provides additional direction on mitigation monitoring or reporting). This Mitigation Monitoring Program (MMP) has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines. The City of Los Angeles is the Lead Agency for this project.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, this environmental document identified Project design features, regulatory compliance measures, or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Proposed Project. This Mitigation Monitoring Program (MMP) is designed to monitor implementation of the mitigation measures identified for the Project.

The MMP is subject to review and approval by the City of Los Angeles as the Lead Agency as part of the approval process of the project, and adoption of project conditions. The required mitigation measures are listed and categorized by impact area, as identified in the MND.

The Project Applicant shall be responsible for implementing all mitigation measures, unless otherwise noted, and shall be obligated to provide documentation concerning implementation of the listed mitigation measures to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.

As shown on the following pages, each required mitigation measure for the proposed Project is listed and categorized by impact area, with accompanying discussion of:

Enforcement Agency – the agency with the power to enforce the Mitigation Measure.

Monitoring Agency – the agency to which reports involving feasibility, compliance, implementation and development are made, or whom physically monitors the project for compliance with mitigation measures.

Monitoring Phase – the phase of the Project during which the Mitigation Measure shall be monitored.

- Pre-Construction, including the design phase
- Construction
- Pre-Operation
- Operation (Post-construction)

Monitoring Frequency – the frequency of which the Mitigation Measure shall be monitored.

Action Indicating Compliance – the action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure has been implemented.

The MMP performance shall be monitored annually to determine the effectiveness of the measures implemented in any given year and reevaluate the mitigation needs for the upcoming year.

It is the intent of this MMP to:

Verify compliance of the required mitigation measures of the MND;

Provide a methodology to document implementation of required mitigation;

Provide a record and status of mitigation requirements;

Identify monitoring and enforcement agencies;

Establish and clarify administrative procedures for the clearance of mitigation measures;

Establish the frequency and duration of monitoring and reporting; and

Utilize the existing agency review processes' wherever feasible.

This MMP shall be in place throughout all phases of the proposed Project. The entity responsible for implementing each mitigation measure is set forth within the text of the mitigation measure. The entity responsible for implementing the mitigation shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented.

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made by the Applicant or its successor subject to the approval by the City of Los Angeles through a public hearing. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the proto-typical nature of the MMP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

MITIGATION MONITORING PROGRAM

Hazards and Hazardous Materials

MM-1: The Applicant shall perform exploratory excavation to locate the seven potential abandoned oil wells located on the site

Enforcement Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once, at plan check

Action Indicating Compliance: Issuance of a building or grading permit

MM-2: The Applicant shall prepare and submit to DOGGR an Application for Construction Site Well Review and Notice(s) of Intention for any of the seven potential abandoned oil wells at the Site that a) DOGGR finds do not meet current abandonment standards or b) require lowering/raising to be at an acceptable depth below finished grade.

Enforcement Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once, at plan check

Action Indicating Compliance: Issuance of a building or grading permit

MM-3: The Applicant shall prepare a design for a methane mitigation system to be installed beneath the proposed building. The design shall conform to the provisions of the City of Los Angeles Ordinance No. 175,790 and applicable methane mitigation standards of the Los Angeles Department of Building and Safety.

Enforcement Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once, at plan check

Action Indicating Compliance: Issuance of a building or grading permit

MM-4: The Applicant shall abandon any oil wells identified at the site during the exploratory excavation according to the permit requirements of DOGGR. Some grading may need to be performed before well abandonment to allow access to the well(s) and room for well drilling and associate equipment.

Enforcement Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once, at plan check

Action Indicating Compliance: Issuance of a building or grading permit

MM-5: The Applicant shall install a Passive System regardless of the design methane concentration or the design methane pressures. The Passive System for this project shall include at minimum:

- A. A standard de-watering system;
- B. Sub-slab vapor collection and ventilation system that includes:
 - a. Perforated horizontal collection piping;
 - b. Permeable gravel blanket for soil gas migration of a minimum 2" thick;
 - c. Solid vent risers (amount and size are dependent on building size);
 - d. A complete impervious membrane (barrier) system. Since there are known oil wells on site, this barrier system will be a chemically compatible spray-applies product that covers the entire footprint of the proposed structure;
 - e. Trench dams and conduit seal fittings

Enforcement Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once, at plan check

Action Indicating Compliance: Issuance of a building or grading permit

MM-6: The Applicant shall conduct a subsurface methane investigation in accordance with Los Angeles Department of Building and Safety Document No. P/BC 2014-101 Site Testing Standards for Methane. The subsurface methane investigation shall include but is not limited to:

- A. Installation of three to four (3-4) gas probes set throughout the Site;
- B. Gas Probe Sets include probes at approximate depths of 5, 10, and 20 feet below ground surface or the lowest building slab elevation;
- C. Collection of methane soil gas and pressure measurements in the field.

The purpose of the subsurface methane investigation is to determine the level of methane concentrations that exist at the site, and the level of methane pressure (in inches water pressure) that exist at the site. The Applicant shall install an Active System and miscellaneous systems subject to the approval of the Los Angeles Department of Building and Safety ("LADBS"), including:

- A. An active mechanical extraction system (i.e., a fan pulling sub-slab air as opposed to active);
- B. Gas detection, alarm, and mechanical ventilation system on the lowest occupied spaces;
- C. A control panel for active/mechanical components;
- D. Additional vent risers.

Enforcement Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once, at plan check

Action Indicating Compliance: Issuance of a building or grading permit

MM-7: The Applicant shall locate, survey, and leak test each oil well. Further, should the development proceed, each well will receive ventilation and protection, including but not limited to.

- A. Locate: Each well must be located to verify that it is or is not within the Site boundaries;
- B. Survey: Each well must be surveyed, both horizontally and vertically, to provide the exact location of this well on the Site and its depth;
- C. Leak Tested: Following exposure, the top casing of each well must be leak tested in the field for excessive methane levels, with DOGGR personnel present to verify. If a well is determined to be leaking, reabandonment activities are likely necessary;
- D. Ventilation and protection: Each oil well that is to current abandonment standards, will require that a protection and ventilation cone be placed over the well cap (head). Attached to the vent cone will be a solid pipe vent riser that will terminate above breathing levels. This ventilation is a precautionary measure should the well ever begin to leak.

Enforcement Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department, Los Angeles Department of Public Works, Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once, at plan check

Action Indicating Compliance: Issuance of a building or grading permit

Regulatory Compliance Measures

In addition to the Mitigation Measures required of the project, and any proposed Project Design Features, the applicant shall also adhere to any applicable Regulatory Compliance Measures required by law. Listed below is a list of often required Regulatory Compliance Measures. Please note that requirements are determined on a case by case basis, and these are an example of the most often required Regulatory Compliance Measures.

AESTHETICS

- **Regulatory Compliance Measure RC-AE-1 (Hillside): Compliance with Baseline Hillside Ordinance.** To ensure consistency with the Baseline Hillside Ordinance, the project shall comply with the City's Hillside Development Guidelines, including but not limited to setback requirements, residential floor area maximums, height limits, lot coverage and grading restrictions.
- **Regulatory Compliance Measure RC-AE-2 (LA River): Compliance with provisions of the Los Angeles River Improvement Overlay District.** The project shall comply with development regulations set forth in Section 13.17.F of the Los Angeles Municipal Code as applicable, including but not necessarily limited to, landscaping, screening/fencing, and exterior site lighting.
- **Regulatory Compliance Measure RC-AE-3 (Vandalism): Compliance with provisions of the Los Angeles Building Code.** The project shall comply with all applicable building code requirements, including the following:
 - Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
 - The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15.
- **Regulatory Compliance Measure RC-AE-4 (Signage): Compliance with provisions of the Los Angeles Building Code.** The project shall comply with the Los Angeles Municipal Code Section 91.6205, including on-site signage maximums and multiple temporary sign restrictions, as applicable.
- **Regulatory Compliance Measure RC-AE-5 (Signage on Construction Barriers): Compliance with provisions of the Los Angeles Building Code.** The project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions:
 - The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: "POST NO BILLS".

- Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

AGRICULTURE and FORESTRY

AIR QUALITY

- **Regulatory Compliance Measure RC-AQ-1(Demolition, Grading and Construction Activities): Compliance with provisions of the SCAQMD District Rule 403.** The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
 - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
 - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
 - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
 - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
 - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
 - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
 - Trucks having no current hauling activity shall not idle but be turned off.
- **Regulatory Compliance Measure RC-AQ-2:** In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- **Regulatory Compliance Measure RC-AQ-3:** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- **Regulatory Compliance Measure RC-AQ-4:** The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

- **Regulatory Compliance Measure RC-AQ-5:** The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.
- **Regulatory Compliance Measure RC-AQ-6:** New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.
- **Regulatory Compliance Measure RC-AQ-7 (Spray Painting): Compliance with provisions of the SCAQMD District Rule 403.** The project shall comply with all applicable rules of the Southern California Air Quality Management District, including the following:
 - All spray painting shall be conducted within an SCAQMD-approved spray paint booth featuring approved ventilation and air filtration system.
 - Prior to the issuance of a building permit, use of land, or change of use to permit spray painting, certification of compliance with SCAQMD air pollution regulations shall be submitted to the Department of Building and Safety.
- **Regulatory Compliance Measure RC-AQ-8 (Wireless Facilities):** If rated higher than 50 brake horsepower (bhp), permit required in accordance with SCAQMD Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Initial Engines and SCAQMD Rule 1110.2 - Emissions from Gaseous- and Liquid- Field Engines.

BIOLOGY

- **(Duplicate of WQ Measure) Regulatory Compliance Measure RC-WQ-5 (Alteration of a State or Federal Watercourse):** The project shall comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the applicant shall consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance shall be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:
 - *United States Army Corps of Engineers.* The applicant shall obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory Division, 805-585-2148.
 - *State Water Resources Control Board.* The applicant shall consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6600.
 - *California Department of Fish and Wildlife.* The applicant shall consult with the Lake and Streambed Alteration Agreement Program and obtain a Streambed

Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSAA Program, 4949 Viewridge Avenue, San Diego, CA 92123, (858) 636-3160.

CULTURAL RESOURCES

- **Regulatory Compliance Measure RC-CR-1 (Designated Historic-Cultural Resource): Compliance with United States Department of the Interior – National Park Service – Secretary of the Interior’s Standards for the Treatment of Historic Properties.** The project shall comply with the Secretary of the Interior's Standards for Historical Resources, including but not limited to the following measures:
 - Prior to the issuance of any permit, the project shall obtain clearance from the Department of Cultural Affairs for the proposed work.
 - A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
 - The historic character of a property shall be retained and preserved. The removal of historic material or alteration of features and spaces shall be avoided.
 - Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other buildings, shall not be undertaken.
 - Most properties change over time; those changes that have acquired significance in their own right shall be retained and preserved.
- **Regulatory Compliance Measure RC-CR-2 (Archaeological):** If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed Modified Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.
 - Distinctive features, finishes and construction techniques or examples of skilled craftsmanship which characterize an historic property shall be preserved.
 - Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive historic feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
 - Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
 - Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

- New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.
- **Regulatory Compliance Measure RC-CR-3 (Paleontological):** If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.
- **Regulatory Compliance Measure CR-4 (Human Remains):** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
 - Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

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

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

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

GEOLOGY AND SOILS

- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.
- **Regulatory Compliance Measure RC-GEO-2 (Hillside Grading Area):** The grading plan shall conform with the City's Landform Grading Manual guidelines, subject to approval by the Advisory Agency and the Department of Building and Safety's Grading Division. Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
- **Regulatory Compliance Measure RC-GEO-3 (Landslide Area):** Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any landslide and soil displacement, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:
 - ground stabilization
 - selection of appropriate foundation type and depths
 - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures

The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- **Regulatory Compliance Measure RC-GEO-4 (Liquefaction Area):** The project shall comply with the Uniform Building Code Chapter 18. Division 1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:
 - ground stabilization
 - selection of appropriate foundation type and depths
 - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.

The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- **Regulatory Compliance Measure RC-GEO-5 (Subsidence Area):** Prior to the issuance of building or grading permits, the applicant shall submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The geotechnical report shall assess potential consequences of any subsidence and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.
- **Regulatory Compliance Measure RC-GEO-6 (Expansive Soils Area):** Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil expansion and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.
- **Regulatory Compliance Measure RC-GHG-1 (Green Building Code):** In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the 2013 Los Angeles Green Code and as it may be subsequently amended or modified.

HAZARDS AND HAZARDOUS MATERIALS

- **Regulatory Compliance Measure RC-HAZ-1: Explosion/Release (Existing Toxic/Hazardous Construction Materials)**
 - **(Asbestos)** Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.
 - **(Lead Paint)** Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint

materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

- **(Polychlorinated Biphenyl – Commercial and Industrial Buildings)** Prior to issuance of a demolition permit, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.
- **Regulatory Compliance Measure RC-HAZ-2: Explosion/Release (Methane Zone):** As the Project Site is within a methane zone, prior to the issuance of a building permit, the Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval.
- **Regulatory Compliance Measure RC-HAZ-3: Explosion/Release (Soil Gases):** During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures shall be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.
- **Regulatory Compliance Measure RC-HAZ-4 Listed Sites (Removal of Underground Storage Tanks):** Underground Storage Tanks shall be decommissioned or removed as determined by the Los Angeles City Fire Department Underground Storage Tank Division. If any contamination is found, further remediation measures shall be developed with the assistance of the Los Angeles City Fire Department and other appropriate State agencies. Prior to issuance of a use of land or building permit, a letter certifying that remediation is complete from the appropriate agency (Department of Toxic Substance Control or the Regional Water Quality Control Board) shall be submitted to the decision maker.
- **Regulatory Compliance Measure RC-HAZ-5 (Hazardous Materials Site):** Prior to the issuance of any use of land, grading, or building permit, the applicant shall obtain a sign-off from the Fire Department indicating that all on-site hazardous materials, including contamination of the soil and groundwater, have been suitably remediated, or that the proposed project will not impede proposed or on-going remediation measures.

HYDROLOGY AND WATER QUALITY

- **Regulatory Compliance Measure RC-WQ-1: National Pollutant Discharge Elimination System General Permit.** Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for

Phase 1 of the proposed Modified Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the proposed Modified Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

- **Regulatory Compliance Measure RC-WQ-2: Dewatering.** If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.
- **Regulatory Compliance Measure RC-WQ-3: Low Impact Development Plan.** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.
- **Regulatory Compliance Measure RC-WQ-4: Development Best Management Practices.** The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.
- **Regulatory Compliance Measure RC-WQ-5 (Alteration of a State or Federal Watercourse):** The project shall comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the applicant shall consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance shall be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:
 - *United States Army Corps of Engineers.* The applicant shall obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory Division, 805-585-2148.

- *State Water Resources Control Board*. The applicant shall consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6600.
- *California Department of Fish and Wildlife*. The applicant shall consult with the Lake and Streambed Alteration Agreement Program and obtain a Streambed Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSAA Program, 4949 Viewridge Avenue, San Diego, CA 92123, (858) 636-3160.
- **Regulatory Compliance Measure RC-WQ-6 (Flooding/Tidal Waves):** The project shall comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective 7/3/98.

LAND USE AND PLANNING

- **Regulatory Compliance Measure RC-LU-1 (Slope Density):** The project shall not exceed the maximum density permitted in Hillside Areas, as calculated by the formula set forth in Los Angeles Municipal Code Section 17.05-C (for tracts) or 17.50-E (for parcel maps).

MINERAL RESOURCES

NOISE

- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

POPULATION AND HOUSING

- **New Regulatory Compliance Measure RC-PH-1 (Tenant Displacement):**
 - **Apartment Converted to Condominium** - Prior to final map recordation, and pursuant to the provisions of Section 12.95.2-G and 47.06 of the Los Angeles Municipal Code (LAMC), a tenant relocation plan shall be submitted to the Los Angeles Housing Department for review and approval.
 - **Apartment Demolition** - Prior to the issuance of a demolition permit, and pursuant to the provisions of Section 47.07 of the Los Angeles Municipal Code, a tenant relocation plan shall be submitted to the Los Angeles Housing Department for review and approval.
 - **Mobile Home Park Closure or Conversion to Different Use** Prior to the issuance of any permit or recordation, and pursuant to the provisions of Section 47.08 and 47.09 of the Los Angeles Municipal Code, a tenant relocation plan and mobile home park closure impact report shall be submitted to the Los Angeles Housing Department for review and approval.

PUBLIC SERVICES**Schools**

- **Regulatory Compliance Measure RC-PS-1 (Payment of School Development Fee)** Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995.

Parks

- **Regulatory Compliance Measure RC-PS-2 (Increased Demand For Parks Or Recreational Facilities):**
 - (*Subdivision*) Pursuant to Section 17.12-A or 17.58 of the Los Angeles Municipal Code, the applicant shall pay the applicable Quimby fees for the construction of dwelling units.
 - (*Apartments*) Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.
- **Regulatory Compliance Measure RC-PS-3 (Increase Demand For Parks Or Recreational Facilities – Zone Change)** Pursuant to Section 12.33 of the Los Angeles Municipal Code, the applicant shall pay the applicable fees for the construction of dwelling units.

RECREATION

See RC measures above under Parks.

TRANSPORTATION AND TRAFFIC

- **Regulatory Compliance Measure RC-TT-1 (Increased Vehicle Trips/Congestion - West Side Traffic Fee)** Prior to issuance of a Building Permit, the applicant shall pay a traffic impact fee to the City, based on the requirements of the West Los Angeles Traffic Improvement and Mitigation Specific Plan (WLA TIMP).

PUBLIC UTILITIES AND SERVICE SYSTEMS**Water Supply**

- **Regulatory Compliance Measure RC-WS-1 (Fire Water Flow)** The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Proposed Project, and will contact a Water Service Representative at the LADWP to order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or

infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

- **Regulatory Compliance Measure RC-WS-2 (Green Building Code):** The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's water use.
- **Regulatory Compliance Measure RC-WS-3 (New Carwash):** The applicant shall incorporate a water recycling system to the satisfaction of the Department of Building and Safety.
- **Regulatory Compliance Measure RC-WS-4 (Landscape)** The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

Energy

- **Regulatory Compliance Measure RC-EN-1(Green Building Code):** The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

Solid Waste

- **Regulatory Compliance Measure RC-SW-1 (Designated Recycling Area)** In compliance with Los Angeles Municipal Code, the proposed Modified Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.
- **Regulatory Compliance Measure RC-SW-2 (Construction Waste Recycling)** In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70 percent by 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.
- **Regulatory Compliance Measure RC-SW-3 (Commercial/Multifamily Mandatory Recycling)** In compliance with AB341, recycling bins shall be provided at appropriate

locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB341.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

November 1, 2019

connie.chauv@lacity.org

Connie Chauv, City Planner Associate
City of Los Angeles, Planning Department
200 North Spring Street
Los Angeles, CA 90012

Mitigated Negative Declaration (MND) for the Proposed Wilmington Apartments (ENV-2018-7330)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to build a 51,202-square-foot affordable housing project with 56 dwelling units on 56,060 square feet (Proposed Project). Construction is expected to take 10 months¹. During construction, "the [Proposed Project] will involve the grading of approximately 2,750 cubic yards of soil²." The Proposed Project site is currently vacant. It contains seven oil wells that were plugged and abandoned in 1990s, and one of the oil wells will require re-abandonment in accordance with the California Department of Conservation, Division of Oil, Gas and Geothermal Resources ("DOGGR") requirements³. Based on a review of aerial photographs, South Coast AQMD staff found that the Proposed Project is located near railroad tracks.

South Coast AQMD Staff's Summary of the Air Quality and Hazards and Hazardous Materials Analyses

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions associated with building 56 dwelling units and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant. No air quality mitigation was included⁴.

In the Hazards and Hazardous Materials Section, the Lead Agency included seven mitigation measures MM-1 through MM-7⁵. Specifically, the Lead Agency requires the Applicant to perform exploratory excavation to locate the abandoned wells; abandon any oil wells that are found during the exploratory excavation, which would require additional grading before well abandonment; submit an application for Construction Site Well Review and Notices of Intention for any of the seven potential abandoned oil wells to DOGGR; install a methane mitigation system, a standard de-watering system, and a sub-slab vapor collection and ventilation system; perform a subsurface methane investigation to install three to four gas probes set throughout the Proposed Project site; and place a protection and ventilation cone over the well cap (head) of each oil well that meets current abandonment standards.

¹ MND. Appendix A, *Air Quality and Greenhouse Gas Impact Analysis*. PDF page 4.

² MND. Page 10.

³ *Ibid.* Pages 10 and 22. See also Appendix C, *California Department of Conservation, Division of Oil, Gas and Geothermal Resources ("DOGGR") Construction Site Well Review and Records, September 18, 2019*, and Appendix D, *Memorandum on Proposed and Anticipated Oil Well and Methane Mitigation Measures, August 21, 2019*.

⁴ *Ibid.* Pages 29 to 33. See also Appendix A.

⁵ *Ibid.* Pages 50 and 51.

The Community Emissions Reduction Plan for Wilmington, Carson, West Long Beach Community

The Proposed Project is located within the Wilmington Community that is heavily impacted by air pollution. The Wilmington, Carson, West Long Beach community was identified as an Assembly Bill (AB) 617 community, which requires the South Coast AQMD to work with community and other stakeholders to identify and address community concerns in disadvantaged communities suffering from disproportionate air pollution impacts generated from sources, such as marine ports, heavy-duty diesel trucks, oil drilling and production facilities. Through the AB 617 program, the Wilmington community and South Coast AQMD staff have developed a Community Emissions Reduction Plan (CERP)⁶ that identifies air quality priorities and actions to reduce air pollution in the community.

South Coast AQMD Staff's Comments on the Construction Air Quality Analysis

While the Air Quality Section in the MND quantified the Proposed Project's emissions from constructing 56 dwelling units and associated grading activities, it did not quantify emissions from on-site well abandonment or re-abandonment activities or implementation of Hazards and Hazardous Materials MM-1 through MM-7, which could take place concurrently with construction activities for the residential development. Additionally, well abandonment or re-abandonment activities will likely involve additional on-site grading, equipment, and mobile sources. For example, "some grading may need to be performed before well abandonment to allow access to the wells [...]"⁷. Drilling activities will require the use of drilling equipment⁸. Other heavy-duty equipment may also be required for grading, earth-loading/unloading, and installation of various collection systems. On-road mobile sources such as medium- and/or heavy-duty, diesel fueled trucks to transport the equipment, worker vehicle trips, and material transport trips may also occur. Since the activities identified in Hazards and Hazardous Materials MM-1 through MM-7 are reasonably foreseeable, their emissions should be included in the Air Quality Analysis of the Final MND. The Lead Agency should use its good faith, best efforts to provide information on the scope, types, and duration of the well abandonment or re-abandonment activities, including information on additional truck trips, workers vehicle trips, and equipment that will be required. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Air Quality Analysis to provide such information, quantify emissions, and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final MND. Alternatively, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final MND to commit to evaluating the subsequent well abandonment or re-abandonment activities through a CEQA process prior to commencing the Proposed Project's construction activities.

If there is any information in the subsequent CEQA process suggesting that the well abandonment or re-abandonment activities, or any other activities identified during the Construction Site Well Review and consultation with DOGGR, would result in new significant adverse air quality impacts not analyzed in the Final MND for the Proposed Project, or substantially more severe air quality impacts than those analyzed in the Final MND for the Proposed Project, the Lead Agency should commit to reevaluating the Proposed Project's air quality impacts through a CEQA process (CEQA Guidelines Section 15162).

South Coast AQMD Rules and Permits

It is important to note that disturbing and excavated soils that may contain hydrocarbons or toxic air contaminants are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil⁹, and Rule 1466 – Control of Particulate Emissions

⁶ The Wilmington, Carson, West Long Beach Community Emissions Reduction Plan. Accessed at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025c.pdf>.

⁷ *Ibid.*

⁸ *Ibid.*

⁹ South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

from Soils with Toxic Air Contaminants¹⁰. The Lead Agency should include discussions on South Coast AQMD Rules 1166 and 1466 in the Air Quality Section of the Final MND. Additionally, the Final MND should discuss how the well abandonment or re-abandonment activities will comply with South Coast AQMD Rule 402 – Nuisance¹¹, in the event that the volatile organic compounds (VOCs) and/or odors are emitted.

It is also important to note that if the well abandonment or re-abandonment activities involve equipment or operations which either emits or controls air pollution, South Coast AQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by South Coast AQMD prior to start of any of the activities. Generally, operation of portable engines and portable equipment units of 50 brake horsepower or greater that emit particulate matter require a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)¹². The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if there is any diesel-powered equipment during implementation that will require a South Coast AQMD permit or if the equipment will need to be registered under the PERP through CARB. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. Any assumptions used in the Air Quality Analysis in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that the recommended mitigation measure is not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting it in the Final MND (CEQA Guidelines Section 15074.1).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC191023-05

Control Number

¹⁰ South Coast AQMD. Rule 1466 – control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

¹¹ South Coast AQMD. Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

¹² South Coast AQMD. Portable Equipment Registration Program (PERP). Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.



Connie Chauv <connie.chauv@lacity.org>

South Coast AQMD Staff Comments on the Mitigated Negative Declaration for the Wilmington Apartments Project (ENV-2018-7330)

Lijin Sun <LSun@aqmd.gov>

Fri, Nov 1, 2019 at 7:54 AM

To: "connie.chauv@lacity.org" <connie.chauv@lacity.org>

Dear Ms. Chauv,

Attached are South Coast AQMD staff comments on the Mitigated Negative Declaration for the Wilmington Apartments Project (ENV-2018-7330) (South Coast AQMD Control Number: LAC191023-05). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. South Coast AQMD staff comments are meant as guidance for the Lead Agency and should be reviewed for incorporation into the Final MND. Please contact me if you have any questions regarding these comments.

Thank you,

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

South Coast Air Quality Management District

[21865 Copley Drive, Diamond Bar, CA 91765](#)

Direct: (909) 396-3308

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Please note that the South Coast AQMD is closed on Mondays.



LAC191023-05 MND 1424 N. Deepwater Avenue_20191101.pdf
278K



Giroux & Associates
Environmental Consultants

Date: November 18, 2019
To: LINC Housing
Attn: Cody Snyder
From: Sara Friedman-Gerrick, Giroux & Associates
Subject: Addendum to Deepwater Air Quality Analysis to include well abandonment impacts

Per your request, Giroux & Associates has evaluated air quality impacts associated with decommissioning the on-site wells at 1424 Deepwater Avenue. This assessment was added to the original report which also covers construction and operational emissions for the proposed 56-unit residential use.

For convenience, the well abandonment analysis is also provided in the attachment. There were two primary activities; exploratory excavation and well abandonment. CalEEMod was used to calculate air quality impacts derived from the use of heavy equipment on-site. Per the project geologist, there will be no import or export of earthworks. As shown on the attachment, abandonment activities would not exceed any SCAQMD thresholds either on a regional level or at a localized level for the nearest sensitive uses.

Please call with any questions,

Sara Friedman Gerrick
Senior Engineer

cc: Hans D. Giroux

WELL ABANDONMENT ACTIVITY IMPACTS

Prior to construction, heavy equipment will be required to complete well abandonment activities. The detailed construction fleet and durations are shown below and were provided by the project geologist. There will be no off-site soil haul involved and minimal equipment is required.

**Well Abandonment Activity
Equipment Fleet and Duration**

Phase Name and Duration	Equipment
Exploratory Excavation (3 days)	1 Excavator
	1 Water Truck
	1 Dump Truck
Well Abandonment (2 weeks)	1 Drill Rig (750 hp)
	1 Mud Pump (modeled as pump)

Utilizing the indicated equipment fleet and durations the following worst-case daily construction emissions are calculated by CalEEMod:

**Well Abandonment Activity Emissions
Maximum Daily Emissions (pounds/day)**

Maximal Construction Emissions	ROG	NO _x	CO	SO ₂	PM-10	PM-2.5
2020						
Exploratory Excavation	0.6	5.6	5.5	0.0	0.7	0.3
Well Abandonment	1.2	11.7	10.6	0.0	1.3	0.9
SCAQMD Thresholds	75	100	550	150	150	55

The two activities will not overlap. Peak daily construction activity emissions are estimated be below SCAQMD CEQA thresholds without the need for added mitigation.

Well Abandonment Localized Significance Thresholds (LSTs)

The SCAQMD has issued guidance on applying CalEEMod to LSTs. LST pollutant screening level concentration data is currently published for 1, 2 and 5 acre sites for varying distances. For this project, the most stringent thresholds for a 1-acre site and a 25-meter receptor distance were applied to account for adjacent sensitive uses. The following thresholds and emissions are therefore determined (pounds per day):

LST and Project Emissions (pounds/day)

LST 1 acre/25 meters South San Gabriel Valley	CO	NO _x	PM-10	PM-2.5
LST Threshold	673	83	5	4
2020				
Exploratory Excavation	5.5	5.6	0.7	0.3
Well Abandonment	10.6	11.7	1.3	0.9

CalEEMod Output in Appendix

LSTs were compared to the maximum daily construction activities. LST impacts are less-than-significant without the need for added mitigation.

AIR QUALITY and GHG IMPACT ANALYSES
1424 DEEPWATER AVENUE RESIDENTIAL PROJECT
CITY OF LOS ANGELES, CALIFORNIA

Prepared by:

Hans D. Giroux

Hans Giroux
Senior Analyst
Giroux & Associates
1800 E Garry St., #205
Santa Ana, CA 92705

Prepared for:

LINC Housing
Attn: Cody Snyder
3590 Elm Avenue
Long Beach, CA 90807-3903

Date:

November 14, 2019

Project No.: P19-025 AQ Update

AIR QUALITY IMPACT

STANDARDS OF SIGNIFICANCE

The SCAQMD has designated significant emissions levels as surrogates for evaluating regional air quality impact significance independent of chemical transformation processes. Projects with daily emissions that exceed any of the following emission thresholds are recommended by the SCAQMD to be considered significant under CEQA guidelines.

Daily Emissions Thresholds		
Pollutant	Construction	Operations
ROG	75	55
NOx	100	55
CO	550	550
PM-10	150	150
PM-2.5	55	55
SOx	150	150
Lead	3	3

Source: SCAQMD CEQA Air Quality Handbook, November, 1993 Rev.

PROJECT CONSTRUCTION ACTIVITY IMPACTS

CaleEMod was developed by the SCAQMD to provide a model by which to calculate both construction emissions and operational emissions from a variety of land use projects. It calculates both the daily maximum and annual average emissions for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions.

The proposed project entails construction of a 56-unit 3-story residential building. Estimated construction emissions were modeled using CaleEMod2016.3.2 to identify maximum daily emissions for each pollutant using default durations and equipment fleets found in CaleEMod for the proposed residential use as shown below:

**Construction Activity
Equipment Fleet and Duration**

Phase Name and Duration	Equipment
Grading (4 days)	1 Grader
	1 Dozer
	1 Loader/Backhoe
Construction (200 days)	1 Crane
	1 Forklift
	1 Generator Set
	3 Welders
	1 Loader/Backhoe
Paving (10 days)	1 Paver
	1 Cement Mixer
	1 Loader/Backhoe
	1 Paving Equipment
	1 Roller
Painting (10 days)	1 Air Compressor

Utilizing the indicated equipment fleet and durations the following worst case daily construction emissions are calculated by CalEEMod:

**Construction Activity Emissions
Maximum Daily Emissions (pounds/day)**

Maximal Construction Emissions	ROG	NO_x	CO	SO₂	PM-10	PM-2.5
2020						
Unmitigated	35.3	15.6	15.1	0.0	5.7	3.2
SCAQMD Rule 403 Compliant	35.3	15.6	15.1	0.0	2.7	1.6
SCAQMD Thresholds	75	100	550	150	150	55

Peak daily construction activity emissions are estimated be below SCAQMD CEQA thresholds without the need for added mitigation. SCAQMD Rule 403 requires control of fugitive dust during periods of soil disturbance. CalEEMod considers adequate daily watering to meet Rule 403 requirements. The only model-based measure that was applied for this project was watering export surfaces three times per day to minimize the generation of fugitive dust generation during grading.

LOCALIZED SIGNIFICANCE THRESHOLDS

The SCAQMD has developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs).

For the proposed project, the primary source of possible LST impact would be during construction. LSTs are applicable for a sensitive receptor where it is possible that an individual could remain for 24 hours such as a residence, hospital or convalescent facility.

LSTs are only applicable to the following criteria pollutants: oxides of nitrogen (NO_x), carbon monoxide (CO), and particulate matter (PM-10 and PM-2.5). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

LST screening tables are available for 25, 50, 100, 200 and 500 meter source-receptor distances. For this project, there are several adjacent residential uses such that the most conservative 25-meter distance was modeled.

The SCAQMD has issued guidance on applying CalEEMod to LSTs. LST pollutant screening level concentration data is currently published for 1, 2 and 5 acre sites for varying distances. For this project, the most stringent thresholds for a 1-acre site were applied.

The following thresholds and emissions are therefore determined (pounds per day):

LST and Project Emissions (pounds/day)
Climate Zone 11

LST 1 acre/25 meters South San Gabriel Valley	CO	NO_x	PM-10	PM-2.5
LST Threshold	673	83	5	4
Max On-Site Emissions				
Unmitigated	15	22	6	3
Rule 403 Compliant	15	22	3	2

CalEEMod Output in Appendix

LSTs were compared to the maximum daily construction activities. With active dust suppression to meet Rule 403, controlled emissions meet the LST for construction thresholds. LST impacts are less-than-significant. With compliance with SCAMD Rule 403 (Fugitive Dust), there will be no significant construction activity air quality impacts.

WELL ABANDONMENT ACTIVITY IMPACTS

Prior to construction, heavy equipment will be required to complete well abandonment activities. The detailed construction fleet and durations are shown below and were provided by the project geologist. There will be no off-site soil haul involved and minimal equipment is required.

**Well Abandonment Activity
Equipment Fleet and Duration**

Phase Name and Duration	Equipment
Exploratory Excavation (3 days)	1 Excavator
	1 Water Truck
	1 Dump Truck
Well Abandonment (2 weeks)	1 Drill Rig (750 hp)
	1 Mud Pump (modeled as pump)

Utilizing the indicated equipment fleet and durations the following worst-case daily construction emissions are calculated by CalEEMod:

**Well Abandonment Activity Emissions
Maximum Daily Emissions (pounds/day)**

Maximal Construction Emissions	ROG	NO _x	CO	SO ₂	PM-10	PM-2.5
2020						
Exploratory Excavation	0.6	5.6	5.5	0.0	0.7	0.3
Well Abandonment	1.2	11.7	10.6	0.0	1.3	0.9
SCAQMD Thresholds	75	100	550	150	150	55

The two activities will not overlap. Peak daily construction activity emissions are estimated be below SCAQMD CEQA thresholds without the need for added mitigation.

WELL ABANDONMENT LOCALIZED SIGNIFICANCE THRESHOLDS

The most stringent thresholds for a 1-acre site and 25-meter receptor were applied to account for adjacent sensitive uses. The following thresholds and emissions are therefore determined (pounds per day):

LST and Project Emissions (pounds/day)

LST 1 acre/25 meters South San Gabriel Valley	CO	NO _x	PM-10	PM-2.5
LST Threshold	673	83	5	4
2020				
Exploratory Excavation	5.5	5.6	0.7	0.3
Well Abandonment	10.6	11.7	1.3	0.9

CalEEMod Output in Appendix

LSTs were compared to the maximum daily construction activities. LST impacts are less-than-significant.

OPERATIONAL IMPACTS

Operational emissions were calculated using CalEEMod2016.3.2 for an assumed project build-out year of 2020 as a target for full occupancy. The project would generate 372 weekday trips using default trip rates in CalEEMod for the proposed use. In addition to mobile sources from vehicles, general development causes smaller amounts of “area source” air pollution to be generated from on-site energy consumption (primarily space heating, hot water and landscaping). These sources represent a minimal percentage of the total project NO_x and CO burdens, and a few percent of other pollutants. The inclusion of such emissions adds negligibly to the total significant project-related emissions burden as shown below.

Daily Operational Impacts

Source	Operational Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM-10	PM-2.5
Area	16.0	1.2	33.0	0.1	4.3	4.3
Energy	0.0	0.1	0.1	0.0	0.1	0.0
Mobile	0.8	3.7	10.8	0.0	2.7	0.8
Total	16.8	5.0	43.9	0.1	7.1	5.1
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod2016.3.2 Output in Appendix

The project would not cause any operational emissions to exceed their respective SCAQMD CEQA significance thresholds. Operational emission impacts are judged to be less than significant. No impact mitigation for operational activity emissions is considered necessary to support this finding.

GHG EMISSIONS THRESHOLDS

On December 5, 2008 the SCAQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.) of 10,000 Metric Tons (MT) CO₂ equivalent/year CO₂e. In September 2010, the SCAQMD CEQA Significance Thresholds GHG Working Group released revisions which recommended a threshold of 3,000 MT CO₂e for all land use projects. This 3,000 MT/year recommendation has been used as a guideline for this analysis. In the absence of an adopted numerical threshold of significance, project related GHG emissions in excess of the guideline level are presumed to trigger a requirement for enhanced GHG reduction at the project level.

PROJECT GHG EMISSIONS GENERATION

Construction Activity GHG Emissions

The project is assumed to require less than one year for construction. During project construction, the CalEEMod2016.3.2 computer model predicts that the construction activities will generate the annual CO₂e emissions identified below.

Construction Emissions (Metric Tons CO₂e)

	CO ₂ e
Year 2020	249.1
Amortized	8.3

CalEEMod Output provided in appendix

SCAQMD GHG emissions policy from construction activities is to amortize emissions over a 30-year lifetime. The amortized level is also provided.

Well abandonment activities will occur in a single year and these emissions were not amortized.

Well Abandonment Emissions (Metric Tons CO₂e)

	CO ₂ e
Exploratory Excavation	1.7
Well Abandonment	17.7
Annual Total	19.4

CalEEMod Output provided in appendix

Project Operational GHG Emissions

The input assumptions for operational GHG emissions calculations and the GHG conversion from consumption to annual regional CO₂e emissions are summarized in the CalEEMod2016.3.2 output files found in the appendix of this report.

The total operational and annualized construction emissions for the proposed project are identified as follows:

Proposed Uses Operational Emissions

Consumption Source	
Area Sources	18.9
Energy Utilization	159.7
Mobile Source	555.4
Waste	12.9
Water	45.7
Construction	8.3
Well Abandonment	19.4
Total	820.3
Guideline Threshold	3,000
Exceeds Threshold?	No

Total project GHG emissions would be substantially below the proposed significance threshold of 3,000 MT suggested by the SCAQMD. Hence, the project would not result in generation of a significant level of greenhouse gases.

CALEEMOD2016.3.2 COMPUTER MODEL OUTPUT

- **DAILY EMISISONS**
- **ANNUAL EMISSIONS**

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

Deepwater Exploratory Excavation

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	1.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - user defined use

Construction Phase - 3 days-modeled as grading

Off-road Equipment - 1 excavator, 2 off-hwy trucks (one dump truck one water truck)

Trips and VMT - 10 worker trips

Construction Off-road Equipment Mitigation -

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	2.00	3.00
tblGrading	AcresOfGrading	0.00	1.13
tblLandUse	LotAcreage	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00

2.0 Emissions Summary

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

2.1 Overall Construction (Maximum Daily Emission)**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	0.6134	5.6002	5.5231	0.0127	0.4889	0.2328	0.7217	0.0668	0.2142	0.2810	0.0000	1,233.5185	1,233.5185	0.3715	0.0000	1,242.8055
Maximum	0.6134	5.6002	5.5231	0.0127	0.4889	0.2328	0.7217	0.0668	0.2142	0.2810	0.0000	1,233.5185	1,233.5185	0.3715	0.0000	1,242.8055

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	0.6134	5.6002	5.5231	0.0127	0.2692	0.2328	0.5020	0.0431	0.2142	0.2573	0.0000	1,233.5185	1,233.5185	0.3715	0.0000	1,242.8055
Maximum	0.6134	5.6002	5.5231	0.0127	0.2692	0.2328	0.5020	0.0431	0.2142	0.2573	0.0000	1,233.5185	1,233.5185	0.3715	0.0000	1,242.8055

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	44.94	0.00	30.44	35.49	0.00	8.44	0.00	0.00	0.00	0.00	0.00	0.00

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	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	1.0000e-005	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000	0.0000	2.3000e-004

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	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	1.0000e-005	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000	0.0000	2.3000e-004

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	1/17/2020	1/21/2020	5	3	

Acres of Grading (Site Preparation Phase): 0**Acres of Grading (Grading Phase): 1.13****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	1	8.00	158	0.38
Grading	Off-Highway Trucks	2	2.00	402	0.38
Grading	Graders	0	6.00	187	0.41
Grading	Rubber Tired Dozers	0	6.00	247	0.40
Grading	Tractors/Loaders/Backhoes	0	7.00	97	0.37

Trips and VMT

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3995	0.0000	0.3995	0.0431	0.0000	0.0431			0.0000			0.0000
Off-Road	0.5765	5.5740	5.1729	0.0118		0.2321	0.2321		0.2135	0.2135		1,139.429 4	1,139.429 4	0.3685		1,148.642 3
Total	0.5765	5.5740	5.1729	0.0118	0.3995	0.2321	0.6315	0.0431	0.2135	0.2566		1,139.429 4	1,139.429 4	0.3685		1,148.642 3

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

3.2 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0368	0.0262	0.3503	9.4000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		94.0890	94.0890	2.9700e-003		94.1632
Total	0.0368	0.0262	0.3503	9.4000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		94.0890	94.0890	2.9700e-003		94.1632

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.1798	0.0000	0.1798	0.0194	0.0000	0.0194			0.0000			0.0000
Off-Road	0.5765	5.5740	5.1729	0.0118		0.2321	0.2321		0.2135	0.2135	0.0000	1,139.429 4	1,139.429 4	0.3685		1,148.642 3
Total	0.5765	5.5740	5.1729	0.0118	0.1798	0.2321	0.4118	0.0194	0.2135	0.2329	0.0000	1,139.429 4	1,139.429 4	0.3685		1,148.642 3

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

3.2 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0368	0.0262	0.3503	9.4000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		94.0890	94.0890	2.9700e-003		94.1632
Total	0.0368	0.0262	0.3503	9.4000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		94.0890	94.0890	2.9700e-003		94.1632

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547726	0.045437	0.201480	0.122768	0.016614	0.006090	0.019326	0.029174	0.002438	0.002359	0.005005	0.000677	0.000907

5.0 Energy Detail

Historical Energy Use: N

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	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
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

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	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
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

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Unmitigated	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

7.0 Water Detail

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Summer

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

Deepwater Drill Abandonment

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	0.25	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	702.44	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Oil Well 7 Abandonment

Construction Phase - 2 weeks

Off-road Equipment - increased drill rig hp from 250 to 750 per instruction, 1 mud pump

Trips and VMT - 10 worker trips

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	2.00	10.00
tblConstructionPhase	PhaseEndDate	2/19/2020	3/2/2020
tblLandUse	LotAcreage	0.00	0.25
tblOffRoadEquipment	HorsePower	221.00	750.00
tblOffRoadEquipment	OffRoadEquipmentType		Bore/Drill Rigs
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	PhaseName		Grading
tblOffRoadEquipment	PhaseName		Grading
tblTripsAndVMT	WorkerTripNumber	15.00	10.00

2.0 Emissions Summary

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.1877	11.7024	10.6432	0.0401	0.8645	0.4789	1.3434	0.4434	0.4572	0.9006	0.0000	3,873.4227	3,873.4227	1.0542	0.0000	3,899.7773
Maximum	1.1877	11.7024	10.6432	0.0401	0.8645	0.4789	1.3434	0.4434	0.4572	0.9006	0.0000	3,873.4227	3,873.4227	1.0542	0.0000	3,899.7773

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.1877	11.7024	10.6432	0.0401	0.8645	0.4789	1.3434	0.4434	0.4572	0.9006	0.0000	3,873.4227	3,873.4227	1.0542	0.0000	3,899.7773
Maximum	1.1877	11.7024	10.6432	0.0401	0.8645	0.4789	1.3434	0.4434	0.4572	0.9006	0.0000	3,873.4227	3,873.4227	1.0542	0.0000	3,899.7773

[illegible]

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	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	1.0000e-005	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000	0.0000	2.3000e-004

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	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	1.0000e-005	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000	0.0000	2.3000e-004

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	2/18/2020	3/2/2020	5	10	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Bore/Drill Rigs	1	8.00	750	0.50
Grading	Pumps	1	8.00	84	0.74

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	6	10.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

3.2 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7528	0.0000	0.7528	0.4138	0.0000	0.4138			0.0000			0.0000
Off-Road	1.1417	11.6697	10.2053	0.0390		0.4780	0.4780		0.4563	0.4563		3,755.8114	3,755.8114	1.0505		3,782.0733
Total	1.1417	11.6697	10.2053	0.0390	0.7528	0.4780	1.2307	0.4138	0.4563	0.8701		3,755.8114	3,755.8114	1.0505		3,782.0733

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0460	0.0327	0.4378	1.1800e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		117.6113	117.6113	3.7100e-003		117.7040
Total	0.0460	0.0327	0.4378	1.1800e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		117.6113	117.6113	3.7100e-003		117.7040

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

3.2 Grading - 2020**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7528	0.0000	0.7528	0.4138	0.0000	0.4138			0.0000			0.0000
Off-Road	1.1417	11.6697	10.2053	0.0390		0.4780	0.4780		0.4563	0.4563	0.0000	3,755.8114	3,755.8114	1.0505		3,782.0733
Total	1.1417	11.6697	10.2053	0.0390	0.7528	0.4780	1.2307	0.4138	0.4563	0.8701	0.0000	3,755.8114	3,755.8114	1.0505		3,782.0733

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0460	0.0327	0.4378	1.1800e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		117.6113	117.6113	3.7100e-003		117.7040
Total	0.0460	0.0327	0.4378	1.1800e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		117.6113	117.6113	3.7100e-003		117.7040

4.0 Operational Detail - Mobile

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547726	0.045437	0.201480	0.122768	0.016614	0.006090	0.019326	0.029174	0.002438	0.002359	0.005005	0.000677	0.000907

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	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
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

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	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
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

6.0 Area Detail**6.1 Mitigation Measures Area**

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Unmitigated	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

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**

Deepwater Drill Abandonment - Los Angeles-South Coast County, Summer

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Annual

Deepwater Exploratory Excavation

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	1.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - user defined use

Construction Phase - 3 days-modeled as grading

Off-road Equipment - 1 excavator, 2 off-hwy trucks (one dump truck one water truck)

Trips and VMT - 10 worker trips

Construction Off-road Equipment Mitigation -

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Annual

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	2.00	3.00
tblGrading	AcresOfGrading	0.00	1.13
tblLandUse	LotAcreage	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00

2.0 Emissions Summary

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Annual

2.1 Overall Construction**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	9.2000e-004	8.4100e-003	8.2500e-003	2.0000e-005	7.3000e-004	3.5000e-004	1.0800e-003	1.0000e-004	3.2000e-004	4.2000e-004	0.0000	1.6731	1.6731	5.1000e-004	0.0000	1.6857
Maximum	9.2000e-004	8.4100e-003	8.2500e-003	2.0000e-005	7.3000e-004	3.5000e-004	1.0800e-003	1.0000e-004	3.2000e-004	4.2000e-004	0.0000	1.6731	1.6731	5.1000e-004	0.0000	1.6857

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	9.2000e-004	8.4100e-003	8.2500e-003	2.0000e-005	4.0000e-004	3.5000e-004	7.5000e-004	6.0000e-005	3.2000e-004	3.9000e-004	0.0000	1.6731	1.6731	5.1000e-004	0.0000	1.6857
Maximum	9.2000e-004	8.4100e-003	8.2500e-003	2.0000e-005	4.0000e-004	3.5000e-004	7.5000e-004	6.0000e-005	3.2000e-004	3.9000e-004	0.0000	1.6731	1.6731	5.1000e-004	0.0000	1.6857

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	45.21	0.00	30.56	40.00	0.00	7.14	0.00	0.00	0.00	0.00	0.00	0.00

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Annual

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2020	3-31-2020	0.0111	0.0111
		Highest	0.0111	0.0111

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						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	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

Deepwater Exploratory Excavation - Los Angeles-South Coast County, Annual

2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						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	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	1/17/2020	1/21/2020	5	3	

Acres of Grading (Site Preparation Phase): 0

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Acres of Grading (Grading Phase): 1.13**Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	1	8.00	158	0.38
Grading	Off-Highway Trucks	2	2.00	402	0.38
Grading	Graders	0	6.00	187	0.41
Grading	Rubber Tired Dozers	0	6.00	247	0.40
Grading	Tractors/Loaders/Backhoes	0	7.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

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3.2 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					6.0000e-004	0.0000	6.0000e-004	6.0000e-005	0.0000	6.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.6000e-004	8.3600e-003	7.7600e-003	2.0000e-005		3.5000e-004	3.5000e-004		3.2000e-004	3.2000e-004	0.0000	1.5505	1.5505	5.0000e-004	0.0000	1.5631
Total	8.6000e-004	8.3600e-003	7.7600e-003	2.0000e-005	6.0000e-004	3.5000e-004	9.5000e-004	6.0000e-005	3.2000e-004	3.8000e-004	0.0000	1.5505	1.5505	5.0000e-004	0.0000	1.5631

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	4.0000e-005	4.9000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	4.0000e-005	0.0000	0.1226	0.1226	0.0000	0.0000	0.1227
Total	6.0000e-005	4.0000e-005	4.9000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	4.0000e-005	0.0000	0.1226	0.1226	0.0000	0.0000	0.1227

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3.2 Grading - 2020**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.6000e-004	8.3600e-003	7.7600e-003	2.0000e-005		3.5000e-004	3.5000e-004		3.2000e-004	3.2000e-004	0.0000	1.5505	1.5505	5.0000e-004	0.0000	1.5630
Total	8.6000e-004	8.3600e-003	7.7600e-003	2.0000e-005	2.7000e-004	3.5000e-004	6.2000e-004	3.0000e-005	3.2000e-004	3.5000e-004	0.0000	1.5505	1.5505	5.0000e-004	0.0000	1.5630

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	4.0000e-005	4.9000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	4.0000e-005	0.0000	0.1226	0.1226	0.0000	0.0000	0.1227
Total	6.0000e-005	4.0000e-005	4.9000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	4.0000e-005	0.0000	0.1226	0.1226	0.0000	0.0000	0.1227

4.0 Operational Detail - Mobile

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4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547726	0.045437	0.201480	0.122768	0.016614	0.006090	0.019326	0.029174	0.002438	0.002359	0.005005	0.000677	0.000907

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5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

[illegible]

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5.2 Energy by Land Use - NaturalGas

Unmitigated

[illegible]

Mitigated

[illegible]

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5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

6.0 Area Detail**6.1 Mitigation Measures Area**

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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	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Unmitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Total	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

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6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Total	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

7.0 Water Detail

7.1 Mitigation Measures Water

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

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7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail

8.1 Mitigation Measures Waste**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

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8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Deepwater Drill Abandonment - Los Angeles-South Coast County, Annual

Deepwater Drill Abandonment

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	0.25	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Oil Well 7 Abandonment

Construction Phase - 2 weeks

Off-road Equipment - increased drill rig hp from 250 to 750 per instruction, 1 mud pump

Trips and VMT - 10 worker trips

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Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	2.00	10.00
tblConstructionPhase	PhaseEndDate	2/19/2020	3/2/2020
tblLandUse	LotAcreage	0.00	0.25
tblOffRoadEquipment	HorsePower	221.00	750.00
tblOffRoadEquipment	OffRoadEquipmentType		Bore/Drill Rigs
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	PhaseName		Grading
tblOffRoadEquipment	PhaseName		Grading
tblTripsAndVMT	WorkerTripNumber	15.00	10.00

2.0 Emissions Summary

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2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	5.9400e-003	0.0585	0.0531	2.0000e-004	4.3100e-003	2.3900e-003	6.7100e-003	2.2100e-003	2.2900e-003	4.5000e-003	0.0000	17.5468	17.5468	4.7800e-003	0.0000	17.6663
Maximum	5.9400e-003	0.0585	0.0531	2.0000e-004	4.3100e-003	2.3900e-003	6.7100e-003	2.2100e-003	2.2900e-003	4.5000e-003	0.0000	17.5468	17.5468	4.7800e-003	0.0000	17.6663

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	5.9400e-003	0.0585	0.0531	2.0000e-004	4.3100e-003	2.3900e-003	6.7100e-003	2.2100e-003	2.2900e-003	4.5000e-003	0.0000	17.5467	17.5467	4.7800e-003	0.0000	17.6663
Maximum	5.9400e-003	0.0585	0.0531	2.0000e-004	4.3100e-003	2.3900e-003	6.7100e-003	2.2100e-003	2.2900e-003	4.5000e-003	0.0000	17.5467	17.5467	4.7800e-003	0.0000	17.6663

[illegible]

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	2-3-2020	5-2-2020	0.0645	0.0645
		Highest	0.0645	0.0645

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						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	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

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2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						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	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	2/18/2020	3/2/2020	5	10	

Acres of Grading (Site Preparation Phase): 0

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Acres of Grading (Grading Phase): 0**Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Bore/Drill Rigs	1	8.00	750	0.50
Grading	Pumps	1	8.00	84	0.74

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	6	10.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

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3.2 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.7600e-003	0.0000	3.7600e-003	2.0700e-003	0.0000	2.0700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.7100e-003	0.0584	0.0510	1.9000e-004		2.3900e-003	2.3900e-003		2.2800e-003	2.2800e-003	0.0000	17.0361	17.0361	4.7600e-003	0.0000	17.1552
Total	5.7100e-003	0.0584	0.0510	1.9000e-004	3.7600e-003	2.3900e-003	6.1500e-003	2.0700e-003	2.2800e-003	4.3500e-003	0.0000	17.0361	17.0361	4.7600e-003	0.0000	17.1552

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.3000e-004	1.9000e-004	2.0600e-003	1.0000e-005	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.5107	0.5107	2.0000e-005	0.0000	0.5111
Total	2.3000e-004	1.9000e-004	2.0600e-003	1.0000e-005	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.5107	0.5107	2.0000e-005	0.0000	0.5111

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3.2 Grading - 2020**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.7600e-003	0.0000	3.7600e-003	2.0700e-003	0.0000	2.0700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.7100e-003	0.0584	0.0510	1.9000e-004		2.3900e-003	2.3900e-003		2.2800e-003	2.2800e-003	0.0000	17.0361	17.0361	4.7600e-003	0.0000	17.1552
Total	5.7100e-003	0.0584	0.0510	1.9000e-004	3.7600e-003	2.3900e-003	6.1500e-003	2.0700e-003	2.2800e-003	4.3500e-003	0.0000	17.0361	17.0361	4.7600e-003	0.0000	17.1552

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.3000e-004	1.9000e-004	2.0600e-003	1.0000e-005	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.5107	0.5107	2.0000e-005	0.0000	0.5111
Total	2.3000e-004	1.9000e-004	2.0600e-003	1.0000e-005	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.5107	0.5107	2.0000e-005	0.0000	0.5111

4.0 Operational Detail - Mobile

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4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547726	0.045437	0.201480	0.122768	0.016614	0.006090	0.019326	0.029174	0.002438	0.002359	0.005005	0.000677	0.000907

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5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

[illegible]

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5.2 Energy by Land Use - NaturalGas

Unmitigated

[illegible]

Mitigated

[illegible]

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5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

6.0 Area Detail**6.1 Mitigation Measures Area**

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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	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Unmitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Total	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

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6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Total	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

7.0 Water Detail

7.1 Mitigation Measures Water

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

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7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

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8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
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**CITY PLANNING
PROJECT PLANNING**

October 23, 2019

Ms. Connie Chauv
Los Angeles City Planning Department
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: Wilmington Apartments Project – Mitigated
Negative Declaration (MND)
SCH # 2019109010
GTS # 07-LA-2019-02853
Vic. LA-1/PM: 10.256

Dear Ms. Connie Chauv:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The proposed project is the construction, use, and maintenance of a 3-story, 36-foot tall, 51,202 square-foot affordable housing project comprised of 56 dwelling units (100% restricted to Very Low-Income households exclusive of one manager's unit). The project will provide 19 parking spaces at grade level, and 48 long-term and 5 short-term bicycle parking spaces. The project will have a Floor Area Ratio ("FAR") of 0.92:1 and will involve the grading of approximately 2,750 cubic yards of soil. The site is currently vacant. The City of Los Angeles is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are State Route 1 (SR-1), which is located approximately 230 feet away from the project, State Route 47 (SR-47), which is located approximately 5,000 feet from the project, and Interstate 110 (I-110), which is located approximately 1.5 miles away from the project.

In terms of alternative transportation facilities that serve the project, two bus stops for Route 3 are located approximately 300 feet away from the project, at the intersection of SR-1 & Eubank Avenue, and one of those stops is also serviced by the DASH Wilmington bus route. There is also a Class II bike lane on Eubank Avenue that runs past the project. Finally, sidewalks exist on the west side of Eubank Avenue, and both sides of Sandison Street as well as SR-1.

The City of Los Angeles adopted a Vehicles Miles Traveled (VMT) metric for transportation analysis in July 2019. Caltrans applauds the City for adopting the metric that assists the State in meeting its greenhouse gas emissions reductions targets as well as reducing VMT. Based on the City's VMT calculator, this project will not have a significant VMT impact.

Due to the project's low VMT, and access to transit, bicycle, and pedestrian facilities, Caltrans does not expect project approval to result in a direct adverse impact to existing State transportation facilities.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse

Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as providing 53 bicycle parking spaces. Additional TDM strategies that the City of Los Angeles might want to consider integrating into this project include:

- Converting the Class II bike lane on Eubank Avenue into a Class IV protected bike lane to provide greater protection to cyclists from freight traffic generated by the nearby railroad and businesses
- Extending the bike lane on Eubank Ave south to connect with the M Street bike facility
- Improving the nearby sidewalk network for residents traveling to grocery stores, museums, and the Los Angeles Public Library branch on Avalon Boulevard

Please make every attempt to reduce VMT. For additional TDM options that can reduce VMT, please refer to:

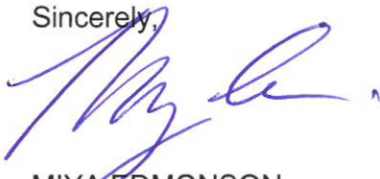
- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation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

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic management plan detailing these delays for Caltrans' review.

Also, storm water run-off is a sensitive issue for Los Angeles county. Please be mindful that the project needs to be designed to discharge clean run-off water.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2019-02853.

Sincerely,



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