DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: Thursday, February 23, 2023
Time: After 8:30 A.M.*
Place: Due to concerns over COVID-19, the CPC meeting will be conducted entirely telephonically by Zoom at https://zoom.us/. The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at: https://planning.lacity.org/about/commissions-boards-hearings and/or by contacting cpc@lacity.org.

Public Hearing: December 20, 2022
Appeal Status: Appealable to City Council
Expiration Date: March 5, 2023
Multiple Approval: Yes

Case No.: CPC-2022-5865-CU-SPR
CEQA No.: ENV-2022-5866-MND
Incidental Cases: N/A
Related Cases: N/A
Council No.: 7 – Monica Rodriguez
Plan Area: Mission Hills – Panorama City – North Hills
Specific Plan: None
Certified NC: North Hills East
Zone: RA-1

Applicant: Elijah Sugay, Bright Star Schools

Representative: Silvia Saucedo, Saucedo Group

PROJECT LOCATION: **15526 & 15544 West Plummer Street**

PROPOSED PROJECT: The project involves the construction, use, and maintenance of a new public charter elementary school campus with a maximum enrollment of 552 students for grades Transitional Kindergarten (TK) to Fourth grade. Project improvements include 28 classrooms within a new one- and two-story building, a multi-purpose room, and an existing house which will be preserved and incorporated as administrative and support space. Proposed buildings will total 36,157 square feet of gross floor area and rise to a maximum height of 26 feet and six (6) inches. The project will provide 49 on-site vehicular parking spaces within a surface parking lot and designated drop-off/pick-up area. Additional landscaping and recreation features will also be provided as part of the project.

REQUESTED ACTIONS:

1) Pursuant to CEQA Guidelines, Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2022-5866-MND ("Mitigated Negative Declaration"), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment;

2) Pursuant to LAMC Section 12.24 U.24, a Conditional Use Permit to allow the construction, use, and maintenance of a new public charter elementary school in the RA-1 Zone; and

3) Pursuant to LAMC Section 16.05, a Site Plan Review for a development project which results in a net increase of 1,000 or more average daily trips as determined by and using the trip generation factors promulgated by the Department of Transportation.

RECOMMENDED ACTIONS:

1) **Find,** pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2022-5866-MND, circulated on November 23,

2022 ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; FIND that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; FIND that the mitigation measures have been made enforceable conditions on the project and all mitigation measures required for the project are described in the Mitigation Monitoring Program ("MMP") prepared for the Mitigated Negative Declaration; and, ADOPT the Mitigated Negative Declaration and the MMP;

2) **Approve** a Conditional Use Permit to allow the construction, use, and maintenance of a new public charter elementary school in the RA-1 Zone;

3) **Approve** a Site Plan Review for a development project which results in a net increase of 1,000 or more average daily trips as determined by and using the trip generation factors promulgated by the Department of Transportation;

4) **Adopt** the attached Conditions of Approval; and

5) **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP
Director of Planning

Christina Toy Lee
Associate Zoning Administrator

Esther Ahn
City Planner

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 272, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1299.

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Exhibits:

Exhibit A – Site Plan, Floor Plans, Elevations, Landscape Plan, Renderings, Site Photos
Exhibit B – Environmental Documents (ENV-2022-5866-MND)
Exhibit C – Vicinity Map, Radius Map, and ZIMAS Map
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PROJECT ANALYSIS

PROJECT SUMMARY

The project involves the construction, use, and maintenance of a new public charter elementary school campus for Valor Academy Elementary School ("VAES") with a maximum enrollment of 552 students for grades Transitional Kindergarten (TK) to Fourth grade. As shown below in Figure 1, project improvements include 28 classrooms within a new one- and two-story building, a multi-purpose room, and an existing house which will be preserved and incorporated as administrative and support space. Proposed buildings will total 36,157 square feet of gross floor area and rise to a maximum height of 26 feet and six (6) inches.

Vehicular ingress and egress will occur off Plummer Street on the western portion of the site. The project will provide 49 on-site vehicular parking spaces within a surface parking lot and designated drop-off/pick-up area. The project will provide 16,366 square feet of landscaping and 50,228 square feet of paved area or hardscape which includes green spaces and recreation areas for students. A single pedestrian entrance will be located off Plummer Street through the main office near the preserved historic home. The project proposes an eight-foot-high block wall along the side yards and rear yard. A fence and gates will be provided along the front yard (Plummer Street). The subject school will also have secondary fencing around the perimeter of the buildings to limit access to students, staff, and other authorized visitors onto the campus.



Figure 1. *Perspective rendering of the proposed project looking southwest from across Plummer Street*

REQUESTED ENTITLEMENTS

The requested entitlements include: a Conditional Use Permit to allow the construction, use, and maintenance of a new public charter elementary school with a maximum enrollment of up to 552 students in the RA-1 Zone; and a Site Plan Review for a development project which results in a net increase of 1,000 or more average daily trips as determined by and using the trip generation factors promulgated by the Department of Transportation.

PROJECT BACKGROUND

Valor Academy Elementary School is an existing public charter elementary school for Transitional Kindergarten to Fourth grade students which has been operating in the San Fernando Valley since 2016. Currently, the elementary school is located approximately three (3) miles away from the subject property at a temporary location leased by the Applicant, Bright Star. Since 2016, the school has already moved once in order to accommodate its needs. The school's current location is limited in space with 16 classrooms and an enrollment of 380 students with a wait list. The proposed project would allow for VAES to have a larger capacity, with 28 classrooms and a maximum enrollment of 552 students. The proposed project would also allow VAES to have a permanent location which is close to the middle school and high school operated by Bright Star, thus completing its North Hills cluster.

Project Site

The project site is a relatively flat parcel of land consisting of two (2) adjoining lots, totaling approximately 89,629 square feet (approximately 2.06 acres) in size. As shown below in Figure 2, the subject property fronts Plummer Street to the north and is further bound by Orion Avenue to the west, Sepulveda Boulevard to the east, and Vincennes Street to the south. The western lot (approximately 1.30-acres in size) is currently undeveloped and covered with grasses, shrubs, and various mature trees. The eastern lot (approximately 0.76-acre in size) is currently developed with a one-story single-family residence with similar vegetation as the other lot. The on-site single-family residence located at 15526 West Plummer Street was built in 1914 and is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. The residence would remain on the site as part of the project but would be converted into additional administrative space for the proposed school, as indicated by the project's Mitigation Measure and reviewed by the Office of Historic Resources. The project site (across both lots) contains 56 trees/shrubs, including nine (9) protected native trees/shrubs and 32 non-protected significant trees, and two (2) street trees in the public right-of-way.

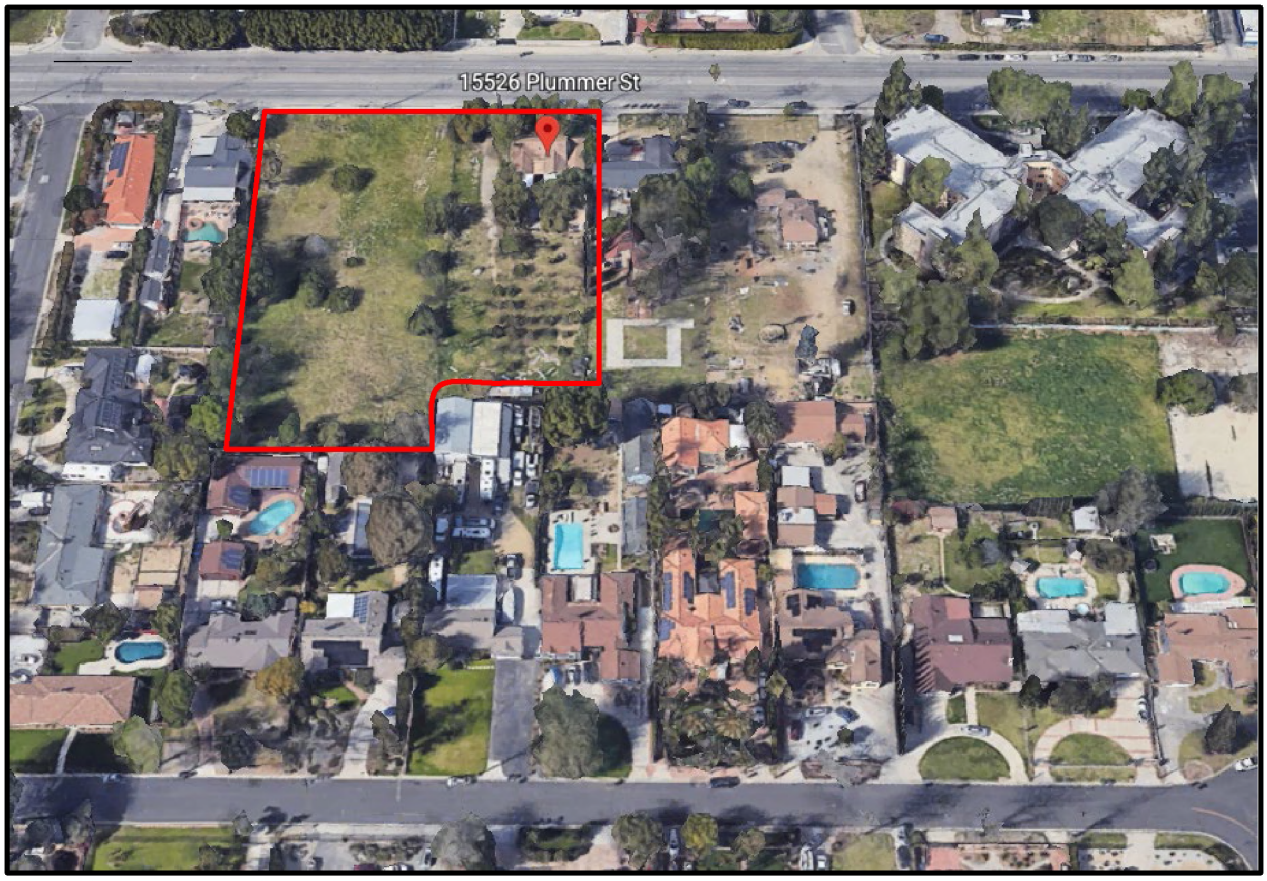

Figure 2. *Aerial view of the subject property*

General Plan Land Use Designation and Zoning

The project site is located within the Mission Hills – Panorama City – North Hills Community Plan area which designates the subject site for Low Residential land uses corresponding to the Van Nuys – North Sherman Oaks Community Plan Area which designates the subject site for Low Residential land uses corresponding to the RE9, RS, R1, and Zones. The project site was previously zoned (T)(Q) RE9-1, in accordance with the designated land use, but because the Zone Change was never effectuated, the subject property reverted back to its underlying RA-1 zoning. The subject property is also governed by the provisions of Ordinance No. 184,802, effective on March 17, 2017, which establishes regulations regarding the size and bulk of development on single-family zoned properties (ZI-2462) and is located within a Transit Priority Area in the City of Los Angeles (ZI-2452). The site is further subject to ZI-2427 which is a Freeway Adjacent Advisory Notice for Sensitive Uses. The subject property is not located within the boundaries of or subject to any specific plan, community design overlay, or interim control ordinance.

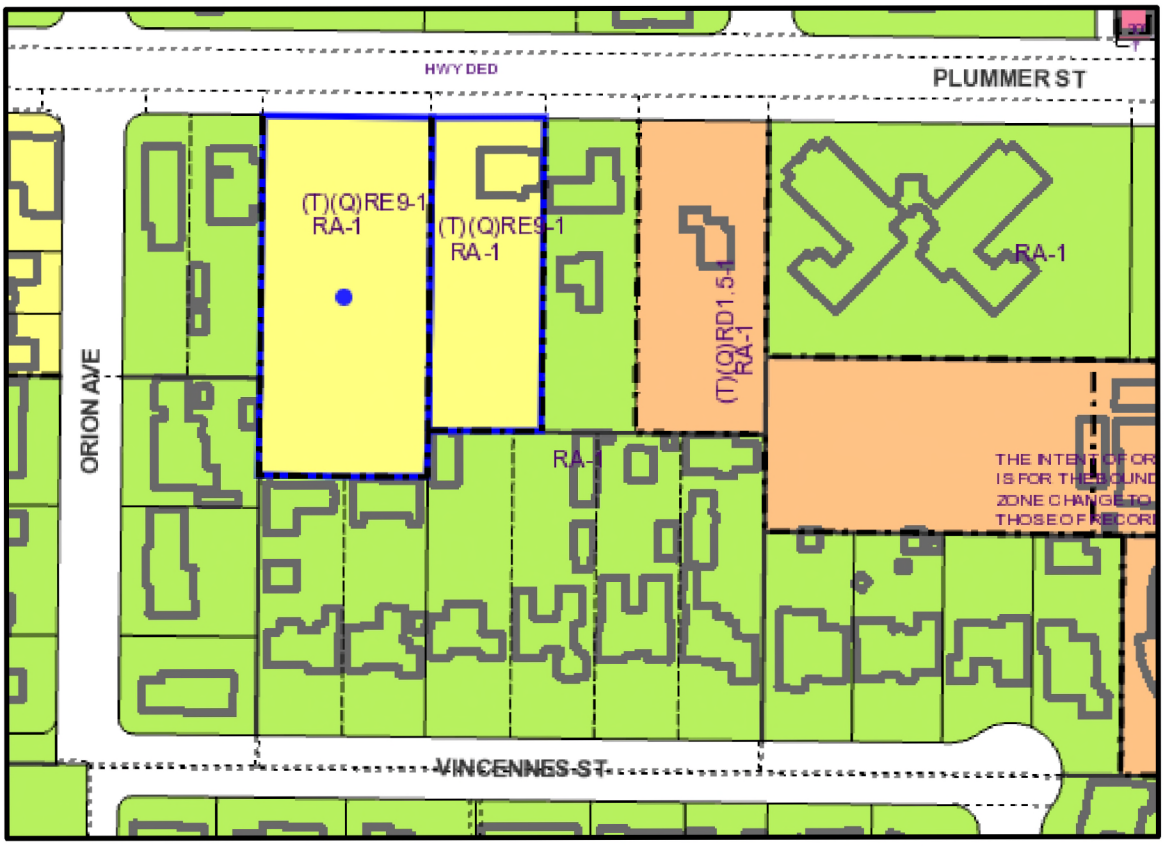

Figure 3. *Zoning on the subject property*

Surrounding Properties

The subject property is located in the North Hills area, an established suburban neighborhood in the San Fernando Valley developed mostly in the early- to mid-20th century. As shown above in Figure 3, the project site is located midblock between Orion Avenue to the west and Sepulveda Boulevard to the east. The site fronts the southerly side of Plummer Street where the property's front yard is located. The surrounding neighborhood primarily consists of low-density residential uses and single-family residences. The subject property is surrounded by single-family residences within the RA-1 Zone on the eastern, southern, and western sides. Properties to the north, across Plummer Street, are also zoned RA-1 and developed with single-family residences. Further out, a three-story multi-family apartment complex is located three parcels east which is adjacent to various commercial uses. Several parcels west of the project site is the 405 Freeway.

Streets and Circulation

Plummer Street, adjoining the subject property to the north, is a designated Avenue II, is dedicated to a right-of-way width of 82 feet and is improved with a concrete curb, gutter, and sidewalk improvements.

Proposed Improvements

The project proposes the development of a new elementary school campus on an approximately 89,629 square-foot site which is currently developed with a historically significant single-family residence and otherwise vacant land. The campus will consist of one- and two-story buildings which rise to a maximum height of 26 feet and six (6) inches to accommodate 28 classrooms (totaling 23,538 square feet) for grades Transitional Kindergarten to Fourth grade; a multi-purpose room (totaling 3,182 square feet); administrative spaces (totaling 1,616 square feet); corridors,

storage spaces, and covered outdoor dining (totaling 6,419 square feet); and a surface parking lot and pick-up/drop-off area with an ingress/egress driveway off Plummer Street. The proposed buildings amount to 34,755 square feet of floor area which, together with the 1,402 square-foot existing and preserved home, results in a total project floor area of 36,157 square feet.

The overall site is designed such that the taller two-story buildings are located in the interior and the exterior portions of the site are developed with single-story buildings, surface parking areas, open recreation areas, and mature trees. This arrangement ensures that the project site is adequately buffered along the adjoining properties and that the scale and massing complement the existing neighborhood. The single-story front portion of the school is planned for Transitional Kindergarten (TK) and Kindergarten (K) students, with its own dedicated play area. The two-story portion of the school, towards the center, is where the First through Fourth graders will have their classrooms; the first floor will house the 1st and 2nd grade classrooms while the second story will house the 3rd and 4th grades classrooms. The First to Fourth graders will also have designated play areas. The single-story multi-purpose room, which will be located at the rear of the site on the east side, will also include the cafeteria and lunch area.

The existing single-family residence will be preserved and incorporated for ancillary uses related to the elementary school. The residence will remain and be adaptively reused for additional administrative space, including a conference room, counselor office, staff support space, and psychologist office. The existing restroom in the residence will remain. The project has been designed such that the buildings fronting along Plummer Street will be heavily landscaped, set back with a large front yard, and single-story in height to match the size and scale of the historic home, as well as the surrounding properties.

The project design is configured to allow for circulation to primarily occur on-site and a single driveway off Plummer Street, as shown below in Figure 4. Both vehicular ingress and egress will occur through one very long driveway situated on the western portion of the site. The driveway includes one lane for ingress and one lane for egress and leads to the surface parking lot at the rear of the site. While 28 parking spaces would be required, the project proposes to provide an additional 21 parking spaces for a total of 49 parking spaces (including 17 standard, 21 compact, nine clean air spaces, and two ADA spaces that would be located along the southern and western portions of the site). The surface parking lot is also where the designated drop-off and pick-up area is located. Only right turns will be allowed when exiting the site. This circulation plan allows for queuing to occur on-site rather than on neighboring streets. The project would also include 112 short-term and three (3) long-term bicycle parking spaces for a total of 115 bicycle parking spaces.



Figure 4. *Proposed project site layout*

The project features landscaped areas and open recreation areas throughout the site. The project would include 16,366 square feet of landscaped area, in addition to two play areas (13,060 square feet) and a kindergarten play area (1,300 square feet) resulting in a total of 30,726 square feet of open space and landscaping. The project includes approximately 50,228 square feet of hardscape and paved areas. The existing conditions of the project site include 56 on-site trees/shrubs, of which four (4) are dead and will be removed. In addition, 41 trees/shrubs will require removal, which consist of nine protected native trees/shrubs and 32 non-protected significant trees. The project would retain 12 existing non-protected significant trees (two of which are street trees) and one protected native tree. Development of the project would result in the planting of 68 new trees on-site for a total of 79 trees including the existing trees.

Previous Planning Actions and Entitlements on the Project Site

Case No. CHC-2022-3646-HCM – On January 27, 2023, the City Council approved the designation of the single-family residence located at 15526 West Plummer Street as a Historical-Cultural Monument. (Council File No. 22-0975)

Case No. APC-2004-5691-ZC – On August 3, 2006, the North Valley Area Planning Commission recommended approval of a Zone Change to convert the zoning of the site to (T)(Q)RE9-1,

subject to Conditions of Approval. Subsequently, the City Council approved the Zone Change with the adoption of Ordinance No. 178,178 on January 5, 2007.

Tentative Tract No. 61202 – On June 29, 2006, the Advisory Agency approved a Tentative Tract Map for the development of three (3) single-family homes in conjunction with a proposed Zone Change. The action was subsequently appealed. On August 3, 2006, the North Valley Area Planning Commission denied the appeal.

Other Relevant Cases Within 1,500 Feet of the Project Site

There are no relevant cases within 1,500 feet of the project site.

PUBLIC HEARING

A public hearing was held virtually with the Hearing Officer on Tuesday, December 20, 2022. A summary of the public hearing is documented in Public Hearing and Communications, Page P-1.

PROFESSIONAL VOLUNTEER PROGRAM

The proposed project was reviewed by the Urban Design Studio's Professional Volunteer Program (PVP) on October 11, 2022. The resulting comments and suggestions detailed in the following section, Issues and Considerations, focus primarily on building materials, landscaping, circulation, and pedestrian access.

ISSUES AND CONSIDERATIONS

The following includes a discussion of issues and considerations related to the project. These were either identified during Urban Design Studio's Office Hours, the design review process by PVP, at the public hearing held on December 20, 2022, or in discussions with the applicant.

Concerns were raised regarding the entrance readability at the pedestrian level off Plummer Street. Given that the project site is landlocked on all sides except the front yard, there is only one pedestrian entrance located along the Plummer frontage. Suggestions from PVP and the Urban Design Studio included removal of secondary fencing or architectural treatment to accentuate the entrance. The Applicant considered removal or relocation of the proposed fencing to help the project seem more open and welcoming, but ultimately decided against it due to security concerns and wanting to keep the students safe. The Applicant team also responded that the pedestrian gates will be welcoming to students and parents as they will have a softer backdrop of landscaping between the buildings fronting Plummer Street. Additionally, the main entrance is set back five feet into the campus to help make the entry more prominent and inviting.

While the project received positive feedback related to its extensive landscaping, as shown below in Figure 5, comments were raised regarding the retention of existing trees, particularly at the perimeter of the site, and the addition of more street trees. The Applicant team, in response, stated that the landscape architect and arborist were able to keep five (5) existing trees along the southern perimeter after considering the health of the trees. The Applicant stated that it would not be possible to widen the landscaped areas towards the rear of the site because the paved area is required to remain to comply with Fire Department turning radius standards. Regarding street trees, the Applicant team agreed to work closely with Urban Forestry to meet any requirements. Although the Bureau of Engineering has not required any dedications at this time, the Applicant agreed to continue coordinating with Urban Forestry in case there are additional street tree planting requirements. The Applicant team added that seven (7) new trees and drought-tolerant groundcover would be provided along the fence line fronting Plummer Street.



Figure 5. *Perspective rendering of the interior and landscaped areas of the proposed project.*

Several concerns were raised from both PVP and the general public related to traffic and congestion management. The project incorporates mitigation measures and project design features which were reviewed by the Department of Transportation (LADOT) for compliance with CEQA. In addition, the Applicant stated that pick-up and drop-off activities would be managed by designated staff. Specific staff members would be assigned to assist with morning drop-off Monday through Friday from 7:00 a.m. to 8:00 a.m. as well as afternoon pick-up from 2:30 p.m. to 3:30 p.m. on Mondays and Wednesdays through Friday. Tuesdays are early release days for the proposed school and, as such, pick-up would take place between 1:00 p.m. and 2:00 p.m. The Applicant stated that staff would be strategically placed along both pedestrian and vehicular routes to prevent congestion, ensure the safety of students, families, staff, and community members, and minimize any inefficiencies in the morning and afternoon procedures. The Applicant team also noted that they have experience implementing these procedures at their other school locations which have been operating successfully for several years.

The primary concern from the general public involved the preservation of the historic property and overconcentration of schools in the surrounding community. PVP also inquired as to whether the project could incorporate references to the historic property in the curriculum or through a plaque incorporated into the landscaping. The Applicant responded that the subject school, Valor Academy Elementary School, has a waitlist because they have reached capacity at their temporary location, thus demonstrating the need for the proposed project. The Applicant also stated that they were supportive of the application to designate the single-family house as a Historical-Cultural Monument and would comply with any subsequent requirements by the City. On January 27, 2023, the City Council voted to approve the proposed nomination and the Applicant, Bright Star, testified on the record in support of the Historical-Cultural Monument designation. The Applicant team stated that they would continue working with their architectural historian to ensure compliance with the Secretary of Interior Standards and Rehabilitation Standards as they preserve and adaptively reuse the property.

Other design and operational aspects of the project received positive feedback from the Urban Design Studio and PVP. The overall design of the school was well-received, particularly related to the harmonious incorporation of the existing house, the large setbacks surrounding the house, the use of natural light, the location of the play/outdoor areas, the separation of the younger grades, and the context-appropriate massing which also helps buffer school noise. The Urban

Design Studio appreciated that the design is water conscious but inquired whether alternate materials aside from artificial turf could be used given the heat in the San Fernando Valley and presence of microplastics. The Applicant responded that they would consider permeable pavers in lieu of asphalt which gets hot and look for alternatives to artificial turf during Design Development. The Applicant team also followed up with the Urban Design Studio to obtain suggestions for different types of grasses.

CONCLUSION

Based on evaluation of the project and information submitted to the record, staff recommends that the City Planning Commission find, after consideration of Mitigated Negative Declaration Case No. ENV-2022-5866-MND and the whole of the administrative record, there is no substantial evidence that the project will have a significant effect on the environment. Staff also recommends that the City Planning Commission approve the requested entitlements to allow for the construction, use, and maintenance of the proposed public charter elementary school.

CONDITIONS OF APPROVAL

Pursuant to Sections 12.24 U.24 and 16.05 of the Los Angeles Municipal Code, the following conditions are hereby imposed upon the use of the subject property:

Development Conditions

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the architectural plans, landscape plan, renderings, and materials submitted by the applicant, stamped "Exhibit A", and attached to the subject case file.

2. **Use.** The use of the property shall be limited to a school, for Grades TK (Transitional Kindergarten) through 4, with a maximum enrollment of 552 students. Any increase beyond the maximum enrollment, up to a maximum increase of 20 percent, shall require an application for a Conditional Use Plan Approval which may be delegated to the Director of Planning for initial decision. Any such application to increase enrollment beyond 552 students shall provide evidence of compliance with the conditions of this grant, that increased enrollment will not adversely impact traffic and parking in the surrounding neighborhood and include appropriate environmental clearance.

3. **Floor Area.** The total maximum floor area of all development proposed on the subject property shall be limited to 36,157 square feet.

4. **Building Height.** The project shall be permitted a maximum building height of 26 feet and six (6) inches.

5. **Setbacks.** Yards shall comply with all applicable provisions of the LAMC.

6. **Design:**

    a. All building facades shall utilize a minimum of two different materials. Windows, doors, balcony railings, and decorative features (such as light fixtures, planters, etc.) are excluded from meeting this requirement.

    b. All mechanical equipment on the roof shall be screened from view by any abutting properties. The transformer, if located in the front yard, shall be screened with landscaping on all exposed sides (those not adjacent to a building wall).

7. **Parking:**

    a. **Vehicle Parking.** The project shall provide at least the minimum required amount of vehicle parking consistent with the provisions of Section 12.21-A,4 of the LAMC.

    b. **Bicycle Parking.** The project shall provide a minimum amount of bicycle parking consistent with the provisions of Section 12.21-A,16 of the LAMC. A greater number may be provided at the applicant's discretion.

    c. Parking provided on-site shall not be utilized for events or uses occurring at off-site locations unless the property owner files a shared parking application pursuant to Section 12.27-1,15 of the LAMC and such request is granted.

8. **Landscaping:**

   a. All open areas not used for buildings, driveways, parking areas, or walkways shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect and to the satisfaction of the Department of City Planning.

   b. Prior to the issuance of a certificate of occupancy, a minimum 8-foot high wall made of slumpstone, decorative masonry, or other similar screening material shall be constructed along the eastern, and western property lines, as depicted in the plans in Exhibit "A", if no such wall already exists.

   c. The project shall provide a minimum of six (6) landscaped "finger island" planters within the surface parking lot, as depicted on the plans in Exhibit "A".

   d. A minimum of one 24-inch box tree (minimum trunk diameter of two inches and a height of eight feet at the time of planting) shall be planted on-site for every four surface parking spaces.

   e. Trees shall be located in such a manner and be of such a size that the trees are capable of producing an overhead canopy that will shade at least 50 percent of the westernmost row of vehicle parking stalls (consisting of 25 stalls) after 10 years of growth.

   f. Planting of required trees within the public right-of-way shall obtain approval from the Urban Forestry Division prior to obtaining clearance from the Department of City Planning. In the event that a required tree cannot be planted within the public right-of-way, those trees shall be planted on-site.

9. **Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source does not illuminate adjacent residential properties or the public right-of-way, nor the above night skies.

10. **Signage.** On-site signs shall comply with the Municipal Code. Signage rights are not part of this approval.

11. **Sustainability:**

   a. **Solar.** A minimum of 15 percent of the total roof area shall be reserved for the installation of solar panels. The solar panels shall be installed prior to the issuance of a certificate of occupancy. The lowest point of any solar panel may not be more than five feet above the roof line.

   b. **Electric Vehicle Parking.** All electric vehicle charging spaces (EV Spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in Section 99.05.106 of Article 9, Chapter IX of the LAMC.

Operational Conditions

12. All school administrators, faculty, and school board members shall be provided a copy of the subject determination.

13. Filming for commercial purposes shall be prohibited on the property. Student filming and filming for school promotional purposes shall be permitted, provided that such filming is not done outdoors after dark where the use of artificial light is employed.

14. No incidental gaming activity as described in Section 12.21-A,13 of the LAMC shall be permitted on the site.

15. **Hours of Operation:**

    a. Hours of operation shall be limited to 7:00 a.m. to 6:00 p.m., Monday through Friday, for the academic school year.

    b. Hours for classroom instruction shall be limited to 8:00 a.m. to 3:00 p.m., Monday through Friday, for the academic school year.

    c. Hours for after-school programs shall be limited between 3:00 p.m. and 6:00 p.m., Monday through Friday, to accommodate a maximum of 50 percent of the student body.

    d. School "special events" shall be limited to no more than ten (10) events annually. School board meetings and parent/teacher conferences are excluded from the definition of "special events." No more than one special event shall occur on a single day. Special events shall conclude at 8:00 p.m. Any special event expected to attract more than 150 people per school shall be held offsite. A copy of the list of special events for each school year shall be posted online on the schools' website.

    e. Summer school programming shall be limited to a maximum period of two weeks outside of the regular academic school year. Hours for any summer school programming is limited to 8:30 a.m. to 12:30 p.m., Monday through Friday.

    f. With the exception of teacher preparations, normal school maintenance, parent conferences with teachers, school board meetings and similar customary school activities, there shall be no use of the subject property beyond the hours specified above.

16. **Loading and Unloading.** Student drop-off/pick-up activities shall be located as indicated on the plans in Exhibit “A”. The drop-off/pick-up plan may be modified to the satisfaction of the Los Angeles Department of Transportation (LADOT). Modifications required by the LADOT shall be submitted to the Department of City Planning for the record.

    a. The school shall inform parents, students, faculty and staff in writing on an annual basis of all rules regulating school traffic and parking. A copy shall be mailed to the City Planning Department at the same time for inclusion in the case file. The school administration shall maintain a list of license plate numbers of all families whose children are enrolled as well as the license plate numbers for each employee who parks on the property.

    b. Activities outside normal instructional hours, including parent teacher conferences, school meetings, and other customary school activities shall be scheduled so as to adequately provide parking on-site for all staff and visitors. Arrangements shall be made to provide off-street parking for events exceeding the parking capacity on-site.

    c. The on-site drop-off and pick-up periods for the school shall occur as follows:

i. The on-site drop-off period for the school shall be limited to 7:00 a.m. to 8:00 a.m.

ii. The primary on-site pick-up period for the school shall be limited to 2:30 p.m. to 3:30 p.m., except on Tuesdays which is limited to 1:00 p.m. to 2:00 p.m., and the on-site pick-up period for students involved in after-school programs shall be approximately 5:30 p.m. to 6:30 p.m.

d. Carpool Program

i. The applicant shall distribute information to parents explaining the carpool program, which information shall include family names and phone numbers so that parents can identify potential carpool opportunities.

ii. The applicant shall require parents to sign a pledge for carpool plan participation and shall implement a formal policy requiring that 30 percent of students who are driven to and from the subject property each day arrive or depart in vehicles with at least one other student.

e. A minimum of five (5) monitors, consisting of school staff and parent volunteers wearing orange vests or other distinctive attire, shall supervise the pick-up/drop-off of students on the subject property during the prescribed hours and maintain smooth ingress to and egress from the subject property. At least one monitor shall be positioned at the vehicular entrance/exit at Plummer Street to ensure efficient movement of cars entering and exiting the school campus. One of the monitors shall be a "traffic ambassador" who is specially employed and trained by the applicant to prevent parents from the following (i) parking or double-parking on Plummer Street, (ii) queueing their cars on Plummer Street for drop-off or pickup and (iii) picking up and dropping off students on Plummer Street. The other monitors shall assist and support the traffic ambassador to prevent such violations. The traffic ambassador shall have the authority to take reasonable actions to enforce these requirements and require corrective action. The traffic ambassador shall report any such violations to the school administration and provide applicable license plate numbers.

f. The traffic ambassador shall be the first point of contact with the community to address any traffic and parking concerns and to work directly and cooperatively with the community to resolve them. Contact information for the traffic ambassador shall be distributed to immediate neighbors and be posted on the school's website.

g. Activities outside normal instructional hours, including parent teacher conferences, school meetings, and other customary school activities, shall be scheduled so as to adequately provide parking on-site for all staff and visitors. Arrangements shall be made to provide off-street parking for events exceeding the parking capacity on-site.

h. The parking and student drop-off/pick-up operational requirements shall be included in the school policies. These school policies should be communicated to faculty, staff, students, and parents at the beginning of the school year and be reinforced throughout the school year and should include information on parking operations, campus access and circulation, and on-site and off-site student drop-off/pick-up operations. In addition, contact information including phone number and contact person will be posted on signs on the school building with notice of the appropriate person to contact regarding school related traffic and parking issues.

i. The traffic ambassador shall oversee this program, which shall include appointment of parent coordinators, distribution of literature explaining the program, and the coordination and distribution of family names and phone numbers so that parents can identify potential carpool opportunities.

j. **Department of Transportation**. All new school projects must contact LADOT for an assessment of the school's proposed drop-off/pick-up process and to determine if any traffic controls, school warning and speed limit signs, school crosswalk and pavement markings, passenger loading zones and school bus loading zones are needed. The site plan indicating the driveway access and circulation shall be submitted, reviewed, and approved by LADOT and should be coordinated with LADOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, (213) 482-7024).

17. **School Calendar/Special Events, Parking, and Neighborhood Outreach and Notice.** The number of special events shall be limited to no more than ten (10) events annually. School administrative board meetings and parent/teacher meetings are excluded from the definition of "Special Events".

a. **School Calendar/Special Events.** A copy of the Calendar and List of Special Events shall be posted online on the school's website, and prominently at the school visible from the public right of way, 10 days prior to the beginning of each school year for public reference.

b. **Parking.** For all events, the use of local streets for parking shall be discouraged. The school shall coordinate and provide information for off-site parking area(s) as needed.

c. A Community Relations representative shall be designated, and contact information of that person shall be posted online on the school's website, and prominently at the school, at least 10 days prior to the beginning of each school year.

d. The school shall provide the public with a 24-hour "hot line" telephone number that shall be attended by a live person during regular hours of operation and all school special events outside of regular hours. If a live person is not available to answer the telephone call, a voicemail system shall be established for members of the public to report any problems associated with the operation of the school. A live person shall respond to all voicemail messages within 24 hours of the call being placed. An email address to submit concerns shall also be established and made available to the public. A complaint log shall be kept aggregating all live person calls, voicemails, and emails, and shall include the complainant's name, date and time of complaint, phone number and/or email address, the nature of the complaint, the date and time of response to the complaint, and a description of how the issue was responded to or resolved. To the extent feasible, the school shall also keep a record of all voicemails and emails concerning issues with the school's operations. Record of all complaints must be maintained on the premises. Information on how the public can report concerns or complaints shall be posted online on the school's website, and prominently at the school visible from the public right-of-way, for public reference at least 10 days prior to the beginning of each school year. Such records shall be maintained for the period between Planning actions, including between the approval of the case herein and the next subsequent Plan Approval application and between each Plan Approval application. Notwithstanding anything to the contrary in this Condition, with respect to any complaint relating to traffic or parking issues, such complaint shall be promptly

referred to the traffic ambassador, who shall respond within 24 hours after the applicable telephone call or voicemail message.

18. **Noise.**

a. No outdoor public address system or bell system shall be installed or maintained on the subject property. No paging system shall be installed which is audible outside the building in which it is located.

b. No exterior bells are permitted. Musical instruments used by members of the school band or orchestra shall be confined to within school buildings.

c. No amplified music or loud non-amplified music is permitted outside.

d. Compressors and other equipment which may introduce noise impacts beyond any property line shall be enclosed or otherwise attenuated such that potential noise sources are oriented away from neighboring properties. All equipment shall be in compliance with the requirements of the LAMC.

e. Motorized cleaning and landscaping (taking place outside) shall not be permitted before 8:00 a.m. or after 6:00 p.m.

19. **Deliveries.** The applicant shall instruct companies who make substantial deliveries to the subject property to do so between 6:00 a.m. and 1:00 p.m., but not during the stated hours of student drop-off/pick-up.

20. **Trash.** All trash collection and storage areas shall be located on-site and not visible from the public right-of-way.

a. Trash/recycling containers shall be locked when not in use.

b. Trash storage bins shall be located within a gated, covered enclosure.

c. Trash/recycling containers shall not be placed in or block access to required parking.

21. **Maintenance:**

a. The subject property, including any trash storage areas, associated parking facilities, sidewalks, driveways, yard areas, parkways, and exterior walls along the property lines, as well as the sidewalk in front of the subject property, shall be maintained in an attractive condition and shall be kept free of trash and debris.

b. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

22. **Security:**

a. An Emergency Procedures Plan shall be established identifying guidelines and procedures to be utilized in the event of fire, medical urgency, earthquake or other emergencies to the satisfaction of the Police Department and Fire Department prior to the issuance of a certificate of occupancy. A copy of such document shall be submitted to the City Planning Department upon its approval.

b. The property shall be internally secured when not in use.

c. A security plan shall be developed in consultation with the Los Angeles Police Department, outlining security features to be provided in conjunction with the operation of the school, prior to the issuance of a certificate of occupancy. In addition, the property owner shall provide to the Mission Community Police Station Commanding Officer a diagram of the site indicating access routes and any additional information to facilitate police response. A copy of such document shall be submitted to the City Planning Department upon its approval.

d. The campus shall be closed after the start of the school until student dismissal times. Students may not leave the campus unescorted at any time during the school day, including at lunch time.

23. **Plan Approval.** Within five (5) years from the issuance of a certificate of occupancy or temporary certificate of occupancy for the school, the property owner shall file a Plan Approval application and associated fees together with mailing labels for all property owners and tenants within 500 feet of the subject property. The matter shall be set for public hearing with appropriate notice. The purpose of the Plan Approval shall be to review the effectiveness of, and the level of compliance with, the terms and conditions of this grant, including the effectiveness of the carpool program, the management of traffic and circulation impacts associated with school drop-off and pick-up operations and any documented noise impacts from parking operations and activities on the surrounding residential properties. Upon review of the effectiveness of and compliance with the conditions, the Department of City Planning shall issue a determination. Such determination may delete, modify the terms and conditions and/or add new terms and conditions, as deemed appropriate. The Department of City Planning may also require one or more subsequent Plan Approval applications, if deemed necessary. The application shall include the following minimum information:

a. The number of students enrolled. Provide a copy of the ledger to verify enrollment numbers for each school year, including any summer sessions.

b. Operational changes to the school such as hours of operation and drop-off/pick-up policy. The schools shall annually monitor their student loading/unloading area and related traffic patterns during the drop-off and pickup hours. If there are neighborhood cut-through issues that could be resolved through neighborhood traffic calming measures (like the installation of speed humps, temporary turn restrictions, or changes to the loading zone), then the school shall work with the affected residents, Council Office and LADOT to determine the appropriate course of action. Prior to filing a Plan Approval application within the required five (5)-year period, within ninety (90) days after the end of the fourth (4th) year of operation, the applicant shall submit to the Department of City Planning and the Council Office a report prepared by a traffic consultant or with the assistance of a traffic consultant that (i) summarizes the effectiveness of the pick-up/drop-off system during the prior two school years, (ii) describes any refinements of that system implemented during the prior two school years and that will be implemented during the next school year and (iii) summarizes any substantial concerns, if any, raised by the community during the prior two school years and how the applicant responded to those concerns.

c. Physical modifications involving expansion or change of use or location. Provide a copy of the building permit for any physical modifications and certificate of occupancy for any expansions along with a copy of the Building and Safety-approved plans.

d. The status of participation in efforts to develop a comprehensive and effective schedule for staggering drop-off and pick-up times as to be sensitive to the preferences of their respective parent and student bodies and no less so to the property owners affected by such otherwise uncoordinated, and possibly duplicative, traffic patterns.

24. **AQ-1. Construction Emissions Reduction.** Prior to issuance of grading permits, the City Engineer and the Chief Building Official shall confirm that the grading plan, building plans, and specifications stipulate that the following measures shall be implemented:

a. All mobile off-road equipment (wheeled or tracked) greater than 50 horsepower used during construction activities shall meet the USEPA Tier 4 final standards Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards.

b. A copy of the equipment's certification or model year specifications shall be available upon request for all equipment on-site.

c. All unpaved demolition and construction areas shall be wetted at least twice times per day during excavation and construction.

d. Electricity shall be supplied to the site from the existing power grid to support the electric construction equipment. If connection to the grid is determined to be infeasible for portions of the project, a non-diesel fueled generator shall be used.

e. The project shall comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction.

25. **BIO-1. Nesting Bird Avoidance.** Project activities (including disturbances to native and non-native vegetation, structures and substrates) shall take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Wildlife Code Section 86). If Project activities cannot feasibly avoid the breeding bird season, beginning 30 days prior to the disturbance of suitable nesting habitat, the Applicant shall:

a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work.

b. If a protected native bird is found, the Applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is

vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d. The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

26. **BIO-2a. Avoidance and Minimization Measures for Protected and Non-Protected Significant Trees.** The following avoidance and minimization measures shall be implemented to reduce impacts to non-protected significant trees from Project activities.

a. **Monitoring.** No person shall impact the roots or canopy of trees without oversight of a certified arborist. The arborist shall be contacted no less than 72 hours prior to anticipated work within or immediately adjacent to the dripline of a tree to ensure availability and shall be present during initial ground disturbance activities that will occur within or immediately adjacent to the tree.

b. **Fencing.** Minimum 6-foot-tall chain-link fencing shall be placed between the construction area and the dripline. Fencing shall be maintained and in place through the duration of construction activities and until all equipment has been removed from the Site.

c. **Root Impacts.** Cutting or disturbing a large percentage of a tree's roots increases the likelihood of the tree's failure or death. Tree roots that are more than four inches in diameter shall never be cut, as roots that large are usually structural. Cutting them can destroy the stability of the tree, causing it to fall over. Where grading, cut-and-fill, trenching, or any other ground disturbing activity occurs or is specifically shown on the project plans within the dripline, the activity shall be done slowly to avoid ripping or tearing roots. Ripping or tearing roots can lead to rotting and decay and reduce stability and health in the tree. Hand tools or small hand-held power equipment shall be used instead within the dripline of a tree. Cutting roots two inches in diameter or greater shall be avoided wherever possible.

    i. The amount of allowable root disturbance shall be determined by the monitoring arborist. If the arborist determines that construction may compromise the tree's health or the structural integrity of the tree, work around that tree shall be suspended until measures to minimize the impact can be determined or until a permit is received by the city if the arborist determines that the tree may not survive the impact.

    ii. Roots that are two inches or more in diameter that are encountered shall be avoided until the arborist determines treatment measures. Cuts shall be prescribed by the arborist and should generally be done at right angles to the roots with a clean, sharp blade. New cuts shall be wetted and covered with absorbent tarp or heavy cloth fabric and remain in place until the trench/excavation is backfilled with soil and immediately watered.

d. **Equipment Staging.** Temporary equipment staging and storage shall be limited to designated areas away from the trees. No washing of equipment or vehicles shall occur within 50 feet of a preserved tree.

e. **Soil Compaction.** Soil compaction imposes a complex set of physical, chemical, and biological constraints on tree growth. Principal components leading to limited growth are the loss of aeration and pore space, poor gas exchange with the atmosphere, lack of available water, and mechanical impedance of root growth. Soil compaction is the largest single factor responsible for the decline of trees on construction sites. The following guidelines shall be implemented to protect trees from soil compaction that may occur due to project activities:

    i. No equipment or materials shall be stored under canopies, or within the dripline of trees. On-site staging, storage and washing of construction materials and equipment shall be limited to designated and approved areas. In areas where vehicles or equipment may impact tree roots, steel plates or plywood shall be installed to protect the root zone as needed.

f. **Mechanical Damage.** Inadvertent damage to limbs and branches (i.e., mechanical damage) from project equipment may occur if work, including staging and access, are within the dripline. If damage occurs to limbs and branches, immediate trimming with clean and sharp pruners shall occur in accordance with the American National Standards Institute (ANSI) standards discussed above. If damage to the bark or trunk occurs, wound dressings are not recommended. Treatment of said damages shall be applied in accordance with the ANSI A300 Management of Trees and Shrubs during Site Planning, Site Development, and Construction (ANSI 2012).

g. **Pruning.** All pruning/trimming shall be performed consistent with the ANSI A300 Pruning Standard (ANSI 2017) and shall adhere to the most recent edition of ANSI Z133.1. Pruning/trimming of protected trees shall be limited to only what is necessary for construction and conducted under the direct supervision of a certified arborist. Climbing spurs and spikes shall not be used.

    i. A thorough inspection of the canopy shall be conducted to determine pruning specifications.

    ii. Within no more than one week prior to excavation, trenching, or other subsurface work that would occur within the root zone, the soil within the dripline of the tree shall be deep irrigated. This can be accomplished using a soaker hose for approximately 2 to 6 hours, depending on the volume of water and soil texture. This will allow water to be absorbed by the roots. This can be performed a few days before the root pruning is to be performed.

    iii. In areas where grading, cut-and-fill, or trenching will take place, digging shall be by hand shovel for the first 2 to 3 feet where most roots are expected to occur.

    iv. Any root pruning shall be performed carefully. The roots shall be exposed through hand digging. The roots shall be cut at a 90- degree angle and cut cleanly. No roots shall be torn or jagged, as this can lead to rotting and decay in the root zone and reduce stability and health in the tree. Excessive root pruning is not recommended. If a tree is in any stress or is lacking in health and vigor, the root pruning can contribute to the quick decline of a tree.

v. If any root zone is left open for an extended period, the contractor shall lightly apply moisture to keep the roots from drying out. Also, roots shall not sit in a pool of water during construction. This situation can also cause rotting and decay.

vi. After root pruning is complete, backfill with native soil. Do not overly compact. Water every 1 to 2 feet to reduce air pockets.

vii. A Certified Arborist shall be on site to observe the root-pruning.

27. **BIO-2b. Measures for Replacement of Protected and Non-Protected Significant Trees.** In accordance with the City's Protected Tree Ordinance, the Board of Public Works may require the following for the removal of a protected tree. The following is assumed to apply to protected and non-protected significant trees:

a. Replacement with at least four specimens of a protected variety (i.e., 1:4 ratio). Each replacement tree shall be at least a 15-gallon, or larger specimen, measuring one inch or more in diameter one foot above the base, and be not less than seven feet in height measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.

b. Replacement with trees of a lesser size or of a different protected species to be planted as replacement trees, if replacement trees of the size and species otherwise required pursuant to the City's Protected Tree Ordinance are not available. In such event, a greater number of replacement trees may be required.

c. Relocation of a protected or non-protected significant tree to another location on the property, provided that the environmental conditions of said new location are favorable to the survival of the tree and there is a reasonable probability that the tree will survive. In addition, the City Planning Department policy requires mitigation at a 1:1 ratio for removal of the non-protected significant trees. The Board of Public Works may charge an in-lieu fee for removal of street trees, per LAMC Section 62.171 and 62.177.

28. **CUL-1. Historical Resource Design Review.** Project Applicant shall engage a qualified historical architect or architectural historian that meets the Secretary of the Interior's Professional Qualifications Standards (as codified in 36 CFR Part 61) to be part of the Project design team. The qualified consultant shall have demonstrated experience providing design guidance for projects of a similar scope involving the adaptive reuse of historical resources. The qualified consultant shall perform periodic reviews of the Project as its design progresses and provide input to the design team during the design process to ensure that the Project remains in compliance with the Secretary of the Interior Standards for the Treatment of Historic Properties (SOI Standards). Reviews shall be performed minimally when Project Plans are 50 percent and 80 percent complete. The reviews shall include a review of the Project's compliance with the SOI Standards and provide recommendations aimed at achieving compliance as necessary. Prior to the issuance of grading permits, the qualified consultant shall prepare a SOI Standards project review memorandum to document the Project's compliance with the SOI Standards. The memorandum shall be submitted to the City of Los Angeles for review, comment, and approval. In the event that the City does not concur with the findings of the memorandum, designs shall be modified until compliance with the SOI Standards and concurrence is obtained.

29. **CUL-2. Unanticipated Discovery of Cultural Resources.** In the unlikely event that archaeological resources, including trash pits associated with the existing 1914 single-family residence, are unexpectedly encountered during ground-disturbing activities, work in the immediate area shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (as codified in 36 CFR Part 61) shall be contacted immediately to evaluate the find. If the find is prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.

30. **GEO-1. Geotechnical Engineering Measures.** Final design and construction plans for the Project shall incorporate geotechnical engineering recommendations based on site specific soil investigations, and shall consider collapsible soils, protection from corrosive soils, and other applicable soil conditions. More specifically, final design and plans shall incorporate geotechnical engineering recommendations from the Geotechnical Investigation Report prepared by LK Geotechnical Engineering in February 2022.

31. **GEO-2. Unanticipated Discovery of Paleontological Resources.**

    a. **Paleontological Worker Environmental Awareness Program.** Prior to the start of construction, a Qualified Professional Paleontologist (as defined by SVP [2010]) or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.

    b. **Unanticipated Discovery of Paleontological Resources.** In the event a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a Qualified Professional Paleontologist. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant, the applicant shall retain a Qualified Professional Paleontologist to direct all mitigation measures related to paleontological resources. The Qualified Professional Paleontologist shall design and carry out a data recovery plan consistent with the SVP (2010) standards.

32. **HAZ-1. Septic Tank Removal.** If encountered, the septic tank shall be properly removed in accordance with all applicable City of LA regulatory requirements. If evidence of a release of a petroleum product or hazardous materials from the septic tank is observed at the time of removal, the Project Applicant shall stop all removal work and retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to prepare a Soil Management Plan and conduct a Subsurface Investigation.

33. **HAZ-2. Asbestos-Containing Materials.** The Project Applicant shall have the asbestos containing materials (ACMs) at the existing on-site structure identified in the Limited Asbestos Survey prepared by NV5 Alta Environmental in February 2022 removed according to proper abatement procedures recommended by an asbestos consultant. All abatement activities shall be in compliance with California and Federal Occupational Safety and Health Administration, and with the South Coast Air Quality Management District (SCAQMD) requirements. Only asbestos trained and certified abatement

personnel shall be allowed to perform asbestos abatement activities onsite. All ACMs removed from onsite structure shall be hauled and disposed of by a transportation company certified to handle asbestos and hazardous materials. If additional ACMs are found to be present, a qualified asbestos abatement consultant shall abate ACMs in compliance with the SCAQMD Rule 1403 as well as all other State and federal rules and regulations.

34. **NOI-1. Construction Vibration.** Grading and earthwork activities within 12 feet of adjacent residential structures or within 10 feet of the on-site existing building shall be conducted with off-road equipment that is limited to 100 horsepower or less.

35. **TRAF-1. Alternative Transportation Options.** The Project shall utilize promotional and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that employees can choose to read at their own leisure.

36. **TRAF-2. Ride-Share Program.** The Project shall proactively aim to increase employee vehicle occupancy by providing ride-share matching services, designating preferred parking for rideshare participants, designing adequate passenger loading/unloading and waiting areas for rideshare vehicles, and providing a website or message board to connect riders and coordinate rides.

37. **TCR-1. Unanticipated Discovery of Tribal Cultural Resources.** In the event that tribal cultural resources of Native American origin are found during Project-related ground disturbance, excavation and other construction activity in that area shall cease. If the City of Los Angeles, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with State guidelines and in consultation with Native American groups. The mitigation plan may include but would not be limited to avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon means.

Administrative Conditions

38. **Grant.** The Conditional Use grant is non-transferable and shall have no expiration date except as provided under Sections 12.24-M, 12.24-P and 12.24-Q of the Los Angeles Municipal Code.

39. **Approvals, Verification and Submittals**. Copies of any approvals, guarantees or verification of consultations, reviews or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning for placement in the subject file.

40. **Building Plans.** A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.

41. **Notations on Plans.** Plans submitted to the Department of Building and Safety for the purpose of processing a building permit application shall include all of the Conditions of

Approval herein attached as a cover sheet and shall include any modifications or notations required herein.

42. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of city Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

43. **Code Compliance.** All area, height and use regulations of the zone classification of the subject property shall be complied with, except wherein these conditions explicitly allow otherwise.

44. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.

45. **Corrective Conditions.** The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the City Planning Commission, or the Director pursuant to Section 12.27.1 of the Municipal Code, to impose additional corrective conditions, if, in the Commission's or Director's opinion, such conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.

46. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public offices, legislation or their successors, designees or amendment to any legislation.

47. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.

48. **Expedited Processing Section.** Prior to the clearance of any conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.

49. **Indemnification and Reimbursement of Litigation Costs**

Applicant shall do all of the following:

a. Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim

personal property damage, including from inverse condemnation or any other constitutional claim.

b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).

d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).

e. If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions include actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

Conditional Use Findings

1. **That the project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.**

   The project involves the construction, use, and maintenance of a new public charter elementary school campus for Valor Academy Elementary School ("VAES") with a maximum enrollment of 552 students for grades Transitional Kindergarten (TK) to Fourth grade. Proposed improvements include 28 classrooms within a new one- and two-story building, a multi-purpose room, and an existing house which will be preserved and incorporated as administrative and support space.

   Valor Academy Elementary School is an existing public charter elementary school which has been operating in the San Fernando Valley since 2016. Currently, the elementary school is located approximately three (3) miles away from the subject property at a temporary location leased by the Applicant, Bright Star. Since 2016, the school has already moved once in order to accommodate its needs. The school's current location is limited in space with 16 classrooms and an enrollment of 380 students with a wait list. The proposed project would allow for VAES to have a larger capacity, with 28 classrooms and a maximum enrollment of 552 students. The proposed project would also allow VAES to have a permanent location which is close to the middle school and high school operated by Bright Star, thus completing its North Hills cluster. The middle school and high school are already permanent locations, so the location of the proposed elementary school is ideal to facilitate drop-offs and pick-ups of families with children in different schools and help ease the transition as students matriculate from one school to the next.

   VAES is a public charter elementary school that has been serving the North Hills community for the past six years, providing free high-quality education to local families. The project site is currently developed with a historic single-family residence and otherwise vacant and unimproved land. The proposed project would be improving the land to align with the most recent Mobility Plan policies and Municipal Code requirements. Additionally, the project would be preserving and renovating the existing historic house. Previous renovations done to the house to date have not followed any preservation guidelines, but the project would follow the Secretary of Interior Standards to preserve any character defining features as advised by a qualified historic consultant and architect. The proposed project will be constructed with high quality materials and has been designed with respect to the Plummer Street frontage and existing character of the neighborhood.

   Therefore, the project will enhance the built environment in the surrounding neighborhood and will perform a function that is beneficial to the community, city and region.

2. **That the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood or the public health, welfare, and safety.**

   The project site is a relatively flat parcel of land consisting of two (2) adjoining lots, totaling approximately 89,629 square feet (approximately 2.06 acres) in size. The subject property fronts Plummer Street to the north and is further bound by Orion Avenue to the west, Sepulveda Boulevard to the east, and Vincennes Street to the south. The western lot (approximately 1.30-acres in size) is currently undeveloped and covered with grasses, shrubs,

and various mature trees. The eastern lot (approximately 0.76-acre in size) is currently developed with a one-story single-family residence with similar vegetation as the other lot. The on-site single-family residence located at 15526 West Plummer Street was built in 1914 and is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. The residence would remain on the site as part of the project but would be converted into additional administrative space for the proposed school.

The subject property is located in the North Hills area, an established suburban neighborhood in the San Fernando Valley developed mostly in the early- to mid-20th century. The site fronts the southerly side of Plummer Street where the property's front yard is located. The surrounding neighborhood primarily consists of low-density residential uses and single-family residences. The subject property is surrounded by single-family residences within the RA-1 Zone on the eastern, southern, and western sides. Properties to the north, across Plummer Street, are also zoned RA-1 and developed with single-family residences. Further out, a three-story multi-family apartment complex is located three parcels east which is adjacent to various commercial uses. Several parcels west of the project site is the 405 Freeway.

The project involves the construction, use, and maintenance of a new public charter elementary school campus for Valor Academy Elementary School ("VAES") with a maximum enrollment of 552 students for grades Transitional Kindergarten (TK) to Fourth grade. Project improvements include 28 classrooms within a new one- and two-story building, a multi-purpose room, and an existing house which will be preserved and incorporated as administrative and support space, as described above. Proposed buildings will total 36,157 square feet of gross floor area and rise to a maximum height of 26 feet and six (6) inches.

The project complies with all objective zoning standards and involves a use that is allowable in the RA-1 Zone with a Conditional Use Permit. The project's maximum building height is 26 feet and six (6) inches which is well within the 30-foot height limit of the site. The two-story portion of the school would be located at the center/interior of the site, at times up to 75 feet away from abutting properties, to provide privacy and not tower over adjacent residences. The project's proposed Floor Area Ratio (FAR) is 0.40 to 1 which is significantly less than the 3:1 FAR allowed on the site. The project's low building coverage and massing allows the project to fit harmoniously into the scale of the existing residential neighborhood and also provide abundant landscaping and open areas. The project meets required setbacks for the rear and side yards while exceeding the minimum setback in the front yard. The project is required to provide at least a 25-foot front yard setback but provides a minimum 31-foot setback to remain compatible with the existing single-family house and maintain the same feel as the prevailing Plummer Street frontage. The project is required to provide 28 parking spaces but exceeds this amount by 21 spaces for a total of 49 parking spaces. The project proposes a single long driveway that leads to a designated drop-off/pick-up area and surface parking lot located towards the rear of the site. The provision of parking and the proposed circulation plan are intended to ensure that traffic activities are streamlined within the site rather than on the adjacent public streets. In addition to the site planning of the project, an eight-foot block wall and tall hedges are proposed along the sides and rear property lines to buffer the school uses. Play areas with equipment are proposed towards the center of the campus where potential noise impacts will be buffered by buildings, fences, large setbacks, and landscaping.

Operation of the school will not result in a significant impact to the community. The project has been conditioned, including the imposition of mitigation measures, to minimize impacts onto the surrounding properties. The proposed school will not have bells, loudspeakers, PA systems, or any other type of intercom system which may cause potential noise impacts. All facilities will only be used during operating hours by students and staff of the school. Any potential environmental impacts have been analyzed thoroughly and mitigated to a less than significant extent.

As such, the project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood or the public health, welfare, and safety.

3. That the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

The subject property is located within the Mission Hills – Panorama City – North Hills Community Plan Area which is one of the 35 Community Plans that make up the Land Use Element of the General Plan. The Community Plan Area Map designates the subject property for Low Residential land uses corresponding to the RE9, RS, R1, and Zones. The project site was previously zoned (T)(Q) RE9-1, in accordance with the designated land use, but because the Zone Change was never effectuated, the subject property reverted back to its underlying RA-1 zoning. The property is not located within the boundaries of or subject to any Specific Plan, Community Design Overlay, or Interim Control Ordinance.

The Los Angeles Municipal Code (LAMC) permits the use of public charter schools within the RA Zone with the approval of a Conditional Use Permit subject to certain findings. Therefore, the requested Conditional Use Permit for the proposed school use is permissible per the underlying zone and land use designation of the project site. The project is consistent with the following specific goal, objective, and policy of the Mission Hills – Panorama City – North Hills Community Plan:

GOAL 6: Appropriate locations and adequate facilities for schools to serve the needs of the existing and future population.

Objective 6-1: To site schools in locations complimentary to existing land uses, recreational opportunities and community identity.

Policy 6-1.1: Encourage compatibility in school locations, site layout, and architectural design with adjacent land uses and community character, and, as appropriate, use schools to create a logical transition and buffer between differing uses.

Policy 6-1.2: Site schools in a manner which compliments and preserves the existing stable single family and multiple-family residential neighborhoods.

GOAL 16: Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.

The project is further consistent with other elements of the General Plan, including the Framework Element. The Framework Element was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001 and provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide polices regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The project supports the following goals, objectives, and policies of the Framework Element:

GOAL 9N: "Work constructively with LAUSD to promote the siting and construction of adequate school facilities phased with growth."

Objective 9.32: "Work constructively with LAUSD to promote the siting and construction of adequate school facilities phased with growth."

Policy 9.32.1: "Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development."

Policy 9.32.2: "Explore creative alternatives for providing new school sites in the City, where appropriate."

The project will enable Valor Academy Elementary School to continue to provide and expand a valuable public service for the region. The existing public charter elementary school currently operates out of a temporary leased location with a church. The current school is a much smaller facility with only 16 classrooms for an enrollment of 380 students with a waitlist. The proposed project will enable VAES to vacate its current location and establish an independent and permanent campus. The new campus will provide additional amenities, all of which will enhance the quality of education that is available to the community. The project will also enable the school to accept new students while growing into a larger facility and keeping the student to teacher ratio low. The location of the project is ideal for current students and families of those who attend the Bright Star middle and high school which are in close proximity. Thus, the project would serve the existing and future families in the neighborhood.

The project will be developed in a manner that meets all applicable zoning parameters, including setbacks, height, FAR, and parking. In many cases, the project will be developed far below the allowable development limits in order to keep the school in character and scale with the surrounding residential neighborhood. In addition, the existing single-family residence which is listed in SurveyLA as an eligible resource and designated as a Historical-Cultural Monument will be preserved and rehabilitated. The project will be repurposing the house as administrative space in accordance with the Secretary of Interior Standards to ensure that any contributing characteristics are not degraded. The proposed project will be a free public charter school that will both serve the community and maintain harmony with the existing built environment. The project has been conditioned to ensure compliance with all applicable regulations and to ensure that there will be no negative impacts on the surrounding community. Therefore, the project substantially conforms with the purpose, intent, and provisions of the General Plan.

Site Plan Review Findings

4. That the project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The subject property is located within the Mission Hills – Panorama City – North Hills Community Plan Area which is one of the 35 Community Plans that make up the Land Use Element of the General Plan. The Community Plan Area Map designates the subject property for Low Residential land uses corresponding to the RE9, RS, R1, and Zones. The project site was previously zoned (T)(Q) RE9-1, in accordance with the designated land use, but because the Zone Change was never effectuated, the subject property reverted back to its underlying RA-1 zoning. The property is not located within the boundaries of or subject to any Specific Plan, Community Design Overlay, or Interim Control Ordinance.

The Los Angeles Municipal Code (LAMC) permits the use of public charter schools within the RA Zone with the approval of a Conditional Use Permit subject to certain findings. Therefore, the requested Conditional Use Permit for the proposed school use is permissible per the underlying zone and land use designation of the project site. The project is consistent with the following specific goal, objective, and policy of the Mission Hills – Panorama City – North Hills Community Plan:

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Policy 6-1.1: Encourage compatibility in school locations, site layout, and architectural design with adjacent land uses and community character, and, as appropriate, use schools to create a logical transition and buffer between differing uses.

Policy 6-1.2: Site schools in a manner which compliments and preserves the existing stable single family and multiple-family residential neighborhoods.

GOAL 16: Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.

The project is further consistent with other elements of the General Plan, including the Framework Element. The Framework Element was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001 and provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide polices regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The project supports the following goals, objectives, and policies of the Framework Element:

GOAL 9N: "Work constructively with LAUSD to promote the siting and construction of adequate school facilities phased with growth."

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The project will enable Valor Academy Elementary School to continue to provide and expand a valuable public service for the region. The existing public charter elementary school currently operates out of a temporary leased location with a church. This current school is a much smaller facility with only 16 classrooms for an enrollment of 380 students with a waitlist. The

proposed project will enable VAES to vacate its current location and establish an independent and permanent campus. The new campus will provide additional amenities, all of which will enhance the quality of education that is available to the community. The project will also enable the school to accept new students while growing into a larger facility and keeping the student to teacher ratio low. The location of the project is ideal for current students and families of those who attend the Bright Star middle and high school which are in close proximity. Thus, the project would serve the existing and future families in the neighborhood.

The project will be developed in a manner that meets all applicable zoning parameters, including setbacks, height, FAR, and parking. In many cases, the project will be developed far below the allowable development limits in order to keep the school in character and scale with the surrounding residential neighborhood. In addition, the existing single-family residence which is listed in SurveyLA as an eligible resource and designated as a Historical-Cultural Monument will be preserved and rehabilitated. The project will be repurposing the house as administrative space in accordance with the Secretary of Interior Standards to ensure that any contributing characteristics are not degraded. The proposed project will be a free public charter school that will both serve the community and maintain harmony with the existing built environment. The project has been carefully conditioned to ensure compliance with all applicable regulations and to ensure that there will be no negative impacts on the surrounding community. Therefore, the project substantially conforms with the purpose, intent, and provisions of the General Plan.

5. **That the project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

The project involves the construction, use, and maintenance of a new public charter elementary school campus for Valor Academy Elementary School ("VAES") with a maximum enrollment of 552 students for grades Transitional Kindergarten (TK) to Fourth grade. Project improvements include 28 classrooms within a new one- and two-story building, a multi-purpose room, and an existing house which will be preserved and incorporated as administrative and support space. Proposed buildings will total 36,157 square feet of gross floor area and rise to a maximum height of 26 feet and six (6) inches.

The subject property is located in the North Hills area, an established suburban neighborhood in the San Fernando Valley developed mostly in the early- to mid-20th century. The project site is located midblock between Orion Avenue to the west and Sepulveda Boulevard to the east. The site fronts the southerly side of Plummer Street where the property's front yard is located. The surrounding neighborhood primarily consists of low-density residential uses and single-family residences. The subject property is surrounded by single-family residences within the RA-1 Zone on the eastern, southern, and western sides. Properties to the north, across Plummer Street, are also zoned RA-1 and developed with single-family residences. Further out, a three-story multi-family apartment complex is located three parcels east which is adjacent to various commercial uses. Several parcels west of the project site is the 405 Freeway.

Vehicular ingress and egress will occur off Plummer Street on the western portion of the site. The project will provide 49 on-site vehicular parking spaces within a surface parking lot and designated drop-off/pick-up area. The project will provide 16,366 square feet of landscaping and 50,228 square feet of paved area or hardscape which includes green spaces and recreation areas for students. A single pedestrian entrance will be located off Plummer Street through the main office near the preserved historic home. The project proposes an eight-foot-

high block wall along the side yards and rear yard. A fence and gates will be provided along the front yard (Plummer Street). The subject school will also have secondary fencing around the perimeter of the buildings to limit access to students, staff, and other authorized visitors onto the campus.

Height, Bulk, and Setbacks

The proposed project meets all objective height, FAR, and setback requirements per the underlying RA Zone and Los Angeles Municipal Code zoning. The project's maximum building height is 26 feet and six (6) inches which is well within the 30-foot height limit of the site. The two-story portion of the school would be located at the center/interior of the site, at times up to 75 feet away from abutting properties, to provide privacy and not tower over adjacent residences. The project's proposed Floor Area Ratio (FAR) is 0.40 to 1 which is significantly less than the 3:1 FAR allowed on the site. The project's low building coverage and massing allows the project to fit harmoniously into the scale of the existing residential neighborhood and also provide abundant landscaping and open areas. The project meets required setbacks for the rear and side yards while exceeding the minimum setback in the front yard. The project is required to provide at least a 25-foot front yard setback but provides a minimum 31-foot setback to remain compatible with the existing single-family house and maintain the same feel as the prevailing Plummer Street frontage. In addition to the arrangement of buildings, an eight-foot block wall and tall hedges are proposed along the sides and rear property lines to buffer the school uses. Play areas with equipment are proposed towards the center of the campus where potential noise impacts will be buffered by buildings, fences, large setbacks, and landscaping. Therefore, the height, bulk, and setbacks of the project are consistent with existing development in the immediate surrounding area and will be compatible with the existing and future developments in the neighborhood.

Parking

The project is required to provide 28 parking spaces but exceeds this amount by 21 spaces for a total of 49 parking spaces. Vehicular ingress and egress will occur off a single curb-cut and driveway off of Plummer Street on the western portion of the site. The project is designed with a single long driveway that leads to a designated drop-off/pick-up area and surface parking lot located towards the rear of the site. Once vehicles enter the property, cars will continue to loop around until reaching a right-turn only exit. The long drive aisle is designed to accommodate queuing on the property and locate drop-off and pick-up activities directly in front of the entrance to the school to keep students close to their play areas and classrooms, away from wandering onto the street. Conditions have also been imposed to require designated staff to monitor and manage traffic during morning and afternoon hours. The provision of parking and the proposed circulation plan are intended to ensure that traffic activities are streamlined within the site rather than on the adjacent public streets. As such, the parking facilities will be compatible with the existing and future development in the neighborhood.

Lighting

Lighting is required to be provided per LAMC requirements. The project proposes lighting at parking lot entrances and exits. The project is required to provide outdoor lighting with shielding, so that the light source cannot be seen from adjacent residential properties. The Project would also comply with LAMC lighting regulations that include the following: approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto specified sensitive uses,

under the terms of the LAMC Section 93.0117(b). Therefore, the lighting will be compatible with the existing and future developments in the neighborhood.

On-Site Landscaping

The project features landscaped areas and open recreation areas throughout the site. The project would include 16,366 square feet of landscaped area, in addition to two play areas (13,060 square feet) and a kindergarten play area (1,300 square feet) resulting in a total of 30,726 square feet of open space and landscaping. The project includes approximately 50,228 square feet of hardscape and paved areas. The existing conditions of the project site include 56 on-site trees/shrubs, of which four (4) are dead and will be removed. In addition, 41 trees/shrubs will require removal, which consist of nine protected native trees/shrubs and 32 non-protected significant trees. The project would retain 12 existing non-protected significant trees (two of which are street trees) and one protected native tree. Development of the project would result in the planting of 68 new trees on-site for a total of 79 trees including the existing trees. Existing mature trees were retained along the perimeter of the site where feasible. The project will feature extensive landscaping to both provide open green areas for the students as well as beautify views of the project from the public rights-of-way. Therefore, the on-site landscaping will be compatible with the existing and future developments in the neighborhood.

Loading/Trash Area

The project will provide a 400 square-foot loading area in accordance with the Municipal Code requirements. The loading area will be located along the primary driveway and designated pick-up/drop-off area for convenient access and queuing. The project provides a trash enclosure towards the rear of the site, adjacent to the multi-purpose room and contained within a five-foot-tall wrought iron fence. The provision of loading and trash areas will allow vehicles to have plenty of space to turn on-site and keep any truck traffic off of Plummer Street.

As such, as proposed, the project is compatible with existing and future development on neighboring properties.

6. **That any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

   The proposed project does not contain any residential uses and thus this finding does not apply.

Environmental Findings

7. **Environmental Finding.** Pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2022-5866-MND, circulated on November 23, 2022 ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment.

8. **Flood Insurance.** The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone C, areas of minimal flooding.

PUBLIC HEARING AND COMMUNICATIONS

A public hearing for Case No. CPC-2022-5865-CU-SPR was held on Tuesday, December 20, 2022. Due to concerns over COVID-19, the hearing was conducted entirely telephonically. The purpose of the hearing was to receive public testimony on behalf of the City Planning Commission as the decision maker on the case.

1. Attendees

   The hearing was attended by approximately 52 people, including the applicant, the applicant's representatives, a representative from Council District 7, and members of the public.

2. Applicant Testimony

   Elijah Sugay, the applicant, Silvia Saucedo, the applicant's representative, and Richard Berliner, the project architect, presented the proposed project via PowerPoint. Mr. Sugay opened the presentation, with Ms. Saucedo providing translation, and discussed the following:

   - An introduction to Bright Star Schools as an organization founded in 2003 operating nine (9) public charter schools within three (3) Los Angeles communities
   - An overview of Valor Academy Elementary School (VAES) and its curriculum
   - The school's need for a permanent campus as the school has moved two (2) times since 2016 and is currently leasing a temporary space in a church which has limited space, restricting enrollment, and limited playground space
   - Bright Star Schools are supportive of the Historical-Cultural Monument nomination
   - The project site has a three-story apartment to the east and residences surrounding the south and west
   - Outreach efforts which have been conducted since March of 2022 and has involved door knocking, coordination with individual leaders, the North Hills East Neighborhood Council and the North Hills West Neighborhood Council

   Ms. Saucedo and Mr. Berliner presented and discussed the following:

   - Goals with design of the project were to be compatible with the neighborhood, partition circulation, provide a green campus, and preserve the historic single-family residence
   - Drop-off and pick-up activities would be taken off Plummer Street, featuring an approximately 500-foot-long driveway that accommodates at least 33 vehicles in the queue
   - The driveway includes a bypass lane in case vehicles get stuck so there is constant flow of traffic on-site to not disturb Plummer Street
   - The circulation and driveway plan has been reviewed by the Fire Department to ensure compliance
   - The proposed structures are well within the allowable height, massing, and setbacks permitted by the underlying zoning
   - Two-story buildings are intentionally in the center, surrounded by single-story buildings, to ensure there is adequate buffer from the adjacent residences
   - Project has been designed so that the playgrounds and courtyards are also in the center to contain noise
   - There will be an eight-foot wall along the school perimeter to ensure campus safety

- Each classroom is accessed through exterior walkways and equipped with MERV-13 filters to clean the air
- The project incorporated as many open lawns and low-water, native plants as possible

3. Public Testimony

- Approximately 36 members of the public, including members of the Coalition for Racial & Ethnic Equity in Development (CREED), current Bright Star/VAES parents, teachers, and students, and nearby residents testified regarding the project. Approximately 11 of the speakers were CREED representatives who were opposed to the project due to an inadequate environmental review and the lack of unionized construction workers. Approximately 12 speakers spoke in opposition to the project, expressing concern over traffic and massing, the overconcentration of schools in the neighborhood, proximity to the freeway, and the desire for a neighborhood park which incorporates the historic residence in lieu of the proposed school project. Approximately 13 speakers spoke in support of the project, citing the need for a permanent independent campus for the school, the quality of education that the school currently provides, and the value that the school would bring to the community.

- A representative of Council District 7, Planning Deputy Cristian Tafoya, attended the public hearing but stated that the Council Office does not have a position on the project. Mr. Tafoya stated that they were present for observation only and did not want to provide any testimony for the public record.

4. Applicant Response

- In response to concerns over air quality, Heather Dubois, an air quality specialist from Rincon, stated that a Health Risk Assessment was conducted using standard methodology which accounted for the higher quality MERV filters that help mitigate air pollution impacts. Ms. Dubois stated that the air quality study submitted by CREED utilized different methodologies which lead to different outcomes. The project would incorporate MERV-13 filters, as required by the Code, and would result in an air quality risk that is below the allowable threshold.

- In response to concerns over the integrity of the historic home, Julieann Murphy, the Applicant's historic consultant, explained that the adaptive reuse of the house as part of the project would result in less than significant impacts with mitigations. The proposed mitigation requires a partnership with an architectural historian to ensure compliance with the Secretary of Interior Standards and coordination with an architect to meet Rehabilitation Standards. This collaboration would ensure that the most important aspects of the house's historic nature and character-defining features are retained and preserved. A memorandum would then be submitted to the City upon completion. The exterior of the house would look similar but be restored. The interior of the home which has not been destroyed will be restored and used as meeting rooms rather than classrooms, as demonstrated commonly in other projects incorporating and preserving historic structures.

- In response to concerns over traffic, David Shender, the Applicant's traffic consultant, stated that a transportation analysis was prepared and reviewed by LADOT which determined that transportation-related impacts would be less than significant per CEQA. The transportation study evaluated Vehicle Miles Traveled (VMT) and impacts related to intersections along Plummer Street and determined that no changes were

needed. Mr. Shender stated that at least 10 vehicles would be queued on-site during peak hours which would be sufficiently accommodated by the site which can accommodate 33 vehicles in queue.

- In response to concerns over noise, the Applicant team stated that a noise report was conducted and found that ambient noise would not be significantly impacts because the project is located in a fully urbanized area. The school will not utilize school bells but rather "calling out systems" so as to not disturb other classes that are in session. Additionally, noise would be mitigated through various aspects of design, such as the play areas and courtyard being barricaded by buildings and the eight-foot concrete wall along the perimeter of the site that is surrounded by landscaping. Mechanical equipment would be designed to meet the Green Building Code Standards which further mitigates potential for noise impacts.

- The Applicant team closed with additional details pertaining to the school's operation and goals. The Applicant stated that the school offers designated support for students who speak second languages (which may impact English learning scores), special programs and gardening for environmental needs, and lessons for students to become active community members. The Applicant team noted that they operate 12 schools in the community and that they took great lengths to design the school to match the existing historic home. Bright Star has been supportive and in favor of the Historical-Cultural Monument nomination from the beginning. The Applicant also noted that they are experienced operators who have been successfully part of the community, particularly for the other two (2) Valor schools in the vicinity which are on Nordoff and the other on Limona. They have allowed the use of their facilities for community uses/events when needed and intend to continue doing so.

Additional Communications

Planning staff received several communications prior to and after the public hearing both in support and opposition to the project. These communications are contained in full within Exhibit E.

Response to Comments

The comments made at the public hearing and otherwise received have been addressed in the Issues and Considerations section of the staff report, Pages A-6 through A-8.

EXHIBIT A

Plans

Site Plan, Floor Plans, Elevations, Landscape Plan,
Renderings, Site Photos

BRIGHT STAR SCHOOLS
VALOR ACADEMY ELEMENTARY SCHOOL

PLANNING ENTITLEMENTS

08/04/2022

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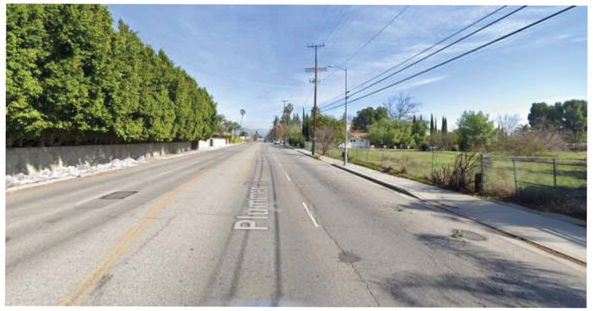
14 TREE DISPOSITION PLAN

15 PLANTING PLAN


Plummer St

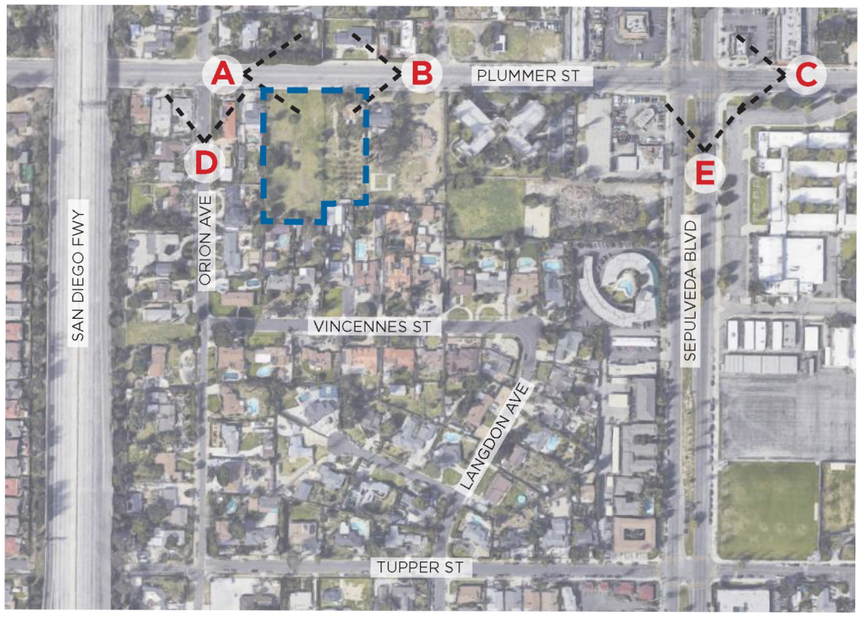
A


Plummer St

B


Plummer St

C


A
B
C
D
E
PLUMMER ST
SAN DIEGO FWY
ORION AVE
SEPULVEDA BLVD
VINCENNES ST
LANGDON AVE
TUPPER ST


Orion Ave

D


Sepulveda Blvd

E



PROJECT DESCRIPTION

THE PROJECT SITE IS LOCATED ON 15526-15544 PLUMMER STREET, NORTH HILLS, CA 91343, (APN 2656015008 AND 2656015007) FOR BRIGHT STAR SCHOOLS' NEW VALOR ACADEMY ELEMENTARY SCHOOL, A CAMPUS THAT WILL BE HOME TO APPROXIMATELY 552 STUDENTS, GRADES TK-4.
THE PARCEL 2656015008 HAS AN EXISTING HOUSE (APPROXIMATELY 1,402 GSF PER ALTA SURVEY) THAT IS LISTED AS AN ELIGIBLE RESOURCE IN SURVEY LA, AND IT WILL REMAIN AND BE INCORPORATED INTO THE OPERATIONS OF THE SCHOOL FOR ADMINISTRATIVE USES.
THE PROPOSED NEW SCOPE OF WORK CONSISTS OF A SINGLE AND TWO-STORY, WOOD FRAMED, TYPE 5 NON-RATED BUILDINGS.
THIS PUBLIC ELEMENTARY SCHOOL WILL BE NEW CONSTRUCTION AND WILL INCLUDE THE FOLLOWING:

- 28 CLASSROOMS (INCLUDING 4 SPECIALTY CLASSROOMS)
- ADMINISTRATION OFFICE SPACE
- MULTIPURPOSE ROOM (MPR) WITH A SERVERY
- OUTDOOR PLAY SPACE (FOR GRADES TK-K AND 1-4)
- ONSITE PARKING FOR 49 PARKING SPACES (PICK-UP AND DROP-OFF WITHIN THE SITE)
- BICYCLE RACKS (SHORT TERM AND LONG TERM)

THE PROPOSED BUILDINGS' DESIGN ALLOWS FOR THE MASSING OF THE BUILDINGS TO REFLECT THE SCALE AND FORMS OF THE SURROUNDING RESIDENTIAL NEIGHBORHOOD.

SITE ADDRESS

15526-15544 PLUMMER ST.
NORTH HILLS, CA 91343

SITE ANALYSIS

SITE AREA (PARCEL 1 + 2):	**89,629.2 SF**
- PARCEL 1	56,408 SF
- PARCEL 2	33,221.2 SF
A) PROPOSED BUILDING AREA:	**34,755 GSF**
- MULTIPURPOSE ROOM	3,182 GSF
- ADMIN	1,616 GSF
- CLASSROOMS	23,538 GSF
- CORRIDORS + SUPPORT + COVERED OUTDOOR DINING	6,419 GSF
B) (E) HOUSE FOR ADMIN USE	**1,402 GSF** (PER ALTA SURVEY)
TOTAL PROJECT GSF:	
A + B = 34,755 GSF + 1,402 GSF =	**36,157 GSF**
PROPOSED BUILDING HEIGHT:	26'-6"
PAVING/HARDSCAPE	50,228.2 SF
LANDSCAPE	16,366 SF

ZONING

ZONE:	RA-1
SETBACK:	
- FRONT YARD:	25'-0
- REAR YARD:	25'-0
- EAST SIDE YARD:	10'-0
- WEST SIDE YARD:	10'-0
HEIGHT LIMIT:	30'-0"

BUILDING ANALYSIS

TOTAL # OF CLASSROOM (TK-4):	28
TOTAL # OF STUDENT (TK-4):	552

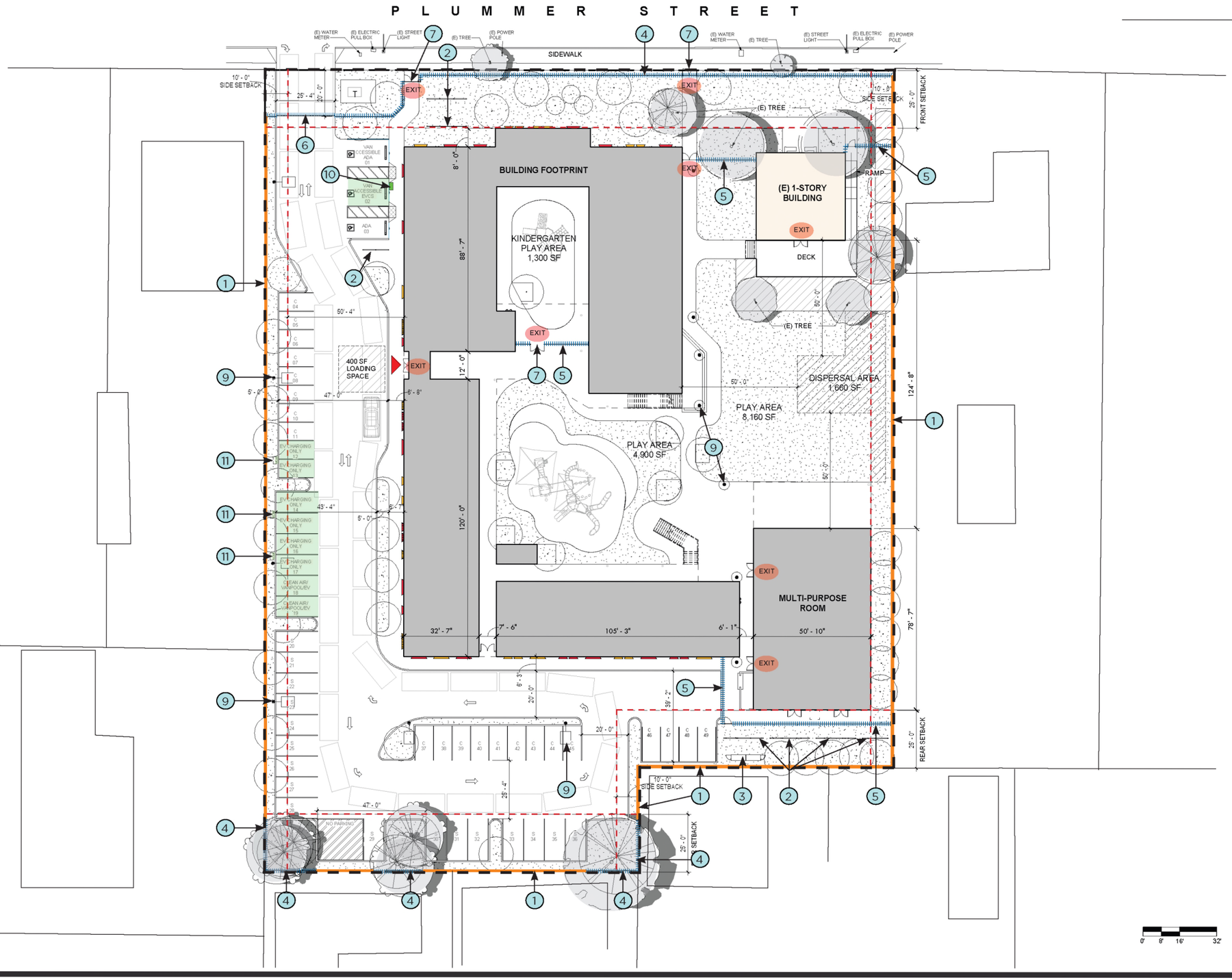
PARKING ANALYSIS

REQUIRED PARKING SPACE:	28 SPACE
TOTAL PROVIDED PARKING:	49 SPACE (INCLUDING EV/ CLEAN AIR PARKING)
-STANDARD	17
-COMPACT (40% MAX OF *REQUIRED* PARKING)	21
-ADA (INCL. VAN) PER CBC TABLE 11B-208.2	2
-CLEAN AIR (INCL. EVCS) PER CAL GREEN TABLE 5.106.5.2	9

- 6 EV CHARGING STATIONS
  PER CAL GREEN TABLE 5.106.5.3.3, INFRASTRUCTURE ONLY
- 1 EVCS VAN ACCESSIBLE
  FULLY INSTALLED
- 2 CLEAN AIR/VANPOOL/EV

LEGEND

- PEDESTRIAN PATH
- VEHICULAR PATH FOR PARKING AND STUDENT DROP OFF AND PICKUP
- RIGHT TURN ONLY SIGNAGE
- PROPERTY LINE



SITE PLAN LEGEND

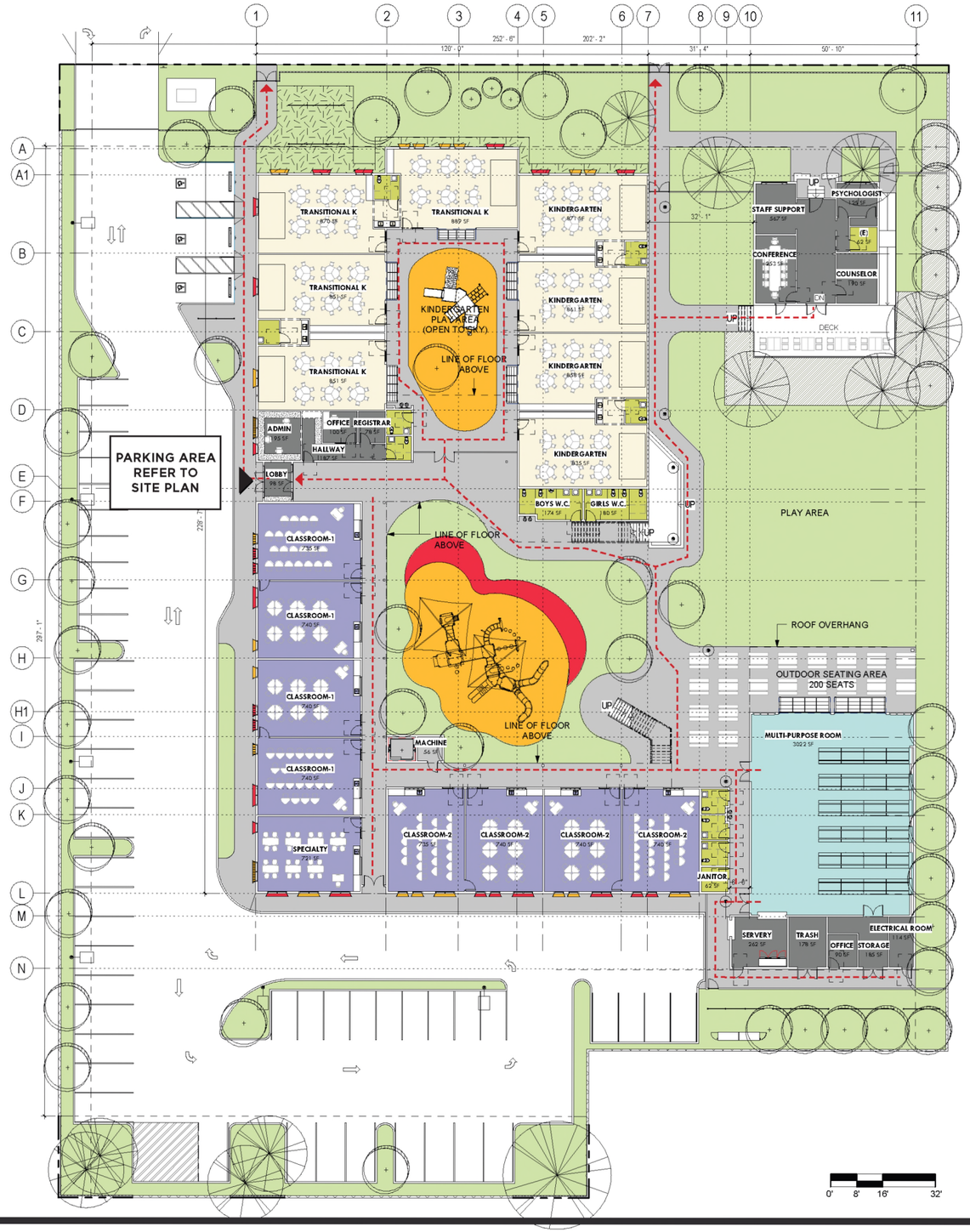
- PROPERTY LINE
- EXISTING BUILDING
- BUILDING FOOTPRINT
- SCHOOL ENTRY
- EXISTING TREE
- NEW TREE
- CMU WALL
- FENCE
- SETBACK LINE
- EXIT — FIRE EXIT
- DESIGNATED PARKING FOR CLEAN AIR VEHICLES

KEYNOTE LEGEND

1. 8'H CMU WALL (PERIMETER)
2. BICYCLE PARKING (SHORT TERM)
3. BICYCLE PARKING (LONG TERM)
4. 8'H WROUGHT IRON FENCE (PERIMETER)
5. 5'H WROUGHT IRON FENCE (INTERNAL)
6. VEHICULAR GATE
7. PEDESTRIAN GATE
8. NOT USED
9. SITE LIGHT
10. FULLY INSTALLED CHARGING STATION
11. INFRASTRUCTURE FOR FUTURE CHARGING STATION
12. 4'H WROUGHT IRON FENCE

PARKING SUMMARY

- 17 STANDARD
- 21 COMPACT
- 2 ADA (INCL. VAN)
- 6 EV CHARGING (INFRASTRUCUTRE ONLY)
- 1 EVCS VAN ACCESSIBLE (FULLY INSTALLED)
- 2 CLEAN AIR/VANPOOL/EV



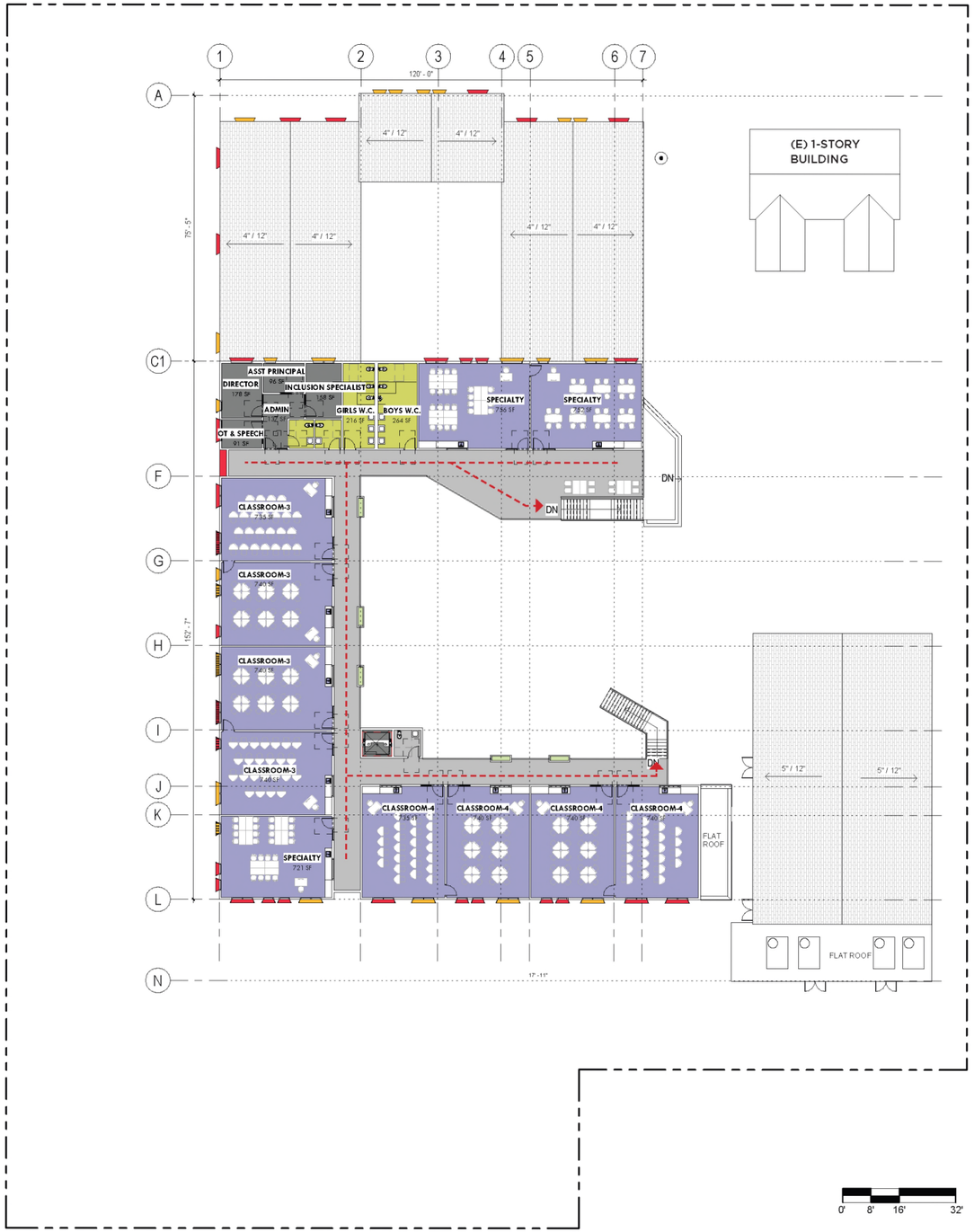
FIRST FLOOR SUMMARY

A3 + E + B OCCUPANCIES	
KINDERGARTEN	
KINDERGARTEN	4 CLASSROOMS
TRANSITIONAL K	4 CLASSROOMS
TOTAL CLASSROOMS	8 CLASSROOMS
ELEMENTARY SCHOOL	
GRADE 1	4 CLASSROOMS
GRADE 2	4 CLASSROOMS
SPECIALTY	1 CLASSROOM
TOTAL CLASSROOMS	9 CLASSROOMS
MULTIPURPOSE ROOM	3,182 GSF
ADMIN AREA	810 GSF
RESTROOMS	
SUPPORT SPACES	

PATH OF TRAVEL/EXITING

PROPOSED FIRST FLOOR	21,633 GSF
(E) HOUSE FOR ADMIN USE	1,402 GSF

FIRST FLOOR GSF:
21,633 + 1,402 = 23,035 GSF

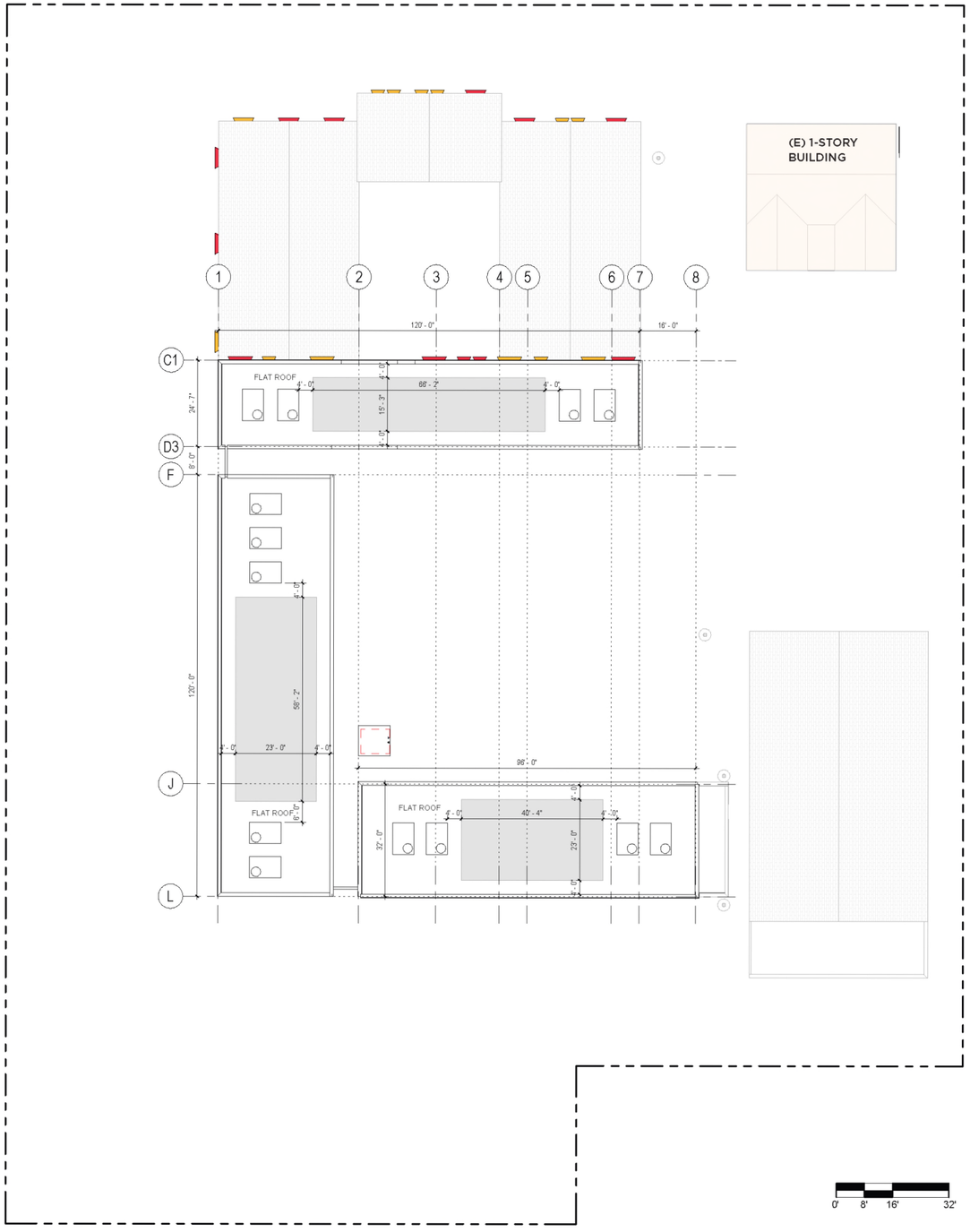


SECOND FLOOR SUMMARY

E + B OCCUPANCIES	
ELEMENTARY SCHOOL	
GRADE 3	4 CLASSROOMS
GRADE 4	4 CLASSROOMS
SPECIALTY	3 CLASSROOM
TOTAL CLASSROOMS	11 CLASSROOMS
ADMIN AREA	806 GSF
RESTROOMS	
SUPPORT SPACES	

PATH OF TRAVEL/EXITING

PROPOSED SECOND FLOOR 13,122 GSF

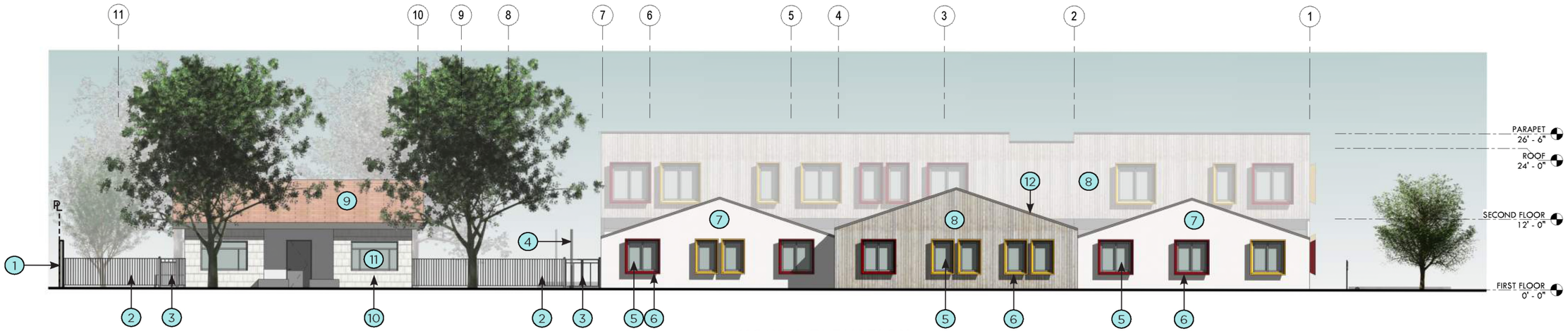


SITE PLAN LEGEND

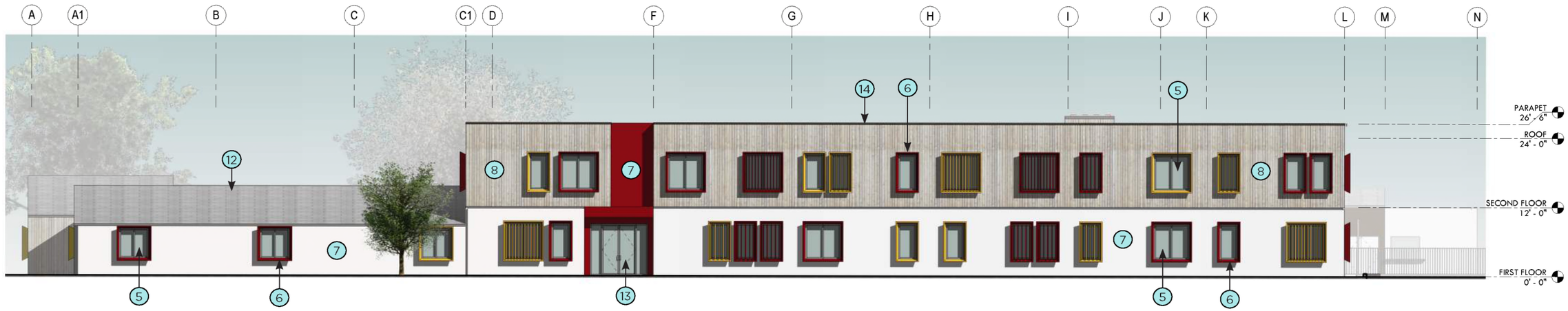
- PROPERTY LINE
- COMPOSITION SHINGLE ROOF, COLOR TBD
- AREA OF FUTURE SOLAR PANELS
- MECHANICAL UNITS

SOLAR ZONE CALCULATIONS
SOLAR ROOF ZONE AREA PER CAL GREEEN 5.211.1, ENERGY CODE 110.10, LAFD 96:

TOTAL PROPOSED ROOF AREA = 21,064 SF
SOLAR ZONE @ 15% = 3,160 SF
TOTAL SOLAR ZONE PROVIDED=3,277 SF



1 NORTH ELEVATION

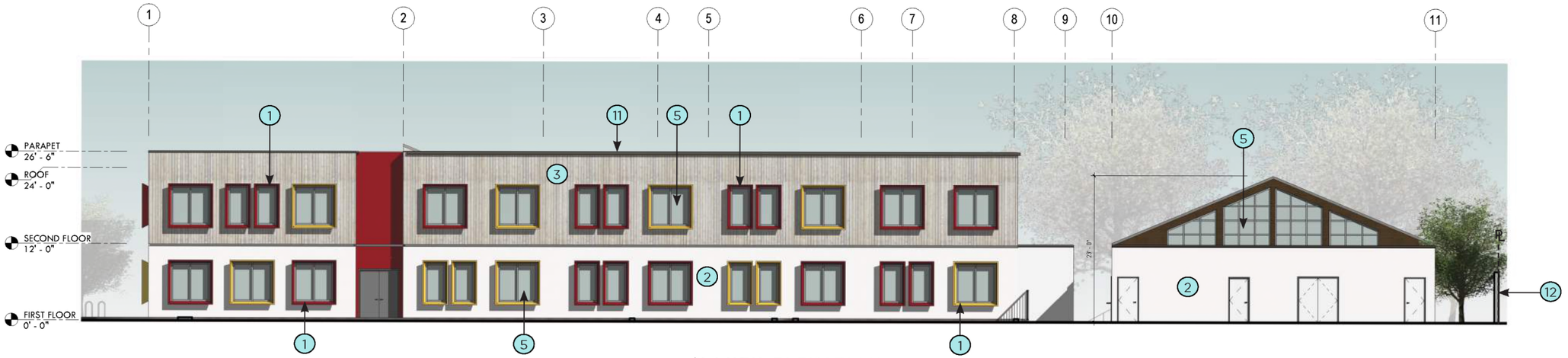


2 WEST ELEVATION

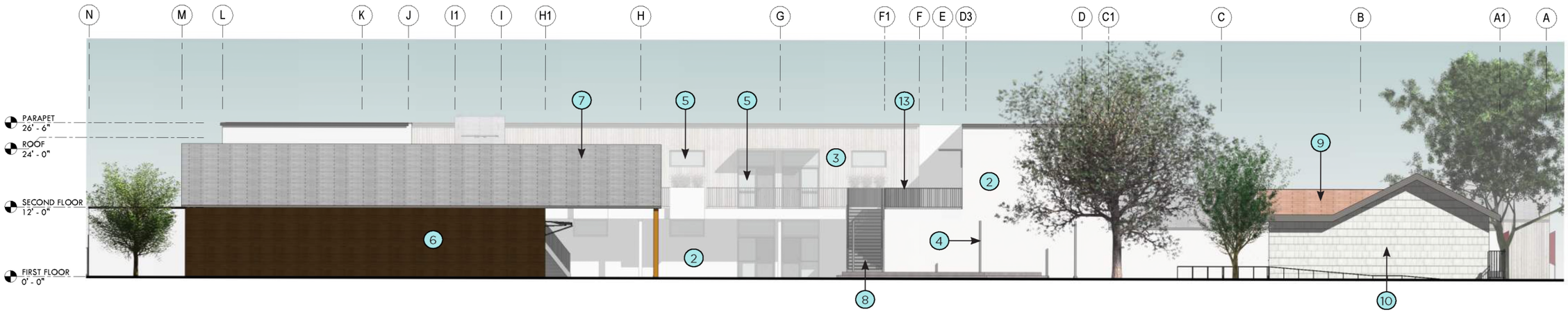


KEYNOTE LEGEND

1. 8'H CMU WALL (PERIMETER)
2. 5'H WROUGHT IRON FENCE (INTERNAL)
3. PEDESTRIAN GATE
4. SITE LIGHT
5. STOREFRONT WINDOW
6. PAINTED SHEET METAL PANEL AROUND WINDOWS 20 GA. GALV.
7. PLASTER FINISH 20/30 SAND FINISH, PAINTED
8. WOOD SIDING, LIGHT OAK
9. COMPOSITION SHINGLE ROOF, COLOR TBD
10. WOOD SHINGLE CLADDING, COLOR TBD
11. (E) FIXED WINDOW
12. SHINGLED COOL ROOF, GRAY COLOR
13. STOREFRONT DOOR
14. COPING CAP



1 | SOUTH ELEVATION



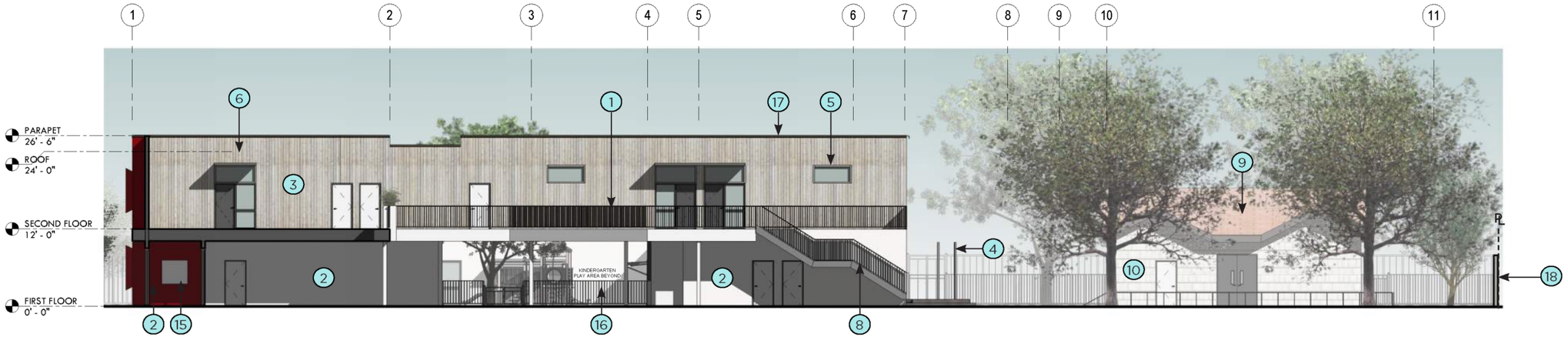
2 | EAST ELEVATION

0' 4' 8' 16'

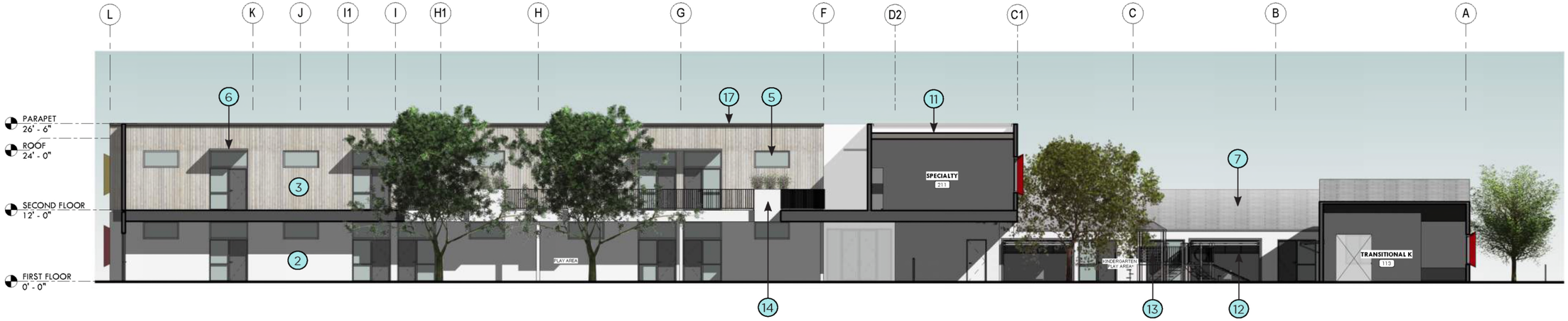


KEYNOTE LEGEND

1. PAINTED SHEET METAL PANEL AROUND WINDOWS 20 GA. GALV.
2. PLASTER FINISH 20/30 SAND FINISH, PAINTED
3. WOOD SIDING, LIGHT OAK
4. SITE LIGHT
5. STOREFRONT WINDOW
6. WOOD SIDING, DARKER SHADE
7. SHINGLED COOL ROOF, GRAY COLOR
8. CONCRETE FILLED METAL PAN STAIR
9. COMPOSITION SHINGLE ROOF, COLOR TBD
10. WOOD SHINGLE CLADDING, COLOR TBD
11. COPING CAP
12. 8'H CMU WALL (PERIMETER)
13. 42"H GUARDRAIL, PAINTED DARK GRAY

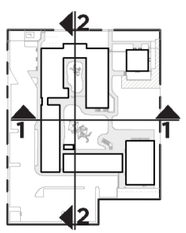


1 | PLAY YARD NORTH ELEVATION



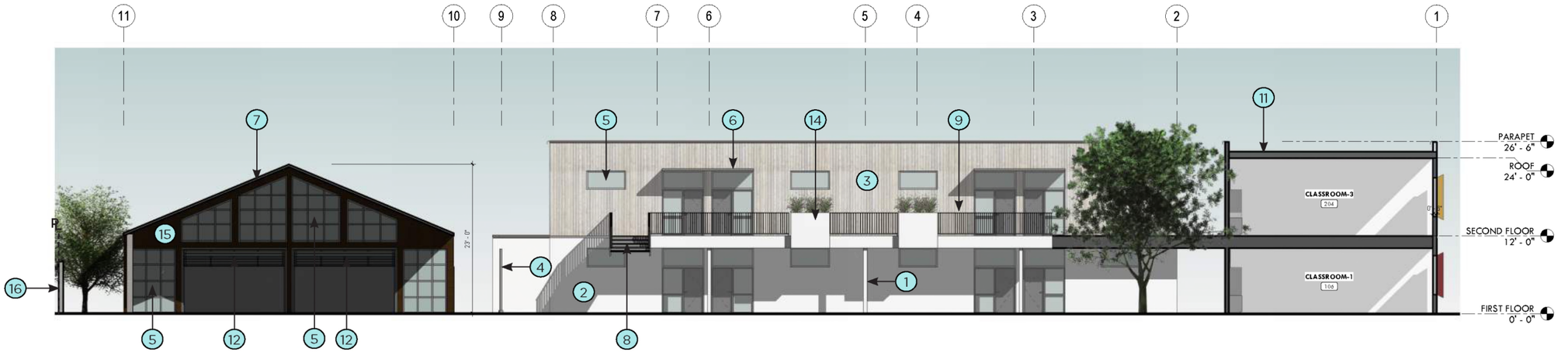
2 | PLAY YARD WEST ELEVATION

0' 4' 8' 16'

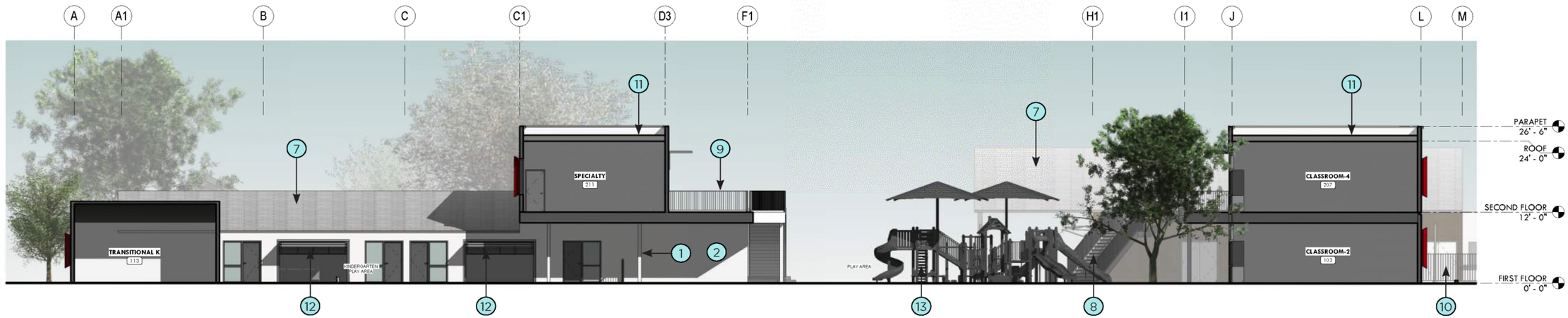


KEYNOTE LEGEND

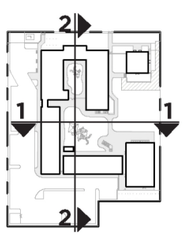
1. 42"H GUARDRAIL, PAINTED DARK GRAY
2. PLASTER FINISH 20/30 SAND FINISH, PAINTED
3. WOOD SIDING, LIGHT OAK
4. SITE LIGHT
5. STOREFRONT WINDOW
6. CANOPY
7. SHINGLED COOL ROOF, GRAY COLOR
8. CONCRETE FILLED METAL PAN STAIR
9. COMPOSITION SHINGLE ROOF, COLOR TBD
10. (E) WOOD SHINGLE CLADDING, COLOR TBD
11. BUILT-UP SYSTEM 4-PLY SHEET
12. GARAGE DOOR
13. PLAY STRUCTURE
14. PLANTER
15. TRANSACTION WINDOW
16. 4'H WROUGHT IRON FENCE
17. COPING CAP
18. 8'H CMU WALL (PERIMETER)



1 | PLAY YARD SOUTH ELEVATION

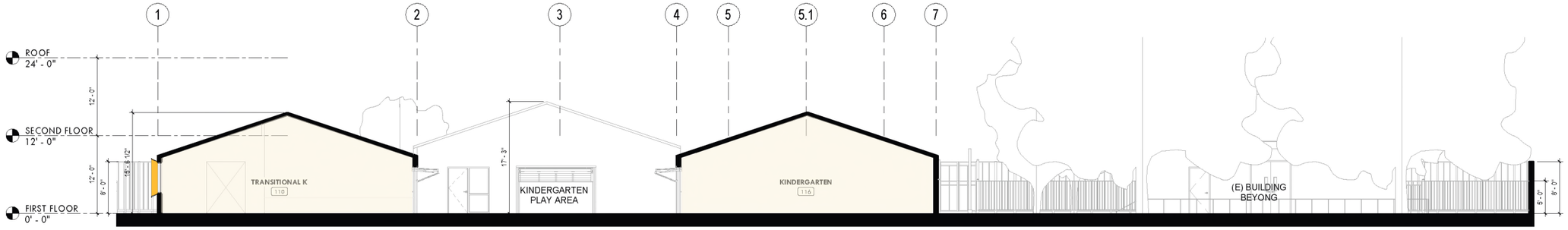


2 | PLAY YARD EAST ELEVATION

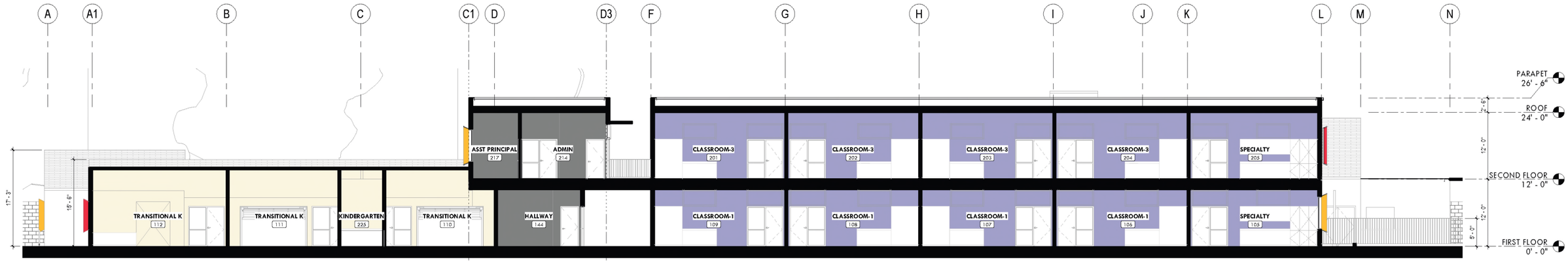


KEYNOTE LEGEND

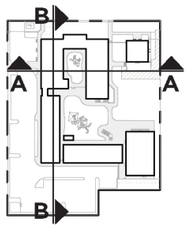
1. COLUMN
2. PLASTER FINISH 20/30 SAND FINISH, PAINTED
3. WOOD SIDING, LIGHT OAK
4. SITE LIGHT
5. STOREFRONT WINDOW
6. CANOPY
7. SHINGLED COOL ROOF, GRAY COLOR
8. CONCRETE FILLED METAL PAN STAIR
9. 42"H GUARDRAIL, PAINTED DARK GRAY
10. 5'H WROUGHT IRON FENCE (INTERNAL)
11. BUILT-UP SYSTEM 4-PLY SHEET
12. GARAGE DOOR
13. PLAY STRUCTURE
14. PLANTER
15. WOOD SIDING, DARKER SHADE
16. 8'H CMU WALL (PERIMETER)



SECTION A-A



SECTION B-B



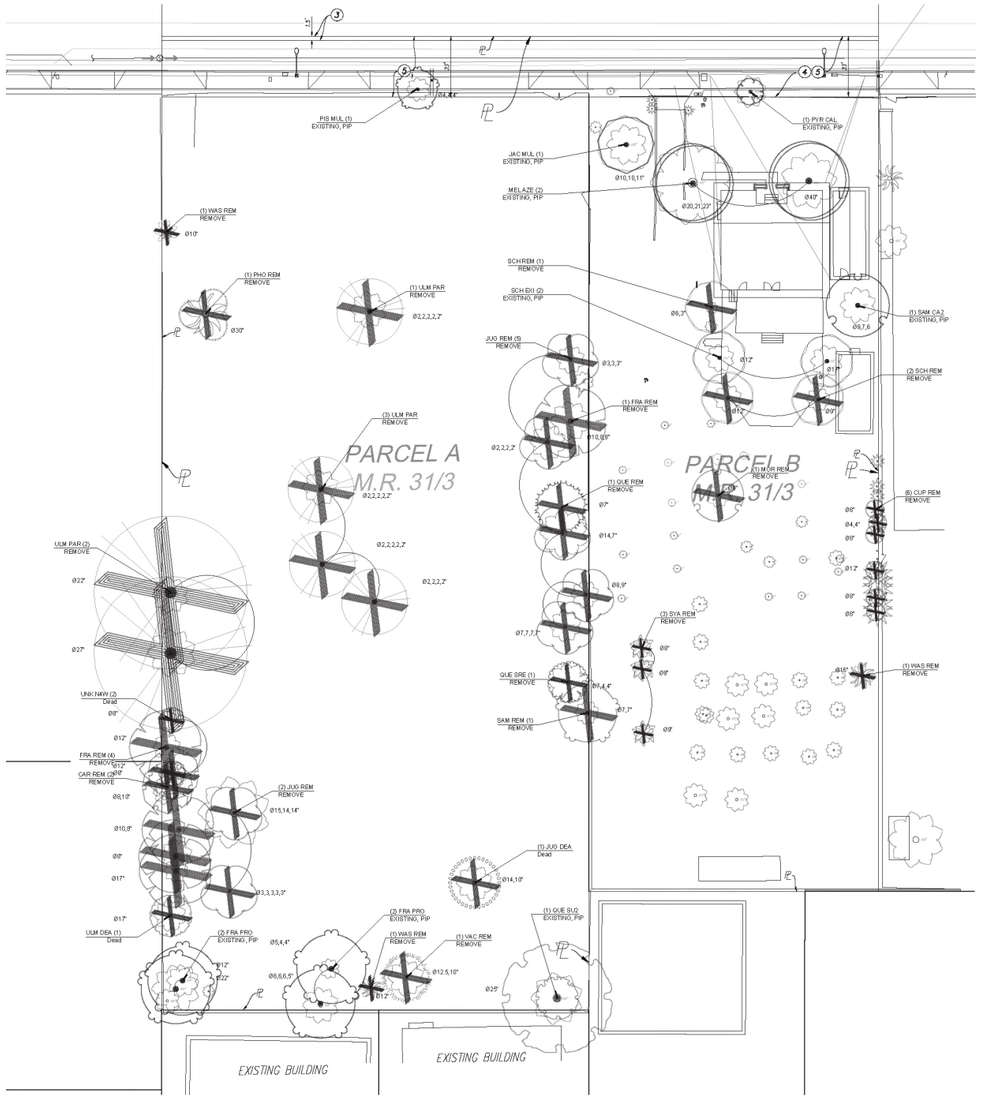


PLANT SCHEDULE

DEAD	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	JUG DEA	JUGLANS CALIFORNICA / SOUTHERN CALIFORNIA BLACK WALNUT	DEAD	NATIVE	1	DEAD, REMOVE FROM SITE. NO REPLACEMENT REQUIRED.
	ULM DEA	ULMUS PUMILA / SIBERIAN ELM	DEAD		1	DEAD, REMOVE FROM SITE
	UNKN4W	UNKNOWN --- / UNKNOWN	DEAD		2	COULD NOT BE IDENTIFIED BY ARBORIST, DEAD REMOVE FROM SITE
EXISTING	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	FRA PRO	FRAXINUS UHDEI / SHAMEL ASH	EXISTING, PIP		4	EXISTING, PROTECT IN PLACE
	JAC MIL	JACARANDA MIMOSIFOLIA / JACARANDA MULTI-TRUNK	EXISTING, PIP		1	EXISTING PROTECT IN PLACE
	MEL AZE	MELIA AZEDARACH / CHINABERRY	EXISTING, PIP		2	EXISTING, PROTECT IN PLACE
	QUE SU2	QUERCUS SUBER / CORK OAK	EXISTING, PIP		1	EXISTING, PROTECT IN PLACE
	SAM CA2	SAMBUCUS NIGRA CAERULEA / BLUE ELDERBERRY	EXISTING, PIP	NATIVE	1	EXISTING, PROTECT IN PLACE
	SCH EXI	SCHINUS MOLLE / CALIFORNIA PEPPER	EXISTING, PIP		2	EXISTING, PROTECT IN PLACE
REMOVE	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	CAR REM	CARYA ILLINOINENSIS / PECAN	REMOVE		2	EXISTING TO BE REMOVED
	CUP REM	CUPRESSUS SEMPERVIRENS / ITALIAN CYPRESS	REMOVE		6	EXISTING TO BE REMOVED
	FRA REM	FRAXINUS UHDEI / SHAMEL ASH	REMOVE		5	EXISTING TO BE REMOVED
	JUG REM	JUGLANS CALIFORNICA / SOUTHERN CALIFORNIA BLACK WALNUT	REMOVE	NATIVE	7	EXISTING TO BE REMOVED. REPLACE AT 1:4 RATIO WITH NATIVE TREES
	MOR REM	MORUS ALBA / WHITE MULBERRY	REMOVE		1	EXISTING TO BE REMOVED
	PHO REM	PHOENIX CANARIENSIS / CANARY ISLAND DATE PALM	REMOVE		1	EXISTING TO BE REMOVED
	QUE REM	QUERCUS AGRIFOLIA / COAST LIVE OAK	REMOVE	NATIVE	1	EXISTING TO BE REMOVED, REPLACE AT 1:4 RATIO WITH NATIVE TREES
	QUE SRE	QUERCUS SUBER / CORK OAK	REMOVE		1	EXISTING TO BE REMOVED
	SAM REM	SAMBUCUS NIGRA CAERULEA / BLUE ELDERBERRY	REMOVE	NATIVE	1	EXISTING TO BE REMOVED. REPLACE AT 1:4 RATIO WITH NATIVE SHRUBS
	SCH REM	SCHINUS MOLLE / CALIFORNIA PEPPER	REMOVE		3	EXISTING TO BE REMOVED
	SYA REM	SYAGRUS ROMANZOFFIANA / QUEEN PALM	REMOVE		3	EXISTING TO BE REMOVED
	ULM PAR	ULMUS PARVIFOLIA / LACEBARK ELM	REMOVE		6	EXISTING TO BE REMOVED
	VAC REM	VACHELLIA FARNESIANA / SWEET ACACIA	REMOVE		1	EXISTING TO BE REMOVED
	WAS REM	WASHINGTONIA FILIFERA / CALIFORNIA FAN PALM	REMOVE		3	EXISTING TO BE REMOVED
STREET TREES	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	PIS MUL	PISTACIA CHINENSIS / CHINESE PISTACHE MULTI-TRUNK	EXISTING, PIP		1	EXISTING, PROTECT IN PLACE
	PYR CAL	PYRUS CALLERYANA / CALLERY PEAR	EXISTING, PIP		1	EXISTING PROTECT IN PLACE

TREE DISPOSITION SUMMARY

TOTAL TREES/NATIVE SHRUBS ON SITE/STREET	58
PROTECTED OR CUMULATIVE DBH 4" OR > PER LAMC SECTION 46.00)	52
EXISTING STREET TREES PROTECT IN PLACE:	2
DEAD TREES ON SITE:	4
TOTAL TREES TO BE REMOVED:	41
NON-NATIVE CUMULATIVE DBH 4" OR >	32
PROTECTED NATIVE TREES/SHRUBS	9
1:4 NATIVE TREE/SHRUB REPLACEMENT REQ'D	36
1:1 TREE REPLACEMENT REQ'D	32
ON SITE TREES TO REMAIN IN PLACE:	11
CUMULATIVE DBH 4" OR >	10
NATIVE TREE/SHRUB	1



0 8' 16' 32'
1/16" = 1'-0"

PLANT SCHEDULE

TREES	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	AFR FAL	AFROCARPUS FALCATUS / YELLOWWOOD	36"BOX		5	STANDARD
	CAL CTN	CALLISTEMON CITRINUS / LEMON BOTTLEBRUSH	36"BOX		5	STANDARD
	CER OCC	CERCIS OCCIDENTALIS / WESTERN REDBUD	24" BOX	NATIVE	5	STANDARD, NATIVE TREE REPLACEMENT
	CER OC2	CERCIS OCCIDENTALIS / WESTERN REDBUD	24" BOX	NATIVE	3	MULTI-TRUNK, NATIVE TREE REPLACEMENT
	CHI BUB	CHILOPSIS LINEARIS 'BUBBA' / BUBBA DESERT WILLOW	24" BOX	NATIVE	7	STANDARD, NATIVE TREE REPLACEMENT
	DAL SIS	DALBERGIA SISSOO / ROSEWOOD	36"BOX		2	STANDARD
	HET ARB	HETEROMELES ARBUTIFOLIA / TOYON	15 GAL	NATIVE	20	NATIVE TREE REPLACEMENT
	LAU NOB	LAURUS NOBILIS / SWEET BAY	36"BOX		1	STANDARD
	LOP CON	LOPHOSTEMON CONFERTUS / BRISBANE BOX	36"BOX		4	STANDARD
	PRO MAV	PROSOPIS GLANDULOSA 'MAVERICK' TM / MAVERICK THORNLESS HONEY MESQUITE	36"BOX	NATIVE	4	STANDARD, NATIVE TREE REPLACEMENT
	PRU LYO	PRUNUS ILICIFOLIA LYONII / CATALINA CHERRY	15 GAL	NATIVE	11	NATIVE TREE REPLACEMENT
	QUE TOM	QUERCUS TOMENTELLA / ISLAND OAK	36"BOX	NATIVE	5	STANDARD, NATIVE TREE REPLACEMENT
EXISTING	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	FRA PRO	FRAXINUS UHDEI / SHAMEL ASH	EXISTING, PIP		4	EXISTING, PROTECT IN PLACE
	JAC MUL	JACARANDA MIMOSIFOLIA / JACARANDA MULTI-TRUNK	EXISTING, PIP		2	EXISTING PROTECT IN PLACE
	MEL AZE	MELIA AZEDARACH / CHINABERRY	EXISTING, PIP		4	EXISTING, PROTECT IN PLACE
	QUE SU2	QUERCUS SUBER / CORK OAK	EXISTING, PIP		1	EXISTING, PROTECT IN PLACE
	SAM CA2	SAMBUCUS NIGRA CAERULEA / BLUE ELDERBERRY	EXISTING, PIP	NATIVE	2	EXISTING, PROTECT IN PLACE
	SCH EXI	SCHINUS MOLLE / CALIFORNIA PEPPER	EXISTING, PIP		4	EXISTING, PROTECT IN PLACE
STREET TREES	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	PIS MUL	PISTACIA CHINENSIS / CHINESE PISTACHE MULTI-TRUNK	EXISTING, PIP		2	EXISTING, PROTECT IN PLACE
	PYR CAL	PYRUS CALLERYANA / CALLERY PEAR	EXISTING, PIP		2	EXISTING PROTECT IN PLACE
SHRUBS	CODE	BOTANICAL / COMMON NAME	SIZE	VALUE	QTY	REMARKS
	CAR CAL	CARPENTERIA CALIFORNICA / BUSH ANEMONE	5 GAL		28	
	OLE LIT	OLEA EUROPAEA 'LITTLE OLLIE' TM / LITTLE OLLIE OLIVE	5 GAL		36	
SHRUB AREAS	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	LYC ESC	EDIBLE GARDEN / EDIBLE PLANTS	1 GAL		44 SF	SCHOOL GARDEN EDIBLE PLANTS
GROUND COVERS	CODE	BOTANICAL / COMMON NAME	CONT	VALUE	QTY	REMARKS
	CHL VTT	CHLOROPHYTUM COMOSUM 'VITTATUM' / VITTATUM SPIDER PLANT	1 GAL		39	

CONCEPT PLANT SCHEDULE

2022-06-28 11:54

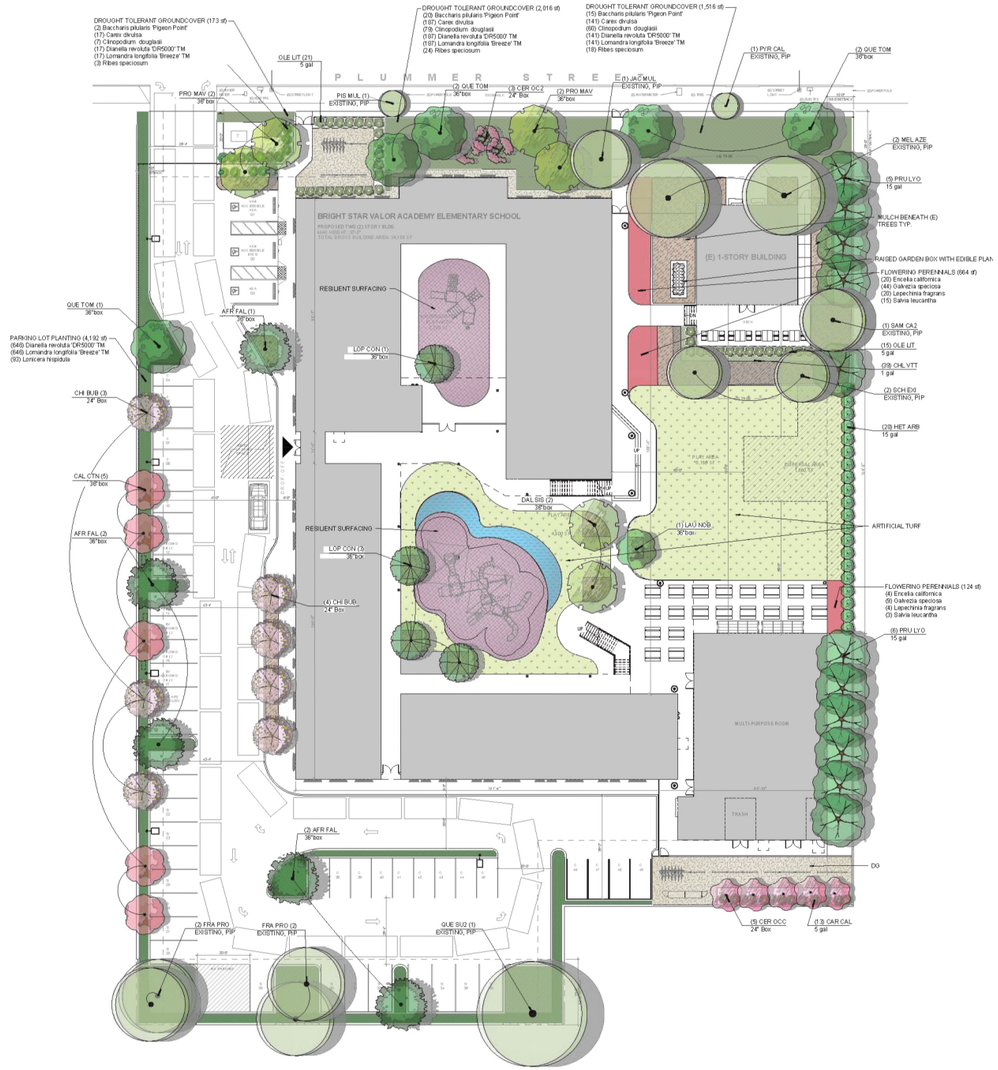
	FLOWERING PERENNIALS	789 SF		
	ENCELIA CALIFORNICA / CALIFORNIA ENCELIA	23	5 GAL	25% @ 36" oc
	GALVEZIA SPECIOSA / ISLAND SNAPDRAGON	52	1 GAL	25% @ 24" oc
	LEPECHINIA FRAGRANS / ISLAND PITCHERSAGE	23	1 GAL	25% @ 36" oc
	SALVIA LEUCANTHA / MEXICAN BUSH SAGE	17	1 GAL	25% @ 42" oc
	DROUGHT TOLERANT GROUNDCOVER	3,705 SF		
	CAREX DIVULSA / EUROPEAN GRAY SEDGE 1 GAL			
	BACCHARIS PILULARIS 'PIGEON POINT' / PIGEON POINT COYOTE BRUSH	37	5 GAL	15% @ 48" oc
	CAREX DIVULSA / EUROPEAN GREY SEDGE	343	1 GAL	20% @ 18" oc
	CLINOPODIUM DOUGLASII / YERBA BUENA	145	1 GAL	15% @ 24" oc
	DIANELLA REVOLUTA 'DR5000' TM / LITTLE REV FLAX LILY	343	1 GAL	20% @ 18" oc
	LOMANDRA LONGIFOLIA 'BREEZE' TM / BREEZE MAT RUSH	343	1 GAL	20% @ 18" oc
	RIBES SPECIOSUM / FUCHSIA FLOWERING GOOSEBERRY	43	1 GAL	10% @ 36" oc
	PARKING LOT PLANTING	3,392 SF		
	DIANELLA REVOLUTA 'DR5000' TM / LITTLE REV FLAX LILY	1,567	1 GAL	18" oc
	LOMANDRA LONGIFOLIA 'BREEZE' TM / BREEZE MAT RUSH	1,567	1 GAL	18" oc
	LONICERA HISPIDULA / CALIFORNIA HONEYSUCKLE	221	5 GAL	48" oc

NATIVE TREE/SHRUB REPLACEMENT

1:4 NATIVE TREE REPLACEMENT REQ'D 36

NON-NATIVE REPLACEMENT

1:1 TREE REPLACEMENT REQ'D 32





SITE AREA	**89,629.2 SF**
PROPOSED BUILDING AREA	**34,755 SF**
EXISTING HOUSE	**1,402 SF**
PAVING/HARDSCAPE	**36,709 SF**
LANDSCAPE	**26,457 SF**

- **PEDESTRIAN PATH**
- **VEHICULAR PATH**
- **RIGHT TURN ONLY SIGNAGE**
- **NEW TREE**
- **EXISTING TREE TO REMAIN**

AERIAL VIEW

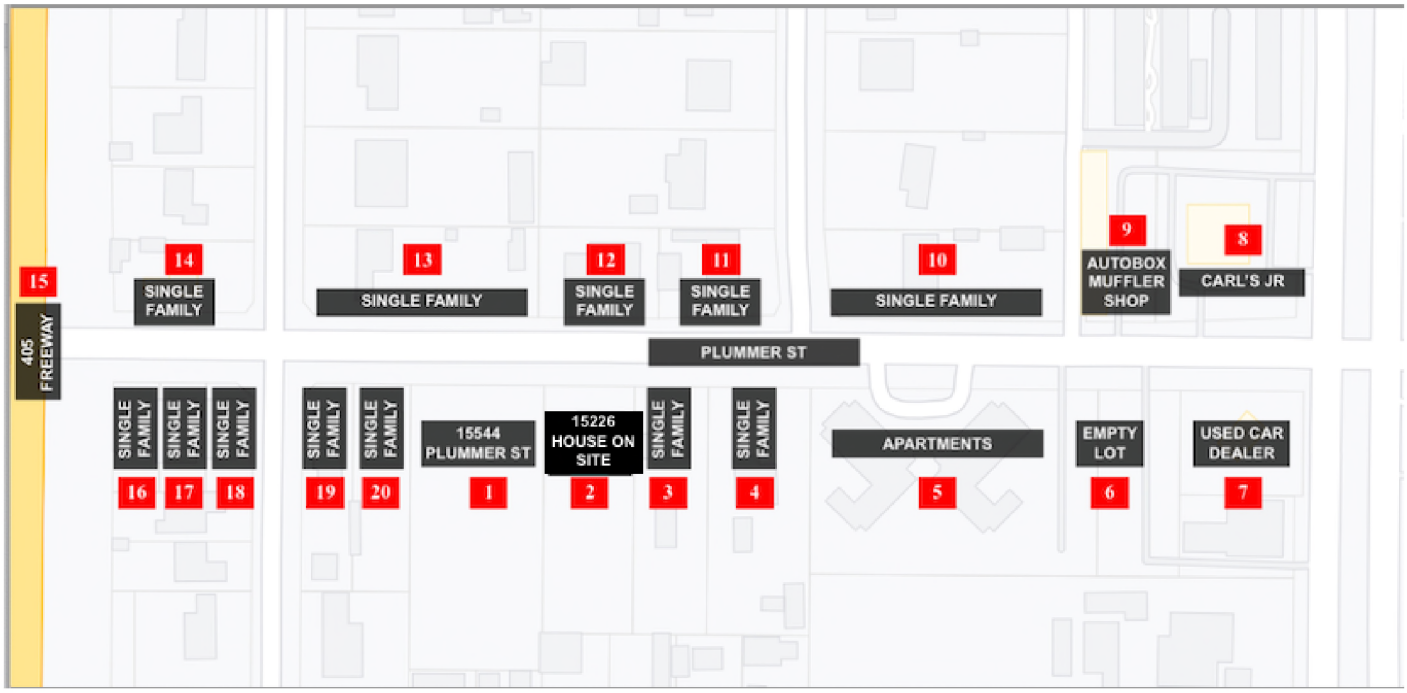


PERSPECTIVE VIEW FROM MPR



15526 & 15544 Plummer Street
Department of City Planning Application
Photographs: Index Maps and Color Photographs

Area Map



Area Map (Satellite)

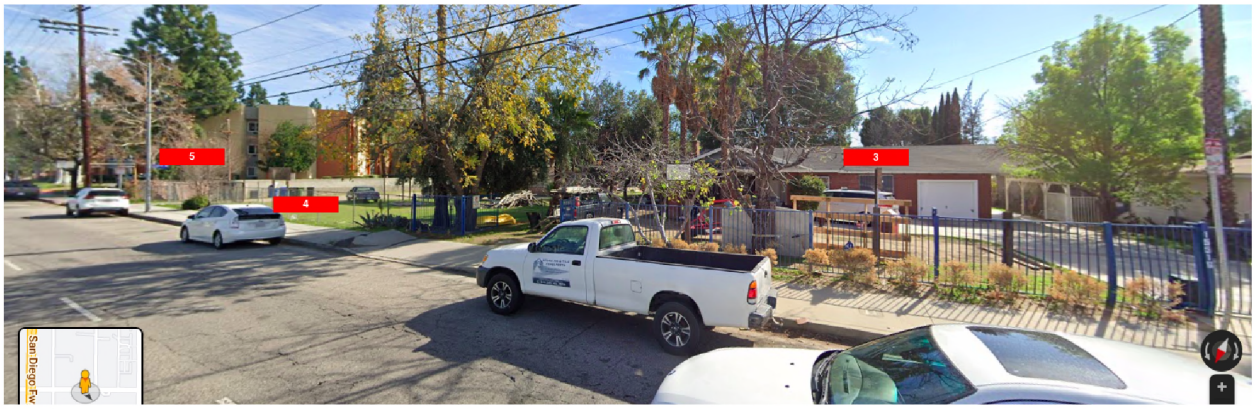


Block View:

15544 & 15526 Plummer Street (Site)



East of Site



East of Site



North East of Site (across the street)



North of Site (across the street)



West of Site



West of Site



Indexed Photos of Plummer Street:

1. 15544 Plummer St (Site)



2. 15526 Plummer St, House on Site



3. Single Family Residence with blue fence (East of Site)



4. Single Family Residence (East of Site)



5. Apartments (East of Site)



6. Empty Lot (East of Site)



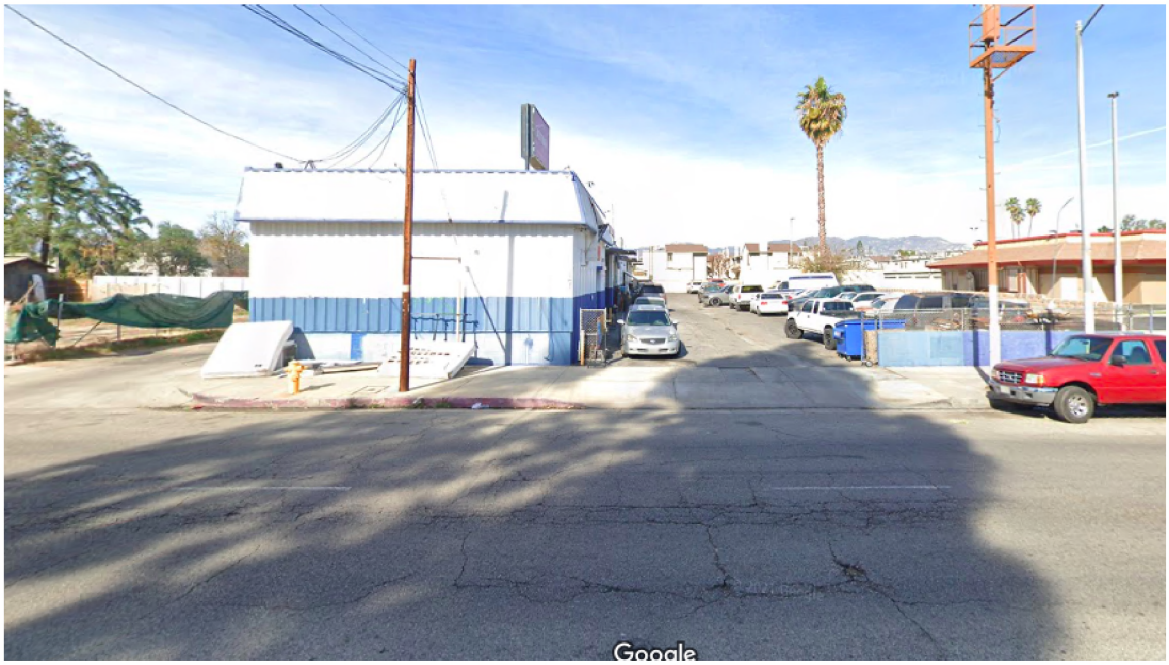
7. Used Car Dealer (East of Site)



8. Carl's Jr (North East of Site – Across the street)



9. Autobox Muffler Shop (North East of Site – Across the street)



10. Single Family Residence (East of Site – Across the street)



11. Single Family Residence (North of Site – Across the street)



12. Single Family Residence (North of Site – Across the street)



13. Single Family Residence (North of Site – Across the street)



14. Single Family Residence (West of Site – Across the street)



15. 405 Freeway (West of Site)



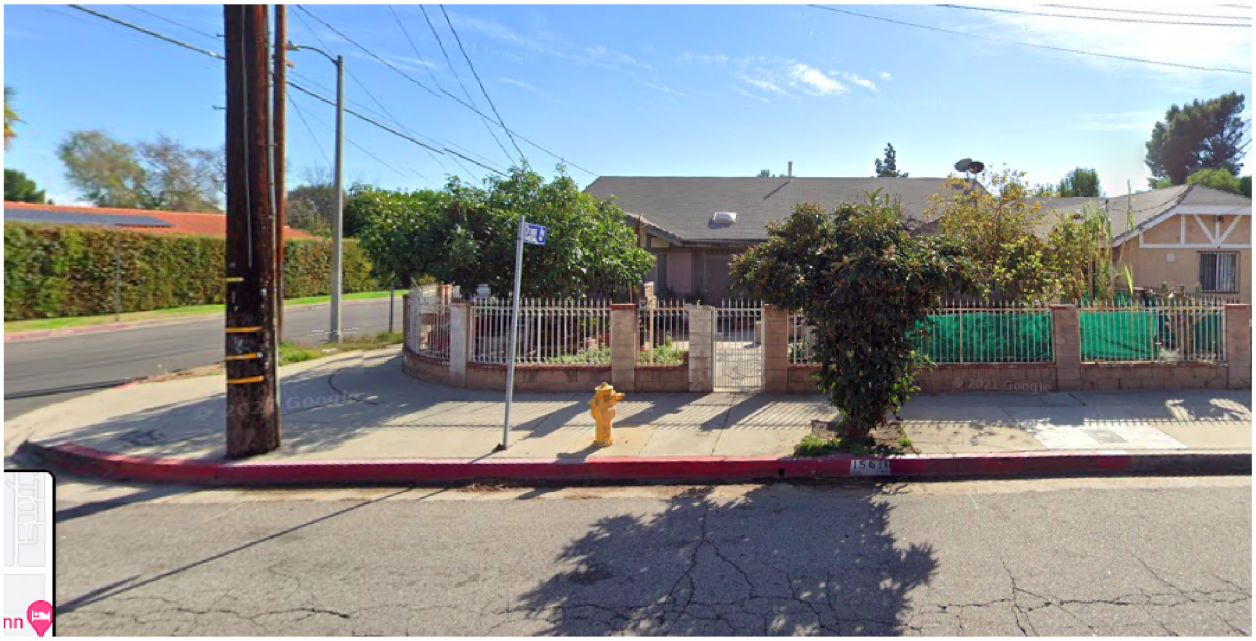
16. Single Family Residence (West of Site)



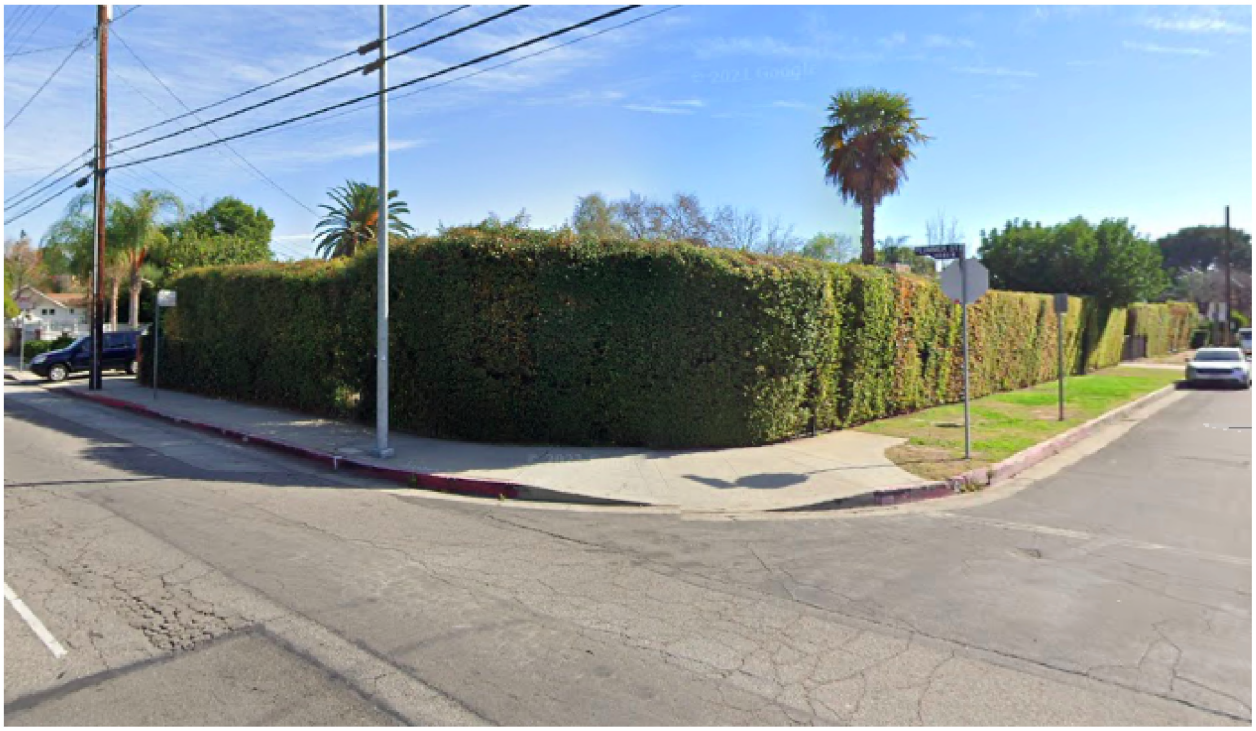
17. Single Family Residence (West of Site)



18. Single Family Residence (West of Site)



19. Single Family Residence (West of Site)



20. Single Family Residence (West of Site)



EXHIBIT B

Environmental Documents

(ENV-2022-5866-MND)

Valor Elementary School Project

Case Number: ENV-2022-5866-MND

Project Location: 15526-15544 Plummer Street, Los Angeles, California 91343

Community Plan Area: Mission Hills - Panorama City - North Hills

Council District: 7 – Rodriguez

Project Description: Bright Star Schools (the "Applicant") proposes to redevelop the site located at 15526-15544 Plummer Street ("Project Site" or "Site), which encompasses approximately 2.06 acres (approximately 89,629 square feet [sf]), into an elementary school. The Site consists of two parcels identified by Assessor Parcel Number (APN) 265-601-5007, which is approximately 1.30 acres in size, and APN 265-601-5008, which is approximately 0.76 acre in size. The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. The site contains 56 trees/shrubs (including nine protected native trees/shrubs and 32 non-protected significant trees), and two street trees.

The Valor Elementary School Project ("Proposed Project" or "Project") involves the construction of a one and two-story, 26.5-foot-tall, elementary school building with 28 classrooms (totaling 23,538 sf) for grades transitional kindergarten (TK) through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces, and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The elementary school building would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf), a kindergarten play area (totaling 1,300 sf). The on-site single-family residence located at 15526 West Plummer Street was built in 1914 and is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. The 1,402-sf residence would remain on the Site as part of the Project but would be adaptively reused for additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. The existing restroom in the residence would remain. The Project would include a car drop-off and pick-up area and a total of 49 surface-level parking spaces including 17 standard, 21 compact, nine clean air spaces, and two ADA spaces that would be located along the southern and western portions of the Site. The Project would also include 112 short-term and three long-term bicycle parking spaces, for a total of 115 bicycle parking spaces.

Project construction is expected to commence in September 2023. Construction activities would occur on weekdays between 8:00 a.m. and 3:00 p.m. The Project would require excavation of approximately 12,500 cubic yards (cy) of soil material. Of the 12,500 cy of soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site. Construction activities would also include tree removal and replacement of existing trees. Of the 56 on-site trees/shrubs, four trees are dead and would be removed along with an additional 41 trees/shrubs, consisting of nine protected native trees/shrubs and 32 non-protected significant trees. As designated by the City's tree removal application permit and consistent with the City's tree protection policies, protected tree/shrub removals would be replaced at a 1:4 ratio by planting 36 trees on-site and non-protected tree removals would be replaced at a 1:1 ratio by planting 32 trees on-site. The removal of the four dead trees do not require replacement. The Project would retain 13 existing trees, including 12 non-protected

significant trees (two of which are street trees) and one protected native tree. Construction is anticipated to end in September 2024, for a total construction period of approximately 12 months.

PREPARED FOR:	PREPARED BY:	APPLICANT:
The City of Los Angeles Department of City Planning	Rincon Consultants, Inc.	Bright Star Schools

November 2022

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Appendix E Geotechnical Investigation Report
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Appendix G Limited Asbestos Survey
Appendix H Phase II Environmental Site Assessment Report
Appendix I Noise and Vibration Study
Appendix J Transportation Assessment

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1 INTRODUCTION

An application for the proposed Valor Elementary School Project ("Proposed Project" or "Project") located at 15526-15544 Plummer Street ("Project Site" or "Site) has been submitted by Bright Star Schools (the "Applicant") to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles (Department of City Planning), as the Lead Agency for the Project, has determined that the Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study/Mitigated Negative Declaration (Initial Study/MND) document evaluates potential environmental effects resulting from construction and operation of the Project. This Initial Study/MND has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), and the State *CEQA Guidelines* (Title 14, California Code of Regulations, Section 15000 et seq.) as implemented by the City. This Initial Study/MND is intended as an informational document, which is ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

Enacted in 1970, CEQA provides several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of Proposed Projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a MND is appropriate. If the Initial Study concludes that neither a Negative Declaration nor MND is appropriate, an Environmental Impact Report is normally required.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study/MND is organized into four sections as follows:

1. INTRODUCTION

   Describes the purpose and content of the Initial Study/MND and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

   Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

   Provides a description of the environmental setting and the Project, including Project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

   Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

In compliance with the *CEQA Guidelines*, the City of Los Angeles (Department of City Planning), as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. An effort will be made to inform, contact, and solicit input on the Project from the public and various government agencies, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that the Project would not have a significant effect(s) on the environment, and, therefore, this MND has been prepared.

As set forth in Section 15072 of the *CEQA Guidelines*, the City, as the Lead Agency for the Project, will provide a notice of intent to adopt a MND to the public, responsible agencies, trustee agencies, and the county clerk to allow the public and agencies to review the proposed MND. Pursuant to Section 15105 of the *CEQA Guidelines*, the public review period for a proposed MND shall be a minimum of 20 days (or 30 days when a proposed MND is submitted to the State Clearinghouse for review by state agencies).

2 EXECUTIVE SUMMARY

PROJECT TITLE	**VALOR ELEMENTARY SCHOOL PROJECT**
ENVIRONMENTAL CASE NO.	**ENV-2022-5866-MND**
RELATED CASES	

PROJECT LOCATION	
ADDRESS	15526 – 15544 PLUMMER STREET, LOS ANGELES, CALIFORNIA 91343
COMMUNITY PLAN AREA	MISSION HILLS – PANORAMA CITY – NORTH HILLS
GENERAL PLAN DESIGNATION	LOW RESIDENTIAL
ZONING	RA-1
COUNCIL DISTRICT	7 – RODRIGUEZ

LEAD AGENCY	CITY OF LOS ANGELES
STAFF CONTACT	ESTHER AHN
ADDRESS	200 NORTH SPRING STREET, ROOM 763
PHONE NUMBER	(213) 978-1486
EMAIL	ESTHER.AHN@LACITY.ORG

APPLICANT	BRIGHT STAR SCHOOLS
ADDRESS	600 SOUTH LA FAYETTE PARK PLACE, SUITE 302, LOS ANGELES, CALIFORNIA 90057
PHONE NUMBER	(323) 954-9957

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with mitigation measures included in this MND.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☒ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology/Water Quality	☒ Transportation
☒ Biological Resources	☐ Land Use/Planning	☒ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☐ Energy	☒ Noise	☐ Wildfire
☒ Geology/Soils	☐ Population/Housing	☐ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

PRINTED NAME	TITLE
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
9) The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

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3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project Site is located at 15526-15544 Plummer Street and encompasses approximately 2.06 acres (approximately 89,629 square feet [sf]) and consists of two parcels identified by Assessor Parcel Number (APN) 265-601-5007, which is approximately 1.30 acres in size, and APN 265-601-5008, which is approximately 0.76 acre in size. The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. The site contains 56 trees/shrubs (including nine protected native trees/shrubs and 32 non-protected significant trees), and two street trees.

The Proposed Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades transitional kindergarten (TK) through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The elementary school building would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf) at the Project Site.

The on-site single-family residence located at 15526 West Plummer Street was built in 1914 and is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. The residence would remain on the Site as part of the Project but would be converted into additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. The existing restroom would remain. The Project would include a car drop-off and pick-up area and a total of 49 surface-level parking spaces including 17 standard, 21 compact, nine clean air spaces, and two ADA spaces that would be located along the southern and western portions of the Site. The Project would also include 112 short-term and three long-term bicycle parking spaces, for a total of 115 bicycle parking spaces.

Project construction is expected to commence in September 2023. Construction activities would occur on weekdays between 8:00 a.m. and 3:00 p.m. The Project would require excavation of approximately 12,500 cubic yards (cy) of soil material. Of the 12,500 cy of soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site. Construction activities would also include tree removal and replacement of existing trees. Of the 56 on-site trees/shrubs, four trees are dead and would be removed along with an additional 41 trees/shrubs, consisting of nine protected native trees/shrubs and 32 non-protected significant trees. As designated by the City's tree removal application permit and consistent with the City's tree protection policies, protected tree/shrub removals would be replaced at a 1:4 ratio by planting 36 trees on-site and non-protected tree removals would be replaced at a 1:1 ratio by planting 32 trees on-site. The removal of the four dead trees do not require replacement. The Project would retain 13 existing trees, including 12 non-protected

significant trees (two of which are street trees) and one protected native tree. Construction is anticipated to end in September 2024, for a total construction period of approximately 12 months.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 15526-15544 Plummer Street, in the Mission Hills - Panorama City - North Hills Community Plan Area in the City of Los Angeles. As shown in Figure 1, Regional Location, the project site is location in the western portion of the Community Plan Area near its center. The Project Site encompasses approximately 2.06 acres (approximately 89,629 sf) and consists of two parcels identified by APN 265-601-5007, which is approximately 1.30 acres in size, and APN 265-601-5008, which is approximately 0.76 acre in size. Figure 2, Project Location, outlines the Project Site in its local context and surrounding uses.

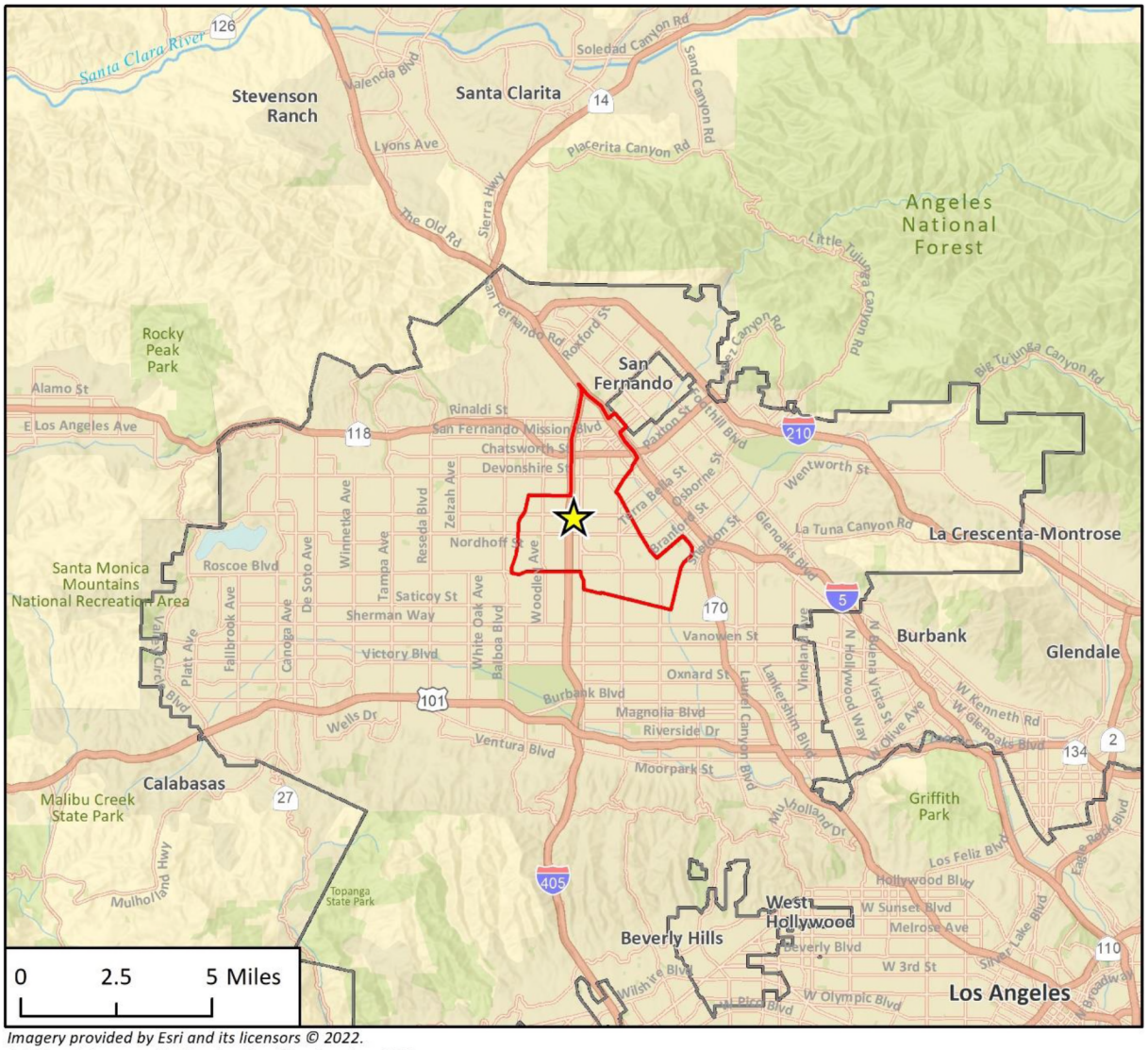
3.2.2 Existing Conditions

The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. The entire Project Site is relatively flat, with the local topography sloping downwards to the south. The elevation of the Site is approximately 869 feet above mean sea level. Of the two parcels that comprise the Site, the eastern parcel (15526 Plummer Street) is developed with a one-story, single-family Craftsman style residence constructed in 1914 and two contemporary sheds. The residence is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. Several partial orchard rows are also located at the rear (south) of this parcel. The western parcel (15544 Plummer Street) is undeveloped and covered with grasses, shrubs, and various mature trees. Each of the parcels is enclosed with various fences and a curbed sidewalk lies beyond the fences to the north, separating the parcels from Plummer Street, a paved four-lane arterial roadway. Figure 3, Views of the Project Site, includes photos of the existing conditions at the Project Site.

3.2.3 Surrounding Land Uses

The Project Site is in an urbanized area. Land uses surrounding the Project Site include Plummer Street to the north, with single-family residences beyond; single- and multi-family residences to the east, with an apartment building for senior citizens (Plummer Village) and commercial uses beyond; single- and multi-family residences to the south, with Vincennes Street beyond; and single-family residences to the west, with Orion Avenue beyond. The Project Site is also located approximately 440 feet east of Interstate 405 (I-405). Figure 2, Project Location, shows the site in the local vicinity.

Figure 1 Regional Location



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Additional data provided by the City of Los Angeles, 2021.

Project Location

City of Los Angeles

Mission Hills – Panorama City – North Hills Plan Area

N

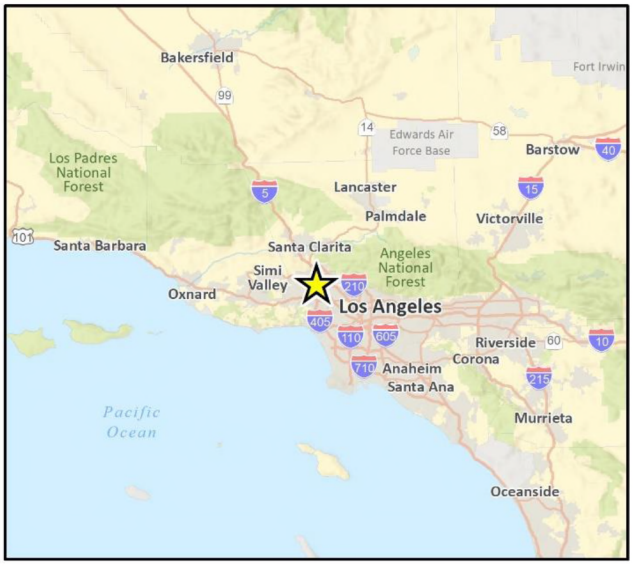


Figure 2 Project Location



Imagery provided by Microsoft Bing and its licensors © 2022.

Figure 3 Views of the Project Site



Photograph 1. Overview of Site from Plummer Street looking south.



Photograph 2. On-site looking east towards the existing single-family residence.



Photograph 3. Along Plummer Street looking southeast toward the Site.



Photograph 4. On-site looking east toward the western parcel of the Site.



Photograph 5. Southern portion of Site.



Photograph 6. Exisitng shed structure on the eastern parcel of the Project Site.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Proposed Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades TK through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street on an approximately 2.06-acre Project Site. The proposed elementary school would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The first floor of the elementary school building would include four TK classrooms, four kindergarten classrooms, four 1st grade classrooms, four 2nd grade classrooms, and one specialty classroom, ranging from 732 sf to 928 sf, as well as an administrative space, registrar/records space, health office, and restrooms. The second floor of the building would include four 3rd grade classrooms, four 4th grade classrooms, and three specialty classrooms, ranging from 734 sf to 928 sf, as well as an administrative space, director office, assistant principal office, inclusion specialist space, occupational therapy and speech space, and restrooms. The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property.

The on-site single-family residence located at 15526 West Plummer Street was built in 1914 and is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. The residence would remain on the site as part of the Project but would be converted into additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. The existing restroom would remain.

Table 1, Project Summary, provides details of the proposed building components, Figure 4, Project Site Plan, depicts the configuration of all project components on the Project Site, Figure 5 through Figure 8, Project Elevations, depict the building elevations from multiple perspectives, Figure 9, Project Cross-Sections, illustrates the proposed building layout of the different classrooms, and Figure 10, Planting Plan, depicts the landscaping plans for the Project.

3.3.2 Open Space and Landscaping

The Project would provide 30,726 sf of open space and landscaping, including a kindergarten play area (totaling 1,300 sf) and two play areas (totaling 13,060 sf). According to Project plans, there are 56 existing trees/shrubs on the Project Site and two street trees. Of the 56 on-site trees/shrubs, four trees are dead and would be removed along with an additional 41 trees/shrubs, consisting of nine protected native trees/shrubs and 32 non-protected significant trees. As designated by the City's tree removal application permit and consistent with the City's tree protection policies, protected tree/shrub removals would be replaced at a 1:4 ratio by planting 36 trees on-site. Non-protected tree removals would be replaced at a 1:1 ratio by planting 32 trees on-site. The removal of the four dead trees do not require replacement. The Project would retain 13 existing trees, including 12 non-protected significant trees (two of which are street trees) and one protected native tree. Landscaping would occur around the entire Project Site boundary and within islands in the surface parking lot. The project would include capture and reuse cisterns; however, details for the size of the cisterns are not yet available at this stage of project design.

3.3.3 Access, Circulation, and Parking

The Project would include construction of one new ingress/egress driveway off Plummer Street, providing access to the surface parking and car drop-off and pick-up area at the southern and western portion of the Site. Per Los Angeles Municipal Code (LAMC) Section 12.21.A.4.f, the Project would be required to provide one parking space per classroom, for a total of 28 parking spaces. The Project would provide 49 surface-level parking spaces including 17 standard, 21 compact, nine clean air spaces, and two ADA spaces. Of the nine clean air spaces, six spaces would include infrastructure for electric vehicle (EV) charging, one space would be EV van accessible with EV charging, and two spaces would be designated for clean air/vanpool/EV vehicles. The Project would also include 112 short-term and three long-term bicycle parking spaces, for a total of 115 bicycle parking spaces.

3.3.4 Anticipated Construction Schedule

Project construction is expected to commence in September 2023. Construction activities would occur on weekdays between 8:00 a.m. and 3:00 p.m. Construction is anticipated to end in September 2024, for a total construction period of approximately 12 months.

Construction would include site preparation, grading, building construction, asphalt paving, and architectural coating. The Project would require excavation of approximately 12,500 cy of soil material. Of the 12,500 cy of soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Initial Study/MND analyzes the impacts associated with the Project and provides environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

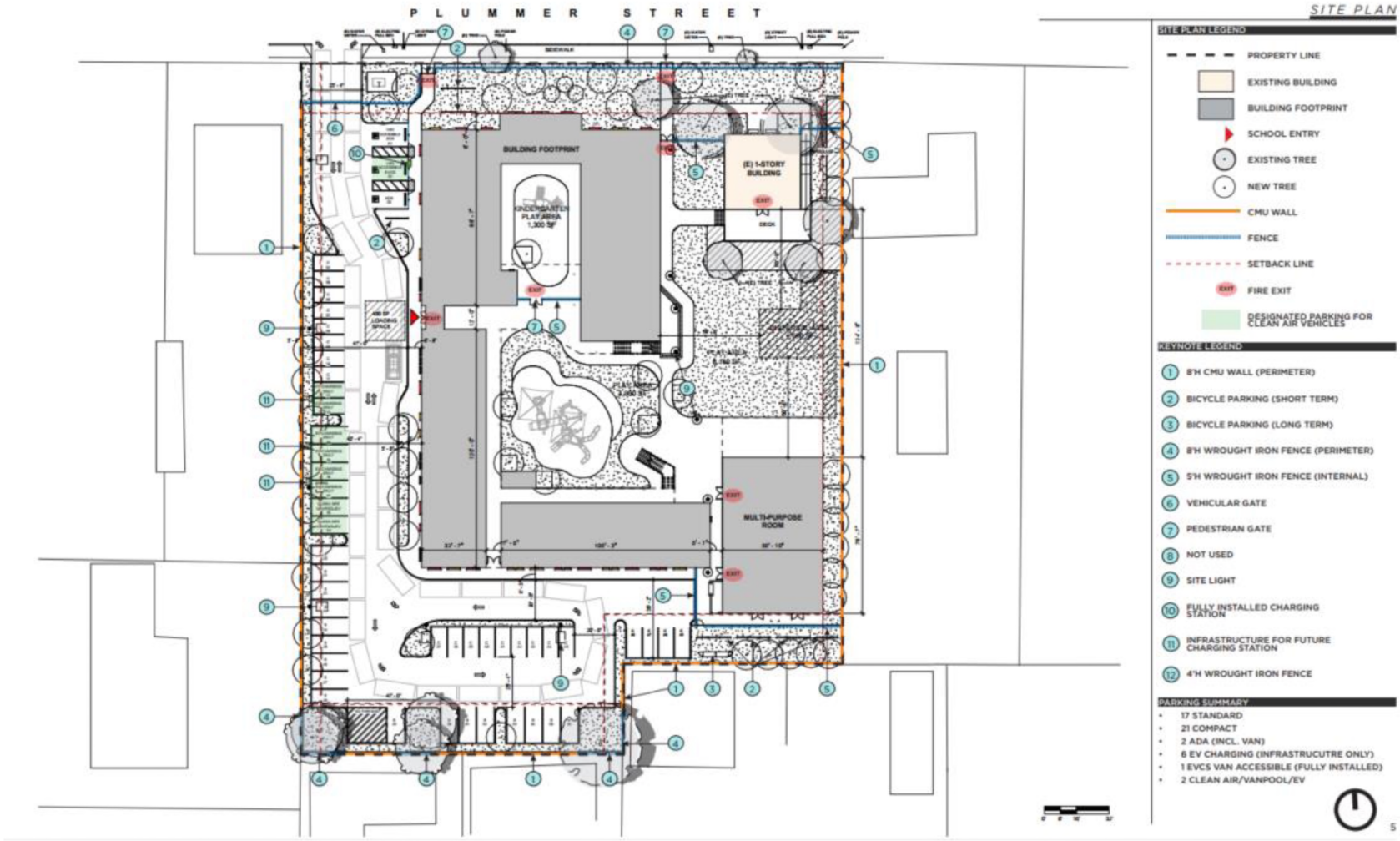
- Pursuant to LAMC Section 16.05, Site Plan Review
- Pursuant to LAMC Section 653, Conditional Use Permit to allow a school use in the RA-1 Zone District
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

Table 1 Project Summary

Proposed Building Area (square feet)	
Multipurpose Room	3,182
Administrative Space	1,616
Administrative Space in Existing Residence	1,402
Classrooms	23,538
Corridors, Storage Spaces, and Covered Outdoor Dining	6,419
Total	**34,755**
Parking Provided (stalls)	
Standard	17
Compact	21*
ADA (Including Van)	2
Clean Air	9**
Total	**49**
Bicycle Parking (spaces)	
Short-Term	112
Long-Term	3
Total	**115**
Public Open Space/Landscaping (square feet)	
Kindergarten Play Area	1,300
Play Areas	13,060
Landscaping	16,366
Total	**30,726**
Setbacks (feet)	
Front Yard	25
East Side Yard	10
West Side Yard	10
Rear Yard	25
Overview	
Gross Site Area	89,629 sf (2.06 acres)
Max School Enrollment	552 students
Max Height	26 feet, 6 inches

*40 percent max of required parking. Required parking is 28 spaces.
** 6electric vehicle charging stations, 1electrical vehicle van accessible, and 2clean air/vanpool/electrical vehicle.
Source: Berliner Architects 2022

Figure 4 Project Site Plan



Source: Berliner Architects, 2022

Figure 5 Project Elevations – North and West



Source: Berliner Architects, 2022

Figure 6 Project Elevations – South and East



Source: Berliner Architects, 2022

Figure 7 Project Elevations – North and West Play Yard



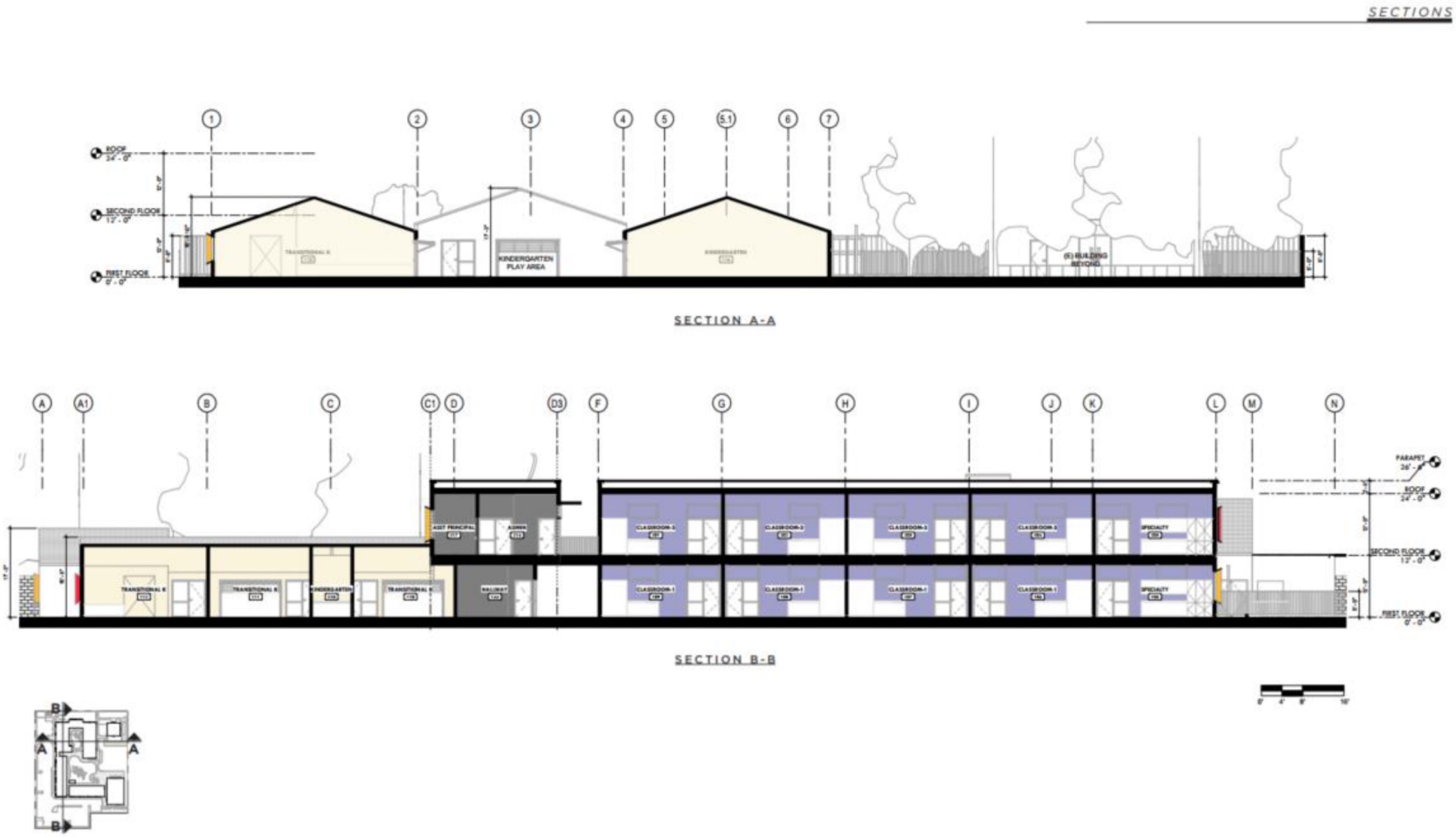
Source: Berliner Architects, 2022

Figure 8 Project Elevations – South and East Play Yard



Source: Berliner Architects, 2022

Figure 9 Project Cross-Sections



Source: Berliner Architects, 2022

Figure 10 Planting Plan



Source: Berliner Architects, 2022

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4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance); and focal views (visual access to a particular object, scene, or feature of interest). The Project is located in an established urban area in which existing views are defined primarily by Plummer Street to the north, with single-family residences beyond; single- and multi-family residences to the east, with a senior apartment building beyond; single- and multi-family residences to the south, with Vincennes Street beyond; and single-family residences to the west, with Orion Avenue beyond. Due to the relatively level topography and extent of development within the immediate area, there are no scenic views or vantage points that afford scenic views. Furthermore, as shown in Figure 3, there are no significant natural features on the Project Site or other valued views within the Project area that would be defined as a scenic vista. Therefore, impacts to scenic vistas would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

Less Than Significant Impact. There are two officially designated State scenic highways in Los Angeles County. This includes State Route 2 (SR-2; Angeles Crest Highway) approximately 11.8 miles south of the Project Site and a portion of State Route 27 (SR-27; Topanga Canyon Highway) approximately 9.9 miles southwest of the Project Site (California Department of Transportation

[Caltrans] 2019). As identified in the Mobility Element of the City of Los Angeles General Plan, the nearest designated scenic highways include Tampa and Wentworth Street, located approximately 4.9 miles northwest and 5.7 miles east of the Project Site, respectively (City of Los Angeles 2016a). Therefore, at these distances, the Site is not near a scenic highway.

The Project Site is relatively level and does not contain any unique geologic features. Although the Project would remove four dead and 41 alive on-site trees, consisting of nine protected native trees/shrubs and 32 non-protected significant trees (not counting the dead trees), the Project would replace all removed protected native trees or shrubs on a 1:4 ratio and all removed non-protected significant trees on a 1:1 ratio. The Project would retain two street trees and 11 existing trees on the Site, including one protected native tree. Section IV, Biological Resources, includes a detailed discussion of tree retention and removal activities associated with the Project in compliance with the City's tree protection policies. Furthermore, although the Project includes a historic single-family residence on-site, the building would remain on the Site as part of the Project but would be adaptively reused for additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. As discussed in Section V, *Cultural Resources*, all character-defining features associated with the historic building would be preserved under the Project. Because there are no impacts to scenic resources on or near the Site, and the Site is not within a scenic highways, the Project would not substantially damage scenic resources in a scenic highway, impacts would be less than significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant. The Project Site is in an urban area. Land uses surrounding the site include single family and multi-family residences connected by an established roadway network. The Site is also 440 feet east of I-405, which is visible from the Site. The Site itself consists of grasses, shrubs, various mature trees, and a one-story historic single-family residence.

The Proposed Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades TK through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces, and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf). As a proposed elementary school, the Project would not conflict with existing uses in the area since there is a high school and middle school located approximately 1,000 feet to the east along Plummer Street.

Although the Project would remove 41 on-site trees/shrubs, including a few protected native trees/shrubs, the Project would replace all removed protected native trees or shrubs on a 1:4 ratio and all removed non-protected significant trees on a 1:1 ratio. The Project would retain 13 existing trees on the Site, including 12 non-protected significant trees (two of which are street trees) and one protected native tree. Section IV, *Biological Resources*, includes a detailed discussion of tree retention and removal activities associated with the Project in compliance with the City's tree protection policies. Furthermore, the existing on-site historic single-family residence would remain on the Site as part of the Project but would be adaptively reused into additional administrative space. As discussed in Section V, *Cultural Resources*, all character-defining features associated with the historic building would be preserved under the Project. Compared to the mostly

undeveloped conditions of the Site and considering the treatment of the on-site historic building, the Project would not degrade the existing visual character or quality of the Site.

Furthermore, the Project Site is in an area zoned RA-1 (Suburban Zone). There is a maximum height limit of 30 feet. The Proposed Project would have a height of 26.5 feet and would not conflict with RA-1 zoning or regulations governing building height, which influence public views. Because the Project would not conflict with applicable zoning and other regulations governing scenic quality, this impact would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

Less Than Significant Impact. The Proposed Project would redevelop the mostly undeveloped Site into an elementary school. The Project Site is in a well-lit urban area where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Artificial light impacts are largely a function of proximity and timing. Because the Project is in an urban area, light emanating from any one source contributes to lighting impacts rather than being solely responsible for lighting impacts on a particular use. As uses surrounding the Project Site are already impacted by lighting from existing development within the area, the amount of new light sources must be highly visible from light-sensitive uses to have any notable effect.

Construction activities associated with the Project would occur on weekdays between 8:00 a.m. and 3:00 p.m. Therefore, construction would occur during daylight hours and would not involve lighting during evening hours. At operation, the Project would include indoor lighting in the school and other amenity areas as well as exterior lighting and signage. The proposed elementary school would not include sports fields with potential for evening or nighttime events requiring lighting; therefore, exterior lighting at nighttime would be primarily for security purposes but would not be so bright as to cause substantial light to spill off the Site.

Outdoor lighting and signage would be designed and installed with shielding, such that lighting would be directed and focused on the Project Site and not on adjacent residential properties in accordance with LAMC lighting regulations. LAMC lighting regulations require that operational lighting be directed downward or on the specific on-site features to be lit or otherwise avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. Specifically, LAMC Section 93.0117(b) limits lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. LAMC Section 14.4.4.E, requires that no sign be arranged and illuminated in a manner that would produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. Therefore, light impacts are not expected to be substantial or to adversely affect day or night views.

The Proposed Project would also utilize reflective materials, such as glass surfaces in its doors and windows, which could create glare during daylight hours. In addition, the Proposed Project would generate new vehicle traffic to and from the Project Site that would contribute light from vehicle headlamps and glare from vehicle surfaces and windows.

As with existing lighting, existing glare in the Project area is not substantial and is typical of a highly urbanized area, with sunlight reflected off reflective materials utilized in buildings and from vehicle windows and other surfaces. In accordance with City requirements (i.e., LAMC Chapter 9, Article 3, Division 1, Section 93.017(b)), the exterior of the proposed school building would use

materials such as, high-performance and/or low-reflective glass (no mirrorlike tints or films) and pre-cast concrete or fabricated wall surfaces that would minimize glare and reflected heat. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets would be temporary, and continuously changing with the movement of the sun throughout the course of the day and the seasons of the year. Therefore, glare impacts are not expected to be substantial or to adversely affect day or night views. Light and glare impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is in an urban area. The site is surrounded by Plummer Street, I-405, and residential uses. The California Department of Conservation's (DOC) 2016 map of Los Angeles County Important Farmland indicates that the Project Site is located in an area designated as Urban Built-up land and is not within an area designated as Farmland (DOC 2016). Therefore, the Project would have no impact on farmland.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is not zoned for agricultural use or under any Williamson Act contract (DOC 2016). According to the Mission Hills - Panorama City - North Hills Community Plan, the Project Site is designated Low Density Residential, which corresponds to the RA-1 zone (Suburban Zone) and is intended to provide for areas appropriate for a range of detached single-family residential dwelling units, each located on a single legal lot, and does not include condominiums or cooperative housing (City of Los Angeles 2010). The Proposed Project would involve the development of a two-story elementary school building and associated open space, landscaping, and surface parking. A school is a permitted use under the RA-1 with approval of a Conditional Use Permit, which is included as part of Project approval. The Project Site does not include the conversion of farmland to non-agricultural uses. Therefore, the Proposed Project would have no impact with respect to agricultural zoning or conflict with a Williamson Act contract or other conversion of farmland to non-agricultural use.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site and the immediate surrounding area is urban and entirely developed with residential uses. As described under impact b) of this section, the Project Site is zoned RA-1 (Suburban Zone). Neither the Project Site nor the surrounding area is zoned for forest land or timberland. Accordingly, the Project would not conflict with forest land or timberland zoning. Additionally, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed in the Phase I Environmental Site Assessment prepared by Alta Environmental in February 2022, the Site has historically included agricultural uses (Alta Environmental 2022). Several partial orchard rows are located at the rear (south) of the eastern parcel with the single-family historic residence. Although the project would remove these rows, the Site is not designated as farmland or forest land. Therefore, the project would not involve any development that would result in the conversion of designated farmland or forest land to another use. No impact would occur.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Rincon prepared an Air Quality and Greenhouse Gas Study in August 2022 to analyze the Project's air quality impacts related to both temporary construction activity and long-term operation of the Project. Rincon also prepared a Health Risk Assessment to assess impacts of the I-405 on the project site. The following analysis is based on the findings of the Air Quality and Greenhouse Gas Study and Health Risk Assessment, which are provided as Appendix A and Appendix B, respectively.

Air Quality Standards and Attainment

The Project Site is in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether the standards are met or exceeded, the SCAB is classified as being in "attainment" or "nonattainment." Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SCAQMD is in nonattainment for the federal standards for ozone and $PM_{2.5}$ and the state standards for ozone, PM_{10}, and $PM_{2.5}$. Areas of the SCAB located in Los Angeles County are also in nonattainment for lead. The SCAB is designated unclassifiable or in attainment for all other federal and state standards.

Air Pollutants of Primary Concern

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Primary criteria pollutants include CO, NO_2, PM_{10}, $PM_{2.5}$, SO_2, and lead. Ozone is considered a secondary criteria pollutant because it is created by atmospheric chemical and photochemical reactions between reactive organic gases (ROG) and

nitrogen oxides (NO_X). The following subsections describe the characteristics, sources, and health and atmospheric effects of critical air contaminants.

Ozone

Ozone is produced by a photochemical reaction (triggered by sunlight) between NO_X and ROG.[1] Nitrogen oxides are formed during the combustion of fuels, while ROG are formed during combustion and evaporation of organic solvents. Since O_3 requires sunlight to form, it usually occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to O_3 include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide is a local pollutant that is found in high concentrations only near fuel combustion equipment and other sources of CO. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulty in people with chronic diseases, reduced lung capacity, and impaired mental abilities.

Nitrogen Dioxide

Nitrogen dioxide is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility. It can also contribute to the formation of ozone/smog and acid rain.

Sulfur Dioxide

Sulfur dioxide is a colorless, pungent, irritating gas formed primarily by the combustion of sulfur-containing fossil fuels. When SO_2 oxidizes in the atmosphere, it forms sulfur trioxide. Collectively, these pollutants are referred to as sulfur oxides (SO_X). In humid atmospheres, SO_2 can also form sulfuric acid mist, which can eventually react to produce sulfate particulates that can inhibit visibility. Combustion of high sulfur-content fuels is the major source of SO_2, while chemical plants, sulfur recovery plants, and metal processing are minor contributors. At sufficiently high concentrations, SO_2 irritates the upper respiratory tract. At lower concentrations, when in conjunction with particulates, SO_2 appears to do still greater harm by injuring lung tissues. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. Sulfur dioxide causes respiratory irritation, including wheezing, shortness of breath, and coughing. Long-term SO_2 exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease. Sulfur oxides, in

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions (CARB 2009). For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions and the term ROG is used in this report.). SCAQMD uses the term VOC to denote organic precursors.

combination with moisture and oxygen, can yellow leaves on plants, dissolve marble, and eat away iron and steel.

Suspended Particulates

Atmospheric particulate matter is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. The particulates that are of particular concern are PM_{10} (small particulate matter that measures no more than 10 microns in diameter) and $PM_{2.5}$ (fine particulate matter that measures no more than 2.5 microns in diameter). The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be different. Major man-made sources of PM_{10} are agricultural operations, industrial processes, combustion of fossil fuels, construction, demolition operations, and entrainment of road dust into the atmosphere. Natural sources include windblown dust, wildfire smoke, and sea spray salt. The finer $PM_{2.5}$ particulates are generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there, which can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Lead

Lead is a metal found naturally in the environment, as well as in manufacturing products. Lead occurs in the atmosphere as particulate matter. The major sources of lead emissions historically have been mobile and industrial sources. In the early 1970s, the United States Environmental Protection Agency (USEPA) set national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA completed the ban prohibiting the use of leaded gasoline in highway vehicles in December 1995. As a result of the USEPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries in part due to national emissions standards for hazardous air pollutants (USEPA 2013). As a result of phasing out leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in the air are generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. Lead may cause a range of health effects, including anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases). The Proposed Project does not include any stationary sources of lead emissions. Therefore, implementation of the Project would not result in substantial emissions of lead, and this pollutant is not discussed further in this analysis.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as diesel particulate matter (DPM; California Air Resources Board [CARB] 2022). TACs are different than

the criteria pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

Air Quality Management Plan

Under State law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which its jurisdiction is in non-compliance. The SCAQMD updates the plan every three years. Each iteration of the SCAQMD's Air Quality Management Plan (AQMP) is an update of the previous plan and has a 20-year horizon. The latest AQMP, the 2016 AQMP, was adopted on March 3, 2017. It incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal eight-hour ozone standard of 0.070 ppm that was finalized in 2015. The Final 2016 AQMP addresses several State and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The Southern California Association of Governments' (SCAG) projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) are integrated into the 2016 AQMP.

The 2016 AQMP builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The 2016 AQMP also demonstrates strategies for attainment of the new federal eight-hour ozone standard and vehicle miles travelled emissions offsets, pursuant to recent USEPA requirements (SCAQMD 2017).

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; people engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. Therefore, the majority of sensitive receptor locations are schools, hospitals, and residences. Sensitive receptors in the Project vicinity include single- and multi-family residences immediately to the east, south, and west; additional residences located approximately 130 feet to the north across Plummer Street; and Plummer Village Senior Community located approximately 215 feet east of the Project Site. In addition, the Proposed Project would include construction of an elementary school, which would add new sensitive receptors to the Project Site.

Regional Significance Thresholds

The SCAQMD recommends quantitative regional significance thresholds for temporary construction activities and long-term project operation in the region of the SCAB overseen by SCAQMD, shown in Table 2.

Table 2 SCAQMD Regional Significance Thresholds

Pollutant	Mass Daily Emissions Thresholds (pounds per day)	
	Construction	Operation
VOC	75	55
NO_X	100	55
CO	550	550
SO_X	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55

Source: SCAQMD 2019

Localized Significance Thresholds

The SCAQMD has also developed Localized Significance Thresholds (LST) as a tool to assist lead agencies to analyze localized air quality impacts to sensitive receptors in the vicinity of a project. The SCAQMD's LST Methodology outlines how to analyze localized impacts from common pollutants of concern including NO_2, CO, PM_{10}, and $PM_{2.5}$ (SCAQMD 2008). Localized air quality impacts would occur if pollutant concentrations at sensitive receptors exceeded applicable NAAQS or CAAQS.

To minimize efforts, the SCAQMD developed mass rate lookup tables as a simple screening procedure. If a project's onsite emissions do not exceed the screening levels for any pollutant, it can be concluded that the Project would not cause or contribute to an adverse localized air quality impacts. Screening levels are provided for various distances between the Project boundary and the nearest sensitive receptor and various Project Site acreages. Screening levels increase, as the Project distance between the boundary and the nearest receiver increases. This is because air pollutant dispersion increases with distance. Screening levels increase, as the acreage increases. This is because the distance between construction sources and sensitive receptors increases with Project acreage.

The LST mass rate lookup tables account for ambient pollutant concentrations based on the Project's source receptor area (SRA). The LST mass rate lookup tables account for ambient pollutant concentrations based on a Project's source receptor area (SRA). The LST methodology includes screening levels for 1-, 2-, and 5-acre sites at distances of 82 feet (25 meters), 164 feet (50 meters), 328 feet (100 meters), 656 feet (200 meters), 1,640 feet (500 meters). Screening levels are more stringent for smaller sites which represent a more concentrated release.

LSTs have been developed for emissions generated by construction sites up to five acres in size. The Project Site is located in SRA 7 (East San Fernando Valley) and is approximately 2.06 acres in size. Pursuant to SCAQMD guidance, the two-acre LSTs were utilized for this analysis (SCAQMD 2008). The closest sensitive receptors to the Project Site are residences directly adjacent to the east, south and west. In addition, there are single-family residences located approximately 130 feet north of the Site across Plummer Street and Plummer Village Senior Community located approximately 215 feet east of the Site. According to the SCAQMD, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet (SCAQMD 2008). LSTs for construction on a two-acre site in SRA 7 for a receptor at 25 meters (82 feet) are shown in Table 3.

Table 3 SCAQMD LSTs for Construction

Pollutant	Allowable Emissions from a 2-acre Site in SRA 7 for a Receptor at 25 Meters (pounds/day)
Gradual conversion of NO_X to NO_2	63[1]
CO	786
PM_{10}	7
$PM_{2.5}$	3[2]

lbs/day = pounds per day; NO_x = nitrogen oxide; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns

[1]The screening criteria for NOx were developed based on the 1-hour NO_2 CAAQS of 0.18 ppm. Subsequently to publication of the SCAQMD's guidance the USEPA has promulgated a 1-hour NO_2 NAAQS of 0.100 ppm. This is based on a 98th percentile value, which is more stringent than the CAAQS. Because SCAQMD's LSTs have not been updated to address this new standard, to determine if project emissions would result in an exceedance of the 1-hour NO_2 NAAQS, an approximated LST was estimated to evaluate the federal 1-hour NO_2 standard. The revised LST threshold is calculated by scaling the NO_2 LST for by the ratio of 1-hour NO_2 standards (federal/State) (i.e., 114 lbs/day * (0.10/0.18) =63.3 lbs/day).

[2]The screening criteria for PM2.5 were developed based on an Annual CAAQS of 15 mg/m^3. Subsequently to publication of the SCAQMD's guidance the annual standard was reduced to 12 mg/m^3. Because SCAQMD's LSTs have not been updated to address this new standard, to determine if project emissions would result in an exceedance of the annual $PM_{2.5}$ CAAQS, an approximated LST was estimated. The revised LST threshold is calculated by scaling the $PM_{2.5}$ LST for by the ratio of 24-hour $PM_{2.5}$ standards (federal/State) (i.e., 4lb/day * (12/15) =3.2 lbs/day).

Source: SCAQMD 2009

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and the demographic forecasts contained in the SCAG 2016 RTP/SCS in its own projections for managing air quality in the SCAB. As such, projects that propose development that is consistent with the growth anticipated by SCAG's growth projections and/or the General Plan would not conflict with the SCAQMD AQMP. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the AQMP.

The growth forecasts in SCAG's 2016 RTP/SCS estimate that the population of Los Angeles will be 4,609,400 in 2040, an increase of 763,900 people from a population of 3,845,500 in 2012 (SCAG 2016).2 The Proposed Project would involve the development of an elementary school for a maximum enrollment of 552 students, including 28 classrooms, administrative spaces, a multi-purpose room, and the adaptive reuse of the existing residence to accommodate additional administrative space. The Proposed Project would involve the development of an elementary school for an additional enrollment of 172 students. The Proposed Project would not directly increase the City's population because no new housing is proposed, and the purpose of this facility is for educational use. Furthermore, as shown in Table 4 and Table 5 under impact b) of this section, the Project would not generate criteria pollutant emissions in excess of SCAQMD thresholds for ozone precursors (VOC and NO_X) or $PM_{2.5}$. The Project would be consistent with the AQMP and would not conflict with or obstruct the applicable air quality plan. Therefore, no impacts would occur.

[2] On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (2020 RTP/SCS), or Connect SoCal, which builds upon the progress made through implementation of the 2016 RTP/SCS and was developed through a four-year planning process to update population, housing and employment data as well as transportation strategies for the region through the horizon year of 2045. However, SCAQMD has not updated the 2016 AQMP to incorporate these new demographic projections (the next update to the AQMP is expected to occur in 2022).

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The City of Los Angeles is located in the SCAB, which is a non-attainment area for the NAAQS for ozone, $PM_{2.5}$, and lead as well as the CAAQS for ozone, PM_{10}, and $PM_{2.5}$. The Project does not include any stationary sources of lead emissions. Therefore, implementation of the Project would not result in substantial emissions of lead and this pollutant is not discussed further in this analysis. The below discussion assesses potential air quality impacts related to construction and operational emissions of criteria air pollutants for which the SCAB is in non-attainment, including ozone, PM_{10}, and $PM_{2.5}$.

Construction Impacts

Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles. In addition, construction equipment would release VOC emissions during the drying of architectural coating and paving phases. Table 4 summarizes the estimated maximum daily emissions of pollutants during project construction. As shown therein, construction-related emissions would not exceed SCAQMD thresholds. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard. Impacts would be less than significant.

Table 4 Project Construction Emissions

	Maximum Emissions (lbs/day)					
Construction Year	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2023	6	58	56	< 1	12	6
2024	9	49	54	< 1	4	2
Maximum Daily Construction Emissions	**9**	**58**	**56**	**<1**	**12**	**6**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Daily On-site Emissions	**9**	**58**	**56**	**< 1**	**12**	**6**
SCAQMD Localized Significance Thresholds (LSTs)	N/A	114	786	N/A	7	4

Construction Year	Maximum Emissions (lbs/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

lbs/day = pounds per day; VOC = Volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns in diameter or less; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter.

Notes: All emissions modeling was completed using CalEEMod. See Appendix A for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with RCMs. Emissions presented are the highest of the winter and summer modeled emissions. Maximum on-site emissions are the highest emissions that would occur on the Project site from on-site sources such as heavy construction equipment and architectural coatings and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.

Operational Impacts

Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Table 5 summarizes the Project's operational emissions by emission source. As shown therein, operational emissions would not exceed SCAQMD regional thresholds for criteria pollutants. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, and impacts would be less than significant.

Table 5 Project Operational Emissions

Emission Source	Maximum Daily Emissions (lbs/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	1	< 1	< 1	0	< 1	< 1
Energy	< 1	< 1	< 1	< 1	< 1	< 1
Mobile	3	3	24	< 1	5	1
Total Project Emissions	**4**	**3**	**24**	**<1**	**5**	**1**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day = pounds per day; NO_x = nitrogen oxide; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns

Notes: All emissions modeling was completed using CalEEMod. See Appendix A for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results that include compliance with SCAQMD Rule 403 and Rule 1113. Emissions presented are the highest of the winter and summer modeled emissions.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact With Mitigation. The following discussion addresses the Proposed Project's potential impacts regarding emissions of local carbon monoxide hotspots and TACs within the SCAB and local areas.

Localized Carbon Monoxide Hotspot Impact

A carbon monoxide hotspot is a localized concentration of carbon monoxide that is above a carbon monoxide ambient air quality standard. Localized carbon monoxide hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local carbon monoxide concentration exceeds the federal one-hour standard of 35.0 ppm or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

A detailed carbon monoxide analysis was conducted during the preparation of SCAQMD's 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the SCAB, those which would be expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near the I-405. The concentration of CO at this intersection was 4.6 ppm, which is well below the state and federal standards. The Wilshire Boulevard/Veteran Avenue intersection has an ADT of approximately 100,000 vehicles per day (SCAQMD 2003).

The total existing ADT for the nearest major intersection to the Project Area, Plummer Street and Sepulveda Boulevard, was estimated at 20,200 vehicles (City of Los Angeles 2016b). Based on the CalEEMod daily trips, the Project would generate approximately 1,232 daily trips. Operation of the Project would cause the ADT at this intersection to increase by 1,232 for a total of 21,432 daily trips. Both the existing and future ADT are below the 100,000-vehicle count on the Wilshire Boulevard/Veteran Avenue intersection, which was already below the CO standards. Project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the one-hour or eight-hour CO standard. Therefore, impacts would be less than significant.

Localized Significance Thresholds

The *Final LST Methodology* was developed to be used as a tool to analyze localized impacts associated with project-specific level proposed projects. If the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables (Appendix C of *Final LST Methodology;* SCAQMD 2009) and no potentially significant impacts are found to be associated with other environmental issues, then the proposed construction or operation activity is not significant for air quality. The Project analysis assumes main construction activity would occur immediately adjacent to single-family residences. The allowable emission for project utilizes the 82 feet receptor distance, and the project is in SRA 7(East San Fernando Valley). Table 6 summarizes the Project's maximum localized daily construction emissions from the Proposed Project. As shown therein, localized construction emissions would exceed SCAQMD LST thresholds for PM_{10} and $PM_{2.5}$. Therefore, Project construction would result in a potentially significant impact from localized criteria pollutant emissions.

Table 6 Unmitigated Project LST Construction Emissions

	Maximum Daily Emissions (lbs/day)					
Year	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum On-site Emissions	N/A	56	52	<1	11	6
SCAQMD LST	N/A	63	786	N/A	7	3
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**Yes**	**Yes**

lbs/day = pounds per day; VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the project site from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips

Source: CalEEMod worksheets in Appendix A, see Table 3.2 – 3.6 "Overall Construction-mitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

Toxic Air Contaminants

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The following subsections discuss the Project's potential to result in impacts related to TAC emissions during construction and operation.

CONSTRUCTION

Construction-related activities would result in temporary project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2022a) and is therefore the focus of this analysis.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the Proposed Project would occur over approximately 12 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time.

The Proposed Project would be consistent with the applicable AQMP requirements and control strategies intended to reduce emissions from construction equipment and activities. However, given the construction area's proximity to nearby sensitive receptors, impacts from TACs could be potentially significant.

OPERATION

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommended buffer distances between sensitive land uses and potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). CARB recommends that local agencies avoid siting new, sensitive land uses within 500 feet of a freeway. In addition, the City of Los

Angeles Planning Commission suggests that project applicants conduct a site-specific health risk assessment, improve indoor air quality with minimum efficiency reporting value (MERV)-Rated or high-efficiency particulate air (HEPA) filtration equipment, and further reduce exposure to TACs through various project design strategies. The Project Site is located approximately 440 feet east of I-405, a primary source of DPM with truck traffic traveling on the I-405 mainline. The Project would install MERV 13 filters, which remove approximately 90 percent of DPM from the intake air (Singer *et al*. 2016). Rincon prepared an operational Health Risk Assessment in August 2022 (Appendix B), which evaluated the potential health risk to on-site receptors due to TAC emissions from nearby roadway sources (i.e., I-405). Results of the analysis were compared to SCAQMD thresholds for a cancer risk threshold of 10 in a million, and a Hazard Index significance threshold of 1.0. As shown in Table 7, the maximum exposed individual receptor and worker (MEIR/MEIW) would not exceed SCAQMD's cancer risk and hazard index thresholds (Rincon 2022).

Table 7 Health Risks Associated with Operational Activity

Scenario	Excess Cancer Risk (per million)	Chronic Hazard Risk[1]	Acute Hazard Risk
Maximally Exposed Individual Receptor (MEIR)	1.97	0.029	0.011
Maximum Exposed Individual Worker (MEIW)	0.212	0.029	0.011
SCAQMD Significance Threshold	>10	>1	<1
Threshold Exceeded?	No	No	No

µg/m^3 = micrograms per cubic meter; SCAQMD = South Coast Air Quality Management District.

[1]Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

For HARP model outputs, refer to the Valor Elementary School Project Health Risk Assessment (Rincon 2022)

Educational land uses are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program. Because the Project would not include substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, it would not result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic or toxic air contaminants. Impacts would be less than significant.

As shown in Table 8, the Project's maximum localized daily construction emissions would exceed SCAQMD LST thresholds for PM_{10} and $PM_{2.5}$. Therefore, implementation of Mitigation Measure AQ-3 would be required to reduce impacts from localized criteria pollutant emissions and construction-related TAC emissions.

Mitigation Measure

AQ-1. Construction Emissions Reduction

Prior to issuance of grading permits, the City Engineer and the Chief Building Official shall confirm that the grading plan, building plans, and specifications stipulate that the following measures shall be implemented:

- All mobile off-road equipment (wheeled or tracked) greater than 50 horsepower used during construction activities shall meet the USEPA Tier 4 final standards Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards.
- A copy of the equipment's certification or model year specifications shall be available upon request for all equipment on-site.
- All unpaved demolition and construction areas shall be wetted at least twice times per day during excavation and construction.
- Electricity shall be supplied to the site from the existing power grid to support the electric construction equipment. If connection to the grid is determined to be infeasible for portions of the project, a non-diesel fueled generator shall be used.
- The project shall comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction.

With incorporation of Mitigation Measure AQ-3, the project would reduce PM_{10}, $PM_{2.5}$, and DPM emissions, as compared to CalEEMod assumption equipment emissions standards, depending on the specific horsepower rating of each piece of equipment. As shown in Table 8, with incorporation of Mitigation Measure AQ-3, criteria pollutant emissions would be below LST thresholds. Therefore, construction activities would not expose sensitive receptors to criteria pollutants and construction-related health impacts, including construction TAC emissions, would be less than significant with mitigation incorporated.

Table 8 Mitigated Project LST Construction Emissions

	Maximum Daily Emissions (lbs/day)					
Year	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum On-site Emissions	N/A	9	66	<1	4	2
SCAQMD LST	N/A	63	786	N/A	7	3
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

lbs/day = pounds per day; VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the project site from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips

Source: CalEEMod worksheets in Appendix A, see Table 3.2 – 3.6 "Overall Construction-mitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. The Project would generate oil or diesel fuel odors during construction from equipment operations. These odors would be limited to the temporary construction period and would dissipate rapidly with distance. Impacts from construction activities would be less than significant.

With respect to odors generated by Project operation, the SCAQMD's CEQA Air Quality Handbook (1993) identifies land uses associated with odor complaints to be agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Educational uses are not identified on this list.

Furthermore, no odor-producing uses are located in the Project vicinity. In addition, the Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public. Therefore, the Proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts would be less than significant.

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IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Rincon Consultants prepared an Arborist Report in August 2022 to address potential impacts to protected and non-protected significant trees from the Proposed Project. The following analysis is based on the findings of the Arborist Report, which is provided as Appendix C.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant With Mitigation. Special-status species are plants and animals that are: (1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) under the federal Endangered Species Act (ESA); (2) listed or proposed for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the California

Endangered Species Act (CESA); (3) animals recognized as Species of Special Concern (SSC) by the CDFW; (4) animals designated as Fully Protected by the California Fish and Game Code (CFGC); or (5) identified on lists 1 and 2 of the CDFW California Rare Plant Rank (CRPR) system. While migratory or other common nesting birds are not designated as special-status species, destruction of their eggs, nests, and nestlings is prohibited by the Migratory Bird Treaty Act (MBTA) and CFGC (Sections 3503, 3503.5, 3511, and 3513).

The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. A review of the California Natural Diversity Database (CNDDB) revealed that 5 special-status species (two plant species and three animal species) have records within the Van Nuys quad which includes the Proposed Project Site. However, no special-status species or sensitive natural communities have a potential to occur on-site (CDFW 2022a) due to the lack of suitable habitat for wildlife (chaparral, grassland, coastal scrub, etc.) on-site and in the surrounding area.

Migratory or other common nesting birds, while not designated as special-status species, are protected by the CFGC and Migratory Bird Treaty Act (MBTA) and may nest onsite in the ornamental trees and shrubs. Therefore, construction of the Project has the potential to directly (by destroying a nest) or indirectly (construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. As discussed in the Arborist Report (Appendix C), a total of 56 trees are located within the Site and an additional two street trees are located at the northern boundary of the site along Plummer Street. Of the 56 on-site trees, four trees are dead and would be removed along with an additional 41 trees consisting of 9 protected native trees and 32 non-protected significant trees. It is possible that these trees provide habitat for nesting birds, which would be impacts by development of the Project. Therefore, implementation of Mitigation Measure BIO-1 would reduce potential impacts to nesting birds to a less than significant level.

Mitigation Measure

BIO-1. Nesting Bird Avoidance

Project activities (including disturbances to native and non-native vegetation, structures and substrates) shall take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Wildlife Code Section 86). If Project activities cannot feasibly avoid the breeding bird season, beginning 30 days prior to the disturbance of suitable nesting habitat, the Applicant shall:

a) Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work.
b) If a protected native bird is found, the Applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

c) Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d) The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. Riparian habitats typically exist to a very limited extent along streams and flood channels where there is disturbance. The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. As such, no sensitive natural communities or riparian habitat are present on the Project Site. The nearest body of water is the channelized Bull Creek (designated as a riverine habitat) is approximately 1.2 miles west of the Project Site; however, no water bodies or riparian habitats occur on the Project Site or in the immediate vicinity (USFWS 2022). Therefore, no impact would occur to riparian habitat or other sensitive natural community.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site does not contain any surface water bodies or potentially jurisdictional wetlands or waters identified in the National Wetlands Inventory (USFWS 2019). No wetlands are located immediately adjacent to the Project Site as it is surrounded by residential, commercial and industrial uses. The nearest water feature is the channelized Bull Creek (designated as a riverine habitat) located approximately 1.2 miles west of the Project Site. The Project would not directly or indirectly have adverse effects on Bull Creek or any other state and federally protected wetlands and no impact would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. No native resident or migratory fish or wildlife species or native wildlife nursery sites exist on the Project Site. Urban land uses surrounding the Project Site also restrict regional wildlife movement. The CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2022b) does not identify any mapped essential habitat connectivity areas or natural landscape blocks near the Project Site. The closest essential habitat connectivity area is located approximately one mile southwest of the Project Site at Mid-Valley Regional Library. As a result, the Project Site is not within an established or recognized native resident or migratory

wildlife corridor. Therefore, due to the distance from a wildlife corridor and the developed urban nature of the Site, the Project would not impede the use of native wildlife nursery sites. No impact would occur.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant With Mitigation. The City of Los Angeles has a tree preservation policy that protects all valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), other native oak species, southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) trees (Ordinance 177404, 2006). Scrub oak (*Quercus dumosa*) is excluded from this tree ordinance. As discussed in the Arborist Report (Appendix C) and impact a) of this section, a total of 56 trees are located within the Site and an additional two street trees are located at the northern boundary of the site along Plummer Street. Of the 56 on-site trees, four trees are dead and would be removed along with an additional 41 trees consisting of 9 protected native trees and 32 non-protected significant trees. Although the Project would remove 41 on-site trees/shrubs, including a few protected native trees/shrubs, the Project would replace all removed protected native trees or shrubs on a 1:4 ratio and all removed non-protected significant trees on a 1:1 ratio. The Project would retain 13 existing trees on the Site, including 12 non-protected significant trees (two of which are street trees) and one protected native tree. With implementation of Mitigation Measure BIO-2a and BIO-2b, impacts to non-protected significant trees and protected native trees would be less than significant.

Mitigation Measures

BIO-2a. Avoidance and Minimization Measures for Protected and Non-Protected Significant Trees

The following avoidance and minimization measures shall be implemented to reduce impacts to non-protected significant trees from Project activities.

Monitoring

No person shall impact the roots or canopy of trees without oversight of a certified arborist. The arborist shall be contacted no less than 72 hours prior to anticipated work within or immediately adjacent to the dripline of a tree to ensure availability and shall be present during initial ground disturbance activities that will occur within or immediately adjacent to the tree.

Fencing

Minimum 6-foot-tall chain-link fencing shall be placed between the construction area and the dripline. Fencing shall be maintained and in place through the duration of construction activities and until all equipment has been removed from the Site.

Root Impacts

Cutting or disturbing a large percentage of a tree's roots increases the likelihood of the tree's failure or death. Tree roots that are more than four inches in diameter shall never be cut, as roots that large are usually structural. Cutting them can destroy the stability of the tree, causing it to fall over. Where grading, cut-and-fill, trenching, or any other ground disturbing activity occurs or is specifically shown on the project plans within the dripline, the activity shall be done slowly to avoid ripping or tearing roots. Ripping or tearing roots can lead to rotting and decay and reduce stability and health in the tree. Hand tools or small hand-held power equipment shall be used instead

within the dripline of a tree. Cutting roots two inches in diameter or greater shall be avoided wherever possible.

The amount of allowable root disturbance shall be determined by the monitoring arborist. If the arborist determines that construction may compromise the tree's health or the structural integrity of the tree, work around that tree shall be suspended until measures to minimize the impact can be determined or until a permit is received by the city if the arborist determines that the tree may not survive the impact.

Roots that are two inches or more in diameter that are encountered shall be avoided until the arborist determines treatment measures. Cuts shall be prescribed by the arborist and should generally be done at right angles to the roots with a clean, sharp blade. New cuts shall be wetted and covered with absorbent tarp or heavy cloth fabric and remain in place until the trench/excavation is backfilled with soil and immediately watered.

Equipment Staging

Temporary equipment staging and storage shall be limited to designated areas away from the trees. No washing of equipment or vehicles shall occur within 50 feet of a preserved tree.

Soil compaction

Soil compaction imposes a complex set of physical, chemical, and biological constraints on tree growth. Principal components leading to limited growth are the loss of aeration and pore space, poor gas exchange with the atmosphere, lack of available water, and mechanical impedance of root growth. Soil compaction is the largest single factor responsible for the decline of trees on construction sites. The following guidelines shall be implemented to protect trees from soil compaction that may occur due to project activities:

- No equipment or materials shall be stored under canopies, or within the dripline of trees. On-site staging, storage and washing of construction materials and equipment shall be limited to designated and approved areas. In areas where vehicles or equipment may impact tree roots, steel plates or plywood shall be installed to protect the root zone as needed.

Mechanical Damage

Inadvertent damage to limbs and branches (i.e., mechanical damage) from project equipment may occur if work, including staging and access, are within the dripline. If damage occurs to limbs and branches, immediate trimming with clean and sharp pruners shall occur in accordance with the American National Standards Institute (ANSI) standards discussed above. If damage to the bark or trunk occurs, wound dressings are not recommended. Treatment of said damages shall be applied in accordance with the ANSI A300 Management of Trees and Shrubs during Site Planning, Site Development, and Construction (ANSI 2012).

Pruning

All pruning/trimming shall be performed consistent with the ANSI A300 Pruning Standard (ANSI 2017) and shall adhere to the most recent edition of ANSI Z133.1. Pruning/trimming of protected trees shall be limited to only what is necessary for construction and conducted under the direct supervision of a certified arborist. Climbing spurs and spikes shall not be used.

- A thorough inspection of the canopy shall be conducted to determine pruning specifications.
- Within no more than one week prior to excavation, trenching, or other subsurface work that would occur within the root zone, the soil within the dripline of the tree shall be deep irrigated.

This can be accomplished using a soaker hose for approximately 2 to 6 hours, depending on the volume of water and soil texture. This will allow water to be absorbed by the roots. This can be performed a few days before the root pruning is to be performed.

- In areas where grading, cut-and-fill, or trenching will take place, digging shall be by hand shovel for the first 2 to 3 feet where most roots are expected to occur.
- Any root pruning shall be performed carefully. The roots shall be exposed through hand digging. The roots shall be cut at a 90- degree angle and cut cleanly. No roots shall be torn or jagged, as this can lead to rotting and decay in the root zone and reduce stability and health in the tree. Excessive root pruning is not recommended. If a tree is in any stress or is lacking in health and vigor, the root pruning can contribute to the quick decline of a tree.
- If any root zone is left open for an extended period, the contractor shall lightly apply moisture to keep the roots from drying out. Also, roots shall not sit in a pool of water during construction. This situation can also cause rotting and decay.
- After root pruning is complete, backfill with native soil. Do not overly compact. Water every 1 to 2 feet to reduce air pockets.
- A Certified Arborist shall be on site to observe the root-pruning.

BIO-2b. Measures for Replacement of Protected and Non-Protected Significant Trees

In accordance with the City's Protected Tree Ordinance, the Board of Public Works may require the following for the removal of a protected tree. The following is assumed to apply to protected and non-protected significant trees:

1. Replacement with at least four specimens of a protected variety (i.e., 1:4 ratio). Each replacement tree shall be at least a 15-gallon, or larger specimen, measuring one inch or more in diameter one foot above the base, and be not less than seven feet in height measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.
2. Replacement with trees of a lesser size or of a different protected species to be planted as replacement trees, if replacement trees of the size and species otherwise required pursuant to the City's Protected Tree Ordinance are not available. In such event, a greater number of replacement trees may be required.
3. Relocation of a protected or non-protected significant tree to another location on the property, provided that the environmental conditions of said new location are favorable to the survival of the tree and there is a reasonable probability that the tree will survive. In addition, the City Planning Department policy requires mitigation at a 1:1 ratio for removal of the non-protected significant trees. The Board of Public Works may charge an in-lieu fee for removal of street trees, per LAMC Section 62.171 and 62.177.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. The Project Site is not located within the jurisdiction of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☒	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Rincon prepared a Cultural Resources Assessment in August 2022 in compliance with the requirements of CEQA and applicable local regulations, including the reporting requirements of the City of Los Angeles, Department of City Planning, Office of Historic Resources (OHR). Efforts include searches of the California Historical Resources Information System (CHRIS) and Native American Heritage Commission (NAHC) Sacred Lands File (SLF), background and archival research, a cultural resources field survey, historical resource impacts assessment and the preparation of this cultural resources assessment report in compliance with the California Office of Historic Preservation (OHP) Archaeological Resources Management Report (ARMR) and OHR guidelines. The following analysis is based on the findings of the Cultural Resources Assessment, which is provided as Appendix D.

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines Section 15064.5?

Less Than Significant With Mitigation. The Cultural Resources Assessment confirmed the presence of one historical resource, 15526 West Plummer Street, at the Project Site. The resource encompasses one deep parcel developed with a single-family residence constructed in 1914 in a vernacular Craftsman Style, in addition to two contemporary sheds and the contemporary remains of what appears to have been a chicken coop. As acknowledged throughout the Cultural Resources Assessment (Appendix D), the existing single-family residence was identified by SurveyLA as eligible for listing in the National Register of Historical Resources (NRHP), California Register of Historical Resources (CRHR), and as a City of Los Angeles Historic-Cultural Monument (HCM) under Criteria A/1/1 as a rare remaining example of residential development representing the earliest pattern of development in North Hills and the San Fernando Valley (Architectural Resources Group 2014). It was successively nominated as a City of Los Angeles HCM and is currently working its way through the HCM nomination process. In concurrence with SurveyLA, the HCM nomination found the residence eligible for listing as a City of Los Angeles HCM under Criterion 1 as a rare remaining example of a single-family residence/poultry farm in the San Fernando Valley. The HCM nomination identified the residence's period of significance as 1914-1927, spanning from the property's construction to the close of the early development period in the San Fernando Valley (South Environmental 2021). Visual observation and historical aerial images of the property indicate that the construction of the existing sheds and chicken coop and planting of the existing orchard rows postdate the historic period and the property's period of significance, identified as 1914-1927; they therefore do not

contribute to its historical significance or ability to convey significance and their removal would not represent material impairment of the property. The research conducted as part of the current assessment did not identify any information that conflicts with previous findings and concurs that the property is eligible for listing in the NRHP, CRHR and as an HCM under Criteria A/1/1. As a property eligible for historic designation, 15526 West Plummer Street is considered a historical resource according to *CEQA Guidelines* Section 15064.5(a).

According to CEQA, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource is defined in *CEQA Guidelines* Section 15064.5(b)(1) as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. Furthermore, material impairment is defined in *CEQA Guidelines* Section 15064.5(b)(2) as the demolition or material alteration in an adverse manner those physical characteristics of a historical resource that convey its significance and justify its inclusion in or eligibility for inclusion in the CRHR or a local register of historical resources. For the purposes of CEQA, impacts to a historical resource are generally considered mitigated below a level of significance when the project conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) (*CEQA Guidelines* Section 15126.4 [b][1]).

The Project proposes to redevelop 15526 West Plummer Street, along with the parcel to its west, into an elementary school campus. This redevelopment would consist of the removal of contemporary sheds and structural remains and rehabilitation of the existing single-family residence, which is proposed to be completed in compliance with the SOI Standards. The residence would ultimately be adaptively reused to support administrative function of the school. The Proposed Project would not result in the physical demolition, destruction, relocation, or alteration of the existing building such that its significance would be materially impaired.

The physical characteristics of the property that convey its significance and justify its eligibility for designation have been previously explored, in both its HCM nomination and in the character defining features memorandum (hereafter referred to as "CDF memo") prepared by Teresa Grimes in support of the current Project. The HCM nomination identifies the following as the property's character-defining features: (site) large, deep lot, mature trees (exterior) single-story, distinct horizontal lines, low pitched roof, overhanging eaves, wood shingle cladding, partial-width porch, grouped windows, Craftsman style door, brick piers at porch, vertical wooden slate vents at gable. While generally consistent with those identified in the HCM nomination, the CDF memo provides additional detail in defining the features of the property that convey its significance, dividing them into primary, secondary, and non-character-defining and providing recommendations for their treatment.

The Project is proposed to be designed to minimize the alteration and removal of the property's character-defining features by following the recommendations included in the CDF memo related to its primary character-defining features, many of which relate to the existing building itself. The following character-defining features of the building, identified by the HCM nomination and the CDF memo, would be retained and would not be altered by the Project: orientation towards the street, U-shaped plan, roof form and details, symmetrical composition of primary elevation and asymmetrical composition of east and west elevations, form and function of primary entry including door itself, wood shingle cladding and wood-framed windows throughout, and wood gable vents.

Additionally, potential impacts resulting from ground-borne vibration associated with Project construction were analyzed in Noise and Vibration Study prepared by Rincon in August 2022, which is discussed further in Section XIII, *Noise*. The study assessed construction related

vibration associated with the Project in relationship to the Caltrans vibration limits, which are reflective of standard practice for analyzing vibration impacts on structures. The Caltrans Transportation and Construction Vibration Guidance Manual identifies impact criteria for several building types, including 'historic and similar old buildings' (Caltrans 2020). The analysis concluded that if bull dozers or other heavy earthmoving equipment were to work within approximately 10 feet or less of the existing building, vibration levels could exceed the threshold identified for historic buildings, potentially resulting in damage to the subject building as a result of vibration. Therefore, as discussed in Section XIII, *Noise*, Mitigation Measure NOI-1 would be implemented and would require that bull dozers or other heavy earthmoving equipment not be utilized within approximately 10 feet or less of the subject building, thereby eliminating potential impacts.

In addition to the rehabilitation of the existing residence and in consideration of proposed changes to its setting, the Project would result in the construction of two new buildings on the Project Site; one single-story building that would house a multipurpose room sited approximately 120 feet to the rear (south) of the existing residence behind a large play area, and a one- to two-story building that would contain classrooms located approximately 30 feet west of the existing residence. The wider setting of the property has been significantly altered since its period of significance, identified as 1914-1927. The research presented in the HCM nomination and reviewed as part of this assessment indicates that the property was likely once part of a larger, approximately 90-acre parcel, owned by the Plummer family, which by the 1920s had been subdivided into smaller parcels (South Environmental 2021). During the period of significance, the setting of the property would have been agricultural with little surrounding development. Consistent with larger development patterns throughout the San Fernando Valley, a review of historical aerial photographs confirms that in the decades following World War II, the area surrounding the property, that which formally comprised the Plummer family's 90-acres, was further developed with single-family homes. Today, due to encroaching development, the property's wider integrity of setting has been largely diminished and therefore does not contribute to its significance or ability to convey significance.

To minimize potential impacts to the immediate setting of the existing residence, two-story portions of the new classroom building would be located at the rear of the Site. Additionally, the setback of the classroom building would be consistent with that of the existing building. The multipurpose room would be sited at the rear (south) of the Project Site to provide a maximum distance between it and the existing building. Additionally, the following character-defining features of the property's setting that contribute to its significance, as identified by the HCM nomination and CDF memo, would be retained: depth of the property, the front yard setback of the subject building, extant mature trees that flank the subject building to the north. While the Proposed Project would further alter the setting of the existing building by increasing development in its vicinity, these alterations would not result in the property's material impairment.

While the Proposed Project is conceptually in compliance with the SOI Standards and, as currently presented, would not result in the material impairment of 15526 West Plummer Street, Project designs are currently conceptual in nature. Therefore, implementation of Mitigation Measure CUL-1 would reduce potential impacts to historical resources to a less than significant level as the Project design further develops.

Mitigation Measure

CUL-1. Historical Resource Design Review

The Project Applicant shall engage a qualified historical architect or architectural historian that meets the Secretary of the Interior's Professional Qualifications Standards (as codified in 36 CFR Part 61) to be part of the Project design team. The qualified consultant shall have demonstrated experience providing design guidance for projects of a similar scope involving the adaptive reuse of historical resources. The qualified consultant shall perform periodic reviews of the Project as its design progresses and provide input to the design team during the design process to ensure that the Project remains in compliance with the Secretary of the Interior Standards for the Treatment of Historic Properties (SOI Standards). Reviews shall be performed minimally when Project Plans are 50 percent and 80 percent complete. The reviews shall include a review of the Project's compliance with the SOI Standards and provide recommendations aimed at achieving compliance as necessary. Prior to the issuance of grading permits, the qualified consultant shall prepare a SOI Standards project review memorandum to document the Project's compliance with the SOI Standards. The memorandum shall be submitted to the City of Los Angeles for review, comment, and approval. In the event that the City does not concur with the findings of the memorandum, designs shall be modified until compliance with the SOI Standards and concurrence is obtained.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5?

Less Than Significant With Mitigation. The Cultural Resources Assessment did not identify any archaeological resources or archaeological deposits in the Project Site, but the lack of surface evidence of archaeological materials does not preclude their subsurface existence. However, the absence of substantial prehistoric or historic-period archaeological remains in the immediate vicinity, along with the existing level of disturbance in the Project Site, suggest there is a low potential for encountering intact subsurface archaeological deposits. Nonetheless, Mitigation Measure CUL-2 would reduce potential impacts to archaeological resources to a less than significant level in the event of an unanticipated discovery of such resources.

Mitigation Measure

CUL-2. Unanticipated Discovery of Cultural Resources

In the unlikely event that archaeological resources, including trash pits associated with the existing 1914 single-family residence, are unexpectedly encountered during ground-disturbing activities, work in the immediate area shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (as codified in 36 CFR Part 61) shall be contacted immediately to evaluate the find. If the find is prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant. No human remains are known to be present within the Project Site. However, the discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a

determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. Therefore, with compliance with existing regulations, impacts to humans remains would also be less than significant.

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VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the site. The Project would require site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during Project construction was estimated using the assumptions and factors from CalEEMod used to estimate construction air emissions (refer to Appendix A for annual emissions). As shown in Table 9, project construction would require approximately 10,980 gallons of gasoline and approximately 79,610 gallons of diesel fuel.

Table 9 Estimated Fuel Consumption during Construction

Source	Gasoline	Diesel	MMBtu1
Construction Equipment & Hauling Trips	-	79,610	10,147
Construction Worker Vehicle Trips	10,980	-	1,205
Total			**11,352**

See Appendix A for energy calculation sheets

[1] Energy consumption is converted to MMBtu for each source

The construction energy estimates represent a conservative estimate because the construction equipment used in each phase of construction was assumed to be operating every day of construction. Construction equipment would be maintained to all applicable standards, and construction activity and associated fuel consumption and energy use is typical for construction site and would be temporary. Therefore, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational Energy Demand

Gasoline consumption for the Project would be attributed to the trips generated from individuals who are either working or dropping off children at the Proposed Project Site during normal

operations and building maintenance employees. The estimated number of average daily trips associated with the Project is used to determine the energy consumption associated with fuel use from the operation of the Project. Most of the fuel consumption would be from motor vehicles traveling to and from the Project Site. According to the CalEEMod calculations, the Project would result in 1,730,067 annual VMT (Appendix A). Table 10 shows the estimated total annual fuel consumption of existing mobile homes and the Project using the estimated trip generation and VMT with the assumed vehicle fleet mix (Appendix A). One gallon of gasoline is equivalent to approximately 109,786 Btu (CARB 2015), while one gallon of diesel is equivalent to approximately 127,460 Btu (Schremp 2017).

Table 10 Estimated Project Annual Transportation Energy Consumption

Source	Total Annual Energy/ Fuel Consumption	Total Energy Consumption (MMBtu)[1]
Transportation Fuels[2]		
Gasoline	76,853 gallons	8,437
Diesel	13,194 gallons	1,682
Other Energy		
Electricity	0.2 GWh	682
Natural Gas	3,854 U.S. therms	358
Total Energy Consumption		**11,159**

Notes: MMBtu = million metric British thermal units; GWh = Gigawatt hours

[1] Energy consumption is converted to MMBtu for each source

[2] The estimated number of average daily trips associated with the Project is used to determine the energy consumption associated with fuel use from operation of the Project. According to CalEEMod calculations (Appendix A), the Project would result in approximately 1,730,067 annual VMT.

Source: Appendix A

As shown in Table 10, operation of the Project would have a total energy consumption of 11,159 MMBtu. Operation of the Project would increase area energy demand from greater electricity, natural gas, and gasoline consumption when compared to the operation of the existing single-family home on the Project Site. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the Project. Operation of the Project would consume approximately 0.2 GWh of electricity per year (electricity use provided in the CalEEMod output, Appendix A). The Project is located within the LADWP service area electricity demand. In 2020, the most recent year with available data, LADWP's electricity generation and distribution infrastructure delivered 21.0 million MWh of electricity to its customers. Commercial users consumed the most electricity supplied by the LADWP in 2020 with approximately 10.3 million MWh, or 49 percent of the total electricity provided by the LADWP. Residential customers consumed approximately 8.6 million MWh, or 41 percent, of electricity supplied by the LADWP in 2020. Industrial users consumed approximately 1.6 million MWh, or eight percent, while other LADWP customers consumed approximately 0.4 million MWh, or approximately 0.02 percent (CEC 2020a). LADWP would have sufficient supplies for the Project.

Estimated natural gas consumption for the Project would be 3,854 U.S. therms, per year (electricity use provided in the CalEEMod output, Appendix A). The Project's natural gas demand would be serviced by SCG. In 2020, a total of approximately 5,231 million therms of natural gas were consumed by SoCalGas' customers. Of this total, residential, industrial, commercial and miscellaneous other customers consumed 2,426 million, 1,616 million, 889 million, and 300 million therms of natural gas, respectively. In 2020, the total gas consumption for Los Angeles County was 2,937 million therms. Of this total, 1,699 million therms was for non-residential use and 1,238 therms was for residential use (CEC 2020b). The Project would comply with standards set in the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. The Los Angeles Green Building Code contains mandatory measures for non-residential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems).

California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. (CEC 2022a).

In conclusion, the construction of the Project would be temporary and typical of similar projects, and would not result in the wasteful, inefficient, or unnecessary consumption of energy. Project operations would increase the consumption of fuel, natural gas, and electricity when compared to existing conditions. However, the new school facility would be developed in conformance with regulatory compliance measures and the latest version of the Los Angeles Green Building Code, California's Green Building Standards Code, and California's Building Energy Efficiency Standards, which include measures related to renewable energy, indoor and outdoor water use, water reuse systems, and energy efficient light fixtures. Therefore, the Project would have a less than significant impact.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. Senate Bill (SB) 100 mandates the use of 100 percent clean sources for electricity for California by 2045. Because the Proposed Project would be powered by the existing electricity grid, the Project would eventually be powered by renewable energy sources mandated by SB 100 and would not conflict with this statewide plan. Furthermore, the City of Los Angeles adopted *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming* (Green LA), in May 2007. Green LA set the goal of reducing the City's greenhouse gas emissions to 35 percent below 1990 levels by 2030. The emphasis of Green LA is on municipal facilities and operations followed by programs to reduce emissions in the community. To facilitate implementation of Green LA, the City adopted the Los Angeles Green Building Code. In addition, the LADWP will continue to implement programs to emphasize water conservation and will also pursue securing alternative water supplies, including recycled water and storm water capture. Furthermore, the City implemented the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) plan to meet solid waste reduction goals by expanding recycling to multifamily dwellings, commercial establishments, and restaurants (City of Los Angeles 2011).

Under the RENEW LA plan, the City is also developing facilities that will convert solid waste to energy without incineration. These measures would serve to reduce overall emissions from the City. Green LA is being implemented through Climate LA, which provides detailed information about each action item discussed in the Green LA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption. On April 8, 2015, Los Angeles released the Sustainable City pLAn, which covers a multitude of environmental, social, and economic sustainability issues related to greenhouse gas reduction either specifically or by association. Actionable goals include increasing the green building standard for new construction, creating a benchmarking policy for building energy use, developing "blue, green, and black" waste bin infrastructure, reducing water use by 20 percent, and possibly requiring LEED Silver or better certification for new construction. In addition, as demonstrated further in Section 8, *Greenhouse Gas Emissions*, the Proposed Project is consistent with applicable strategies for reducing greenhouse gas emissions from the Southern California Association of Governments 2016 *Regional Transportation Plan/Sustainable Communities Strategy*. Therefore, no impact would occur.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

A Geotechnical Investigation Report was prepared for the Project by LK Geotechnical Engineering in February 2022 (Appendix E). The Report concludes that the Project is feasible from a geotechnical engineering standpoint provided that the recommendations presented in the report are incorporated into the site design, grading, and construction. This section is based on the information and analysis contained in the Geotechnical Investigation Report.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region; however, according to the DOC, the Project Site is not located in an Alquist-Priolo Fault Zone, a liquefaction zone, or an earthquake-induced landslide zone. There are no faults present on the Project Site, and the closest mapped fault to the Project Site is the Northridge Hills fault located approximately 2.2 miles south of the site. The nearest Alquist-Priolo fault zone is the Sierra Madre/San Fernando Fault Zone located approximately 11.7 miles to the east of the site (DOC 2021a). Implementation of the Project would not exacerbate the existing risk of earthquake-induced landslides in the immediate vicinity because the Project would not directly result in a seismic event or destabilize soils prone to landslide. In addition, the Project Site and the surrounding area are relatively flat. Therefore, due to the Project's location from an Alquist-Priolo mapped zone, the Project would not directly or indirectly cause potential adverse effects related to rupture of a known earthquake fault, liquefaction, or earthquake-induced landslides. Impacts related to fault rupture, liquefaction, and landslides would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, where several fault systems are considered to be active or potentially active. Nearby active faults include the Northridge Hills fault, located approximately 2.2 miles south of the site. The nearest Alquist-Priolo fault zone is the Sierra Madre/San Fernando Fault Zone located approximately 11.7 miles to the east of the site (DOC 2021a). The Sierra Madre/San Fernando Fault Zone is capable of producing substantial ground shaking if a seismic event occurred along that fault. Similarly, a strong seismic event on any other fault system in Southern California has the potential to create considerable levels of ground shaking throughout the City. Nevertheless, the Project Site is not subject to unusual levels of ground shaking.

Design and construction of the Proposed Project would conform to the current seismic design provisions of the CBC. The CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide for the latest in earthquake safety. While the Project would be susceptible to seismic activity given its location within a seismically-active area, the Project would be required to minimize this risk, to the extent feasible, through the incorporation of applicable CBC standards. A large seismic event, such as a fault rupture, seismic shaking, or ground failure, could result in breakage of the proposed pipelines, failure of joints, and/or underground leakage from the pipelines. Therefore, due to the Project's application of CBC standards it would limit the Project's exposure of people or structures to potential substantial adverse effects involving strong seismic ground shaking. Impacts related to seismic ground shaking would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils,

resulting in their transport off the Project Site. Construction of the Project would require cut of approximately 12,500 cy of soil material. Of the 12,500 cy of cut soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site. However, standard construction BMPs would be implemented in order to avoid or minimize soil erosion associated with ground-disturbing activities. As discussed further in Section X, *Hydrology and Water Quality*, implementation of erosion control measures stated in LAMC Chapter 98.02, as well as adherence to requirements provided in the National Pollutant Discharge Elimination System (NPDES) permit for construction activities would avoid or minimize potential adverse impacts associated with erosion and loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. According to the California Seismic Hazard Map, the Project Site is not located within an earthquake-induced landslide hazard zone (DOC 2021b). Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. The Proposed Project does not include installation of new groundwater wells or use of groundwater from existing wells, pumping of oil and gas, or mining. Lateral spreading is the horizontal movement or spreading of soil toward an open face. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high and where relatively soft and recent alluvial deposits exist. Lateral spreading hazards may also be present in areas with liquefaction risks; however, the Project Site is not located in a liquefaction zone. Nonetheless, the Project would be required to comply with the CBC requirements. Therefore, through compliance with the CBC requirements, impacts associated with unstable geologic units or soils that are potentially unstable would be less than significant.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact With Mitigation. Expansive soils generally consist of a high percentage of clays, which increase in volume when saturated and shrink when dried. According to the Geotechnical Investigation Report (Appendix E), the Site consists of artificial fill and alluvium soils. The on-site artificial fill consists of silty sand with man-made debris and varies in depths across the Site. This material is considered unsuitable for foundation or slab support for the proposed structures and/or for support of new compacted fill. The on-site alluvium consists of dark brown to light brown silty sand and was observed to be medium dense and dry to slightly moist. Undisturbed alluvium is considered suitable for foundation or slab support for the proposed structures and/or for supported of new compacted fill provided Project implementation of geotechnical measures (LK Geotechnical Engineering 2022). Therefore, implementation of Mitigation Measure GEO-1 would be required to reduce potential impacts associated with expansive soils to a less than significant level.

Mitigation Measure

GEO-1. Geotechnical Engineering Measures

Final design and construction plans for the Project shall incorporate geotechnical engineering recommendations based on site specific soil investigations, and shall consider collapsible soils, protection from corrosive soils, and other applicable soil conditions. More specifically, final design

and plans shall incorporate geotechnical engineering recommendations from the Geotechnical Investigation Report prepared by LK Geotechnical Engineering in February 2022.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Proposed Project would not include the installation of new septic tanks or alternative wastewater disposal systems and no impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation. Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in "soil" but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Rincon evaluated the paleontological sensitivity of the geologic units that underlie the Project Site to assess the project's potential for significant impacts to scientifically important paleontological resources. The analysis was based on the results of a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the Project Site. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

The Project Site is in the San Fernando Valley, a lowland plain between the Santa Monica Mountains, Santa Susana Mountains, San Gabriel Mountains, and Simi Hills, within the Transverse Ranges geomorphic province, one of eleven major geomorphic provinces in California (California Geological Survey 2002). According to geologic mapping by Campbell et al. (2014), the Project Site is underlain by a single geologic unit, Young alluvial-fan deposits (Unit 1). Young alluvial-fan deposits consist of unconsolidated gravel, sand, and silt, that were deposited by flooding streams and debris flows. Campbell et al. (2014) identified four subunits of Young alluvial-fan deposits of which Unit 1 is the oldest (based on geomorphic relationships, surface dissection, and soil development) being Holocene to late Pleistocene in age. Sediments that are younger than 5,000 years old are considered too young to preserve paleontological resources per the SVP (2010), but early Holocene and late Pleistocene alluvial sediments have produced scientifically significant paleontological resources throughout Los Angeles County, including mammoth (*Mammuthus*), wolf (*Canis, Aenocyon*), horse (*Equus*), bison (*Bison*), and ground sloth

(*Megalonyx*, *Paramylodon*) (Jefferson 2010; Paleobiology Database 2022; University of California Museum of Paleontology 2022). Therefore, Young alluvial-fan deposits (Unit 1) have low paleontological sensitivity at the surface before becoming old enough to preserve paleontological resources, and therefore having high paleontological sensitivity, at some unknown depth in the subsurface.

The Geotechnical Investigation Report discovered on to two feet of artificial fill in three of five test borings in the Project Site (LK Geotechnical Engineering 2022). Below the artificial fill (or from the surface in two of five test borings), alluvial sediments consisting of sandy silt or silty sand were encountered. There is no obvious indication of when these alluvial sediments become old enough (i.e., greater than 5,000 years old) to preserve paleontological resources.

Ground disturbance associated with this project is expected to consist primarily of surficial grading and excavation for proposed capture and reuse cisterns. Surficial grading will remove impact artificial fill, which has no paleontological sensitivity because it was placed by humans, and up to one foot of previously undisturbed sediment. These previously disturbed sediments impacted by grading will likely be too young to preserve paleontological resources. Excavations for capture and reuse cisterns could reach up to 17 feet below the ground surface. At this depth, it is likely that sediments of appropriate age to preserve paleontological resources (i.e., greater than 5,000 years old) occur. However, the total volume of potentially high sensitivity sediment disturbed by these excavations will be small, especially considering that the top-most several feet of sediment will be low sensitivity due to its age. Therefore, impacts to paleontological resources as a result of this project will likely be less than significant. Nonetheless, Mitigation Measure GEO-1 would reduce potential impacts to paleontological resources to a less than significant level in the event of an unanticipated discovery of paleontological resources.

Mitigation Measure

GEO-2. Unanticipated Discovery of Paleontological Resources

Paleontological Worker Environmental Awareness Program

Prior to the start of construction, a Qualified Professional Paleontologist (as defined by SVP [2010]) or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.

Unanticipated Discovery of Paleontological Resources

In the event a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a Qualified Professional Paleontologist. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant, the applicant shall retain a Qualified Professional Paleontologist to direct all mitigation measures related to paleontological resources. The Qualified Professional Paleontologist shall design and carry out a data recovery plan consistent with the SVP (2010) standards.

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VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Rincon prepared an Air Quality and Greenhouse Gas Study in August 2022 to analyze the Project's greenhouse gas emission impacts related to both temporary construction activity and long-term operation of the Project. The following analysis is based on the findings of the Air Quality and Greenhouse Gas Study, which is provided as Appendix A.

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate changes continuously, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed substantial acceleration in the rate of warming during the past 150 years. The United Nations Intergovernmental Panel on Climate Change (IPCC) expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021). Furthermore, since the late 1700s, estimated concentrations of CO_2, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (USEPA 2021). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature.

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (USEPA 2020).

Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (IPCC 2021).[3]

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33 degrees Celsius (°C) cooler (World Meteorological Organization 2022). However, since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity (Forster et al. 2007). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Significance Thresholds

The majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environment effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (*CEQA Guidelines* Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]).

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in

[3] The IPCC's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by CARB uses a GWP of 25 for methane, consistent with the IPCC's (2007) *Fourth Assessment Report*. Therefore, as the analysis is based on consistency with the 2017 Climate Change Scoping Plan, this analysis utilizes a GWP of 25 for methane.

establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see *CEQA Guidelines* Section 15064.7[c]). The *CEQA Guidelines* also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see *CEQA Guidelines* Section 15130[f]). As a note, the *CEQA Guidelines* were amended in response to SB 97. In particular, the *CEQA Guidelines* were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of less-than-significant for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Neither the SCAQMD, the California Office of Planning and Research, CARB, CAPCOA, or any other state or relevant regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Therefore, in recent environmental impact reports certified by the City of Los Angeles, the City has evaluated the significance of projects' potential impacts with regard to GHG emissions and climate change solely on consistency with plans and polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change. The City has also quantified the project's GHG emissions for informational purposes but does not compare the quantified GHG emissions to a numeric threshold (City of Los Angeles 2021a, 2021b, and 2021c).

In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with *CEQA Guidelines* Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the 2017 Scoping Plan, the 2020-2045 RTP/SCS, the City's LA Green Plan, and the Sustainable City pLAn/Green New Deal.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. Construction activities, energy use, daily operational activities, and mobile sources (traffic) due to the Proposed Project would generate GHG emissions. As discussed under *Significance Thresholds* of this section, the significance of the Project's GHG emissions is evaluated consistent with *CEQA Guidelines* Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations and requirements

adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Project construction and operational GHG emissions are quantified for informational purposes. CalEEMod version 2020.4.0 was used to calculate emissions resulting from Project construction and long-term operation.

Consistency with Applicable Plans and Policies

Senate Bill 32 and 2017 Scoping Plan

There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall state plan is SB 32, the follow up to AB 32, the California Global Warming Solutions Act of 2006. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. CARB's 2017 Scoping Plan, which outlines a framework to achieve SB 32's 2030 target, emphasizes innovation, adoption of existing technology, and strategic investment to support its strategies for GHG emissions reductions. Statewide plans and regulations in support of these strategies, such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at the statewide level; as such, compliance at a project-level would occur as implementation continues statewide. Therefore, the Project would be consistent with SB 32 and the 2017 Scoping Plan.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG's 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals. According to the 2020-2045 RTP/SCS, the updated target for the SCAG region is 19 percent below 2005 per capita emissions levels by 2035. The revised 2035 target is higher than the previous CARB target of 13 percent for the SCAG region. The 2020-2045 RTP/SCS includes implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. The Project's consistency with the 2020-2045 RTP/SCS is discussed in Table 11. As shown therein, the Proposed Project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 11 Project Consistency with Applicable SCAG RTP/SCS GHG Emission Reduction Strategies

Strategy/Action	Project Consistency
Focus Growth Near Destinations & Mobility Options. • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies. • Promote the redevelopment of underperforming retail developments and other outmoded non-residential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent.**. The Proposed Project is an infill development that would involve construction of a new public elementary school. The Proposed Project would be within walking and biking distance of existing residential and commercial uses and would include 115 bicycle parking spaces for students and staff. In addition, the Project is within 0.5-mile of bus stops for Metro bus routes 166, 167, and 234. These features would incentivize the use of public transit and active transportation for traveling to and from the Site. Therefore, the Proposed Project would focus growth near destinations and mobility options.

Strategy/Action	Project Consistency
• Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	
Leverage Technology Innovations. • Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** Related to energy production and usage, the Project would be required to equip 10 percent of the total number of on-site parking spaces with EV charging stations and designate 30 percent of parking spaces as EV spaces, in accordance with LAMC Sections 99.05.106.5.3.3 and 99.05.106.5.3.6. Of the required parking spaces for the Project, at least 10 percent would be equipped with EV charging stations and at least 30 percent would be designated EV/clean air vehicles spaces.
Support Implementation of Sustainability Policies. • Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Consistent.** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code. The Project's indoor water use would be minimized by 20 percent. Furthermore, energy use would be reduced by implementing the requirements of 2022 Title 24 standards, including energy-efficient lighting and appliances. Therefore, the Project would support implementation of sustainability policies.
Promote a Green Region. • Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	**Consistent**. The Project is an infill development that would involve construction of a new public elementary school. Because the project is an infill development, it would not interfere with regional wildlife connectivity or convert agricultural land. The Project would comply with Sustainable City pLAn, Green New Deal, and Title 24, including CALGreen. Therefore, the Project would support development of a green region.

Strategy/Action	Project Consistency
• Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	

Source: SCAG 2020

Green LA and Sustainable City pLAn/Green New Deal

Table 12 and Table 13 summarize the Project's consistency with the Green LA and Sustainable City pLAn, respectively. As discussed therein, the Project would be consistent with the actions and measures contained in these local GHG reduction plans.

Table 12 Project Consistency with Applicable Green LA Actions

Action	Project Consistency
Energy	
Present a comprehensive set of green building policies to guide and support private sector development.	**Consistent.** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code.
Water	
Meet all additional demand for water resulting from growth through water conservation and recycling. Reduce per capita water consumption by 20 percent	**Consistent.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features, such as low-flow fixtures, required pursuant to the California Plumbing Code, CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code.
Transportation	
Promote walking and biking to work, within neighborhoods, and to large events and venues.	**Consistent.** The Project Site is located approximately 55 feet east of the Plummer/Orion bus stop for Metro Bus Line 167 and approximately 820 feet west of the Sepulveda/Plummer bus stop for Metro Bus Line 234. The Proposed Project would be within walking and biking distance of existing residential and commercial uses and would include 115 bicycle parking spaces for students and staff. Therefore, the Project would promote walking and biking to work and within the local neighborhood.
Waste	
Recycle 70 percent of trash by 2015.	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Sanitation and Environment 2022). The Project would be subject to the requirements of the statewide commercial recycling program, which established a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.

Source: City of Los Angeles 2007

Table 13 Project Consistency with Applicable Sustainable City pLAn/Green New Deal Measures

Action	Project Consistency
Renewable Energy • LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045. • Increase cumulative megawatts by 2025; 2035; and 2050 of: o Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW. o Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW. o Demand response (DR) programs to 234 MW (2025) and 600 MW (2035).	**Consistent.** While this action primarily applies to the City and LADWP, LADWP is required to generate electricity that would increase renewable energy resources to 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045 under SB 100. Because LADWP would provide electricity service to the Project Site, the Project would use electricity consistent with the requirements of SB 100 and City goals.
Local Water • Source 70% of L.A.'s water locally and capture 150,000 acre-feet per year of stormwater by 2035. • Recycle 100% of all wastewater for beneficial reuse by 2035. • Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050. • Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050 • Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035.	**Consistent.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be required to comply with the City's water use restrictions on timing, area, frequency, and duration of specified allowable water usage. The Project would also be required to comply with the Title 24 standards for Water Efficiency and Conservation that are in effect at the time of development. These standards include actions such as separate water submeters for subsystems, prescriptive reduced flow rates for water and fixtures, wall-mounted urinals, and plumbing fixtures and fittings.
Clean and Healthy Buildings • All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050. • Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	**Consistent.** The Project would be constructed in accordance with the applicable requirements of CALGreen and the City's Green Building Code.
Mobility & Public Transit • Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050. • Reduce vehicle miles traveled per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050. • Ensure Los Angeles is prepared for Autonomous Vehicles (AV) by the 2028 Olympic and Paralympic Games.	**Consistent.** The Proposed Project is an infill development that is located approximately 55 feet east of the Plummer/Orion bus stop for Metro Bus Line 167 and approximately 820 feet west of the Sepulveda/Plummer bus stop for Metro Bus Line 234. The Project would be within walking and biking distance of existing residential and commercial uses and would include 115 bicycle parking spaces for students and staff. Therefore, the Project would support increasing the percentage of trips made by walking, biking, and transit as well as the reduction of per capita VMT.
Zero Emissions Vehicles • Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050. • Electrify 100% of LA Metro and LADOT buses by 2030. • Reduce port-related GHG emissions by 80% by 2050.	**Consistent.** In accordance with LAMC Sections 99.05.106.5.3.3 and 99.05.106.5.3.6, the Project would equip 10 percent of the total number of on-site parking spaces with electric vehicle charging stations and designate 30 percent of parking spaces as electric vehicle spaces.

Action	Project Consistency
Waste and Resource Recovery • Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050 • Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028 • Eliminate organic waste going to landfill by 2028 Increase proportion of waste products and recyclables productively reused and/or repurposed within Los Angeles County to at least 25% by 2025; and 50% by 2035.	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Sanitation and Environment 2022). The Project would be subject to the requirements of the statewide commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.
Urban Ecosystems and Resilience • Increase tree canopy in areas of greatest need by at least 50% by 2028. • Complete or initiate restoration identified in the 'ARBOR' Plan by 2035. • Create a fully connected LARiverWay public access system that includes 32 miles of bike paths and trails by 2028. • Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035. • Ensure proportion of Angelenos living within 1/2 mile of a park or open space is at least 65% by 2025; 75% by 2035; and 100% by 2050. • Achieve and maintain 'no-net-loss' of native biodiversity by 2035.	**Consistent.** The Project would be an infill development in an urbanized area and thus would not adversely impact native biodiversity.

Source: City of Los Angeles 2020

Conclusion

The plan consistency analysis demonstrates that the Project complies with or exceeds the requirements of policies, regulations and GHG reduction actions/strategies outlined in the 2017 Scoping Plan, the 2020–2045 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn/Green New Deal. Consistency with the above plans, policies, regulations and GHG reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions to a less than significant level.

GHG Emissions Quantification

Construction Emissions

The SCAQMD has recommended amortizing construction-related emissions over a 30-year period in conjunction with the Proposed Project's operational emissions. As shown in Table 14, construction of the Project would generate an estimated 1,208 MT CO_2e, or 40 MT CO_2e year when amortized over a 30-year period.

Table 14 Estimated Construction GHG Emissions

Year	Emissions (MT CO_2e)
2023	389
2024	819
Total	1,208
Total Amortized over 30 Years	**40**

See Appendix A for CalEEMod worksheets.

Combined Total Annual Emissions

Table 15 combines the construction, operational, and mobile GHG emissions associated with development of the Proposed Project. As shown therein, the Project's emissions would be approximately 753 MT CO_2e.

Table 15 Combined Annual GHG Emissions

Emission Source	Annual Emissions (MT CO_2e)
Construction	40
Area	<1
Energy	84
Mobile	592
Solid Waste	23
Water	14
Total	**753**

See Appendix A for CalEEMod worksheets.

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IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

NV5 Alta Environmental prepared a Phase I ESA Report and a Limited Asbestos Survey in February 2022 to identify conditions indicative of releases and threatened releases of hazardous substances, pollutants, contaminants, petroleum and petroleum products, and controlled substances on, at, in, or adjacent to the site. The Phase I ESA Report is included as Appendix F and the Limited Asbestos Survey is included as Appendix G. A follow up Phase II ESA Report was prepared by NV5 Alta Environmental in March 2022 based on the findings of the Phase I ESA Report. The Phase II ESA is included as Appendix H. The following analysis is based on the findings of these reports.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Project construction would involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to occur. Any use of potentially hazardous materials utilized during construction of the Proposed Project would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials. Operation and maintenance of the Proposed Project would likely involve an incremental increase the use of common household materials in the project vicinity. Cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in the regular maintenance of the building and landscaping would also be utilized in the secondary activities associated with residential uses. additional use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact With Mitigation. As described above, construction of the Proposed Project would involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to occur. The transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22.

As discussed in the Phase I ESA Report (Appendix F), the historical land uses of the Project Site include previous agricultural uses and currently contains residential uses (i.e., single-family home). Based on the results of the site reconnaissance, no evidence of a Controlled Recognized Environmental Condition (REC) or Historical REC were identified in connection with the Site. However, several other RECs were identified during the assessment. The Phase I ESA Report identified a potential REC associated with the historic agricultural activities on-site. Although no information or observations indicating the misuse or misapplication of pesticides, herbicides, or fertilizers were obtained during the Site reconnaissance, in certain instances, the chemicals historically applied to the property, or their breakdown products, could be persistent and not biodegrade. As with any agriculturally developed land, there exists the possibility that pesticides, herbicides, or fertilizers have been applied that may still be present at residual concentrations. Furthermore, records indicate that the Site included unapproved/non-permitted auto storage/repairing activities, which typically utilize petroleum products and other hazardous substances. In addition, other database records report that, in 2005, construction materials were unlawfully dumped at the Site (NV5 Alta Environmental 2022a). The Phase I ESA recommended additional shallow soil sampling to further assess these identified RECs, which were documented as part of a Phase II ESA Report. According to the Phase II ESA Report, and based on the results

of soil samplings, no concentrations of Title 22 metals, organochlorine pesticides (OCP), total petroleum hydrocarbons (TPH), and volatile organic compounds (VOC) in the soil were found above their respective regulatory agency health-risk based careening levels and no further action was determined with respect to the previously identified RECs (NV5 Alta Environmental 2022b).

The Phase I ESA also noted the potential presence of an underground septic tank based on an interview with the current Site tenant; however, the location of the tank is unknown. The Phase I ESA concluded that, based on the presumed domestic sewer usage of the septic tank, it is not considered a REC. Nonetheless, the septic tank, if present on-site, could be encountered during project construction and grading activities. Therefore, Mitigation Measure HAZ-1 would reduce potential impacts related to the potential encounter and removal of an on-site septic tank to a less than significant level.

Furthermore, the Asbestos Survey Report concluded that, based on sampling of exterior materials associated with the on-site single family residence, samples of black penetration mastic located at the northeast portion of the roof was identified to have asbestos-containing materials (ACMs). These materials could pose as hazards to the environment during the construction stage of the Project, particularly with adaptive reuse of the residence. Therefore, implementation of HAZ-2 would reduce impacts related to removal of ACMs to a less than significant level.

Mitigation Measures

HAZ-1. Septic Tank Removal

If encountered, the septic tank shall be properly removed in accordance with all applicable City of LA regulatory requirements. If evidence of a release of a petroleum product or hazardous materials from the septic tank is observed at the time of removal, the Project Applicant shall stop all removal work and retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to prepare a Soil Management Plan and conduct a Subsurface Investigation.

HAZ-2. Asbestos-Containing Materials

The Project Applicant shall have the asbestos containing materials (ACMs) at the existing on-site structure identified in the Limited Asbestos Survey prepared by NV5 Alta Environmental in February 2022 removed according to proper abatement procedures recommended by an asbestos consultant. All abatement activities shall be in compliance with California and Federal Occupational Safety and Health Administration, and with the South Coast Air Quality Management District (SCAQMD) requirements. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement activities onsite. All ACMs removed from onsite structure shall be hauled and disposed of by a transportation company certified to handle asbestos and hazardous materials. If additional ACMs are found to be present, a qualified asbestos abatement consultant shall abate ACMs in compliance with the SCAQMD Rule 1403 as well as all other State and federal rules and regulations.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The nearest existing schools are the Francisco Sepulveda Junior High School and Sepulveda Middle School located approximately 0.2 mile east of the Project Site. During construction of the Proposed Project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed above, the transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous

Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Furthermore, operation and maintenance of the Project would likely involve the use of common commercial cleaning materials comparable to those materials already in use in the Site vicinity. For these reasons, emissions or hazardous materials releases near the schools would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. The following databases and listings compiled pursuant to Government Code Section 65962.5 were checked (June 2022) for known hazardous materials contamination at the Project Sites:

- USEPA
  - Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)/Superfund Enterprise Management System (SEMS)/Envirofacts database search
- State Water Resources Control Board (SWRCB)
  - GeoTracker search for leaking underground storage tanks (LUST) and other cleanup sites
- Department of Toxic Substances Control (DTSC)
  - EnviroStor database for hazardous waste facilities or known contamination sites
  - Cortese List of Hazardous Waste and Substances Sites

As discussed in impact b) of this section, the Phase I ESA recommended additional shallow soil sampling to further assess identified RECs associated with the historic agricultural uses, unapproved/non-permitted auto storage/repairing activities, and unlawfully dumped construction materials on-site. According to the Phase II ESA Report, and based on the results of subsequent soil samplings, no concentrations of Title 22 metals, OCPs, TPHs, and VOCs in the soil were found above their respective regulatory agency health-risk based careening levels and no further action was determined with respect to the previously identified RECs (NV5 Alta Environmental 2022a; NV5 Environmental 2022b). Furthermore, SEMS database search did not produce any results associated with the Project Site, indicating that the Project Site is devoid of known hazards and contaminants. The Project Site is not located on or directly adjacent to any known hazardous or contaminated sites that are actively being monitored. A search of the Geotracker database shows that the nearest listing to the site is approximately 700 feet east of the Project Site boundary at the Arco facility on the corner of Plummer Street and Sepulveda Boulevard intersection. The database report indicates that the status of the leaking underground storage tank (LUST) was deemed complete, and the case closed on April 2003. Due to the status of the LUST, it is unlikely that the contaminated site would have adverse impacts on the Project Site (SWRCB 2022). In addition, the construction and operation of the Proposed Project would not create a significant hazard to the public or the environment. Therefore, impacts would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The airports closest to the Project Site are the Van Nuys Airport, located approximately 2.3 miles to the southwest and the Whiteman Airport, located approximately 3.5 miles to the northeast. While the Project Site would be subject to temporary and intermittent noise from aircraft overflights, the Site is not located in either airports' noise contours and would not be affected by substantial noise from aircraft operations (Los Angeles County 2003). In addition, the Project Site is not near a private airport. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels from aircraft noise and no impact would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Proposed Project would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Safety Element of the City of Los Angeles General Plan shows Van Nuys Boulevard (located approximately 1.1 miles east of the Site) to be a Selected Disaster Route. However, in accordance with the Safety Element of the General Plan, emergency response and evacuation procedures would be developed though the City in coordination with the police and fire departments. The Project would include construction of an ingress/egress driveway along the south side of Plummer Street. The existing driveway providing access to the on-site single-family residence and two of the existing fenced driveways along the existing vacant lot will be removed. Nonetheless, the Proposed Project would not require the development of additional streets or introduce new features that would interfere with or obstruct an adopted emergency response plan. Implementation of the Project would increase traffic to and from the Project Site; however, the Project Site is surrounded by major roadways, including I-405, Plummer Street, Sepulveda Boulevard and Van Nuys Boulevard, which have sufficient capacity to provide access to and from the Project Site. Therefore, impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is in an urban area of the City of Los Angeles and is not located in a Fire Hazard Severity Zone (FHSZ) or Very High Hazard Severity Zone (VHFHSZ) for wildland fires (California Department of Forestry and Fire Protection [CALFIRE] 2022). Due to the urban nature of the Project Site, there is low potential for wildland fires to occur creating a significant risk for injury, or death involving wildland fires, and no impacts involving wildland fires would occur.

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X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. Result in substantial erosion or siltation on- or off-site; ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The Proposed Project would include the development of a two-story elementary school building and associated open space, landscaping, and surface parking. Construction of the Project would require cut of approximately 12,500 cy of soil material. Of the 12,500 cy of cut soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site. Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction associated with the Project would be subject to the requirements of Los Angeles Regional Water Quality Control Board (LARWQCB) Order No. R4-2012-0175, National Pollution Discharge Elimination System (NPDES) No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"),

which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of best management practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. ESCPs are required to include the elements of a SWPPP. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. Furthermore, LAMC Section 91.106.4.1.14 requires that applicants incorporate BMPs necessary to control stormwater pollution from sediments, erosion, and construction materials leaving the construction site into the plan documents. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.

With respect to water quality during operation of the Project, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 sf or more of impervious surface area on an already developed site, which would apply to the Project. This Program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the Standard Urban Storm Water Mitigation Plan (SUSMP) adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance requires the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Los Angeles Department of City Planning, Department of Building and Safety (LADBS), and Department of Public Works (LADPW) that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Project Site. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the Project Site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site compared to existing conditions. With appropriate Project design and compliance with the applicable federal,

State, local regulations, and permit provisions, impacts related to water quality degradation associated with construction and operation of the Project would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact.

The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. According to the Geotechnical Investigation Report (Appendix E), no groundwater was observed on the site to a maximum depth of 31.5 feet below existing grade. According to the State of California Seismic Hazard Zone Report of the Van Nuys Quadrangle, the site is located within an area with the historically highest groundwater level reportedly greater than 150-feet below ground surface (LK Geotechnical Engineering 2022). Construction of the Project is not anticipated to involve ground disturbance and drilling to depths beyond 30 feet; therefore, no dewatering (i.e., removal of groundwater) during construction is anticipated. While the Project would increase impervious surfaces on the Site compared to existing conditions, it would retain permeable landscaped areas throughout the Site. Furthermore, the Project does not proposed groundwater extraction and would not contribute to a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. As discussed in impact a) of this section, the Project would be designed to comply with the City of Los Angeles's LID design standard. Further, Project construction would comply with applicable NPDES and City requirements including those requiring the preparation of a Project-specific SWPPP. Pursuant to the LID Ordinance, the Project would be required to capture and manage the first three quarters of an inch of runoff flow during storm events as defined in the City's BMPs. The Project would result in less than significant impacts associated substantial erosion or siltation on-or off-site.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. Runoff associated with the Project would be collected in a proposed on-site catch basin, directed in non-erosive drainage devices to landscaped areas for evaporation, and/or directed to the existing City storm drain system. The Project would be subject to the provisions of the LID Ordinance. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, LADPW that expand the review of the SUSMP discussed above. Incorporation of these features would minimize the stormwater runoff from the Project Site. It can be reasonably anticipated, then, that the existing storm drain system has adequate capacity to accommodate flows from the Project Site. Therefore, impacts would be less than significant.

iv. Impede or redirect flood flows?

No Impact. According to Federal Emergency Management Agency flood plain data presented in the site-specific Environmental Data Resources (EDR) Geocheck Report, the Site is not located within a 100- or 500-year flood zone (EDR 2021). The Project Site is located in Zone X of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map # 06037C1305F, dated September 26, 2008) (FEMA 2008). Zone X is characterized as an area determined to be outside the 0.2 percent annual chance floodplain. The Proposed Project would not have the potential to impede flood flows and no impact would occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. As discussed under impact c.iv) of this section, the Project is not located within a 100- or 500-year flood zone and is in Zone X according to the FEMA FIRM, which is characterized as an area determined to be outside the 0.2 percent annual chance floodplain. Furthermore, the Site is located approximately 14 miles from the coast of the Pacific Ocean and is approximately 869 feet above mean sea level. Therefore, the Site is not located in an area potentially impacted by a tsunami. There are no other large bodies of water in the Site vicinity. As such, the Project is not in a flood hazard, tsunami, or seiche zone and there is no potential for risk of the release of pollutants due to project inundation. No impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. As discussed in impact a) and b) of this section, the Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the LID Ordinance. Project construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to avoid or reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a SWPPP in accordance with the NPDES permit. The SWPPP incorporates BMPs in accordance with the City of Los Angeles' Best Management Practices Handbook to control erosion including grading and dust control measures. The Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Physically divide an established community?

No Impact. The Project Site is in an urban area surrounded by Plummer Street, I-405, and residential uses. The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. Since the Project would be developed within a long-established urban area, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Therefore, the proposed would not physically divide an established community and no impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The Proposed Project involves the development of a two-story elementary school building and associated open space, landscaping, and surface parking. The Project Site is currently zoned RA-1 (Suburban Zone). As referenced in LAMC Section 12.19, schools are allowed in the RA-1 zone with a Conditional Use Permit. According to the Mission Hills - Panorama City - North Hills Community Plan, the Project Site is also designated Low Density Residential, which corresponds to the RA-1 zone and is intended to provide for areas appropriate for a range of detached single-family residential dwelling units, each located on a single legal lot (City of Los Angeles 2010). Therefore, the Proposed Project would not be consistent with the site's current zoning and land use designation. However, Proposed Project entitlements includes a Conditional Use Permit to allow a school use in the RA-1 Zone District.

Upon approval of the requested Conditional Use Permit, the Proposed Project would comply with City zoning standards, including maximum height limits, parking, open space requirements, and yard setbacks. In addition, as discussed in the impact analyses for biological resources, cultural resources, and tribal cultural resources, the Project would comply with necessary measures and would not conflict with applicable policies aimed at mitigating environmental effects. Table 16 discusses the Proposed Project's consistency with relevant policies from the Mission Hills - Panorama City - North Hills and City of Los Angeles General Plan Housing Element. Policies that call for City actions independent of review and approval or denial of the Proposed Project have been omitted. The ultimate determination of whether the Proposed Project is consistent with applicable general plans lies with the City's decision-making body, specifically the Planning Commission, and City Council if the Proposed Project is appealed.

Table 16 Project Consistency with Relevant City Policies

Policy	Discussion
Mission Hills - Panorama City - North Hills Community Plan	
Goal 6: Appropriate locations and adequate facilities for schools to serve the needs of the existing and future population	
Policy 6-1.1: Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character and, as appropriate, use schools to create a logical transition and buffer between differing uses.	Consistent: The Proposed Project would include the development of a two-story elementary school building and associated open space, landscaping, and surface parking. As discussion in Section I, *Aesthetics*, the Project would not degrade the character of the Site. As a proposed elementary school, the Project would not conflict with existing uses in the area since there is a high school and middle school located approximately 1,000 feet to the east along Plummer Street.
Policy 6-1.2: Site schools in a manner which compliments and preserves the existing stable single family and multiple-family residential neighborhoods.	Consistent: The Proposed Project would be developed in an urban area. Land uses surrounding the site include single family and multi-family residences.
Policy 6-1.3: Proximity to noise sources should be avoided whenever possible or the school design should buffer classrooms from such noise.	Consistent: The Proposed Project would be compatible with the existing noise environment without the implementation of noise buffers, as discussed in Section XII, *Noise*.
Policy 6-1.6 Encourage cooperation to provide recreation facilities for the community.	Consistent: The Proposed Project would include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) to accommodate a maximum enrollment of 552 students. The student's recreational needs will be met on-site and will not significantly impact off-site recreational facilities.
City of Los Angeles General Plan Framework Element – Chapter 9 Infrastructure and Public Services	
Goal 9N: Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.	
Policy 9.32.1: Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development.	Consistent: The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property. Therefore, the Project would provide expanded school facilities compared to current operations at Panorama Baptist Church to accommodate an additional 172 students.
Policy 9.32.2: Explore creative alternatives for providing new school sites in the City, where appropriate.	Consistent: The Proposed Project would include the development of a two-story elementary school building and associated open space, landscaping, and surface parking. The site is currently zoned as RA-1 and includes a single-family residence. The residence is listed in SurveyLA and is, therefore, recognized by the City as having historic significance. Rather than demolishing the structure, the residence would be adaptively reused and school administrative space and would remain onsite.

Source: City of Los Angeles 2001

Based on the consistency analysis provided in Table 16 the Proposed Project would be consistent with the Mission Hills - Panorama City - North Hills Community Plan and City of Los Angeles General Plan Framework Element. The Proposed Project would not conflict with any applicable land use plan, policy, or regulation, and impacts would be less than significant.

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XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project Site is in an urban area surrounded by Plummer Street, I-405, and residential uses. The Site itself consists of grasses, shrubs, various mature trees, and a one-story historic single-family residence. The Project Site is zoned RA-1 (Suburban Zone) and is also designated as Low Density Residential under the Mission Hills - Panorama City - North Hills Community Plan. According to the California DOC Mineral Land Classification Maps, the Project Site is located in an area with a Mineral Resource Zone (MRZ) designation of MRZ-3, indicating an area containing known or inferred Portland cement concrete aggregate resource of undetermined mineral resource significance (DOC 2021c). However, there are no ongoing extraction activities at or near the Site. Because there are no known mineral resources on the Project Site or in the vicinity of the site, the Project would have no impact on the availability or recovery of mineral resources that would be of value to the region and residents of the state.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As discussion under impact a) of this section, the Project Site is in a developed urban area, is zoned RA-1 (Single-Unit Residential) and is also designated as Low Density Residential under the Mission Hills - Panorama City - North Hills Community Plan. The Project Site is in an area with an MRZ-3 designation, indicating an area containing known or inferred Portland cement concrete aggregate resource of undetermined mineral resource significance (DOC 2021c). However, there are no ongoing extraction activities at or near the Site. Because there are no known mineral resources on the Project Site or in the vicinity of the site, the Project would have no impact on the availability or recovery of locally-important mineral resource recovery sites.

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XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Rincon prepared a Noise and Vibration Study dated August 2022 to analyze the Project's noise and vibration impacts related to both temporary construction activity and long-term operation of the Project. The following analysis is based on the findings of the Noise and Vibration Study, which is provided as Appendix I.

Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, its frequency, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed.

One of the most frequently used noise metrics that considers both duration and intensity is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007). Normal conversational levels at three feet are in the 60- to 65-dBA Leq range and ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (L_{dn} or DNL), which is a 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by DNL and CNEL usually differ by about 0.5 dBA. Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are typically in the 50 to 70+ CNEL range.

Propagation

Sound from a small, localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of approximately 6 dBA for each doubling of distance.

Traffic noise is not a single, stationary point source of sound. Rather, the movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point. The drop-off rate for a line source is approximately 3 dBA for each doubling of distance.

Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates.

Descriptors

Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Response to Vibration

Caltrans has developed limits for the assessment of vibrations from transportation and construction sources. The Caltrans vibration limits are reflective of standard practice for analyzing vibration impacts on structures. The Caltrans *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020) identifies impact criteria for buildings. Table 17 presents the impact criteria for buildings.

Table 17 Vibration Damage Potential

Structure and Condition	Maximum PPV (in./sec.)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient mountains	0.12	0.08
Fragile buildings	0.20	0.10
Historic and similar old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. According to the City of Los Angeles Noise Element, the following land uses are considered noise-sensitive: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses, houses of worship, hospitals, libraries, schools, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, and parks (City of Los Angeles 1999).

Vibration-sensitive receivers, which are similar to noise-sensitive receivers, include residences and institutional uses, such as schools, churches, and hospitals. Vibration-sensitive receivers also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studies or medical facilities with sensitive equipment).

As shown in Figure 11, Noise Measurement and Sensitive Receiver Locations, the Site is surrounded by residential uses. The nearest sensitive receivers consist of residences directly adjacent to the east, south, and west, and residences approximately 130 feet to the north across Plummer Street, as well as Plummer Village Senior Community approximately 215 feet to the east. The Project Site includes an existing residence that would be converted into additional administrative space for the proposed elementary school. In addition, the Project would include construction of an elementary school, which would add new sensitive receivers to the Project Site.

Project Noise Setting

The most common source of noise in urban areas is vehicular traffic. In the Project Area, vehicular traffic along Plummer Street is the primary noise source with steady traffic on the I-405, located approximately 440 feet west of the Site, being barely perceptible. Ambient noise levels are generally highest during the daytime and peak traffic hours unless congestion substantially slows speeds.

To further characterize ambient noise levels at and near the Project Site, two 15-minute noise level measurements were collected by Rincon on May 25, 2022 between 8:57 a.m. and 9:31 a.m. using an Extech (Model 407780A) ANSI Type 2 integrating sound level meter. An additional 24-hour noise level measurement was collected between May 25, 2022 and May 26, 2022. Table 18 summarizes the short-term noise measurement results and Figure 11 shows the noise measurement locations. Short-term noise measurement (ST) 1 is located at the northern property line of the Site facing Plummer Street and ST 2 is located along Orion Avenue adjacent to single-family residences. The long-term noise measurement (LT) 1 is located near the southern property line of the Site. Noise levels for the 15-minute measurements are provided in L_{eq} for the measurement period; L_{min} and L_{max} are also provided. The noise level for the 24-hour measurement is provided in CNEL. Table 19 summarizes the long-term noise measurement. Detailed sound level measurement data are included in Appendix I.

Table 18 Project Vicinity Sound Level Monitoring Results

	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
ST1	Northern property line of Site	8:57 a.m. – 9:12 a.m.	30 feet from centerline of Plummer Street	70	53	93
ST2	West of Site, adjacent to residences	9:16 a.m. – 9:31 a.m.	15 feet from centerline of Orion Avenue	59	54	75

See Appendix I for noise monitoring data. Noise level measurements have been rounded to the nearest whole number.
Source: Rincon field visit between May 25, 2022 and May 26, 2022

Table 19 Project Site Long-Term Noise Monitoring Results

Sample Time[1]	dBA L_{eq}	Sample Time[1]	dBA L_{eq}
24-hour Measurement – 5/25- 5/26/2022			
8:42 a.m.	57	8:42 p.m.	50
9:42 a.m.	51	9:42 p.m.	49
10:42 a.m.	51	10:42 p.m.	48
11:42 a.m.	53	11:42 p.m.	49
12:42 p.m.	49	12:42 a.m.	50
1:42 p.m.	51	1:42 a.m.	47
2:42 p.m.	46	2:42 a.m.	49
3:42 p.m.	48	3:42 a.m.	51
4:42 p.m.	50	4:42 a.m.	51
5:42 p.m.	48	5:42 a.m.	57
6:42 p.m.	51	6:42 a.m.	53
7:42 p.m.	50	7:42 a.m.	57
24-hour Noise Level (CNEL)			**58**

dBA = A-weighted decibels; L_{eq} = equivalent noise level; CNEL = community equivalent noise level

[1]Sample times shown in this table are the correct sample times. The date and time located in the raw data is not shown correctly due to an input error.

See Figure 11 for noise measurement locations; see Appendix A for full measurement details.

Figure 11 Noise Measurement and Sensitive Receiver Locations



Regulatory Setting

City of Los Angeles Noise Element

The goals, policies, and actions contained in the City of Los Angeles General Plan Noise Element focus on establishing and applying criteria for acceptable noise levels for different land uses in order to minimize the negative impacts of noise, especially at sensitive receiver locations. In support of these goals and policies, the City's Noise Element contains a land use and noise compatibility matrix (shown in Table 20) that determines the normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for various land uses. According to the City's noise compatibility matrix shown in Table 20, ambient noise up to 60 CNEL is normally acceptable for schools whereas ambient noise up to 70 CNEL is conditionally acceptable for schools. In addition, consistent with state noise insulation standards (California Building Code Title 24, Part 2, Section 1206.4), the City's Noise Element limits interior noise to a maximum of 45 CNEL in any habitable room (City of Los Angeles 1999).

Table 20 Land Use and Noise Compatibility Matrix (CNEL)

Land Use	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Single-Family, Duplex, Mobile Homes	50 – 55	55 – 70	70 – 75	75+
Multi-Family	50 – 60	60 – 70	70 – 75	75+
School, Library, Church, Hospital, Nursing Home	50 – 60	60 – 70	70 – 80	80+
Transient Lodging, Motel, Hotel	50 – 60	60 – 70	70 – 75	75+
Auditorium, Concert Hall, Amphitheater	–	50 – 65	–	65+
Sports Arena, Outdoor Spectator Sports	–	50 – 70	–	70+
Playground, Neighborhood Park	50 – 65	–	65 – 75	75+
Golf Course, Riding Stable, Water Recreation, Cemetery	50 – 70	–	70 – 75	75+
Office Building, Business, Commercial, Professional	50 – 65	65 – 75	75+	–
Agriculture, Industrial, Manufacturing, Utilities	50 – 70	70 – 75	75+	–

[1] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

[2] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning would normally suffice.

[3] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

[4] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: City of Los Angeles 1999

City of Los Angeles Municipal Code

The City implements and enforces construction and operational noise regulations through the Los Angeles Municipal Code (LAMC). LAMC Section 91.1206 establishes noise insulation performance standards to protect persons within new hotels, motels, dormitories, residential care facilities, apartment houses, dwellings, private schools, and places of worship from the effects of excessive noise, including but not limited to, hearing loss or impairment and interference with speech and sleep. According to Subsection 91.1206.14.1, these structures shall be designed to prevent the intrusion of exterior noise beyond prescribed levels when located in noise critical areas, such as proximity to highways, country roads, city streets, railroads, airports, and commercial or industrial areas. Proper design shall include, but shall not be limited to, orientation of the structure, setbacks, shielding, and sound insulation of the building itself. According to Subsection 91.1206.14.3, structures identified under Subsection 91.1206.1 that are exposed to airport noise greater than 60 dBA L_{dn} or CNEL, shall require an acoustical analysis showing that the proposed design will achieve the allowable interior noise level.

LAMC Section 111.02 provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation. This standard applies to radios, television sets, air conditioning, refrigeration, heating, pumping and filtering equipment, powered equipment intended for repetitive use in residential areas, and motor vehicles driven on-site. To account for people's increased tolerance for short-duration noise events, the LAMC provides a 5 dBA allowance for a noise source that causes noise lasting more than five but less than 15 minutes in any one-hour period, and an additional 5 dBA allowance (for a total of 10 dBA) for a noise source that causes noise lasting five minutes or less in any one-hour period.

LAMC Section 111.03 indicates that, in cases where the actual ambient noise conditions are not known, the City's presumed daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) minimum ambient noise levels should be used, as shown in Table 21. For example, for residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 40 dBA during the nighttime. According to LAMC Section 111.03, where the ambient noise level is less than the presumed ambient noise level shown in Table 21, the presumed ambient noise level is to be considered the minimum ambient noise level.

Table 21 Noise Level Monitoring Results

Zone	Presumed Ambient Noise Level (dbA)	
	Day 7 a.m. to 10 p.m.	Night 10 p.m. to 7 a.m.
Residential (A1, A2, RA, RE, RS, RD, RW1, RW1, RW2, R1, R2, R3, R4, and R5)	50	40
Commercial (P, PB, CR, C1, C1.5, C2, C4, C5, and CM)	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

Note: At the boundary between two zones, the presumed ambient noise level of the quieter zone is to be applied.
Source: LAMC Section 111.03

LAMC Section 112.01 prohibits noise from radios, musical instruments, television sets, and other sound-amplifying devices from being audible at a distance in excess of 150 feet from the property line of the noise source within 500 feet of any residential zone or from exceeding the ambient noise level on the premises of any other occupied property.

LAMC Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping, and filtering equipment. Such equipment may not be operated in such manner as to create any noise that would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

LAMC Section 112.04 prohibits the operation of any lawn mower, backpack blower, lawn edger, riding tractor, or any other machinery equipment, or other mechanical or electrical device, or any hand tool which creates a loud, raucous or impulsive sound, within any residential zone or within 500 feet of a residence between 10:00 p.m. and 7:00 a.m. LAMC Section 114.03 prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m.

LAMC Section 112.05 limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA between 7:00 a.m. and 10:00 p.m., as measured at a distance of 50 feet from the source, i.e. construction site, unless compliance is technically infeasible. Technical infeasibility means that noise limitations cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of construction equipment. LAMC Section 41.40 also restricts construction activity to the hours below:

- Monday through Friday between 7:00 a.m. and 9:00 p.m.
- Saturdays and national holidays between 8:00 a.m. and 6:00 p.m. except for individual homeowners engaged in the repair or construction of a single-family residence
- No construction on Sundays except for individual homeowners engaged in the repair or construction of a single-family residence

LAMC Section 113.01 prohibits collecting or disposing of rubbish or garbage, operating any refuse disposal truck, or collecting, loading, picking up, transferring, unloading, dumping, discarding, or disposing of any rubbish or garbage, as such terms are defined in LAMC Section 66.00, within 200 feet of any residential building between the hours of 9:00 p.m. and 6:00 a.m. of the following day, unless a permit has been duly obtained beforehand from the Board of Police Commissioners.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The Proposed Project involves the construction of an elementary school and the adaptive reuse of the existing on-site residence for additional administrative space. The immediate surrounding area, consisting of residential uses, may be subject to both temporary construction noise and long-term operational noise. On-site noise source associated with operation of the Project would consist of noise from periodic delivery and trash hauling services; rooftop-mounted heating, ventilation, and air conditioning (HVAC) equipment; and student recreational activity in outdoor areas. The Project would also generate off-site operational noise from vehicle trips. The following discussion analysis each temporary and permanent noise source.

Construction Noise

Construction activity would result in temporary increases in ambient noise in the Project Site vicinity on an intermittent basis and, as such, would expose surrounding noise sensitive receivers to increased noise. Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). Using RCNM, noise was modeled at the property line of the nearest noise-sensitive receptors from the edge of proposed construction activity. As discussed

in discussed in *Sensitive Receivers* of this section, sensitive receivers nearest to the Project Site include single-family residences directly adjacent to the east, south, and west and the Plummer Street Senior Community approximately 215 feet to the east. RCNM calculations are included in Appendix I.

Pursuant to LAMC Section 112.05, in which construction noise in a residential zone shall not exceed 75 dBA L_{max} between 7:00 a.m. and 10:00 p.m. at a distance of 50 feet, construction noise was modeled at a distance of 50 feet from the nearest residential receivers. In addition, construction activities are limited to the hours of 7:00 a.m. and 9:00 p.m. on weekdays and between the hours of 8:00 a.m. and 6:00 p.m. on Saturday pursuant to LAMC Section 41.40.

Construction noise is typically loudest during activities that involve excavation and moving soil, such as site preparation and grading. A potential high-intensity construction scenario based on client provided information includes a grader, excavator and concrete saw working during site preparation to excavate and move soil. At a distance of 50 feet, a grader, excavator and concrete saw would generate a noise level of 90 dBA L_{max}. Therefore, construction noise could exceed the threshold of 75 dBA L_{max}. The approximate 75 dBA L_{max} noise contour for project construction is estimated at 150 feet (i.e., if construction occurs at a distance of 150 feet or greater from a sensitive receptor, it would not exceed the threshold). Therefore, if construction occurs within 150 feet of sensitive receivers, noise levels from construction may exceed the City's construction noise limit.

The nearest sensitive receivers include single-family residences adjacent to the east, south, and west of the project boundary. Other sensitive receivers include single-family residences approximately 130 feet to the north across Plummer Street, as well as Plummer Village Senior Community approximately 215 feet to the east. At nearby residences, construction noise could exceed the 75 dBA L_{max} threshold since construction activity could occur within 50 feet of these sensitive receptors if uncontrolled. Construction noise at the Plummer Village Senior Community, approximately 215 feet to the east of the project boundary, is not estimated to exceed the 75 dBA L_{max} threshold.

However, compliance with the City's RCMs would reduce impacts related to construction noise. In particular, compliance with RCM-1 would reduce construction noise by at least 15 dBA, thereby reducing construction noise levels to 75 dBA L_{max}. Therefore, with RCM-1, this impact would be less than significant.

Regulatory Compliance Measures

RCM-1 Adherence to Existing Noise Standards

The Proposed Project shall comply with the City of Los Angeles General Plan Noise Element, the City of Los Angeles Noise Ordinance, and any subsequent ordinances that prohibit the emission or creation of noise beyond certain levels at adjacent uses.

To implement RCM-1 and reduce construction noise, the construction Contractor would be required to implement noise-reducing during construction, which may include but are not limited to:

- Schedule construction activities to avoid operating several pieces of equipment simultaneously, which can cause high noise levels.
- Retrofit mobile equipment with an industrial grade silencer or silencer of similar capacity.
- Enclose stationary equipment.

- Locate all construction areas for staging and warming up as far as possible from adjacent residential buildings and sensitive receivers.
- Erect temporary noise barriers with a minimum height of 12 feet along the project boundaries. The noise barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher.

RCM-2 Construction Hours

The Proposed Project shall comply with LAMC Section 41.40, which restricts construction activities to the hours of 7:00 a.m. to 9:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday and national holidays with no construction permitted on Sunday.

RCM-3 Construction Site Noticing

The Proposed Project shall comply with the City's Building Regulations Ordinance No. 178,048 (LAMC Section 91.106.4.8), which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor or owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and the Applicant's telephone number where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

On-Site Operational Noise

Delivery and Trash Hauling

The Project would require periodic delivery and trash hauling services. However, noise associated with delivery and trash-hauling trucks would be an intermittent noise source and are already a common occurrence in the Project area due to existing residential and commercial uses that make up the developed urban area. Therefore, such services associated with the Project would not result in a substantial permanent increase in ambient noise levels without the Project. Furthermore, LAMC Section 114.03 prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m. Therefore, operational noise impacts associated with delivery and trash-hauling trucks would be less than significant.

HVAC Units

The primary on-site operational noise source from the Project would be HVAC units. The HVAC used in the analysis was a Trane Split System Heat Pump. Specific model data for the future HVAC systems are not available at this stage of Project design; however, this analysis assumes the use of a typical Trane HVAC system. The unit used in this analysis is a 5-ton Carrier 4TWA4036A3, which has a sound power level of 75 dBA (see Appendix I for manufacturer's specifications). Based on the location of the proposed buildings, it is anticipated that the closest rooftop-mounted HVAC unit would be installed on the proposed multi-purpose building located approximately 30 feet from the nearest off-site sensitive receivers east of the Project Site. HVAC equipment would diminish at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from ground and shielding effects).

The nearest sensitive receivers are single-family residences, which are approximately 30 feet from the nearest proposed multi-purpose building to the east. A 2.5-foot-high parapet wall is proposed on the rooftop, which would reduce HVAC noise levels by approximately 5 dBA. At a distance of 30 feet and with the shielding from the proposed parapet wall, HVAC noise would attenuate to approximately 43 dBA or less, which would not exceed the lowest measured hourly L_{eq} at LT-1 of 46 dBA. According to LAMC Section 111.03, where the ambient noise level is less than the presumed ambient noise level shown in Table 18, the measured ambient becomes the standard. Project HVAC noise would be less at other sensitive receptors located at further distances. This impact would be less than significant.

Outdoor Noise

The primary on-site noise source associated with operation of the Project would consist of student recreational activity in the proposed outdoor play areas. Outdoor noise would be an intermittent and periodic noise source, which would be limited to the daytime during school hours and when staff and students are outdoors (e.g., mornings prior to class start times, study breaks or lunch breaks throughout the day, afterschool prior to students getting picked up). The new elementary school would serve traditional kindergarten through grade four. Campus hours of operation for Valor Elementary School would be from 7:15 a.m. to 6:00 p.m., Monday through Friday during normal school months. During the summer months, the school campus would be closed. The proposed school would not host athletic events that would occur during the late afternoon/early evening hours. No lighting is proposed for the proposed playfields and a limited amount of special events are proposed throughout the school years. Additionally, there would be no PA system proposed for recreational activities. Since student recreational activities would be limited to daytime hours and there are no proposed PA systems for sports activities, impacts would be less than significant.

Off-site Operational Noise

Traffic Noise

The Project would generate new vehicle trips and incrementally increase traffic on area roadways, particularly on Plummer Street due to the location of the Project's proposed driveway. According to the TA prepared by the LLG, the Project would result in approximately 1,232 daily vehicle trips on Plummer Street (LLG 2022). As discussed in the TA, new traffic count data could not be collected due to the COVID-19 pandemic (LLG 2022). While the TA uses the City's peak hour traffic data, the TA does not include 24-hour traffic volume data for the segment of Plummer Street nearest to the Site. Based on the City's 24-hour traffic volume data, the segment of Plummer Street nearest to the Site has a volume of approximately 17,710 ADT.[4] Conservatively adding all 1,232 daily vehicle trips generated by the Project to Plummer Street would increase traffic along these roadways by approximately seven percent. This traffic increase would, in turn, increase traffic noise by an estimated 0.3 CNEL along Plummer Street.[5] Therefore, the Project would not generate substantial traffic noise from vehicle trips that would result a perceptible 3-dBA increase above existing traffic noise at Plummer Street. Noise impacts associated with off-site traffic generated by the Project would be less than significant.

[4] Based on the City's 24-hour traffic volume data, the nearest intersection (Plummer Street West of Orion Avenue) had approximately 16,100 ADT in 2012 (City of Los Angeles 2012). To estimate current year traffic volumes, the 16,100 ADT were increased by a one percent annual traffic growth rate through the year 2022.

[5] A doubling of traffic is required for an audible 3 dB increase in traffic noise levels. However, the increase in traffic generated by the Proposed Project would be approximately seven percent of the estimated existing daily traffic along Plummer Street.

Land Use Compatibility

As discussed in *Project Noise Setting* of this section and shown in Table 19, the peak hour ambient noise level along Plumer Street is 70 dBA L_{eq}, which indicates that future classrooms closest to Plummer Street could be exposed to ambient noise levels on the order of 70 CNEL. According to the City's noise compatibility matrix shown in Table 20, ambient noise up to 60 CNEL is normally acceptable and noise up to 70 CNEL is conditionally acceptable for a school use. Based on existing noise levels described in *Project Noise Setting*, the project is anticipated to be within the "conditionally acceptable" range for school uses at the project site. RCM-4 would require that future classrooms are designed for an interior noise environment of 45 dBA L_{eq} or less, and impacts would be less than significant.

Regulatory Compliance Measure

RCM-4 Interior Noise Reduction

The Applicant shall consider the noise and land use compatibility of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and project designs shall achieve interior classroom noise levels of 45 dBA L_{eq} or less with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features.

- New construction should achieve classroom acoustical quality consistent with the current School Design Guide and California High Performance Schools (CHPS) standard of 45 dBA L_{eq}.
- New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq}
- Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system.
- The Applicant's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost.
- Exterior doors would have a solid core with perimeter weather-stripping and threshold seals with a Sound Transmission Class (STC) rating of at least 32, with the potential for STC rating of 36 or higher if necessary.
- Exterior walls would include minimum of 5/8-inch of stucco or brick veneer over a minimum ½-inch plywood or OSB shear panel, R11 insulation and interior 5/8-inch gypsum board.
- Walls would have a STC rating of at least 46.
- Dual-paned windows would be installed with a STC rating of at least 32, with the potential for STC rating of 36 or higher if necessary.
- If exterior sliding glass doors are included, high-performance glazing would be installed with a minimum STC rating of 36.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact With Mitigation. Operation of the Project would not include stationary sources of significant vibration, such as heavy equipment operations. Therefore, operational vibration impacts would be less than significant. Rather, construction activities have the potential to generate groundborne vibration affecting nearby structures. Construction of the Project would utilize loaded trucks and bulldozers and other heavy-duty construction equipment during the grading phase. Vibratory rollers are not proposed for use during the paving phase.

Vibration impacts are assessed based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of the Project Site, to the edge of nearby off-site structures. Based on the distance of the nearest structures to the Project Site, heavy-duty equipment could potentially come within very close distances to the adjacent single-family residences and the existing building on site with historic significant per SurveyLA. If dozers or other heavy earthmoving equipment were to work within approximately 10 feet or less of adjacent single-family structures, vibration levels could reach 0.352 in/sec PPV or greater and exceed the threshold of 0.3 in/sec PPV for typical residential structures. If such equipment were to work within approximately 12 feet or less of the existing on-site structure, vibration levels could reach 0.268 in/sec PPV or greater and exceed the threshold of 0.25 in/sec PPV for historic structures. Therefore, construction vibration impacts would be considered significant. Implementation of Mitigation Measure NOI-1 would reduce this impact to a level of less than significant.

Mitigation Measure

NOI-1. Construction Vibration

Grading and earthwork activities within 12 feet of adjacent residential structures or within 10 feet of the on-site existing building shall be conducted with off-road equipment that is limited to 100 horsepower or less.

c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The airports closest to the Project Site are the Van Nuys Airport, located approximately 2.3 miles to the southwest and the Whiteman Airport, located approximately 3.5 miles to the northeast. While the Project Site would be subject to temporary and intermittent noise from aircraft overflights, the Site is not located in either airports' noise contours and would not be affected by substantial noise from aircraft operations (Los Angeles County 2003). In addition, the Project Site is not near a private airport. Therefore, the Project would not expose people working in the Project area to excessive noise levels from aircraft noise and no impact would occur.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The Proposed Project would not induce direct population growth. The elementary school would serve students already living in the area and accommodate enrollment in addition to other nearby schools, including the existing San Francisco Sepulveda Junior High School and Sepulveda Middle School. The Project area is a developed urban area, and implementation of the new school would not attract new residents to the region. The Proposed Project would be served by existing roads and other infrastructure, and no new roads, expanded utility lines, and housing that could induce population growth would be constructed or required as part of the Proposed Project. No impacts related to population growth would occur.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The Site itself consists of grasses, shrubs, various mature trees, and a one-story single-family residence currently rented by two tenants. The residence would remain on the Site as part of the Project but would be adaptively reused for additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. While the Project would not demolish the residence, it would displace its current tenants and change its use. Assuming a maximum displacement of two people and one housing unit, Project development would not displace a substantial number of housing units or require replacement housing and impacts would be less than significant.

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XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less Than Significant Impact. Fire protection services in the City are provided by the Los Angeles Fire Department (LAFD). In particular, the primary duties of the LAFD Fire Development Services Unit is to conduct Fire Life Safety Plan Checks and Fire Life Safety Inspections which aim to enforce applicable standards of the Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling. Furthermore, the Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement.

The Proposed Project is within the existing service area of the LAFD. The nearest fire station to the Project Site is LAFD Station No. 7 located approximately a mile east of the site at 14630 Plummer Street. Currently, the average response times for Fire Station No. 7 are approximately six minutes for emergency medical services (EMS) and non-emergency medical services (NON-EMS), and six minutes for structure fires (LAFD 2022). Although the Proposed Project would not cause a growth in the City's population (as discussed in Section XIV, *Population and Housing*), the Project would accommodate a maximum enrollment of 552 students compared to existing conditions, which would incrementally increase demand and call load for fire protection services. LAFD works with the City's Planning Department to review and make recommendations relating to all land use cases, including development projects, in the City. Therefore, the Proposed Project would also be required to comply with applicable fire and life safety standards and code requirements, such as fire hydrant flows, hydrant spacing, adequate fire lane turning-radius, access, and design to comply with LAFD's fire protection requirements, as well as standard design requirements (e.g., fire sprinklers and fire alarm devices) in accordance with the CBC. Upon implementation of LAFD requirements, including compliance with all applicable standards required by the LAFD as a result of the Fire Life Safety Plan Checks and Fire Life Safety Inspections processes, the Proposed Project would not place an unanticipated burden on fire protection services. In addition, emergency access to the Project Site would be maintained at all times during both Project construction and operation. As such, the Proposed Project would therefore not substantially affect response times or service ratios such that new or expanded fire facilities would be needed. Impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. Police protection services in the City are provided by the Los Angeles Police Department (LAPD). The Project would not include an increase of residents but would accommodate a maximum enrollment of 552 students. The nearest police station to the Project Site is the Mission Community Police Station, located at 11121 Sepulveda Boulevard, approximately two miles north of the site, which serves the neighborhoods of Arleta, Mission Hills, North Hills, Panorama City and Sylmar under the under the jurisdiction of the Valley Bureau. The Mission Community Police Station serves 25.1 square miles with an estimated population of 225,849 persons. The Proposed Project would not place an unanticipated burden on police protection services and would therefore not affect response times or service ratios such that new or expanded police facilities would be needed. The Proposed Project would comply with all applicable regulations required by the LAPD during the plan check process. Impacts would be less than significant.

c) Schools?

Less Than Significant Impact. The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property. Therefore, the Project would provide expanded school facilities compared to current operations at Panorama Baptist Church to accommodate an additional 172 students.

The Proposed Project would not increase demands for schools and would not require construction of other new or expanded school facilities. Furthermore, as discussed in this document, construction of the Project would include mitigation measures to reduce potential impacts. Therefore, the Proposed Project would not result in the need for or construction of school facilities that would result in significant impacts. Impacts would be less than significant.

d) Parks?

No Impact. As discussed in Section XIV, *Population and Housing*, the Proposed Project would not induce direct population growth. The Proposed Project would include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf) to accommodate a maximum enrollment of 552 students and alleviate the burden on existing park and recreational facilities. It is anticipated that all recreational demands generated by the Project would be met on school grounds. Therefore, there would not be an increase in the demand for usage of existing parks and recreational facilities in the city necessitating the need for construction of new or expanded facilities elsewhere. No impact would occur.

e) Other public facilities?

Less Than Significant Impact. Physical impacts to public services are usually associated with population growth, which increase the demand for public services and facilities, including libraries. As discussed in Section XIV, *Population and Housing*, the Proposed Project would not induce direct population growth. The Los Angeles Public Library (LAPL) provides library services to the City. As a proposed elementary school, students accommodated by the Project may require the use of the City's library facilities for supplemental research and education; however, it is anticipated that the Project would supply its students with resources and tools to complete

coursework thereby reducing the need for use of off-site public libraries. Therefore, impacts would be less than significant.

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XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

No Impact. As discussed in Section XIV, *Population and Housing*, the Proposed Project would not induce direct population growth. The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property. Therefore, the Project would provide expanded school facilities compared to current operations at Panorama Baptist Church to accommodate an additional 172 students.

The Proposed Project would include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf). It is anticipated that all recreational demands generated by the Project would be met on school grounds. Therefore, there would not be an increase in the demand for usage of existing parks and recreational facilities in the city resulting in substantial or accelerated deterioration. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. As discussed under impact a) of this section, the Project would not directly increase the population in the city and would include 30,726 sf of open space and landscaping including play areas. Therefore, sufficient recreational facilities to support students accommodated by the Proposed Project would be constructed as part of the new school. The environmental effects of the construction and operation of these recreational facilities are considered throughout the environmental analysis herein. As discussed in this document, construction of the Project would not result in impacts that would not be reduced to a less than significant level with mitigation. The Proposed Project would not require the construction or expansion of additional recreational facilities elsewhere that would have an adverse effect on the environment. No impact would occur.

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XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☒	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

Linscott Law & Greenspan Engineers (LLG) prepared a Transportation Assessment in May 2022 to assess traffic operations and potential impacts resulting from implementation of the Proposed Project. The transportation analysis follows the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG). The City's TAG are focused on transportation metrics that promote: the reduction of greenhouse gas emissions, the development of multimodal networks and access to diverse land uses, as well as safety, sustainability and smart growth. In compliance with CEQA, the City's TAG identifies vehicle miles traveled (VMT) as the primary metric for evaluating a project's transportation impacts along with whether the project conflicts or is inconsistent with local plans and policies. As a non-CEQA impact, Level of Service (LOS) impacts are not discussed in this section but are included in the Transportation Assessment, which is provided as Appendix J for reference.

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. As discussed in the Transportation Assessment, The Project would not conflict with the relevant City plans, policies and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Project is most likely not required to make modifications to the public right-of-way but would make any modifications to the public right-of-way as required by BOE. The Project would not conflict with plans or policies such as LADOT's Manual of Policy and Procedures (MPP) Section 321, Driveway Design, and the Citywide Design Guidelines – Guideline 2. The Project has been found to be consistent with the GHG reduction targets forecasted in *Connect SoCal,* the SCAG RTP/SCS discussed in Section VIII, *Greenhouse Gas Emissions*. Additionally, the Project has been found to be consistent with the transportation-related elements of the Plan for a Healthy Los Angeles (Healthy LA), Vision Zero, the Mobility Hubs Reader's Guide, the City's Walkability Checklist, and the Mission Hills-Panorama City-North Hills Community Plan. Furthermore, the Project Applicant would comply with existing applicable City ordinances (e.g., the City's existing transportation demand management (TDM) Ordinance in LAMC Section 12.26.J) and other requirements pursuant to the LAMC. It is noted that the City's TDM Ordinance is currently being updated. Although not yet adopted, the Project Applicant would

comply with the terms of the proposed TDM Ordinance update, which is expected to be completed prior to the anticipated construction of the Project. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities (LLG 2022), and the impact would therefore be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant With Mitigation. Senate Bill 743 mandates that guidelines be amended to provide an alternative to LOS for evaluating transportation impacts. The amended *CEQA Guidelines*, specifically Section 15064.3, recommend the use of VMT for land use and transportation impact evaluation. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated *CEQA Guidelines* recommending use of VMT for evaluating transportation impacts as of July 1, 2020. The City of Los Angeles implemented the VMT metric on July 30, 2019, prior to the July 1, 2020 compliance date.

Per Section 2.3.3 of the City's TAG, a non-residential, non-office, non-retail project would have a potential VMT impact if it would generate work VMT per employee exceeding 15 percent below the existing work VMT per employee for the Area Planning Commission (APC) area in which the project is located. As the Project is located in the North Valley APC, the VMT impact criteria (i.e., 15 percent below the APC average) applicable to the Project is 15.0 Daily Work VMT per Employee (LLG 2022).

Based on the VMT Calculator (Version 1.3) results, the Proposed Project would generate a total of 1,144 daily vehicle trips. The estimated Daily Work VMT per Employee for the Project (with the considering of proposed bicycle parking) is 16.8 Daily Work VMT per Employee, which is greater than the North Valley APC significance threshold of 15.0 Daily Work VMT per Employee. Therefore, the Project would result in a significant Daily Work VMT per Employee impact prior to the consideration of potential mitigation measures.

Implementation of Mitigation Measures TRAF-1 and TRAF-2, which would 1) require promotions and marketing tools to educate employees about alternative transportation options and 2) implement a ride-share program would reduce the estimated daily vehicle trips to 1,088. In turn, the Project's Daily Work VMT per Employee would reduce to 14.6 Daily Work VMT per Employee, which is less than the North Valley APC significance threshold of 15.0 Daily Work VMT per Employee. Therefore, Mitigation Measures TRA-1 and TRA-2 would reduce VMT impacts to a less than significant level.

Mitigation Measures

TRAF-1. Alternative Transportation Options

The Project shall utilize promotional and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that employees can choose to read at their own leisure.

TRAF-2. Ride-Share Program

The Project shall proactively aim to increase employee vehicle occupancy by providing ride-share matching services, designating preferred parking for rideshare participants, designing adequate

passenger loading/unloading and waiting areas for rideshare vehicles, and providing a website or message board to connect riders and coordinate rides.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. As discussed in the Transportation Assessment, impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the project site, and may include safety, operational, or capacity impacts. No roads would be permanently closed as a result of construction or operation of the Proposed Project. The Project proposes to remove a portion of the existing shared driveway along the Project Site's Plummer Street frontage at the northwesterly portion of the Project Site (which currently provides access to the on-site single-family residence) and proposes a new driveway approximately 10 feet east of the Project Site's westerly frontage along Plummer Street. The Project would also remove the remaining driveways along the Project Site's Plummer Street frontage. Thus, the number of driveways along the Project Site's Plummer Street frontage will be reduced to one driveway. The new driveway would be located approximately 150 feet east of the Orion Avenue/Plummer Street intersection and would provide access to the on-site parking lot and drop-off/pick-up area. Furthermore, the driveway will be designed to meet City standards to ensure adequate maneuvering by vehicles entering and exiting the Project Site. The driveway would accommodate right-turn ingress and egress movements only (i.e., left-turn ingress and egress movements would not be permitted) and reduce potential vehicle conflicts with pedestrians and bicyclists (LLG 2022).

The Project would include a pathway connecting the Project Site to the existing sidewalk provided along the Project Site's Plummer Street frontage, and signalized crossings are provided within convenient walking distance to the Project Site along Plummer Street. The Project will also make improvements as required by BOE to the sidewalk along the Project Site's Plummer Street frontage, including at the Project Site access point, to enhance the pedestrian experience, enhance connections to and from the pedestrian destinations in the direct vicinity of the Project Site, and reduce the potential for vehicle/pedestrian conflicts at the proposed driveway. Furthermore, as the student drop-off/pickup area is internal to the Project Site, students will not have to utilize the public right-of-way to walk to and from the main school building (LLG 2022).

Furthermore, per the City's TAG, because the Project would not add 25 or more trips to nearby freeway off-ramps (e.g., I-405) serving the Project Site during either the a.m. or p.m. peak hour, a freeway safety analysis is not required (LLG 2022). The Proposed Project would not result in inadequate emergency access or introduce any design features or incompatible uses, such as sharp curves or dangerous intersections, that would substantially increase hazards. Impacts would be less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact. Implementation of the Project would increase traffic to and from the Project Site; however, the Project Site is surrounded by major roadways, including I-405, Plummer Street, Sepulveda Boulevard and Van Nuys Boulevard, which have sufficient capacity to provide access to and from the Project Site. The Proposed Project would not result in inadequate emergency access because it would be subject to the LAFD review and acceptance of site plans, and structures prior to occupancy to ensure that required fire protection safety features, including adequate driveway access to buildings and adequate emergency access are implemented. Impacts would be less than significant.

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XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resource Code [PRC] Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources as defined in PRC section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Proposed Project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation. As part of the Cultural Resources Assessment prepared for the Project (Appendix D), Rincon contacted the NAHC on May 2, 2022, to request a SLF search of the project site. The NAHC emailed a response on June 16, 2022, stating that the SLF search was "negative" for tribal heritage resources (indicating no known cultural resources were present on the project site).

Pursuant to PRC Section 21080.3.1, the City sent out consultation letters on September 20, 2022 to 10 Native American contacts and tribal groups with traditional and/or cultural affiliation with the geographic area in which the Project is located. In these letters, the City requested information on potential cultural resources in the Project Site vicinity that may be impacted by the Proposed Project's development. Of the 10 contacts and tribal groups, the City received one response, from the Gabrieleno Band of Mission Indians – Kizh Nation on September 27, 2022, requesting consultation; a consultation meeting was subsequently scheduled for November 8, 2022. On November 8, 2022, Brandy Salas, a representative of the Kizh Nation, contacted the City to inform that Chairman Andy Salas opted to defer consultation on the project to Chairwoman Donna Yocum of the San Fernando Band of Mission Indians. The scheduled consultation meeting with the Kizh Nation was subsequently cancelled. Chairwoman Yocum had been previously contacted by the City, in a letter sent on September 20, 2022, and did not provide a response. Furthermore, no other response was received from the remaining Native American contacts and tribal groups contacted by the City within the 30-day consultation period. Although the City did not receive a response from the San Fernando Band of Mission Indians within the consultation period, the City opted to contact with Chairwoman Yocum on November 8, 2022, again requesting information on potential cultural resources in the Project Site vicinity. Additional information associated with this follow-up will be included as part of the Final Initial Study/MND for the project.

In addition to the SLF search, the SCCIC record search results, background research, and a pedestrian field survey conducted as part of the Cultural Resources Assessment (Appendix D) did not indicate the presence of tribal cultural resources existing within the Project Site as specified in PRC Section 21074 (a)(1)(A) and (B). Despite the disturbances of the Project area that may have displaced or submerged archaeological resources relating to tribal cultural resources on the surface, intact archaeological resources, which may qualify as tribal cultural resources, may exist at depth given the proven prehistoric occupation of the region and the favorable natural conditions that would have attracted prehistoric inhabitants to the area. In the event such previously unknown archaeological resources are found, significant effects may occur to that resource if the resource is disturbed, destroyed, or otherwise improperly treated. As such,

Mitigation Measure TCR-1 would reduce potential impacts to tribal cultural resources to a less than significant level in the event of an unanticipated discovery of such resources.

Mitigation Measure

TCR-1. Unanticipated Discovery of Tribal Cultural Resources

In the event that tribal cultural resources of Native American origin are found during Project-related ground disturbance, excavation and other construction activity in that area shall cease. If the City of Los Angeles, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with State guidelines and in consultation with Native American groups. The mitigation plan may include but would not be limited to avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon means.

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XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) supplies water inside City limits. According to the City's 2020 Urban Water Management Plan (UWMP), the primary LADWP sources of water supplies are water purchased from the Metropolitan Water District (MWD), the Los Angeles Aqueducts (LAA), and local groundwater. Recycled water projects are progressing and expected to be a greater portion of LADWP water supply in the future. Overall, these sources of water provide the necessary water to meet LADWP's water supply needs. According to the 2020 UWMP, the City's average water demand between 2016 and 2020 was 495,685-acre feet per year (AFY) (LADWP 2021). The 2020 UWMP water demand projection for 2025 is approximately 642,600 AF under an average weather year assuming passive conservation efforts, which is an increase of approximately 146,915 AF (LADWP 2021).

The Proposed Project would demand an estimated 3.6 million gallons (13.3 AFY) of water according to CalEEMod estimations (Appendix A). Project water demand would represent less than 0.01 percent of the projected increase in water demand between 2020 and 2025. Furthermore, according to the 2020 UWMP, LADWP anticipates all demand will be met by available supplies under all hydrologic scenarios for the next 25 years (LADWP 2021). Nonetheless, the Proposed Project's projected water demand is within forecasted water supply required to for the service area and would not require the construction of new water supply facilities, or expansion of existing facilities. Impacts would be less than significant.

Wastewater

Less Than Significant Impact. The Los Angeles Bureau of Sanitation (LASAN) operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and business customers in a 600 square mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to treat an average of 580 million gallons per day (MGD) of wastewater. Of the four reclamation plants, the Donald C. Tillman Water Reclamation Plant treats approximately 55 MGD per day with a capacity of 80 MGD and serves the area between Chatsworth and Van Nuys in the San Fernando Valley (LASAN 2019).

The Project would continue to connect to the existing storm drain system operated and maintained by the City. The Proposed Project would create demand for an estimated 3.6 million gallons of water per year, or approximately 9,863 gallons per day, according to CalEEMod estimates (Appendix A). Conservatively assuming that 100 percent of this water would subsequently be treated as wastewater, 9,863 gallons per day (or 0.01 MGD) demanded by the Proposed Project represents approximately 0.04 percent of the remaining treatment capacity of 25 MGD of wastewater at the Tillman Water Reclamation Plant. Therefore, the Tillman Water Reclamation Plant would have adequate capacity to provide wastewater treatment for the Project and the Project would not require the construction of new or expanded wastewater conveyance or treatment facilities. Impacts would be less than significant.

Stormwater Drainage

Less Than Significant Impact. As discussed in Section IX, *Hydrology and Water Quality*, the Proposed Project would comply with current regulations pertaining to retention/detention of site runoff into storm drains and receiving waters, as well as LID requirements that would apply to the construction and operation (e.g., proposed catch basin) of the Proposed Project to further reduce storm water runoff. Compliance with these requirements would reduce potential impacts to local storm water drainage facilities to a less than significant level and no new conveyance infrastructure would be required.

Electric Power, Natural Gas, Telecommunications

Less Than Significant Impact. The Project Site is in an existing developed area of the City of Los Angeles, which has existing infrastructure for electric power, natural gas, and telecommunications services. The Proposed Project would involve construction of a two-story elementary school building, which is contingent upon the approval of the applicant's Conditional Use Permit. If approved, the subject site's zoning would be consistent with the proposed educational use (Section XI, *Land Use and Planning*). The proposed two-story elementary school building would not cause substantial unplanned population growth (Section XIV, *Population and Housing*), would not result in wasteful or inefficient use or energy (see Section XI, *Energy*), and would not require or result in the construction of new electric power, natural gas, or

telecommunication facilities or expansion of existing facilities. As such, although the Proposed Project would create an incremental increase in demand on these facilities, this impact would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As discussed under impact *a)* in this section, the LADWP supplies water inside City limits. As shown in Table 22, LADWP projects that water supplies will be sufficient to meet all demands through the year 2045 during normal, single dry year, and multiple dry year hydrologic conditions (LADWP 2021).

Table 22 Water Supply and Demand in Single and Multiple Dry Years (AF)

Year-Type	2025	2030	2035	2040	2045
Average Year					
Total Supplies	642,600	660,200	678,800	697,800	710,500
Total Demands	642,600	660,200	678,800	697,800	710,500
Single Dry Year					
Total Supplies	674,700	693,200	712,700	732,700	746,000
Total Demands	674,700	693,200	712,700	732,700	746,000
Multiple Dry Year (1st, 2nd, and 3rd Year Supply)					
Total Supplies	657,900	675,800	694,900	714,400	727,400
Total Demands	657,900	675,800	694,900	714,400	727,400

Units in acre-feet (AF)
Source: LADWP 2021

The Proposed Project would demand an estimated 3.6 million gallons (13.3 AFY) of water according to CalEEMod estimations (Appendix A). As discussed under impact a) of this section, project water demand would represent less than 0.01 percent of the projected increase in water demand between 2020 and 2025. Furthermore, according to the 2020 UWMP, LADWP anticipates all demand will be met by available supplies under all hydrologic scenarios for the next 25 years (LADWP 2021). Because sufficient water is available to serve the Project during average, single and multiple dry year conditions, new sources of water supply would be not required to meet Project water needs. Impact would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed under impact a) of this section, the Proposed Project would create demand for an estimated 3.6 million gallons of water per year, or approximately 9,863 gallons per day, according to CalEEMod estimates (Appendix A). Conservatively assuming that 100 percent of this water would subsequently be treated as wastewater, 9,863 gallons per day (or 0.01 MGD) demanded by the Proposed Project represents approximately 0.04 percent of the remaining treatment capacity of 25 MGD of wastewater at the Tillman Water Reclamation Plant. The Proposed Project would not require the construction of new treatment facilities because the Tillman Water Reclamation Plant would have adequate

capacity to treat the wastewater produced by the Proposed Project. Impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. LASAN manages solid waste collection in the City, which involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. Solid waste generated in the City is currently disposed of at the Sunshine Canyon Landfill. Table 23 summarizes the permitted daily throughput, estimated average waste quantities disposed, remaining capacity, and closure date for the landfill.

Table 23 Solid Waste Disposal Facilities

Facility	Permitted Daily Throughput (tons/day)	Average Daily Waste Quantities Disposed (tons/day)	Estimated Remaining Daily Capacity (tons/day)[1]	Estimated Closure Date
Sunshine Canyon Landfill	12,100	6,469	5,631	2037

[1] Estimated remaining daily capacity was calculated by subtracting the average daily waste quantities disposed from the permitted daily throughput.

Sources: CalRecycle 2019

The Proposed Project has two components (construction and operation) that would result in the generation of solid waste. The handling of all debris and waste generated during construction would be subject to the State's requirements under AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project Site. Construction of the Proposed Project would also involve site preparation activities that would generate waste materials; however, construction would be temporary. In addition, the Proposed Project would be required to comply with the City's Construction and Demolition (C&D) Waste Recycling Ordinance. All construction and demolition waste generated by the Proposed Project would be required to be taken to a certified C&D waste processor.

According to CalEEMod, operation of the Proposed Project would generate 0.1 tons of waste per day (Appendix A). This estimate is conservative since it does not factor in any recycling or waste diversion programs. The 0.1 tons generated by the Project would result in less than 0.01 percent of the estimated remaining daily capacity of 5,631 tons of waste per day at Sunshine Canyon Landfill. Furthermore, the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, such as AB 939. As there is adequate remaining daily landfill capacity in the region to accommodate project-generated waste, impacts related to solid waste and waste facilities would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. As discusses under impact d), the handling of all debris and waste generated during construction would be subject to the State's requirements under AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project Site. Construction of the Proposed Project would also involve site preparation activities that would generate waste materials; however, construction would be

temporary. In addition, the Proposed Project would be required to comply with the City's C&D Waste Recycling Ordinance. All construction and demolition waste generated by the Proposed Project would be required to be taken to a certified C&D waste processor. Impacts would be less than significant.

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XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. A FHSZ is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard (i.e., moderate, high, and very high). While FHSZs do not predict when or where a wildfire will occur, they do identify areas where wildfire hazards could be more severe and therefore are of greater concern. FHSZs are meant to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk. The FHSZs serve several purposes: they are used to designate areas where California's wildland urban interface building codes apply to new buildings, they can be a factor in real estate disclosure, and they can help local governments consider fire hazard severity in the safety elements of their general plans.

The Project Site is in an urban area of the City of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Site. According to the California FHSZ Viewer, the Project Site is not located in a FHSZ or VHFHSZ for wildland fires (CALFIRE 2022). The nearest VHFHSZ is located approximately four miles northwest of the Project Site on the opposite side of I-405 and SR-118. Therefore, the Project Site is not located near a VHFHSZ, state responsibility area nor is the site classified as having a high fire hazard.

As discussed above, the LAFD provides fire protection and emergency response for the Project Site and greater Los Angeles area. The LAFD also provides several other services to the City, including Fire Life Safety Plan Checks and Fire Life Safety Inspections which aim to enforce applicable standards of the Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling. Furthermore, the Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement. Through site plan review,

construction of the Proposed Project would maintain adequate emergency access to the site and would not interfere with an emergency response plan or evacuation route. No impact would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site and the surrounding area are relatively flat and located within an urban area of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Site. Undeveloped wildland areas, streams, or rivers are not located on or adjacent to the Project Site, and the Project Site and surrounding areas are not at high risk to frequent high windspeeds, downslopes, downstream flooding, or landslides that may exacerbate wildfire risk. Residents and visitors of the Project Site would not be exposed to exacerbated wildfire risks or associated pollutant concentrations and uncontrolled spreads from such wildfires. No impact would occur.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is in an urban area of the City of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Site. According to the California FHSZ Viewer, the Project Site is not located in a FHSZ or VHFHSZ for wildland fires (CALFIRE 2022). As previously mentioned, undeveloped wildland areas, streams, or rivers are not located on or adjacent to the Project Site, and the Project Site and surrounding areas are not at high risk to high windspeeds, downslopes, downstream flooding, or landslides that may exacerbate wildfire risk. Furthermore, as discussed in Section XIX, *Utilities and Service Systems,* the Project would not require the installation or expansion of any utilities that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. . No impact would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is in an urban area of the City of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Site. According to the California FHSZ Viewer, the Project Site is not located in a FHSZ or VHFHSZ for wildland fires (CALFIRE 2022). The Project would be served by existing infrastructure, including roads and utilities. Therefore, the Proposed Project would not require additional roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk and temporary or ongoing impacts to the environment would not occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. As discussed in Section IV, *Biological Resources*, the Project area does not include any mapped essential habitat connectivity areas in the immediate vicinity of the Project Site. In addition, regional wildlife movement is restricted given the built-out nature of the Project area surroundings, and no native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites exist on the Project Site. However, construction of the Project has the potential to directly (by destroying a nest) or indirectly (construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. However, as discussed in Section IV, *Biological Resources*, the Proposed Project includes Mitigation Measure BIO-1 that would require the Project Site to be surveyed if construction occurs during the nesting bird season (generally February 1 to August 31). If active nests are identified, construction buffers would be implemented to reduce proximity to nests and minimize impacts to nesting birds. Therefore, with implementation of the Mitigation Measure BIO-1, potential impacts would be less than significant. Furthermore, as discussed in Section V, *Cultural Resources*, Section VII, *Geology and Soils*, and Section XVIII, *Tribal Cultural Resources*, the Proposed Project would have a less than significant impact on unanticipated cultural resources, paleontological resources, and tribal cultural resources with implementation of Mitigation Measures CUL-1, CUL-2, GEO-2, and TCR-1, which would require adherence to existing local, State and federal regulations and specific monitoring

procedures related to the discovery of any unanticipated cultural resources, paleontological resources, and tribal cultural resources. Furthermore, in the event human remains are found on-site during Project construction, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. Therefore, with compliance with existing regulations, impacts to humans remains would also be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. As concluded in Sections I through XX of this document, the Project would have no impact, a less than significant impact, or a less than significant impact with mitigation with respect to all environmental issues considered in this document. Cumulative impacts of several resource areas have been addressed in the individual resource sections, including air quality, GHG, noise, and transportation. As discussed in the analysis herein, the Proposed Project would result in less than significant impacts with respect to air quality and GHG emissions. Therefore, the Project would not contribute to cumulative impacts related to these issues. Both the noise and traffic analyses (see Sections XIII and XVII, respectively) consider cumulative increases in traffic under Existing plus Project conditions and conclude that impacts would be less than significant with respect to noise and less than significant with mitigation with respect to traffic. Some of the other resource areas (agricultural and mineral) were determined to have no impact in comparison to existing conditions. As such, the Project would not contribute to cumulative impacts related to these types of issues. Other location specific impacts (e.g., geology, hazards, and hazardous materials) are by their nature specific to the area and impacts at one location do not add to impacts at other locations or create additive impacts. As such, cumulative impacts would be less than significant (not cumulatively considerable).

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. In general, impacts to human beings are associated with air quality, GHG emissions, hazards and hazardous materials, and noise impacts. As detailed in analyses for air quality, GHG emissions, hazards and hazardous materials, and noise, the Proposed Project would not result, either directly or indirectly, in adverse hazards related to air quality, hazardous materials or noise. Compliance with applicable rules, regulations, and recommended mitigation measures reduce potential impacts on human beings to a less than significant level.

5 PREPARERS AND PERSONS CONSULTED

Rincon Consultants, Inc.

Deanna Hansen, Principal-In-Charge
Vanessa Villanueva, Project Manager/Senior Environmental Planner
Josh Carman, Director – Noise, Air Quality & GHG
Shannon Carmack, Principal – Architectural History
Nichole Jordan, Principal – Cultural Resources
Steven Treffers, Supervising Archaeologist
Bill Vosti, Senior Environmental Planner
Heather Dubois, Senior Environmental Planner
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Rachel Perzel, Senior Archaeologist
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David S. Shender, P.E., Principal
Amrita Shankar, Transportation Engineer

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6 REFERENCES, ACRONYMS AND ABBREVIATIONS

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EXHIBIT C

Maps

Vicinity Map
Radius Map
Zoning Map

15526 and 15544 Plummer Street
Vicinity Map



CONDITIONAL USE - SITE PLAN REVIEW - EAF

QMS Quality Mapping Service

14549 Archwood St. Suite 301
Van Nuys, California 91405
Phone (818) 997-7949 - Fax (818) 997-0351
qmapping@qesqms.com

THOMAS BROTHERS
Page: 501 **Grid:** G-6

LEGAL
LOT: POR LOT 39 (ARBS 2 & 3)
TRACT: SEC. 20,T2N,R15W
SUBDIVISION NO 1
OF THE PORTER
LAND & WATER CO
M.R. 31-3-6
" SEE APPLICATIONS"

CONTACT: SAUCEDO GROUP **PHONE:** 323-243-4556

ASSESSOR PARCEL NUMBER: 2656-015-(007-008)

SITE ADDRESS: 15526-15544 PLUMMER ST

CD: 7

CT: 1172.01

PA: MISSION HILLS
PANORAMA CITY
NORTH HILLS

USES: FIELD/RECORD

CASE NO:

SCALE: 1" = 100'

D.M.: 198B145,198B141
201B145, 201B141

NORTH

DATE: 08-09-2022
Update:

NET AC: 2.058 +/-

QMS: 22-165

ZIMAS PUBLIC

Generalized Zoning

11/29/2021

City of Los Angeles
Department of City Planning



Address: 15526 W PLUMMER ST

APN: 2656015008

PIN #: 198B145 52

Tract: SUBDIVISION NO. 1 OF THE PROPERTY OF THE PORTER LAND AND WATER COMPANY

Block: None

Lot: FR 39 SEC 20 T2N R15W

Arb: 3

Zoning: (T)(Q)RE9-1

General Plan: Low Residential

N W E S

EXHIBIT D

Agency Reports

BOARD OF PUBLIC WORKS
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BUREAU OF
ENGINEERING

TED ALLEN, PE
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

http://eng.lacity.org

September 27, 2022

Bright Star Schools
Attn: Elijah Sugay
600 S. La Fayette Park Place, Suite 302
Los Angeles, CA 90057

Dear Applicant:

Recently, you filed for **CPC 2022-5865 (CU/SPR)** with the City Planning Department for the property located at 15526 W. Plummer Street. Please be advised that **LAMC Section 61.16** requires the City Engineer to collect a fee before processing a report to the City Planning Department. The report will provide the specific requirements of the Bureau of Engineering for this project. The total amount owed for this application (including surcharges of 3% and 7%) is currently **$7,931.00** payable to the City of Los Angeles. Delays in payment may result in changes to amount owed should the fees be increased. The fee may be paid online or by mail.

We will send you an electronic invoice payment link by a separate email. The processing of this application by the Bureau of Engineering will continue upon receipt of the fee.

To pay by mail:

Permit Case Management Division
201 N. Figueroa Street, Suite 290
Los Angeles, CA 90012-2625
Attn: Public Counter

If you have any questions, please contact Quyen Phan through the Bureau of Engineering Customer Portal and request for service in the Customer Service Request box at https://engpermits.lacity.org. Thank you.

Sincerely,

Quyen Phan (for)

Bertram Moklebust, Principal Civil Engineer
Permit Case Management Division
Bureau of Engineering

Recyclable and made from recycled waste.

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: 9/6/2022

To: Charlie Rausch, Senior City Planner
Department of City Planning
200 N. Spring St., 6th Floor MS-395

From: Gil De La Cruz, P.E.
Case Management Supervisor
Private Development Division
Bureau of Street Lighting

SUBJECT: STREET LIGHTING REQUIREMENTS FOR DISCRETIONARY ACTIONS

CITY PLANNING CASE No.: CPC 2022-5865 CU SPR
15526 & 15544 W PLUMMER ST 91343

The Bureau of Street Lighting's recommended condition of approval for the subject city planning case is as follows: (Improvement condition added to S-3 (c) where applicable.)

IMPROVEMENT CONDITION: No street lighting improvements if no street widening per BOE improvement conditions. Otherwise, relocate and upgrade street lights: two (2) on Plummer St.

NOTES:

The quantity of street lights identified may be modified slightly during the plan check process based on illumination calculations and equipment selection.

Conditions set: 1) in compliance with a Specific Plan, 2) by LADOT, or 3) by other legal instrument excluding the Bureau of Engineering conditions, requiring an improvement that will change the geometrics of the public roadway or driveway apron may require additional or the reconstruction of street lighting improvements as part of that condition.

CC: Land Development Group MS 901
Engineering District Office: CEN

Esther Ahn <esther.ahn@lacity.org>

Technical Data Request: Proposed Valor Elementary School Project (Case Number: ENV-2022-5866-MND)

9 messages

Evelyn Aguilar <eaguilar@aqmd.gov> Tue, Dec 6, 2022 at 12:12 PM
To: "ESTHER.AHN@LACITY.ORG" <ESTHER.AHN@lacity.org>
Cc: Sam Wang <swang1@aqmd.gov>

Dear Esther Ahn,

South Coast AQMD staff received the Notice of Intent to Adopt a Mitigated Negative Declaration (NOI/MND) for the Proposed **Valor Elementary School Project (Case Number: ENV-2022-5866-MND)** (South Coast AQMD Control Number: LAC221201-06). Staff is currently in the process of reviewing the NOI/MND. The public commenting period is from 11/24/2022 – 12/14/2022.

Upon review of the files provided as part of the public review period, I was able to access the NOI/MND and Appendices on the City's website.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources;
- AERMOD Input and Output files, including AERMOD View file(s) (.isc);
- HARP Input and Output files and/or cancer risk calculation files (live version of excel file(s); no PDF) used to calculate cancer risk, and chronic and acute hazards from the Project;
- Any other files related to post-processing done outside of AERMOD to calculate pollutant-specific concentrations (if applicable).

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by **12/13/22**. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

Thank you,

Evelyn Aguilar

Air Quality Specialist, CEQA-IGR

Planning, Rule Development & Implementation

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765

Phone: 909-396-3148

E-mail: eaguilar@aqmd.gov

Hours of operation:

Tuesday - Friday 7:00 AM to 5:30 PM

South Coast AQMD

Cleaning the air that we breathe……™

Esther Ahn <esther.ahn@lacity.org> Tue, Dec 6, 2022 at 4:02 PM
To: Evelyn Aguilar <eaguilar@aqmd.gov>
Cc: Sam Wang <swang1@aqmd.gov>

Good afternoon,

Thank you for your comments. I am confirming receipt of your email and am working to respond to your request.

I will try my best to get you a thorough response by 12/13 and will keep you updated if there is any delay.

Please also let me know if there are any updates on your end in the meantime.

Best,
Esther
[Quoted text hidden]
--

LOS ANGELES CITY PLANNING

Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
T: (213) 978-1486 | Planning4LA.org
E-NEWS

Evelyn Aguilar <eaguilar@aqmd.gov> Tue, Dec 6, 2022 at 4:08 PM
To: Esther Ahn <esther.ahn@lacity.org>
Cc: Sam Wang <swang1@aqmd.gov>

Good afternoon, Esther,

Thank you for the confirmation e-mail, much appreciated.

Sincerely,

Evelyn Aguilar

Air Quality Specialist, CEQA-IGR

Phone: 909-396-3148

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Esther Ahn <esther.ahn@lacity.org> Thu, Dec 8, 2022 at 3:47 PM
To: Evelyn Aguilar <eaguilar@aqmd.gov>
Cc: Sam Wang <swang1@aqmd.gov>

Good afternoon,

Please see requested data for the subject MND at this link: https://rinconconsultants.exavault.com/share/view/39n1v-f2duildj

Also, I just wanted to note that I plan on keeping the public comment review period open longer (at least until the end of the month) in case you require some additional time to review the documents.

Many thanks,
Esther

[Quoted text hidden]

Evelyn Aguilar <eaguilar@aqmd.gov> Thu, Dec 8, 2022 at 4:09 PM
To: Esther Ahn <esther.ahn@lacity.org>
Cc: Sam Wang <swang1@aqmd.gov>

Good afternoon, Esther,

Thank you for the data files. I am able to access them.

Thank you as well for letting me know that the comment period may be extended. Would you be able to provide a copy/link to the extended comment period deadline once it is available?

Best,

[Quoted text hidden]

Esther Ahn <esther.ahn@lacity.org> Thu, Dec 8, 2022 at 5:02 PM
To: Evelyn Aguilar <eaguilar@aqmd.gov>
Cc: Sam Wang <swang1@aqmd.gov>

Hi Evelyn,

No problem. The initial hearing for this project will be occurring in 2 weeks, so I will have a better sense then of how much additional time would be needed.

I just ask that your review be completed some time before the end of January because of the strict timelines the project needs to meet as a proposed school.

Please feel free to share your response at your convenience, and I will let you know if there is a final deadline later this month.

Many thanks again,
Esther
[Quoted text hidden]

Evelyn Aguilar <eaguilar@aqmd.gov> Thu, Dec 8, 2022 at 5:05 PM
To: Esther Ahn <esther.ahn@lacity.org>
Cc: Sam Wang <swang1@aqmd.gov>

Hi Esther,

Okay, sounds good. Thank you for the additional information.

May you have a good evening,

[Quoted text hidden]

Esther Ahn <esther.ahn@lacity.org> Mon, Dec 19, 2022 at 2:07 PM
To: Evelyn Aguilar <eaguilar@aqmd.gov>
Cc: Sam Wang <swang1@aqmd.gov>

Good afternoon all,

I just wanted to check in on the status of this project and with your agency's review of the subject MND.

A tentative date for the project to go before the City Planning Commission has been scheduled for late February.

While I'm unable to extend the public review period for much longer (this project is an Expedited case), the case file will remain open until mid-February so any comments you have will be considered as part of the project by the decision maker (the City Planning Commission).

The project Applicant is eager to cooperate with any further inquiries or requests your agency may have, so please do not hesitate to reach out.

Many thanks,
Esther
[Quoted text hidden]

Evelyn Aguilar <eaguilar@aqmd.gov> Wed, Dec 21, 2022 at 9:49 AM
To: Esther Ahn <esther.ahn@lacity.org>
Cc: Sam Wang <swang1@aqmd.gov>

Good morning, Esther,

Thank you for letting us know the case file will remain open until mid-February and that the public review period will soon close. We will not be commenting on the Project at this time.

If we do have comments on the Valor Elementary School Project before mid-February, we will reach out.

Thank you and happy holidays,

[Quoted text hidden]

CITY OF LOS ANGELES

INTER-DEPARTMENTAL MEMORANDUM

15526 W Plummer St.
LADOT Project ID No. 54247

Date: September 14, 2022

To: Deputy Advisory Agency
Department of City Planning

From: Sheila Ahoraian, Transportation Engineering Associate II
Department of Transportation

Subject: **CASE NO: CPC-2022-5865-CU-SPR**
ENV-2022-5866-EAF

Reference is made to your request for review of this case regarding potential traffic access problems. Based upon this review, it is recommended that:

1. A minimum 20-foot reservoir space is required between any security gate or parking space and the property line, or to the satisfaction of LADOT.

2. A two-way driveway width of W=28 feet is required for all driveways, or to the satisfaction of LADOT.

3. A parking area and driveway plan should be submitted to the Citywide Planning Coordination Section of the Los Angeles Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Transportation approvals are conducted at 6262 Van Nuys Blvd., Room 320, Van Nuys, CA 91401.

4. The subdivision report fee and condition clearance fee be paid to the Los Angeles Department of Transportation as required per Ordinance No. 183270 and LAMC Section 19.15 prior to recordation of the final map. Note: The applicant may be required to comply with any other applicable fees per this new ordinance.

If you have any questions, you may contact me at sheila.ahoraian@lacity.org or 818-374-4699.

+FORM. GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

September 19, 2022

TO: Vincent Bertoni, AICP, Director of Planning
Department of City Planning
Attention: planning.expedited@lacity.org

FROM: Los Angeles Fire Department

SUBJECT: **CPC-2022-5865-CU.: 15526 Plummer**

Submit plot plans for Fire Department approval and review prior to recordation of City Planning Case.

RECOMMENDATIONS:

Access for Fire Department apparatus and personnel to and into all structures shall be required.

Address identification. New and existing buildings shall have approved building identification placed in a position that is plainly legible and visible from the street or road fronting the property.

One or more Knox Boxes will be required to be installed for LAFD access to project. Location and number to be determined by LAFD Field Inspector. (Refer to FPB Req # 75).

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Fire Lane Requirements:

1) Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
2) The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
3) Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
4) Submit plot plans indicating access road and turning area for Fire Department approval.
5) All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
6) Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.
7) Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
8) All public street and fire lane cul-de-sacs shall have the curbs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.
9) No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

Construction of public or private roadway in the proposed development shall not exceed 10 percent in grade.

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

Smoke Vents may be required where roof access is not possible; location and number of vents to be determined at Plan Review.

Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Site plans shall include all overhead utility lines adjacent to the site.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

On small lot subdivisions, any lots used for access purposes shall be recorded on the final map as a “Fire Lane”.

Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan S-470-0.

Standard cut-corners will be used on all turns.

FPB #105
5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

A. The establishment of a property owners association, which shall cause a yearly inspection to be, made by a registered civil engineer of all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.

B. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed or their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as the Advisory Agency must approve required hereinabove in writing after consultation with the Fire Department.

C. In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.

D. Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.

E. That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.

The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.

Provide Fire Department pathway front to rear with access to each roof deck via gate or pony wall less than 36 inches.

Any required Fire Annunciator panel or Fire Control Room shall be located within 20ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished **BY APPOINTMENT ONLY**, in order to assure that you receive service with a minimum amount of waiting please call **(213) 482-6543**. You should advise any consultant representing you of this requirement as well.

Kristin M. Crowley
Fire Chief

Orin Saunders, Fire Marshal
Bureau of Fire Prevention and Public Safety

OS:MRC:mrc

CPC-2022-5865-CU.: 15526 Plummer

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: October 6, 2022

TO: Heather Bleemers, Senior City Planner
Department of City Planning

FROM: Bryan Ramirez, Street Tree Superintendent I
Bureau of Street Services, Urban Forestry Division

SUBJECT: **CPC-2022-5865-CU-SPR – 15526 W. PLUMMER ST.**

In regard to your request for review of this case regarding Urban Forestry requirements, it is our recommendation that:

1. **NATIVE PROTECTED TREES**

   a. All tree and shrub preservation measures shall be considered to retain all protected native species whenever possible. Project should include feasible alternatives in project design to retain native trees and shrubs. A permit is required for the removal of any native protected tree and shrub. Removal of any on site native tree or shrub shall be replaced in kind at a 4:1 ratio as approved by the Board of Public Works and Urban Forestry Division. The tree replacement plan shall include all retained native trees and shrubs. All on-site tree and shrub replacements shall be planted in locations favorable to the long term survival of the species.

   b. The applicant shall submit a Protected Tree Report with an acceptable tree and shrub replacement plan prepared by a reputable Tree Expert, as required by Ordinance No. 186,873 for approval by the Advisory Agency and the Bureau of Street Services, Urban Forestry Division. The Protected Tree Report (PTR) shall contain the Tree Expert's recommendations for the preservation of as many protected trees as possible and shall provide their species, health, size, and condition. The PTR shall include a topographical map (construction drawing) identifying tree and shrub location, drip line, and correctly numbered and plotted.

Note: Removal of Native Protected trees and shrubs requires approval from the Board of Public Works. All projects must have environmental (CEQA) documents that appropriately address any removal and replacement of native protected trees and shrubs. Contact Urban Forestry Division at: (213) 847-3077 for tree removal permit information.

2. STREET TREES

a. Project shall preserve all healthy mature street trees whenever possible. All feasible alternatives in project design should be considered and implemented to retain healthy mature street trees. A permit is required for the removal of any street tree and shall be replaced 2:1 as approved by the Board of Public Works and Urban Forestry Division.

b. Plant street trees at all feasible planting locations within dedicated streets as directed and required by the Bureau of Street Services, Urban Forestry Division. All tree plantings shall be installed to current tree planting standards when the City has previously been paid for tree plantings. The sub divider or contractor shall notify the Urban Forestry Division at: (213) 847-3077 upon completion of construction for tree planting direction and instructions.

Note: Removal of street trees requires approval from the Board of Public Works. All projects must have environmental (CEQA) documents that appropriately address any removal and replacement of street trees. Contact Urban Forestry Division at: (213) 847-3077 for tree removal permit information.

BR:djm

EXHIBIT E

Public Comments

Rincon Consultants, Inc.

250 East 1st Street, Suite 1400
Los Angeles, California 90012

213 788 4842
FAX 908 2200

info@rinconconsultants.com
www.rinconconsultants.com

February 9, 2023
Project No. 22-12694

Elijah Sugay
Vice President, Finance & Facilities
Bright Star Schools
600 South La Fayette Park Place, Suite 302
Los Angeles, California 90057

Subject: **Valor Elementary School Project Final IS-MND (ENV-2022-5866-MND), Responses to CREED LA Comment Letter Dated December 14, 2022**

Dear Mr. Sugay:

Rincon Consultants, Inc. (Rincon) has prepared responses to the comment letter provided by Kevin Carmichael of Adams Broadwell Joseph & Cardozo law firm on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA). The comment letter was received by the City on December 14, 2022 in relation to the 20-day public review period for the Valor Elementary School Project Mitigated Negative Declaration (MND), which began November 23, 2022 and ended December 13, 2022.

Each separate issue raised by the commenter in their letter has been bracketed and assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue. Response 1, for example, indicates that the response is for the first issue raised in the comment Letter. CREED LA's comment letter is included as Attachment 1 to this document. Due to the length of attachments to CREED LA's original letter, only the main body of their letter has been attached.

Responses to Comments

Response 1

The commenter notes that comments are submitted on behalf of CREED LA for the project MND and provides a description of the project. The commenter states that, based upon their review of the MND, the MND fails to disclose the extent of the project's potentially significant impacts on air quality, public health, hazards, public services, and noise, requiring preparation and circulation of an Environmental Impact Report (EIR). The commenter notes that comments from an environmental health, air quality, and greenhouse gas (GHG) expert and noise expert are attached to their letter for the City's reference and requests that the City respond to them as well.

According to Public Resources Code Section 21092.5 and California Environmental Quality Act (CEQA) Guidelines Section 15073(e), written responses to comments on a MND is not required by CEQA; however, responses may be provided at the discretion of the Lead Agency. The commenter does not yet provide specifics regarding how they believe that the MND fails to disclose potentially significant impacts related to air quality, public health, hazards, public services, and noise necessitating preparation

of an EIR. At the discretion of the Lead Agency, the commenter's key concerns issued in the main body of their letter are addressed under Responses 4 through 10.

Response 2

The commenter states that CREED LA is an association of individuals that live in the City of Los Angeles and labor organizations, including Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California. The commenter states that CREED LA supports the development of commercial, mixed use, and educational projects carefully planned to minimize impacts on public health, climate change, and the environment.

The commenter's description of CREED LA as an association of individuals and labor organizations is noted. The commenter does not yet provide specific concerns regarding the impacts disclosed in the MND. The commenter's key concerns are addressed under Responses 4 through 10.

Response 3

The commenter provides a description of the purpose of CEQA as a tool that fosters informed decision-making and states that CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an EIR "except in certain limited circumstances". The commenter states that an MND is inadequate whenever substantial evidence in the record supports a "fair argument" that significant impacts may occur, even with mitigation measures.

The commenter has not accurately stated the "fair argument" standard or when the preparation of an EIR, rather than an MND, is required by CEQA. To clarify the circumstances in which an MND is prepared under CEQA, as outlined in CEQA Guidelines Sections 15064, 15070 and 15369.5, a Mitigated Negative Declaration is prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed MND and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole of the record before the Lead Agency that the project, as revised, may have a significant effect on the environment.

With respect to the proposed project, mitigation measures have been identified for potentially significant impacts disclosed in the MND based on substantial evidence, including all investigations and associated project modeling in the Air Quality and Greenhouse Gas Study, Health Risk Assessment, Arborist Report, Cultural Resources Assessment Report, Phase I and Phase II Environmental Site Assessment (ESA), Asbestos Survey, Noise and Vibration Study, and Transportation Assessment. The analysis in the MND determined that identified mitigation measures would reduce potentially significant impacts to a less-than-significant level. The commenter does not yet provide specific concerns regarding the impacts disclosed in the MND. The commenter's key concerns are addressed under Responses 4 through 10.

Response 4

The commenter states that substantial evidence supports the argument that the project may result in significant unmitigable health risk impacts and adds that the City lacks substantial evidence to rely on an MND. The commenter's specific concerns related to this topic are summarized and addressed under Responses 4.1 through 4.3.

Response 4.1

The commenter acknowledges that a Phase I ESA and Phase II ESA were prepared for the project but adds that the City failed to conduct a Preliminary Endangerment Assessment (PEA) per the California Education Code. The commenter states that the California Education Code outlines a three-step process in assessing whether there has been a release of hazardous waste at a school site, in which Step 2 requires consultation with the Department of Toxic Substances Control (DTSC). The commenter states that the City failed to consult with DTSC in violation of the California Education Code and therefore must retract the MND to prepare a PEA for the project.

According to Section 47610 of the California Education Code, a charter school shall comply with Part 26.8 (Charter Schools) of the California Education Code and all provisions in its charter but is otherwise exempt from the laws governing school districts. As a privately funded charter school, the project is therefore exempt from Section 17213.1(a) of the California Education Code relied upon by the commenter. DTSC review in this case is optional. Nonetheless, Section IX, *Hazards and Hazardous Materials,* of the MND documents the findings of the Phase I ESA, Phase II ESA, and Asbestos Survey.

As discussed in the Phase I ESA Report (Appendix F to the MND), the historical land uses of the site include previous agricultural uses and currently contains residential uses (i.e., single-family home). Furthermore, records indicate that the site included unapproved/non-permitted auto storage/repairing activities, which typically utilize petroleum products and other hazardous substances. The Phase I ESA recommended additional shallow soil sampling to further assess the identified Recognized Environmental Conditions (REC) associated with the site, which were documented as part of the Phase II ESA. According to the Phase II ESA Report, and based on the results of soil samplings, no concentrations of Title 22 metals, organochlorine pesticides (OCP), total petroleum hydrocarbons (TPH), and volatile organic compounds (VOC) in the soil were found above their respective regulatory agency health-risk based careening levels and no further action was determined with respect to the previously identified REC. The Phase I ESA also noted the potential presence of an underground septic tank based on an interview with the current Site tenant; however, the location of the tank is unknown. The Phase I ESA concluded that, based on the presumed domestic sewer usage of the septic tank, it is not considered a REC. Nonetheless, the septic tank, if present on-site, could be encountered during project construction and grading activities. Therefore, Mitigation Measure HAZ-1 (Septic Tank Removal) identified in the MND would reduce potential impacts related to the potential encounter and removal of an on-site septic tank to a less than significant level. Furthermore, the Asbestos Survey Report concluded that, based on sampling of exterior materials associated with the on-site single-family residence, samples of black penetration mastic located at the northeast portion of the roof was identified to have asbestos-containing materials (ACMs). These materials could pose hazardous to the environment during the construction stage of the project, particularly with adaptive reuse of the residence. Therefore, implementation of Mitigation Measure HAZ-2 (Asbestos-Containing Materials) identified in the MND would reduce impacts related to removal of ACMs to a less than significant level. The project would not result in a significant unmitigable impact associated with hazards and hazardous materials.

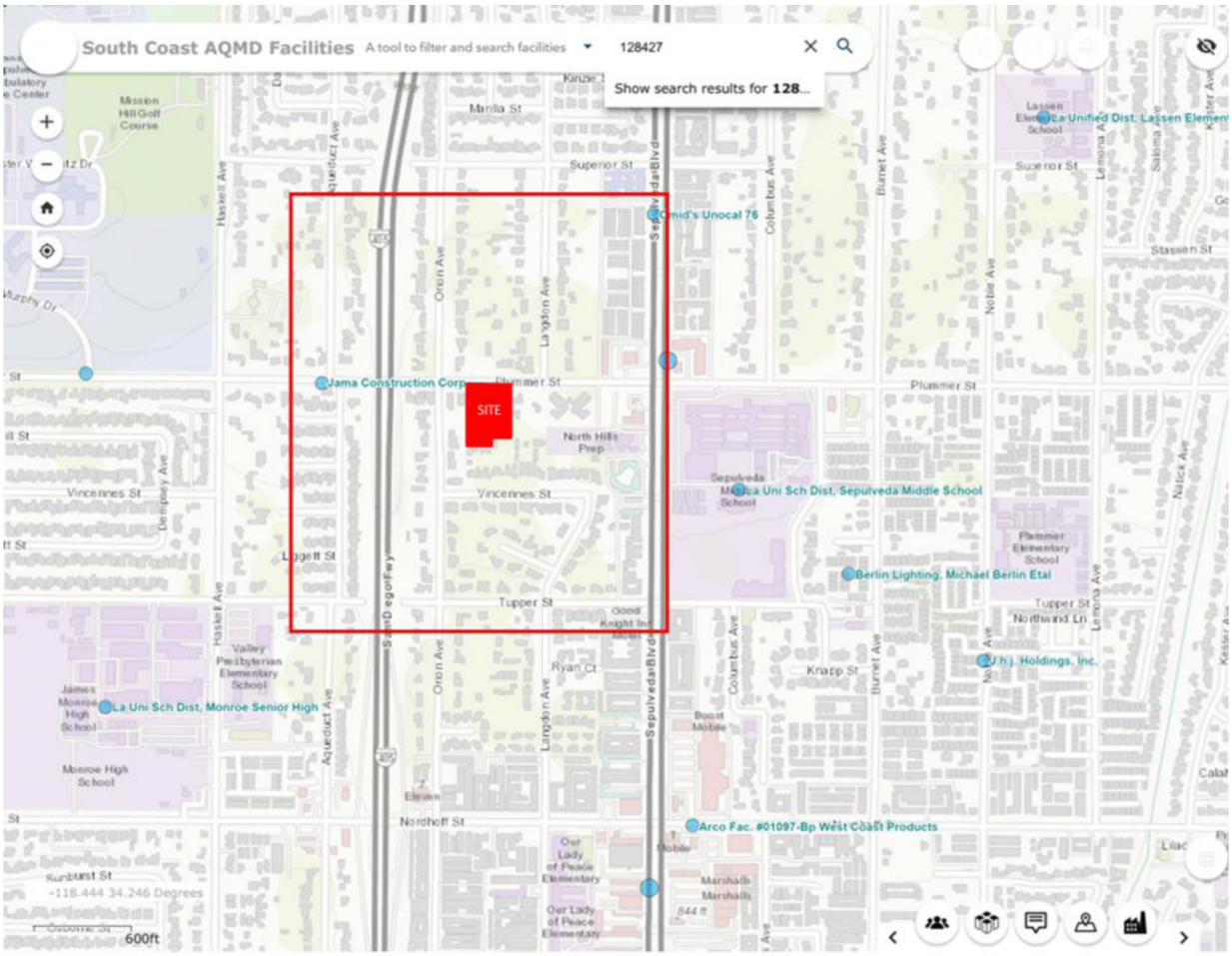
Response 4.2

The commenter states that the MND fails to disclose the potential health impacts of placing schoolchildren next to existing sources of pollution that emit toxic air contaminants (TAC), diesel exhaust, and particulate matter (PM) permitted by the South Coast Air Quality Management District (SCAQMD). The commenter refers to the SCAQMD's Facility Information Detail (FIND) database which

identified six different permitted sites within a 0.5-mile radius from the site. The commenter concludes that the MND ignores these sources and fails as an informational document.

The commenter identifies six permitted facilities within a 0.5-mile radius of the project site. SCAQMD's FIND database identifies facilities that have permitted operations, notices of violation, emissions inventories, transportation plans, and Rule 22 registrations/approvals. Not all of these fall under categories that will emit TACs or present a potential health risk to on-site students and staff. In addition, the California Air Resources Board (CARB) has an Air Quality and Land Use Handbook (Handbook) that provides recommendations on siting new sensitive land uses near sources of TACs, including those identified in the FIND database. CARB's Handbooks recommends a distance of 1,000 feet between identified pollutant-emitting land uses and sensitive receptors such as the proposed school. Therefore, this discussion includes only those facilities identified within 1,000 feet of the project site. The FIND database shows three facilities within 1,000 feet of the project site, shown in the following figure.

FINDs Database Results Within 1,000 Feet of the Site



As discussed herein, none of these facilities poses a potential impact risk to students and staff at the proposed project site:

- **Facility ID: 62563** – JAMA Construction (15700 Plummer Street) – The FIND information shows an application for VOC contaminated soil handling based on Rule 1166 from 1988. However, the site is approximately 800 feet from the site and the application was canceled. There is no active work onsite and no active permit for VOC handling. Therefore, this site results in no potential impacts to the project site.
- **Facility ID: 128427** – Carl's Jr. (9505 Sepulveda Boulevard) – The facility has an active permit to operate a Natural Gas Charbroiler. This facility is located approximately 700 feet from the project site. Given the active permit to operate, and the fact that this is not a source of DPM or PM, and the distance from the site, this facility would present no significant impact to site.
- **Facility ID 92991** – Omid's Unocal 76 (addressed as 88300 Sepulveda Boulevard, Sepulveda California however address is not locatable) – Reported as an "Oil/Gas Field" Services facility but has no active permits, equipment, emissions, or compliance issues. The mapped location in the FIND database is a residential development area. CARB's Handbook recommends a 300-foot separation between land uses and large gas stations of 3.6 million gallons or greater. There are no gasoline stations (Unocal 76 or other) within 300 feet of the project site. Therefore, this facility would not be a potential risk to the students on-site.

Response 4.3

The commenter states that the MND omits an analysis of several sources of pollution and that the project's health risk impacts must be accurately disclosed, analyzed, and mitigated in an EIR. The commenter states that the input files for the Health Risk Assessment (HRA) were not originally included in the attachments to the HRA and adds that the same input parameters used in the HRA resulted in concentrations of TACs at the site from Interstate 405 (I-405) that were 1.5 times higher than those presented in the HRA. The commenter states that the AERMOD analysis relies on source terms from a model that is not commonly used to assess emission from freeways and adds that modeling calculations of ground-level concentrations of diesel particulate matter (DPM) fail to account for building downwash, ignoring the effect of building elevations. The commenter requests an updated HRA that accounts for elevation differences and properly identifies inputs and methodology.

AERMOD files associated with the HRA were provided to the commenter on December 12, 2022 based on their request to review the files. The methodology used by Rincon is a typical methodology applied when using the HARP2 modeling program to determine risk. By unitizing emission rates in AERMOD and inputting the emissions per pollutant in HARP2, the HARP2 modeling program quantifies the risk associated with the actual emission rates for the traffic on the freeway.

As discussed in the HRA (Appendix B to the MND), building downwash is only applicable to point or flare sources in AERMOD where the sources are located adjacent to, on, or in real close vicinity to a building. In the case of a freeway, the source is a volume-line source which precludes the necessity use of building downwash. Mobile Source Air Toxic (MSAT) spreadsheet calculations are available and are attached to this letter for review.

There are several differences in modeling between what was conducted by Rincon and in the analysis referenced by the commenter. These are:

1. Rincon used "Urban" dispersion coefficient while the analysis referenced by the commenter used "Rural" with a non-urban transition which can lead to overly conservative concentrations for low-level sources.
2. Rincon used a "Flat & Elevated" terrain while the commenter's model only used flat.

3. Rincon did not specify a pollutant type while the commenter assigned DPM as the pollutant.
4. Rincon modeled for 1-hour and period whereas the commenter only used period for the averaging time.

These differences can result in the differences in concentrations that were noted between the two modeling scenarios.

Modeling files associated with the HRA (i.e., AERMOD, CalEEMod, EMFAC, and HARP2) were also provided to SCAQMD on December 8, 2022 upon their request to review all modeling and emission calculation files. As of December 21, 2022, SCAQMD has responded that they will not be further commenting on the project.

Response 5

The commenter states that the MND's noise analysis fails to accurately disclose the project's potentially significant noise impacts and fails to mitigate these impacts. The commenter's specific concerns related to this topic are summarized and addressed under Responses 5.1 through 5.4. As in the MND and its underlying technical reports, the responses reference RCMs (Regulatory Compliance Measures), which are the existing requirements and standard conditions based on local, State, or federal regulations and laws that serve to offset or prevent specific impacts. RCMs are not included as mitigation measures in the environmental clearance document because the project is required to comply with RCMs through State and local regulations.

Response 5.1

The commenter states that the noise measurements conducted as part of the noise analysis may not be representative of the loudest times of day because the noise environment is affected by transportation sources that can change by the hour throughout the day. The commenter states that the long-term noise measurement conducted for the analysis was taken at the back of the site where it is partially shielded from nearby streets at does not capture traffic patterns at residences close to Plummer Street, adding that the short-term 15-minute measurement noise level at location ST 1 is 10 dB higher than the long-term noise measurement noise level at the same time frame. The commenter states that the noise measurements are not representative of the noise environment and existing baseline noise conditions should be characterized by multiple measurements at different times over several days. The commenter adds that the higher baseline noise levels at the residences on Plummer Street would result in a noise environment that exceeds the normally acceptable CNEL noise levels for single-family homes per the City's Land Use and Noise Compatibility Matrix.

As discussed in Section XIII, *Noise*, of the MND, to characterize ambient noise levels at and near the site, two 15-minute noise level measurements were collected by Rincon on May 25, 2022 between 8:57 a.m. and 9:31 a.m. using an Extech (Model 407780A) ANSI Type 2 integrating sound level meter. The commenter incorrectly identifies that a 14-hour measurement was conducted; a 24-hour noise level measurement was collected between May 25, 2022 and May 26, 2022. Determining baseline noise levels through a 24-hour measurement is an industry standard technique that accurately captures the noise environment throughout the day, evening, and nighttime. Transportation noise is relatively consistent from day to day, and thus capturing more than one day's worth of measurements does not yield valuable data for determining a baseline.

The short-term noise measurement (ST) 1 is located at the northern property line of the site facing Plummer Street and ST 2 is located along Orion Avenue adjacent to single-family residences. The long-

term noise measurement (LT) 1 is located near the southern property line of the site. The location for LT 1 was chosen to determine the lowest ambient noise level at the sensitive receivers near the project site to provide the most conservative analysis. In other words, if the long-term measurement was conducted near the roadway, it would show higher noise levels in line with ST 1 that would underestimate the project's operational noise. For example, the HVAC noise levels from the project site were compared to the lowest hourly measured noise level of 46 dBA; if the LT 1 measurement was close to the roadway, HVAC noise levels would have been compared to a higher value, thus underestimating the project's noise impacts. ST 1 and ST 2 short-term measurements are provided for additional context, but the more conservative LT 1 is used for the impact analysis.

The commenter also states that a higher baseline would result in a noise environment that exceeds the normally acceptable CNEL level for single-family homes. However, the proposed project is for a school, not for single-family homes. The City's Land Use and Noise Compatibility Matrix is used to determine the appropriate siting of specific land uses as a planning tool for development, not to determine impacts on existing sensitive receivers. As discussed in Section XIII, *Noise*, ambient noise up to 60 CNEL is normally acceptable and noise up to 70 CNEL is conditionally acceptable for a school use. The project is anticipated to be within the "conditionally acceptable" range for school uses at the project site. RCM-4 (Interior Noise Reduction) would require that future classrooms are designed for an interior noise environment of 45 dBA L_{eq} or less, and impacts would be less than significant.

Response 5.2

The commenter states that, while the noise analysis modeled construction noise levels at 50 feet per the Los Angeles Municipal Code (LAMC) threshold, construction work could occur as near as six feet from residences adjacent to the site, resulting in higher dBA L_{max} noise levels. The commenter states that, based on model calculations for a residence located six feet from construction activity, construction of the project would result in a 30+ dBA increase over the City's threshold.

Pursuant to LAMC Section 112.05, in which construction noise in a residential zone shall not exceed 75 dBA L_{max} between 7:00 a.m. and 10:00 p.m. at a distance of 50 feet, construction noise was modeled at a distance of 50 feet from the nearest residential receivers. The use of a distance of 50 feet is appropriate as it is how violations are determined within the LAMC and also consistent with City impact analysis for construction noise. If the City did not want to take into account a 50 feet distance, it would have written the LAMC to specify an exceedance of 75 dBA L_{max} at any distance. At a distance of 50 feet per the City's threshold, a grader, excavator and concrete saw would generate a noise level of 90 dBA L_{max}. Therefore, as discussed in Section XIII, *Noise*, of the MND construction noise could exceed the threshold of 75 dBA L_{max}. The approximate 75 dBA L_{max} noise contour for project construction is estimated at 150 feet (i.e., if construction occurs at a distance of 150 feet or greater from a sensitive receptor, it would not exceed the threshold). Therefore, if construction occurs within 150 feet of sensitive receivers, noise levels from construction may exceed the City's construction noise limit.

The nearest sensitive receivers include single-family residences adjacent to the east, south, and west of the project boundary. Other sensitive receivers include single-family residences approximately 130 feet to the north across Plummer Street, as well as Plummer Village Senior Community approximately 215 feet to the east. At nearby residences, construction noise could exceed the 75 dBA L_{max} threshold since construction activity could occur within 50 feet of these sensitive receptors if uncontrolled. Construction noise at the Plummer Village Senior Community, approximately 215 feet to the east of the project boundary, is not estimated to exceed the 75 dBA L_{max} threshold.

Compliance with the City's RCMs would reduce impacts related to construction noise. In particular, compliance with RCM-1 (Adherence to Existing Noise Standards) would reduce construction noise by at least 15 dBA, thereby reducing construction noise levels to 75 dBA L_{max}. Therefore, with RCM-1, this impact would be less than significant.

Response 5.3

The commenter states that the 12-foot noise barrier included as Mitigation Measure N-1 to reduce construction noise would result in a 15 dBA reduction and would not be sufficient to reduce impacts at nearby receivers to a less than significant level. The commenter adds that this error is the result of the City's reliance on the incorrect interpretation of the LAMC noise standards.

As discussed under Response 5.2, the LAMC was correctly interpreted per its wording and typical City construction noise analysis, and the commenter's assertion that the wrong threshold was used and thus the mitigation is not adequate is not correct. Compliance with the City's RCMs would reduce impacts related to construction noise. In particular, compliance with RCM-1 would reduce construction noise by at least 15 dBA, thereby reducing construction noise levels to 75 dBA L_{max}. Therefore, with RCM-1, this impact would be less than significant.

Response 5.4

The commenter states that the MND does not provide a quantitative analysis for noise from on-site operations (i.e., activities in play area, trash-hauling, pick-up/drop-off activities along the driveway, and traffic noise). The commenter adds that these activities would result in an increase of 5 dB or more over the ambient, resulting in a significant impact.

The LAMC would regulate operational noise associated with the project. As discussed in Section XIII, *Noise*, of the MND the primary on-site noise source associated with operation of the project would consist of student recreational activity in the proposed outdoor play areas. Outdoor noise would be an intermittent and periodic noise source, which would be limited to the daytime during school hours and when staff and students are outdoors (e.g., mornings prior to class start times, study breaks or lunch breaks throughout the day, afterschool prior to students getting picked up). The new elementary school would serve traditional kindergarten through grade four. Campus hours of operation for Valor Elementary School would be from 7:15 a.m. to 6:00 p.m., Monday through Friday during normal school months. During the summer months, the school campus would be closed. The proposed school would not host athletic events that would occur during the late afternoon/early evening hours. No lighting is proposed for the proposed playfields and a limited number of special events are proposed throughout the school years. Noise from sources such as trash hauling are typical of the existing environment and are also short-term and intermittent. Additionally, there would be no PA system proposed for recreational activities. Since student recreational activities would be limited to daytime hours and there are no proposed PA systems for sports activities, impacts would be less than significant.

Response 6

The commenter states that the MND's energy use analysis fails to quantify and adequately assess the project's energy consumption impacts during project construction. The commenter adds that the energy use analysis does not analyze electricity use from the existing power grid despite the requirement under Mitigation Measure AQ-1 which states that "electricity shall be supplied to the site from the existing power grid to support the electric construction equipment". The commenter concludes that the MND

lacks evidence to conclude that construction related impacts to energy consumption would be less than significant.

The use of electricity during construction is intermittent and temporary depending on the equipment used on-site during any given day. Mitigation Measure AQ-1 (Construction Emissions Reduction) eliminates the use of diesel generators to supply electricity to any electric equipment that may be used as part of the construction activities. The mitigation measure also indicates that Tier IV or alternative (including electric) equipment would be used, however conservatively assumes all equipment would be Tier IV as the exact nature of the equipment is unknown. Since the construction fleet has not been specifically identified and electric equipment that may be used is unknown at this time, quantifying electrical use from construction activities would be speculative. In addition, there is currently a single-family home on the project site that would be renovated for use as part of the project. The home would not be actively used during construction and therefore the electrical use from that home, which is currently part of the daily/annual consumption assumptions for Los Angeles Department of Water and Power (LADWP) demand calculations, would not be taken from the existing electric supply. Any construction activities for the site, from temporary use of electric equipment for a project of this size, would be similar or less than that of the daily usage of a single-family home. Therefore, electrical usage from construction activities would not be anticipated to result in any additional energy needs than already anticipated by LADWP for the existing demand.

Response 7

The commenter states that the MND does not analyze the project's burden on police protection services. The commenter highlights Policies 8-2.2 and 8-2.3 of the Mission Hills-Panorama City-North Hills Community Plan, which require consultation with the Los Angeles Police Department (LAPD) as part of the project's land use review process to review project landscaping and lighting. The commenter states that the MND does not confirm that compliance with the Community Plan policies has been completed and adds that any changes to the plans required by LAPD which would result in changes to the energy, GHG, and biological resources impacts.

Policy 8-2.2 regulates landscaping around buildings such that it does not impede visibility whereas Policy 8-2.3 regulates adequate lighting around buildings to improve security. According to Section 47610 of the California Education Code, a charter school shall comply with the California Building Standards Code Part 2 (California Building Code) as adopted and enforced by the local building enforcement agency (i.e., Los Angeles Department of Building and Safety [LADBS]). Further, the project plans are the subject of review and appropriate conditions per Section 16.05 of the LAMC, which states that the purpose of site plan review is to "promote orderly development, evaluate and mitigate significant environmental impacts, and promote public safety and the general welfare by ensuring that development projects are properly related to their sites, surrounding properties, traffic circulation, sewers, other infrastructure and environmental setting; and to control or mitigate the development of projects which are likely to have a significant adverse effect on the environment as identified in the City's environmental review process, or on surrounding properties by reason of inadequate site planning or improvements."

Response 8

The commenter states that the project would result in the removal of nine protected native trees and 32 non-protected significant trees and adds that eight of the protected trees are Southern California black walnut trees. The commenter states that it is not clear whether the California Department of Fish and

Wildlife (CDFW) was consulted as a trustee agency for the project since the MND was not submitted to the State Clearinghouse (SCH). The commenter states that the lead agency must consult with CDFW and obtain written findings from CDFW on the impact of the project on the continued existence of any State-listed endangered or threatened species. The commenter provides an example of mitigation measures from another project (James Street Four (4) Single-Family Residences; Case Number: ENV-2018-1130-MND) that required the removal of 11 southern California black walnut trees and did include consultation with CDFW.

The MND was submitted to the SCH (i.e., SCH #2022110530) but was determined by the City, based on City CEQA thresholds, to not require review from State agencies per CEQA Guidelines Section 15205 and Section 15206 and was, therefore, circulated for a 20-day public review period. The California black walnut tree is not a State-listed or threatened species necessitating consultation with CDFW. Further, the black walnut is not tracked in the California Natural Diversity Database. According to the most recent January 2023 CDFW update to its listing of special plants, the southern California black walnut is described as "apparently secure; at fairly low risk of extinction or elimination due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors." That the CDFW has had occasion to comment on the removal of black walnut trees in unrelated projects under materially different facts, such as in the James Street Four (4) Single-Family Residences project discussed by the commenter, does not create a mandate for CDFW review here. It must also be recognized that in those instances where the CDFW has had the opportunity to comment on the California black walnut, such as in the James Street project, the CDFW recommended replacement in the same 1:4 mitigation ratio as recommended in this MND.

As discussed in Section IV, *Biological Resources*, of the MND, no special-status species, or sensitive natural communities, have a potential to occur on-site due to the lack of suitable habitat for wildlife (chaparral, grassland, coastal scrub, etc.) on-site and in the surrounding area. In addition, with respect to tree preservation, the City has a tree preservation policy that protects all valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), other native oak species, southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) trees (Ordinance 177404, 2006). Scrub oak (*Quercus dumosa*) is excluded from this tree ordinance. As discussed in the Arborist Report (Appendix C to the MND) and the MND, a total of 56 trees are located within the site and an additional two street trees are located at the northern boundary of the site along Plummer Street. Of the 56 on-site trees, four trees are dead and would be removed along with an additional 41 trees consisting of nine protected native trees and 32 non-protected significant trees. The southern California black walnut is protected by the City's tree ordinance. Consistent with that ordinance, the project would replace all removed protected native trees or shrubs on a 1:4 ratio and all removed non-protected significant trees on a 1:1 ratio. This replacement ratio will be maintained even though the existing southern California black walnut trees are currently located on a disturbed site in an urban environment and are not in native undisturbed woodland. The project would additionally retain 13 existing trees on the site, including 12 non-protected significant trees (two of which are street trees) and one protected native tree. Accordingly, with implementation of Mitigation Measure BIO-2a (Avoidance and Minimization Measures for Protected and Non-Protected Significant Trees) and BIO-2b (Measures for Replacement of Protected and Non-Protected Significant Trees), impacts to non-protected significant trees and protected native trees would be less than significant.

Response 9

The commenter states that, based on their letter, the MND fails to disclose and mitigate impacts and, therefore, the Conditional Use Permit (CUP) to allow development of a public school in the RA-1 zone cannot be approved by the City per Section 12.24.E. of the LAMC. The commenter states that the project will adversely affect public health due to its proximity to I-405, will adversely affect adjacent properties due to unmitigated noise impacts, and does not comply with Community Plan policies due to lack of consultation with the LAPD.

A school is a permitted use under the RA-1 zone with approval of a Conditional Use Permit, which is included as part of project entitlements. With respect to Section 12.24.E. of the LAMC, and prior to approval of a CUP, the City must find that (1) the project will enhance the build environment in the surrounding neighborhood or will perform a function/service that is essential or beneficial to the community, city or region; (2) the project's location, size, height, operations and other features will be compatible with and not adversely affect or degrade the public health, welfare, and safety of surrounding neighborhood; and (3) the project conforms with the purpose, intent, and provisions of the General plan and any other applicable plan. The analysis in the MND determined that identified mitigation measures would reduce potentially significant impacts to a less-than-significant level. The commenter's additional key concerns, including those related to health risks and police protection, are addressed under Responses 4 through 10. The project would not result in significant impacts such that the CUP cannot be approved by the City.

Response 10

The commenter states that the MND's air quality analysis ignores that the project site is in Census Tract 6037117201, a designated disadvantaged community under Senate Bill 535. The commenter states that the Tract is in the top 10th percentile of communities impacted by DPM, the top 6th percentile of communities impacted by traffic, and the top 5th percentile of communities impacted by ozone in the State of California. The commenter adds that, given the project's location in a disadvantaged community burdened by exposure to harmful air contaminants, the project cannot be found to not impact the public health, welfare, and safety of students and staff on-site. The commenter requests that the City reanalyze the air quality and health impacts in an EIR and include a statement of overriding considerations to justify the use of the site.

The impacts from the project on the community is the focus of the analysis under CEQA. Nonetheless, there are known impacts from the community that have the potential to impact on-site students and staff. The project site is in the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. The SCAQMD is in nonattainment for the federal standards for ozone and $PM_{2.5}$ and the state standards for ozone, PM_{10}, and $PM_{2.5}$. Areas of the SCAB located in Los Angeles County are also in nonattainment for lead. The SCAB is designated unclassifiable or in attainment for all other federal and state standards. With respect to the pollutants that are in attainment these pollutant concentrations throughout the basin are below the ambient air quality standards which were established by the State and federal government to protect health and safety of the population.

With respect to the pollutants where the basin is not in attainment, the SCAQMD has implemented the AQMP which has numerous strategies that are intended to reduce ambient pollution within the Basin and will help to reduce air pollution in disadvantaged areas such as where the project site is located.

Some of the main concerns raised by the commentor are DPM and traffic as well as ozone. Ozone precursors, emissions from traffic, as well as DPM will be reduced throughout the Basin with the transition from fossil fuel vehicles to electric vehicles as well as the elimination of natural gas in residential and some non-residential land uses. These will all help to reduce pollution exposure to the basin entirely, as well as the students and staff of the project site.

With respect to TAC emissions and specifically pollutant exposure from the proximity to the freeway, as discussed under Responses 4.2 and 4.3, the project would not be substantially adversely impacted by its proximity to the few identified source facilities in the SCAQMD's FIND database, nor from its proximity to the freeway. While located in a disadvantaged community, the project would not expose on-site students and staff to significant impacts.

Response 11

The commenter states that for the reasons included in their letter, the MND is inadequate under CEQA and substantial evidence supports the "fair argument" that the project has multiple significant, unmitigated impacts. The commenter states that the City may not lawfully approve the project until it prepares and circulates an EIR.

Refer to Response 1 for a description of the circumstances in which an MND is prepared under CEQA, and as outlined under CEQA Guidelines Sections 15064, 15070 and 15369.5. With respect to the proposed project, mitigation measures have been identified for potentially significant impacts disclosed in the MND based on substantial evidence, including all investigations and associated project modeling in the Air Quality and Greenhouse Gas Study, Health Risk Assessment, Arborist Report, Cultural Resources Assessment Report, Phase I and Phase II ESA, Asbestos Survey, Noise and Vibration Study, and Transportation Assessment. The analysis in the MND determined that identified mitigation measures would reduce potentially significant impacts to a less-than-significant level. The commenter's additional key concerns, including those related to health risks and police protection, are addressed under Responses 4 through 10. Therefore, preparation of an EIR is unwarranted.

Conclusion

Comments provided on behalf of CREED LA are addressed in this letter and do not raise any concerns regarding significant impacts that have not been identified and mitigated or would otherwise substantially change the conclusions of the MND.

Sincerely,
Rincon Consultants, Inc.

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Attachment 1 CREED LA Comment Letter
Attachment 2 MSAT Spreadsheet Calculations

Attachment 1

CREED LA Comment Letter

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December 14, 2022

Via Email and Overnight Mail
Esther Ahn, Planner
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Re: Comments on the Mitigated Negative Declaration for the Valor Elementary School Project (ENV-2022-5866-MND)

Dear Ms. Ahn:

On behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"), we respectfully submit these comments on the City of Los Angeles' ("City") Mitigated Negative Declaration[1] ("MND") prepared for the Valor Elementary School Project (ENV-2022-5866-MND) ("Project") proposed by Bright Star Schools ("Applicant") and prepared pursuant to the California Environmental Quality Act ("CEQA")[2] by the City of Los Angeles ("City").

The Project proposes to construct a one and two-story, 26.5-foot-tall, elementary school building with 28 classrooms, totaling 23,538 square-feet. for grades transitional kindergarten ("TK") through 4; a 3,182 square-foot multi-purpose room, administrative spaces, corridors, storage spaces, and covered outdoor dining, and a surface parking lot with an ingress/egress driveway off Plummer Street.[3] The elementary school building would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The Project would also include 30,726 sf of open space and landscaping, including two play areas totaling 13,060 square-feet.

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[1] City of Los Angeles, Mitigated Negative Declaration, Valor Elementary School Project ("MND") Case No: ENV-2022-5866-MND (November 2022) available at https://planning.lacity.org/odocument/4665dfef-ecad-42b5-80b6-575ca5e17851/ENV-2022-5866.pdf
[2] Public Resources Code § 21000 *et seq.*; 14 Cal. Code Regs. ("C.C.R.") §§ 15000 *et seq.*
[3] MND, p .1.

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The Project site located at 15526-15544 Plummer Street, Los Angeles, CA 91343, on Assessor Parcel Numbers ("APN") 265-601-5007 and 265-601-5008, which are approximately 1.30 acres in size, and 0.76 acre in size respectively. The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. The site contains 56 trees/shrubs (including nine protected native trees/shrubs and 32 non-protected significant trees), and two street trees.

Our review of the MND demonstrates that the MND fails to comply with CEQA. As explained more fully below, the MND fails to accurately disclose the extent of the Project's potentially significant impacts on air quality, public health, hazards, public services, and noise. There is more than a fair argument that the Project will result in significant, unmitigated impacts in each of these areas. The City may not approve the Project until the City prepares an Environmental Impact Report ("EIR") that adequately analyzes the Project's potentially significant impacts and incorporates all feasible mitigation measures to avoid or minimize these impacts. As a result of these deficiencies, the City also cannot make the requisite findings to approve the Project under the City's municipal code.[4] 1 cont.

These comments were prepared with the assistance of environmental health, air quality, and GHG expert Dr. James Clark, Ph.D., and noise expert Ani Toncheva of Wilson Ihrig. Comments and curriculum vitae of Dr. Clark are attached to this letter as Attachment A.[5] Ms. Toncheva's comments and curriculum vitae are included as Attachment B.[6] Attachments A and B are fully incorporated herein and submitted to the City herewith. Therefore, the City must separately respond to the technical comments in Attachments A and B.

For the reasons discussed herein, and in the attached expert comments, CREED LA urges the City to remedy the deficiencies in the MND by preparing a legally adequate EIR and recirculating it for public review and comment.[7]

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[4] Pub. Res. Code § 21081; *Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 883.

[5] **Attachment A:** Comments on Valor Elementary School Project (December 13, 2022) ("Clark Comments").

[6] **Attachment B:** Comments on Valor Elementary School Project (December 14, 2022) ("Toncheva Comments").

[7] We reserve the right to supplement these comments at later hearings on this Project. Gov. Code § 65009(b); Public Resources Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199–1203; *see Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

I. STATEMENT OF INTEREST

CREED LA is an unincorporated association of individuals and labor organizations formed to ensure that the construction of major urban projects in the Los Angeles region proceed in a manner that minimizes public and worker health and safety risks, avoids, or mitigates environmental and public service impacts, and fosters long-term sustainable construction and development opportunities. The association includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the Los Angeles region.

Individual members of CREED LA live in the City of Los Angeles, and work, recreate, and raise their families in the City and surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health, and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist on site.

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

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

II. AN EIR IS REQUIRED

CEQA is designed to inform decision-makers and the public about the potential, significant environmental effects of a project.[8] "CEQA's fundamental goal [is] fostering informed decision-making."[9] "The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind."[10]

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an EIR, except in certain limited circumstances.[11] The EIR is the very heart of CEQA.[12] The EIR acts like an "environmental 'alarm bell' whose purpose is to alert the public and its responsible officials to environmental changes before they have reached the ecological points of no return."[13] The EIR aids an agency in identifying, analyzing, disclosing, and, to the extent possible, avoiding a project's significant environmental effects through implementing feasible mitigation measures.[14] The EIR also serves "to demonstrate to an apprehensive citizenry that the [agency] has analyzed and considered the ecological implications of its action."[15] Thus, an EIR "protects not only the environment but also informed self-government."[16]

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An EIR is required if "there is substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment."[17] The EIR aids an agency in identifying, analyzing, disclosing, and, to the extent possible, avoiding a project's significant environmental effects through implementing feasible mitigation measures.[18] In very limited circumstances, an agency may avoid preparing an EIR by issuing a negative declaration, a written statement briefly indicating that a project will have no significant impact. Because "[t]he adoption of a negative declaration . . . has a terminal effect on the environmental review process" by allowing the agency to dispense with the duty to

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[8] 14 Cal. Code Regs. ("CEQA Guidelines") § 15002, subd. (a)(1).
[9] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 402.
[10] *Bozung v. LAFCO* (1975) 13 Cal.3d 263, 283.
[11] See, e.g., Pub. Resources Code, § 21100.
[12] *Dunn-Edwards v. Bay Area Air Quality Management Dist.* (1992) 9 Cal.App.4th 644, 652.
[13] *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1220.
[14] Pub. Resources Code § 21002.1(a); CEQA Guidelines § 15002(a), (f).
[15] *No Oil, Inc. v. City of Richmond* (1974) 13 Cal.3d 68, 86.
[16] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.
[17] Pub. Resources Code, § 21080, subd. (d) (emphasis added); CEQA Guidelines, § 15064; see also *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 927; *Mejia v. City of Richmond* (2005) 13 Cal.App.4th 322.
[18] Pub. Resources Code, § 21002.1, subd. (a); CEQA Guidelines, § 15002, subd. (a) & (f).

prepare an EIR, negative declarations are allowed only in cases where there is not even a "fair argument" that the project will have a significant environmental effect.[19]

Under the fair argument standard, a lead agency "shall" prepare an EIR whenever substantial evidence in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.[20] The phrase "significant effect on the environment" is defined as "a substantial, or potentially substantial, adverse change in the environment."[21] In certain circumstances, a project with potentially significant impacts can be modified by the adoption of mitigation measures to reduce the impacts to a level of insignificance. In such cases, an agency may satisfy its CEQA obligation by preparing a mitigated negative declaration.[22] A mitigated negative declaration, however, is subject to the fair argument standard. Thus, an MND is inadequate, and an EIR is required, whenever substantial evidence in the record supports a "fair argument" that significant impacts may occur, even with the imposition of mitigation measures.

3 cont.

The "fair argument" standard is an exceptionally "low threshold" favoring environmental review in an EIR rather than a negative declaration.[23] The "fair argument" standard requires the preparation of an EIR if any substantial evidence in the record indicates that a project may have an adverse environmental effect.[24] As a matter of law, substantial evidence includes both expert and lay opinion.[25] Even if other substantial evidence supports the opposite conclusion, the agency nevertheless must prepare an EIR.[26] Under the "fair argument" standard, CEQA always resolves the benefit of the doubt in favor of the public and the environment.

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[19] *Citizens of Lake Murray v. San Diego* (1989) 129 Cal.App.3d 436, 440; Pub. Resources Code, §§ 21100, 21064.
[20] Pub. Res. Code §§21080(d), 21082.2(d); 14 Cal. Code Reg. §§ 15002(k)(3), 15064(f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *No Oil, Inc. v. City of Richmond* (1974) 13 Cal.3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601-1602.
[21] Pub. Resources Code, § 21068.
[22] Pub. Resources Code, § 21064.5; CEQA Guidelines, § 15064, subd. (f)(2).
[23] *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.
[24] CEQA Guidelines, § 15064, subd. (f)(1); *Pocket Protectors v. City of Sacramento, supra*, 124 Cal.App.4th at 931.
[25] Pub. Resources Code, § 21080, subd. (e)(1); CEQA Guidelines, § 15064, subd. (f)(5).
[26] *Arviv Enterprises v. South Valley Area Planning Comm.* (2002) 101 Cal.App.4th 1333, 1346; *Stanislaus Audubon v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical Gardens v. City of Encinitas* (1994) 29 Cal.App.4th 1597.

III. SUBSTANTIAL EVIDENCE SUPPORTS A FAIR ARGUMENT THAT THE PROJECT MAY RESULT IN SIGNIFICANT IMPACTS REQUIRING AN EIR AND THE CITY LACKS SUBTANTIAL EVIDENCE TO RELY ON AN MND

4

A. There is a Fair Argument that the Project May Result in Significant, Unmitigated Health Risk Impacts

1. The City Failed to Proceed in the Manner Required by Law By Failing to Conduct a Preliminary Endangerment Assessment Pursuant to the California Education Code.

The MND includes a Phase I environmental site assessment ("ESA") report that identifies several recognized environmental conditions ("REC") and concludes that a Phase II ESA be completed for the site.[27] While a Phase II ESA was completed for the Project site, the City failed to conduct a Preliminary Endangerment Assessment as required under the California Education Code.[28]

The Education Code outlines a three-step process in assessing whether there has been a release of hazardous waste at a school site consisting of Step 1. Phase I ESA, Step 2. PEA, and Step 3. Response action.[29] The PEA required by Step 2 requires consultation with the Department of Toxic Substances Control ("DTSC") and to enter into an Environmental Oversight Agreement with DTSC, then contract with a qualified environmental consultant to prepare an assessment according to DTSC guidelines.[30] Here, the City failed to consult with DTSC in violation of the Education Code. Additionally, based on the results of the Phase I completed for the Project, there is a fair argument that if the City had consulted with DTSC, a PEA would be required. The City must retract the MND and proceed with consultation with DTSC to prepare a PEA for the Project.

4.1

2. The MND Fails to Disclose and Analyze the Potentially Significant Health Risk to Students and Staff from Air Emissions Released from Adjacent Sites

4.2

The MND fails to disclose the potential health impacts of placing schoolchildren next to existing sources of pollution located adjacent to the Project

[27] MND, Appendix F, p. v.
[28] Ed. Code §17213.1(a)(4)(B).
[29] *See* Ed. Code §§17213.1(a), 17213.1(a)(4), 17213.1(a)(7)
[30] Ed. Code §17213.1(a)(4)(B).

site. Dr. Clark found that there are a number of sources that emit toxic air contaminants including VOCs, diesel exhaust, and particulate matter permitted by the South Coast Air Quality Management District ("SCAQMD") surrounding the Project site.[31] According to the SCAQMD's Facility Information Detail ("FIND") website, there are at least 6 different permitted sites within ½ mile of the Project Site as seen in Figure 5 of Dr. Clark's comments.[32] The MND completely ignores these potential sources of pollution in its air quality analysis and as such fails as an informational document under CEQA.

4.2 cont.

3. There is Substantial Evidence Supporting a Fair Argument That the Project Will Result in Significant, Unmitigated Health Risks from Exposure to Freeway Emissions

The MND's statement that that health risks are less than significant is unsupported because the MND omits an analysis of several sources of pollution, resulting in underestimated emissions calculations. Dr. Clark reviewed the additional sources, and concludes that, when considered with the other emissions identified in the MND, the resulting health impacts on schoolchildren may be significant. The Project's health risk impacts must be accurately disclosed, analyzed, and mitigated in an EIR.

An agency must support its findings of a project's potential environmental impacts with concrete evidence, with "sufficient information to foster informed public participation and to enable the decision makers to consider the environmental factors necessary to make a reasoned decision."[33] A project's health risks "must be 'clearly identified' and the discussion must include 'relevant specifics' about the environmental changes attributable to the Project and their associated health outcomes."[34]

Dr. Clark found that the MND's health risk analysis is little more than a screening assessment of impacts based on unverifiable data. Additionally, he found the Project will result in a significant health risk to the students and staff at the Project site.

4.3

[31] Clark Comments, p. 7.
[32] Clark Comments, p. 7.
[33] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516.
[34] *Id.* at 518.

First, Dr. Clark notes that the input files for the Project's HRA were not included in the attachments to the HRA.[35] The Project's HRA states:

> TAC emissions associated with vehicle traffic on I-405 were estimated based on the methodology and spreadsheet developed by the UC Davis-Caltrans Air Quality Project, Estimating Mobile Source Air Toxics Emissions [MSAT]: A Step-By-Step Project Analysis Methodology (2006). This spreadsheet was designed to estimate the total amount of the six pollutants of concern discussed in Section 2.2, Toxic Air Contaminants, based on total organic gases emission factors and diesel particulate emission factors from EMFAC2021… The spreadsheet outputs from the UC Davis-Caltrans MSAT model and composite emission rates are contained in Appendix A.[36]

However, these spreadsheets were not included with the HRA and as such act as a black-box precluding analysis of the sufficiency of the HRA by preventing validation of the HRA model inputs.[37]

Dr. Clark used the same input parameters listed in the AERMOD input file utilized in the HRA for the Project and found that I-405 produces concentrations of TACs at the Project Site that are 1.5 times higher than presented in the HRA, resulting in a significant, unmitigated impact.[38] 4.3 cont.

Additionally, while reviewing the AERMOD model inputs used in the HRA, Dr. Clark found that the AERMOD analysis relies on source terms from a model that is not commonly used to assess emissions from freeways and excludes components in the analysis including the actual assumed emission rate of each chemical of concern ("COC") from each class of vehicle moving along I-405. By using an uncommon methodology and omitting the spreadsheets necessary to verify the HRA, the City fails to adequately analyze the Project's health risk impacts.

Finally, according to Dr. Clark, analyses of health risks from I-405 emissions feature a critical flaw leading to inaccurate estimations of Project emissions. The MND's AERMOD modeling calculations of ground-level concentrations of DPM fail to account for building downwash, which occurs when the wind flows over and around buildings and impacts the dispersion of pollution from nearby sources.[39] The

[35] Clark Comments, p. 8.
[36] MND, Appendix B, PDF p. 12.
[37] Clark Comments, p. 9.
[38] Clark Comments, p. 9.
[39] Clark Comments, p. 31.

MND's air quality analysis fails to explain why building elevations were not considered in the HRA. An updated HRA that accounts for elevation differences must be prepared and included in an EIR.

4.3 cont.

The City must prepare a new HRA that properly identifies the inputs and methodology used to calculate the operational health risk of the Project.

B. The City Lacks Substantial Evidence to Support the MND's Conclusion that Noise Impacts Would Be Less Than Significant with Mitigation

The CEQA Guidelines require an MND to consider "whether a project would result in…[g]eneration of a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project . . ."[40] The MND's noise analysis fails to accurately disclose the Project's potentially significant noise impacts and fails to mitigate them. Ms. Toncheva concludes that the Project's construction and operational noise impacts remain significant and unmitigated notwithstanding the mitigation measures proposed in the MND. Ms. Toncheva's comments provide substantial evidence supporting a fair argument that an EIR is required to accurately disclose and mitigate these impacts.

5

1. The MND Fails to Establish an Adequate Baseline to Measure Project Noise Impacts.

CEQA directs a lead agency to find that a Project would result in a significant impact if the Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.[41] In order to establish a baseline to measure noise impacts it is common practice to conduct measurements of ambient noise at locations surrounding a proposed project. Here, the MND's noise impact analysis is based on two measurements of only 15 minutes each[42] and one 14-hour long-term measurement on May 25th and 26th.[43] Ms. Toncheva explains that the limited data collected to evaluate the Project's noise impacts may not be representative of the loudest times of day because the noise environment is affected by transportation sources that can change from hour to hour and day to day.[44] Ms. Toncheva states

5.1

[40] CEQA Guidelines, Appendix G, Sec. XII(d).
[41] CEQA Guidelines, Appendix G.
[42] MND, p. 102.
[43] MND, p. 103.
[44] Toncheva Comments, p. 1.

that best practices call for documentation of the existing condition with measurements at different times over several days.[45] Furthermore, the long-term noise measurement purports to document these changes, but the measurement was taken from the back of the project site where it is partially shielded from both nearby streets and does not capture traffic patterns at residences close to Plummer Street.[46] Ms. Toncheva found that the short-term Leq at location ST-1 is more than 10 dB higher than the same time frame at LT-1.[47] Therefore, the long term measurement taken for the Project's noise analysis are not representative of the noise environment surrounding the Project.

5.1 cont.

Ms. Toncheva states in her comments that higher baseline noise levels at the residences on Plummer Street would result in a noise environment that exceeds the normally acceptable CNEL levels for single-family homes per the Land Use and Noise Compatibility Matrix.[48] The City must prepare an updated baseline analysis that incorporates noise measurements taken at locations surrounding the Project site over a multi-day period in order to properly establish the baseline used in the noise analysis.

2. The MND Fails to Analyze Impacts to All Relevant Noise-Sensitive Receptors

The MND fails to accurately analyze the severity of construction noise impacts on sensitive receptors because it relies on incorrect distances between on-site noise sources and off-site receptors. Ms. Toncheva explains that this error is due to the MND's failure to properly acknowledge how construction sites operate in the MND's selection of where to measure noise levels in relation to sensitive receptors.

5.2

The construction noise calculations use a minimum receptor distance of 50 feet, per the cited LAMC threshold. However, multiple phases of ongoing construction activity, including grading work, may be as close as 6 feet from the adjacent residences, resulting in higher Lmax levels (108 dB).[49]

[45] Toncheva Comments, p. 1.
[46] Toncheva Comments, p. 1.
[47] Toncheva Comments, p. 1.
[48] Toncheva Comments, p. 1. *see also* MND, p. 105.
[49] Toncheva Comments, p. 2.

Ms. Toncheva modeled the Project's construction noise at 15516 Plummer Street, which is a single-family residence adjacent to the project site and 6 feet east of the project boundary, using the Federal Highway Administration's ("FHWA") Roadway Construction Noise Model ("RCNM") and found that the Project would result in a 30+ dBA increase over the MND noise threshold during construction [50]

5.2 cont.

Given this failure of analysis the MND failed to accurately assess the severity of the Project's noise impacts on all sensitive receptors, and fails to adequately mitigate them. The City must prepare an EIR to accurately analyze and mitigate these impacts.

3. Mitigation Measures Fail to Reduce Noise Impacts Below Levels of Significance

The MND concludes that noise impacts will be less than significant with implementation of mitigation measure RCM-1, which requires that a barrier be erected during construction.[51] However, this measure is less effective than asserted in the MND. Ms. Toncheva notes that the 12-foot barrier would result in a dBA reduction of 15, which will not be enough to reduce the impacts to nearby sensitive receptors to non-significant levels.[52]

5.3

Ms. Toncheva found that the mitigation offered by the MND is wholly insufficient. She explains that a reduction of even 15 dBA (the maximum reduction that mitigation measure RCM-1 would provide) is inadequate to mitigate noise impacts at the nearby residences of the Project.[53] Ms. Toncheva explains that these errors were the result of the City's reliance on the incorrect interpretation of Municipal Code noise standards, as discussed above. As a result, the noise mitigation proposed in the MND will be ineffective to reduce noise impacts below levels of significance and is not adequate to support a finding of no significant impact with mitigation.

4. The MND Fails to Analyze Operational Noise Impacts

The MND does not provide a quantitative analysis for noise from on-site operations such as activity in the play area, trash-hauling, or traffic noise and other activity during pick up/drop off along the driveway directly adjacent to residences.

5.4

[50] Toncheva Comments, p. 3.
[51] MND, pp. 108-109.
[52] Toncheva Comments, p. 2.
[53] Toncheva Comments, p. 2.

Ms. Toncheva notes that these activities may result in an increase of 5 dB or more over the ambient, resulting in a significant impact. The City must conduct a quantified noise analysis to determine if additional mitigation measures are necessary to reduce the Projects potentially significant operational noise impacts.

5.4 cont.

C. The MND Fails to Analyze and Mitigate the Project's Potentially Significant Energy Impacts

The MND is inadequate as an environmental document because it fails to properly disclose, analyze, and mitigate the Project's potentially significant impacts on energy use. The City cannot approve the Project until an EIR is prepared and circulated to resolve these issues and comply with CEQA's requirements. Namely, the City's construction energy analysis fails to quantify and adequately assess the Project's energy consumption impacts during Project construction.

The MND states that Project construction energy use would result through the consumption of gasoline and diesel fuel. The energy use analysis does not analyze electricity use from the existing power grid despite the requirement under mitigation measure AQ-1 which stipulates that "[e]lectricity shall be supplied to the site from the existing power grid to support the electric construction equipment."[54] Electricity use from the existing power grid is not included or analyzed in the Project's construction energy use analysis. As a result, the MND lacks substantial evidence to conclude that construction-phase impact related to energy consumption would be less than significant.[55]

6

The City must revise the construction energy use analysis to include the expected electricity use and include the results of the analysis in an EIR.

D. The MND Fails to Account for the Public Services That Will Be Needed to Support the Project

An MND must consider the effect of changes to the environment that can result from the expansion of services.[56] Here, the MND states that the Project would not place an unanticipated burden on police protection services.[57] However, the MND fails to include any information or analysis on how this conclusion was reached.

7

[54] MND, p. 48.
[55] MND, p. 63.
[56] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553.
[57] MND, p. 116.

Additionally, the Project is within the Mission Hills-Panorama City-North Hills Community Plan ("Community Plan") Area which includes goals and objectives to ensure proper police protection of new developments.[58] The Community Plan includes the following policies and related programs that are applicable to the Project:

- 8-2.2 Ensure that landscaping around buildings be placed so as not to impede visibility.
    - Program: Discretionary land use reviews and approvals by the Department of City Planning with consultation from the Los Angeles Police Department.

- 8-2.3 Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security.
    - Program: Discretionary land use reviews and approvals by the Department of City Planning with consultation from the Los Angeles Police Department.[59]

7 cont.

Policies 8-2.2 and 8-2.3 both include a program requirement that consultation be completed with LAPD as part of a project's land use review process in order to ensure the safety of the future occupants of a project, in this case children and teachers primarily. However, the MND does not include any analysis of the Project's conformance with the Community Plan and provides no evidence that the required consultation has been completed. Instead, the MND states that the "Project would comply with all applicable regulations required by the LAPD during the plan check process."[60]

This approach improperly defers required analysis of the Project's potential impacts to public services that may be uncovered during LAPD's review of the Project and defers mitigation measures that may be required through consultation with LAPD. As a result, the MND fails to demonstrate consistency with mandatory public protection policies in the Community Plan, in violation of CEQA and land use law.

[58] City of Los Angeles, Mission Hills-Panorama City-North Hills Community Plan (1999) p. III-16, available at https://planning.lacity.org/odocument/fee68461-843f-48da-92e9-49a01d1f09e3/Mission_Hills-Panorama_City-North_Hills_Community_Plan.pdf
[59] Community Plan, p. III-16.
[60] MND, p. 116.

For example, LAPD's review of the project may find that additional lighting is necessary for the Project to protect the students and staff, this would in turn increase the Project's energy use and GHG impacts. Similarly, consultation with LAPD may require alteration to the Project's landscaping plan changing the number of protected trees and shrubs to be replaced resulting in nonconformance with the City's tree protection policies.[61] The MND is silent on these issues.

Given the massively significant impacts that crime, violence, and shootings at schools have wreaked on American children and their families in recent years, it is incumbent on the City to take every feasible step to ensure that schools are built safely and in compliance with all Police Department land use policies. The MND's failure to demonstrate compliance with Policies 8-2.2 and 8-2.3 is inexcusable.

The City failed to proceed in the manner required by law by failing analyze consistency with the Community Plan's public protection policies and lacks substantial evidence to support its conclusion that the Project's public services impacts would be less than significant. The City must complete the required consultation with LAPD and analyze the environmental impacts of any required Project design changes to the Project in an EIR.

7 cont.

E. The MND Fails to Mitigate Potentially Significant Impacts to Protected Species and Failed to Consult with Responsible Wildlife Agencies

The MND states that the Project would result in the removal of 9 protected native trees and 32 non-protected significant trees.[62] Eight of the protected trees to be removed are Southern California black walnut trees [*Juglans californica*] which are listed by the California Department of Fish and Wildlife in the California Natural Diversity Database ("CNDDB") on the Special Vascular Plants, Bryophytes, And Lichens List[63] and recognized by the United States Department of Agriculture as "severely threatened by urbanization. According to the USDA, the Nature Conservancy, in cooperation with the state of California, is giving high priority to acquiring vegetative/habitat data on the woodland and is listed as one of

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[61] "[P]rotected tree/shrub removals would be replaced at a 1:4 ratio by planting 36 trees on-site. Non-protected tree removals would be replaced at a 1:1 ratio by planting 32 trees on-site." MND, p. 20
[62] MND, p. 54.
[63] California Department of Fish and Wildlife, Biogeographic Data Branch, California Natural Diversity Database, Special Vascular Plants, Bryophytes, And Lichens List (October 2022) available at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline

California's rare and imperiled natural communities.[64] CDFW regularly provides comments on projects that deal with removal of South Coast black walnut. However, it is not clear whether the CDFW was consulted as a trustee agency for this Project.

Under CEQA, a project that affects the habitat of an endangered, rare, or threatened species is considered to be a project of statewide significance that requires state agency review of a CEQA document prepared for the project.[65] In addition, when preparing its CEQA document, the lead agency must consult with CDFW and obtain written findings from CDFW on the impact of the project on the continued existence of any State-listed endangered or threatened species.[66]

The CDFW regularly provides substantive comments and recommendations to the City regarding the removal of South Coast black walnut trees. For example, a recent City of Los Angeles project, The James Street Four (4) Single-Family Residences, Case Number: ENV-2018-1130-MND[67], which required the removal of 11 Southern California Black Walnut trees did include consultation with the CDFW resulting in the following recommended mitigation measures:

- Mitigation Measure #2: CDFW recommends the City work with a certified arborist familiar with Southern California black walnut tree life history to update the Protected Tree Report and Tree Locations on Project Landscaping Plan for 434, 438, and 442 West James Street. Specifically, CDFW recommends modifying the plans to reflect a total of 20 replacement Southern California black walnut trees appropriately spaced to accommodate growth horizontally, vertically, and laterally below ground. CDFW also recommends that each landscaping plan and/or Protected Tree Report be updated to disclose/provide planting instructions specifying appropriate spacing between each replacement tree. [68]

8 cont.

[64] U.S.D.A., Fire Effects Information System, Index of Species Information, *Juglans californica*, available at https://www.fs.usda.gov/database/feis/plants/tree/jugcal/all.html
[65] 14 CCR § 15206(b)(5). "A project which would substantially affect sensitive wildlife habitats including but not limited to riparian lands, wetlands, bays, estuaries, marshes, and habitats for endangered, rare and threatened species as defined by Section 15380 of this Chapter."
[66] PRC § 21104.2.
[67] City of Los Angeles, James Street Four (4) Single-Family Residences MND, SCH 2020100088 (October 6, 2020) available at https://ceqanet.opr.ca.gov/2020100088/2
[68] California Department of Fish and Wildlife, Letter re James Street Four (4) Single-Family Residences, MND, SCH #2020100088, City of Los Angeles, Los Angeles County (November 9, 2020) p. 3. available at https://files.ceqanet.opr.ca.gov/265078-2/attachment/cjEnN_Le0w7OINF2hj__LUpxX0DG-Af32QhutP1XGnwh8DFEvrYIyXncLOILCv5RJD4GRhuEoXopL13p0

- Mitigation Measure #3: CDFW recommends that trees planted for mitigation be monitored, maintained, and inspected as described in the Protected Tree Report. CDFW recommends long-term monitoring, maintenance, and inspection until all planted trees survive to produce reproductive structures (i.e., catkins). [69]

- Mitigation Measure #4: If the City observes changes, stress, or failure of planted Southern California black walnut trees, as recommended in the Protected Tree Report, CDFW recommends consulting with a certified arborist or tree specialist to assess the tree and provide specific recommendations. There should be no net loss of Southern California black walnut trees. If any replacement trees fail, CDFW recommends City replace those trees until a minimum of 20 total trees survive to produce catkins.[70]

8 cont.

The City failed to submit the MND to the State Clearinghouse ("SCH") and consult with CDFW as a trustee agency, as required under CEQA. When questioned by the California Office of Planning and Research why the Project was not submitted to the SCH, the City's internal email exchange shows that they determined that the Project was not affected by CCR §§ 15205 and 15206.[71] The City has violated CEQA by failing to submit the MND to the SCH and failing to consult with CDFW.

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

A. The City Cannot Approve the Project's Conditional Use Permit

The Project seeks approval of a Conditional Use Permit to allow development of a public school in the RA-1 zone ("CUP") pursuant to LAMC § 12.24.[72] The MND fails to accurately disclose and mitigate significant impacts, as discussed herein. Therefore, the Project currently fails to meet the LAMC requirements to obtain a CUP. LAMC § 12.24(E) requires the following findings be made to approve the CUP:

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(1) that the project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region;

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[69] *Id,* at p. 4
[70] *Ibid.*
[71] **Exhibit C**: Email from Maria Reyes, City of Los Angeles to Esther Ahn, City of Los Angeles, re: SCH Number (New SCH Number), (November 22, 2022).
[72] LAMC § 12.24(U)(24).

(2) that the project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety; and

(3) that the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

9 cont.

The Project as analyzed above **will** adversely affect public health due to the Project's proximity to I-405 and the unmitigated impacts to future students and school staff, **will** adversely affect adjacent properties due to unmitigated noise impacts and, and **does not** comply with the applicable community plan by failing to consult with LAPD prior to Project approval.

Additionally, the MND's analysis of air quality ignores substantial evidence that the Census Tract 6037117201, which contains the Project site, is a designated disadvantaged community under Senate Bill 535.[73]

Census tract 6037117201 is in the top 10th percentile of communities impacted by diesel particulate matter, the top 6th percentile of communities impacted by traffic, and the top 5th percentile of communities impacted by ozone in the State of California.[74] The City must reanalyze the air quality and health risk impacts of the Project and consider the public well-being of this already burdened community in an EIR. Given the Project's location in a region with one of the nation's worst records for air quality, in a disadvantaged community already overly burdened by exposure to harmful air contaminants, it is impossible to find that the Project is consistent with the Municipal Code. The Project cannot be found to not adversely affect the public health, welfare and safety of students and staff present at the Project site. The City must prepare an EIR that includes a statement of overriding considerations to justify the use of the Project site.

10

[73] California Office of Environmental Health Hazard Assessment, SB 535 Disadvantaged Communities (2022) available at https://oehha.ca.gov/calenviroscreen/sb535
[74] Clark Comments, p. 4.

V. CONCLUSION

For the reasons discussed above, the MND for the Project remains wholly inadequate under CEQA. There is substantial evidence supporting a fair argument that the Project has numerous potentially significant, unmitigated impacts. The City must prepare and circulate an EIR to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. Until the City prepares an EIR, the City may not lawfully approve the Project. 11

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

Sincerely,

Kevin Carmichael

KTC:ljl

Attachment 2

MSAT Spreadsheet Calculations

Emissions Calculations - I-405

AADT	AADT per direction	Caltrans Truck %	Number daily trucks	Diesel Truck *	Gas Truck *	LD Vehicles	LD Diesel **	All Gas
194,000	97,000	6.40%	6,211	1,603	4,608	90,789	168	95,229

Source: Caltrans Traffic Data Branch, 2020 AADT and Truck Traffic 2020

* "Translation Factors" (the fractions below identify % of trucks that are diesel-powered; they translate Caltrans truck data into an estimate of diesel vehicles)

Diesel Proportion: 25.8%

Non-Diesel Proportion: 74.2%

Translation Factors Source: UC Davis-Caltrans Air Quality Project, Project-Level Mobile Source Air Toxics Analysis

** Light Duty Diesel proportion based on vehicle miles traveled for LDA, LDT1, and LDT2 for Year 2024, South Coast AQMD, EMFAC2021.

	Truck Diesel Vehicles		Light Duty Diesel Vehicles		All Gas Vehicles
Speed (miles/hour)	**hot stabilized exhaust PM (grams/mile)**	**hot stabilized exhaust TOG (grams/mile)**	**hot stabilized exhaust PM (grams/mile)**	**hot stabilized exhaust TOG (grams/mile)**	**hot stabilized exhaust TOG (grams/mile)**
65 mph for trucks (TOG), 65 mph for trucks (PM), 65 mph for light duty (TOG), 65 for light duty (PM), 65 for gas (TOG)	0.0271	0.0304	0.0181	0.0288	0.0239

Source: EMFAC2021 Emissions Database

Mobile Source Air Toxics (MSAT) Speciation Factors Based on Proportion In TOG

Analysis Year	Diesel					Non-Diesel				
	Hot Stabilized Exhaust					Hot Stabilized Exhaust				
	benzene	1,3-butadiene	Acetaldehyde	Acrolein	Formaldehyde	benzene	1,3-butadiene	Acetaldehyde	Acrolein	Formaldehyde
2024	0.007320	0.002292	0.034383	0.006088	0.082668	0.034539	0.002295	0.009056	0.000602	0.014238
Total Daily Emissions, g/mi	0.39	0.12	1.84	0.00	4.43	78.52	5.22	20.59	1.37	32.37

Speciation Source: U.S. Environmental Protection Agency Motor Vehicle Emission Simulator (MOVES2014a).

Derivation of Emission Rates for I-405 Sources

Freeway width, one way 80.7 feet 24.6 m 5 lanes
Each direction segment at 6680.4 feet long 2036.2 m

I-405 North	Emissions					
	Diesel PM	Benzene	1,3-Butadiene	Acetaldehyde	Acrolein	Formaldehyde
grams/mi/day **	46.6	78.92	5.34	22.43	1.37	36.80
lbs/hour/segment	0.005412	0.009172	0.000621	0.002607	0.000159	0.004277
lbs/day/segment	0.129878	0.220126	0.014896	0.062571	0.0038184	0.102644
lbs/year/segment ***	47.405630	80.346104	5.437052	22.838255	1.393719	37.464893

Freeway width, one way 80.7 feet 24.6 m 5 lanes
Each direction segment at 6676.5 feet long 2035 m

I-405 South	Emissions					
	Diesel PM	Benzene	1,3-Butadiene	Acetaldehyde	Acrolein	Formaldehyde
grams/mi/day **	46.6	78.92	5.34	22.43	1.37	36.80
lbs/hour/segment	0.005408	0.00917	0.000620	0.00261	0.000159	0.00427
lbs/day/segment	0.1298	0.2200	0.0149	0.0625	0.0038	0.1026
lbs/year/segment ***	47.377692	80.298753	5.433848	22.824796	1.392898	37.442814

** Total emissions per mile calculated using the above speciation factors.
*** Based on 365 day/year

HARP ID:	9901	71432	106990	75070	107028	50000

Emissions Calculations - I-405
Source: EMFAC2021 (v1.0.2) Emission Rates
Region Type: County
Region: Los Angeles
Calendar Year: 2024
Season: Annual
Vehicle Classification: EMFAC202x Categories
Units: miles/day for CVMT and EVMT, g/mile for RUNEX, PMBW and PMTW, mph for Speed, kWh/mile for Energy Consumption, gallon/mile for Fuel Consumption. PHEV calculated based on total VMT.

Region	Calendar Y	Vehicle Ca	Model Yea	Speed	Fuel	Total VMT	CVMT	EVMT	NOx RUN	PM2.5 RU	PM10 RU	RUNEX	Weighted PM10	CO2 RUNEX	CH4 RUN	N2O RUN	ROG RUN	TOG RUN	Weighted TOG	CO RUNEX	SOx RUNEX	NH3 RUN	PM10 PMI	PM2.5 PM	Fuel Cons	Energy Co	
Heavy Duty Truck																											
Los Angele	2024	All Other B	Aggregate	65	Diesel	7683.217053	7683.217	0	1.914505	0.054333		0.056789962	0.000014281	1117.470561	0.003458	0.176058	0.074446	0.084751	0.000618254	0.233258649	0.010581778	0.201006	0.041585	0.014555	0.110036		0
Los Angele	2024	LHD1	Aggregate	65	Diesel	161519.3527	161519.4	0	1.17584	0.016533		0.017280193	0.002650045	454.80658	0.003024	0.071655	0.065108	0.074121	0.011366963	0.203649328	0.004309523	0.183324	0.078	0.0273	0.044784		0
Los Angele	2024	LHD2	Aggregate	65	Diesel	71542.48291	71542.48	0	1.021768	0.016345		0.017084089	0.001160475	536.1238873	0.002882	0.084467	0.062053	0.070644	0.004798636	0.17126518	0.005080046	0.187589	0.091	0.03185	0.052792		0
Los Angele	2024	MDV	Aggregate	65	Diesel	18143.89778	18143.9	0	0.105583	0.007401		0.007735524	0.00013326	445.2665326	0.000549	0.070152	0.011811	0.013446	0.000231632	0.178207416	0.004219127	0.0031	0.002548	0.000892	0.043845		0
Los Angele	2024	MH	Aggregate	65	Diesel	5066.484392	5066.484	0	3.065132	0.103383		0.108057376	0.000519806	949.0087603	0.002313	0.149517	0.049807	0.056702	0.000272762	0.217010655	0.00899234	0.156305	0.041585	0.014555	0.093448		0
Los Angele	2024	Motor Coa	Aggregate	65	Diesel	12529.05992	12529.06	0	1.746991	0.033709		0.035233645	0.000419137	1778.845035	0.000691	0.280258	0.014866	0.016924	0.00020133	0.056944445	0.016844599	0.22	0.069327	0.024264	0.175161		0
Los Angele	2024	SBUS	Aggregate	65	Diesel	974.1402427	974.1402	0	6.988466	0.039386		0.041166934	3.80759E-05	1080.714717	0.002696	0.170267	0.05804	0.066074	6.11126E-05	0.185071381	0.010233722	0.092703	0.041585	0.014555	0.106417		0
Los Angele	2024	T6 CAIRP	Aggregate	65	Diesel	164.2122637	164.2123	0	0.43117	0.009118		0.009530037	1.48587E-06	1147.943488	0.000464	0.180859	0.009992	0.011376	1.77362E-06	0.035559139	0.010870338	0.218554	0.041585	0.014555	0.113037		0
Los Angele	2024	T6 CAIRP	Aggregate	65	Diesel	225.4378994	225.4379	0	0.398511	0.007708		0.008056882	1.72454E-06	1148.014973	0.000339	0.18087	0.007288	0.008297	1.77587E-06	0.02926429	0.010871015	0.219686	0.041585	0.014555	0.113044		0
Los Angele	2024	T6 CAIRP	Aggregate	65	Diesel	587.2065086	587.2065	0	0.359637	0.007945		0.008304705	4.63015E-06	1128.792438	0.000381	0.177842	0.008203	0.009339	5.2066E-06	0.030869911	0.010688989	0.218962	0.041585	0.014555	0.111151		0
Los Angele	2024	T6 CAIRP	Aggregate	65	Diesel	3697.25346	3697.253	0	0.418189	0.007781		0.008133015	2.85503E-05	1061.397138	0.000311	0.167224	0.006701	0.007629	2.67798E-05	0.029274411	0.010050796	0.22	0.041585	0.014555	0.104515		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	10755.7969	10755.8	0	1.452196	0.027339		0.028575532	0.000291821	1127.730919	0.001894	0.177674	0.040773	0.046417	0.000474028	0.118283611	0.010678937	0.205487	0.041585	0.014555	0.111047		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	11125.1402	11125.14	0	0.716614	0.013321		0.013923138	0.00014707	1148.375639	0.000744	0.180927	0.016023	0.018241	0.000192676	0.052176588	0.010874431	0.216364	0.041585	0.014555	0.113079		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	34002.43097	34002.43	0	0.840372	0.015161		0.015846346	0.000511587	1140.300086	0.000893	0.179655	0.019227	0.021889	0.000706666	0.060600092	0.01079796	0.215126	0.041585	0.014555	0.112284		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	13643.11663	13643.12	0	0.797101	0.01114		0.011643976	0.000150833	1132.82655	0.000454	0.178477	0.009776	0.011129	0.00014416	0.039770033	0.01072719	0.219972	0.041585	0.014555	0.111548		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	16527.17779	16527.18	0	1.310997	0.025158		0.026295208	0.000412625	1140.126364	0.001685	0.179627	0.036282	0.041305	0.000648154	0.101674991	0.010796315	0.208608	0.041585	0.014555	0.112267		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	38263.75755	38263.76	0	0.616927	0.010751		0.011237586	0.000408264	1157.241421	0.000545	0.182324	0.011727	0.01335	0.000485009	0.041014224	0.010958384	0.218378	0.041585	0.014555	0.113952		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	34002.80998	34002.81	0	0.862245	0.016244		0.016978181	0.000548133	1149.664249	0.00096	0.18113	0.020675	0.023536	0.000759862	0.064364833	0.010886633	0.214727	0.041585	0.014555	0.113206		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	17083.09804	17083.1	0	0.769574	0.011265		0.011774449	0.00019098	1133.64791	0.00048	0.178607	0.010335	0.011765	0.000190829	0.039776495	0.010734968	0.219889	0.041585	0.014555	0.111629		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	562.1629443	562.1629	0	0.585667	0.010971		0.01146663	6.12038E-06	1150.577192	0.000549	0.181274	0.011826	0.013463	7.18585E-06	0.041005632	0.010895278	0.218196	0.041585	0.014555	0.113296		0
Los Angele	2024	T6 Instate	Aggregate	65	Diesel	8293.837623	8293.838	0	0.856116	0.011755		0.012286238	9.67508E-05	1070.301763	0.00049	0.168626	0.01056	0.012021	9.46644E-05	0.041260664	0.010135118	0.219911	0.041585	0.014555	0.105392		0
Los Angele	2024	T6 OOS C	Aggregate	65	Diesel	94.18752716	94.18753	0	0.500762	0.010685		0.011167843	9.98718E-07	1141.878268	0.000596	0.179903	0.012826	0.014602	1.30581E-06	0.042259442	0.010812904	0.217486	0.041585	0.014555	0.11244		0
Los Angele	2024	T6 OOS C	Aggregate	65	Diesel	129.2083501	129.2084	0	0.414868	0.007997		0.008358722	1.02544E-06	1143.103246	0.000366	0.180096	0.00789	0.008982	1.10191E-06	0.030558552	0.010824504	0.219451	0.041585	0.014555	0.11256		0
Los Angele	2024	T6 OOS C	Aggregate	65	Diesel	337.6251155	337.6251	0	0.409898	0.009031		0.009439422	3.02594E-06	1120.922788	0.00047	0.176602	0.010125	0.011527	3.69502E-06	0.035469627	0.010614469	0.218192	0.041585	0.014555	0.110376		0
Los Angele	2024	T6 OOS C	Aggregate	65	Diesel	2454.954423	2454.954	0	0.429863	0.007836		0.008190445	1.90911E-05	1054.336078	0.00031	0.166111	0.006683	0.007608	1.77336E-05	0.029410497	0.009983932	0.22	0.041585	0.014555	0.103819		0
Los Angele	2024	T6 Public (	Aggregate	65	Diesel	2185.454021	2185.454	0	3.151178	0.020035		0.020940934	4.34528E-05	1088.628173	0.000997	0.171514	0.021463	0.024434	5.07013E-05	0.074908094	0.010308658	0.151383	0.041585	0.014555	0.107196		0
Los Angele	2024	T6 Public (	Aggregate	65	Diesel	1499.396301	1499.396	0	3.167169	0.019524		0.020406618	2.90514E-05	1104.514496	0.000975	0.174017	0.020988	0.023893	3.4015E-05	0.07422468	0.010459092	0.144935	0.041585	0.014555	0.10876		0
Los Angele	2024	T6 Public (	Aggregate	65	Diesel	1823.243723	1823.244	0	5.24776	0.029746		0.031090968	5.38219E-05	1093.442639	0.001795	0.172272	0.038646	0.043995	7.6161E-05	0.103668768	0.010354248	0.121516	0.041585	0.014555	0.10767		0
Los Angele	2024	T6 Public (	Aggregate	65	Diesel	10076.99891	10077	0	4.266071	0.026527		0.027726527	0.000265281	1100.069738	0.001467	0.173316	0.031593	0.035966	0.000344113	0.092106287	0.010417003	0.136959	0.041585	0.014555	0.108323		0
Los Angele	2024	T6 Utility C	Aggregate	65	Diesel	2266.769667	2266.77	0	0.456034	0.007103		0.007424504	1.59792E-05	1104.407261	0.000314	0.174	0.006761	0.007697	1.6566E-05	0.026284854	0.010458076	0.22	0.041585	0.014555	0.10875		0
Los Angele	2024	T6 Utility C	Aggregate	65	Diesel	426.2686258	426.2686	0	0.468352	0.006848		0.00715734	2.89678E-06	1099.35477	0.000284	0.173204	0.006117	0.006964	2.81841E-06	0.026319164	0.010410232	0.22	0.041585	0.014555	0.108252		0
Los Angele	2024	T6 Utility C	Aggregate	65	Diesel	591.813256	591.8133	0	0.380419	0.006172		0.006450835	3.62477E-06	1104.927066	0.000239	0.174082	0.005155	0.005869	3.29774E-06	0.024223502	0.010462999	0.22	0.041585	0.014555	0.108801		0
Los Angele	2024	T7 CAIRP	Aggregate	65	Diesel	111913.3397	111913.3	0	1.524395	0.036277		0.037917753	0.004029068	1545.989617	0.000606	0.243571	0.013042	0.014848	0.00157767	0.041310835	0.014639597	0.22	0.069327	0.024264	0.152232		0
Los Angele	2024	T7 NNOOS	Aggregate	65	Diesel	133541.3905	133541.4	0	1.462172	0.03451		0.036070386	0.00457348	1529.992184	0.000587	0.241051	0.012631	0.014379	0.00182318	0.035410247	0.014488111	0.22	0.069327	0.024264	0.150657		0
Los Angele	2024	T7 NOOS	Aggregate	65	Diesel	48489.50752	48489.51	0	1.557713	0.037123		0.038801175	0.001786376	1535.525811	0.00062	0.241923	0.01334	0.015186	0.000699167	0.041904175	0.014540511	0.22	0.069327	0.024264	0.151202		0
Los Angele	2024	T7 POAK (	Aggregate	65	Diesel	10.45546243	10.45546	0	1.226971	0.029082		0.030396853	3.01753E-07	1763.286944	0.000498	0.277807	0.010718	0.012202	1.21129E-07	0.02166342	0.016697273	0.22	0.069327	0.024264	0.173629		0
Los Angele	2024	T7 POLA (	Aggregate	65	Diesel	106284.6755	106284.7	0	1.643019	0.032966		0.034456789	0.003477167	1658.529659	0.000535	0.261302	0.011508	0.013101	0.001322035	0.056044739	0.015705284	0.22	0.069327	0.024264	0.163314		0
Los Angele	2024	T7 Public (	Aggregate	65	Diesel	12910.60528	12910.61	0	9.54998	0.059381		0.062065507	0.000760811	1655.884799	0.003024	0.260885	0.065111	0.074124	0.000908632	0.24759009	0.015680239	0.104378	0.083385	0.029185	0.163053		0
Los Angele	2024	T7 Single (	Aggregate	65	Diesel	5536.869298	5536.869	0	1.022021	0.020787		0.021727149	0.000114221	1648.316843	0.000449	0.259693	0.009672	0.011011	5.7884E-05	0.033757458	0.015608575	0.219957	0.069332	0.024266	0.162308		0
Los Angele	2024	T7 Single I	Aggregate	65	Diesel	13104.59543	13104.6	0	1.757826	0.02534		0.026485682	0.000329545	1657.998714	0.000853	0.261218	0.018363	0.020905	0.000260106	0.073123299	0.015700256	0.219826	0.069348	0.024272	0.163261		0
Los Angele	2024	T7 Single (	Aggregate	65	Diesel	38102.8362	38102.84	0	1.222457	0.021794		0.022778998	0.000824085	1642.590806	0.000582	0.258791	0.012537	0.014273	0.000516347	0.044413911	0.015554353	0.219892	0.06934	0.024269	0.161744		0
Los Angele	2024	T7 SWCV	Aggregate	65	Diesel	8284.180726	8284.181	0	14.34328	0.01492		0.015594153	0.000122657	3623.493634	6.67E-05	0.570883	0.001435	0.001634	1.28533E-05	0.008857662	0.034312318	0.03243	0.21	0.0735	0.356802		0
Los Angele	2024	T7 Tractor	Aggregate	65	Diesel	84870.65672	84870.66	0	1.590371	0.029967		0.031322107	0.002523996	1563.365457	0.000689	0.246309	0.014833	0.016887	0.001360749	0.051602014	0.014804136	0.219977	0.06933	0.024265	0.153943		0
Los Angele	2024	T7 Utility C	Aggregate	65	Diesel	1825.830644	1825.831	0	1.093907	0.016517		0.017263607	2.99276E-05	1645.791331	0.00048	0.259295	0.010338	0.011769	2.04026E-05	0.04614617	0.01558466	0.22	0.069327	0.024264	0.162059		0
Los Angele	2024	UBUS	Aggregate	65	Diesel	68.93477512	68.93478	0	0.263564	0.020205		0.021119002	1.38227E-06	1189.098454	0.002078	0.187343	0.044748	0.050942	3.33421E-06	0.042883584	0.011267312	0.207618	0.109999	0.038499	0.117089		0
					VMT Sum	**1,053,222**						**HDT Diesel (g/mile)**	**0.027146922**					**HDT Diese**	**0.030403448**								
Gasoline Light Duty Vehicles																											
Los Angele	2024	LDA	Aggregate	65	Gasoline	5596577.222	5596577	0	0.040948	0.001131		0.001229566		291.462891	0.002307	0.004495	0.008823	0.012875	0.006575335	0.581268741	0.002881407	0.03483	0.001943	0.00068	0.033879		0
Los Angele	2024	LDT1	Aggregate	65	Gasoline	485501.698	485501.7	0	0.180851	0.001888		0.002053523		347.7279643	0.007831	0.012161	0.035084	0.051187	0.002267818	1.454702115	0.003437645	0.037944	0.002619	0.000917	0.040419		0
Los Angele	2024	LDT2	Aggregate	65	Gasoline	2763673.218	2763673	0	0.073958	0.001167		0.001268701		355.9983197	0.002981	0.006093	0.011791	0.017204	0.004338833	0.684239681	0.003519406	0.037249	0.002498	0.000874	0.04138		0
Los Angele	2024	LHD1	Aggregate	65	Gasoline	380273.5174	380273.5	0	0.170433	0.001159		0.001260643		581.4851224	0.005693	0.009548	0.028923	0.042204	0.001464573	1.341857823	0.005748572	0.04487	0.078	0.0273	0.06759		0
Los Angele	2024	LHD2	Aggregate	65	Gasoline	54672.23892	54672.24	0	0.166437	0.001023		0.001112801		669.6012686	0.003815	0.010196	0.017989	0.02625	0.000130964	0.959921882	0.00661969	0.044972	0.091	0.03185	0.077833		0
Los Angele	2024	MCY	Aggregate	65	Gasoline	41429.72251	41429.72	0	0.540133	0.001778		0.001900426		193.5761347	0.150048	0.037691	0.983423	1.184101	0.004476698	11.36443412	0.001913697	0.008866	0.012	0.0042	0.022501		0
Los Angele	2024	MDV	Aggregate	65	Gasoline	1534882.029	1534882	0	0.120121	0.0012		0.001304928		436.28219	0.004463	0.008591	0.018999	0.027698	0.003879509	0.874225448	0.004313094	0.036873	0.002563	0.000897	0.050712		0
Los Angele	2024	MH	Aggregate	65	Gasoline	13529.10035	13529.1	0	0.392858	0.001201		0.001306295		1826.264672	0.012769	0.023885	0.057486	0.083883	0.000103562	1.956112182	0.018054486	0.044773	0.041585	0.014555	0.21228		0
Los Angele	2024	OBUS	Aggregate	65	Gasoline	13604.54715	13604.55	0	0.47998	0.000708		0.000770252		1718.79167	0.0104	0.022768	0.05105	0.074492	9.24807E-05	1.186598036	0.016992006	0.044962	0.041585	0.014555	0.199788		0
Los Angele	2024	SBUS	Aggregate	65	Gasoline	1594.180164	1594.18	0	0.422967	0.000649		0.000705932		819.8386117	0.007987	0.023223	0.039649	0.057855	8.41658E-06	0.839711987	0.008104939	0.045	0.041585	0.014555	0.095296		0
Los Angele	2024	T6TS	Aggregate	65	Gasoline	71202.05139	71202.05	0	0.421734	0.000852		0.00092636		1686.124734	0.010746	0.021198	0.05263	0.076798	0.000498998	1.228159714	0.01666906	0.044973	0.041585	0.014555	0.195991		0
Los Angele	2024	T7IS	Aggregate	65	Gasoline	318.8992602	318.8993	0	7.083588	0.001556		0.001692812		2185.069948	0.152012	0.200546	0.847677	1.236929	3.59961E-05	42.7288842	0.021601641	0.044119	0.079797	0.027929	0.253987		0
Los Angele	2024	UBUS	Aggregate	65	Gasoline	1037.219956	1037.22	0	0.096181	0.000909		0.000988949		985.8617607	0.001388	0.008958	0.00452	0.006595	6.24253E-07	0.511560912	0.009746247	0.045	0.097499	0.034125	0.114594		0
					VMT Sum	**10,958,296**												**LDT Gas (**	**0.023873807**								
Diesel Light Duty																											
Los Angele	2024	LDA	Aggregate	65	Diesel	11020.69672	11020.7	0	0.274788	0.025915		0.027086871	0.014707222	259.5449661	0.00169	0.040891	0.036391	0.041429	0.02249459	0.392820809	0.00245932	0.0031	0.001979	0.000693	0.025557		0
Los Angele	2024	LDT1	Aggregate	65	Diesel	101.3774911	101.3775	0	1.812963	0.252679		0.264104008	0.001319105	449.4314409	0.015062	0.070808	0.324283	0.369174	0.001843893	2.456624332	0.004258591	0.0031	0.003	0.00105	0.044255		0
Los Angele	2024	LDT2	Aggregate	65	Diesel	9175.177341	9175.177	0	0.041302	0.004478		0.004680903	0.002115957	328.9058567	0.000403	0.051819	0.008683	0.009885	0.004468584	0.083624354	0.00311655	0.0031	0.002453	0.000859	0.032387		0
					VMT Sum	**20,297**						**LDT Diesel (g/mile)**	**0.018142284**					**LDT Diese**	**0.028807067**								

Light Duty Percents

GAS	0.998151
DSL	0.001849



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Yesenia Ostorga	8/29/2022
Name	*Date*
yesebiaostorga25@gmail.com	91405
Email	*Zip Code*

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Kenya estevez	8/29/2022
Name	*Date*
estevezlorena87@gmail.com	91343
Email	*Zip Code*

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¡Gracias!

Isaura Rodriguez	8/30/2022
Name	*Date*
esparza.isaura@gmail.com	91402
Email	*Zip Code*

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Lanira Murphy	8/30/2022
Name	*Date*
lanira_m@yahoo.com	91402
Email	*Zip Code*

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Irene Macias	8/30/2022
Name	*Date*
neneykarlita@icloud.com	91405
Email	*Zip Code*

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Carolina Macias	8/30/2022
Name	*Date*
carolinagm78@icloud.com	91403
Email	*Zip Code*

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Lesly Agustin Florencio	8/30/2022
Name	*Date*
daneth0408castaneda@gmail.com	91402
Email	*Zip Code*

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ana flores	8/30/2022
Name	*Date*
anaflores201900@gmail.com	91343
Email	*Zip Code*

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Guadalupe Ruiz	8/30/2022
Name	*Date*
jlupitaruiz5@gmail.com	91331
Email	*Zip Code*

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Olga de rosas	8/30/2022
Name	*Date*
Olgaderosas84@gmail.com	91402
Email	*Zip Code*

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Fatima tejeda	8/30/2022
Name	*Date*
fatmatejeda@icloud.com	91402
Email	*Zip Code*

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Ruben arana	8/30/2022
Name	*Date*
electricoarana89@gmail.com	91402
Email	*Zip Code*

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FRANCISCA V BRAVO	9/5/2022
Name	*Date*
ver0nica21@yahoo.com	91402
Email	*Zip Code*

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Emma wright	9/8/2022
Name	*Date*
ejwg88@gmail.com	91405
Email	*Zip Code*

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Mareli Santos	9/8/2022
Name	*Date*
marelisantos@aol.com	91402
Email	*Zip Code*

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¡Gracias!

Sara Judith Hernández Montano	9/8/2022
Name	*Date*
24sjhm@gmail.com	91402
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Valerie Golez	9/8/2022
Name	*Date*
golezvalerie@gmail.com	91325
Email	*Zip Code*

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Ivan Lopez	9/8/2022
Name	*Date*
navinomil@hotmail.com	91402
Email	*Zip Code*

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Zuleima Garcia	9/8/2022
Name	*Date*
zeeg55@gmail.com	91402
Email	*Zip Code*

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Cindy Haro	9/8/2022
Name	*Date*
cindydyan818@yahoo.com	91345
Email	*Zip Code*

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Andrea coy	9/9/2022
Name	*Date*
82andreaangel@gmail.com	91343
Email	*Zip Code*

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Norma Pena	9/13/2022
Name	*Date*
norma_0207@yahoo.com	91331
Email	*Zip Code*

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Christy Bracamontes	9/13/2022
Name	*Date*
christy.24@live.com	91402
Email	*Zip Code*

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Veronica Rivera	9/13/2022
Name	*Date*
riveraveronicaa68@gmail.com	91343
Email	*Zip Code*

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Adriana Paola Rangel	9/13/2022
Name	*Date*
rangeladriana40@yahoo.com	91331
Email	*Zip Code*

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Graciela Arreola	9/13/2022
Name	*Date*
graos07@yahoo.com.mx	91343
Email	*Zip Code*

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Eyra López	9/13/2022
Name	*Date*
imelda51380@gmail.com	91343
Email	*Zip Code*

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hannalee siaga	9/13/2022
Name	*Date*
hannaleesiaga@yahoo.com	91402
Email	*Zip Code*

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Gabriela Vargas	9/13/2022
Name	*Date*
gabbby0900@gmail.com	91352
Email	*Zip Code*

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jaime gonzalez	9/13/2022
Name	*Date*
gonzalezj28@ymail.com	91345
Email	*Zip Code*

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Lorena Escobar	9/13/2022
Name	*Date*
lore.rosa85@gmail.com	91324
Email	*Zip Code*

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Estela santillan	9/13/2022
Name	*Date*
stelie29@yahoo.com	91402
Email	*Zip Code*

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Mayra Rodriguez	9/13/2022
Name	*Date*
mayraoregon06@gmail.com	91402
Email	*Zip Code*

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Corgen Feliciano	9/13/2022
Name	*Date*
corgenfelix@yahoo.com	91402
Email	*Zip Code*

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Veronica bravo	9/13/2022
Name	*Date*
ver0nica21@yahoo.com	91402
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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¡Gracias!

Cindy Castaneda	9/13/2022
Name	*Date*
cindygonsalez52@yahoo.com	91344
Email	*Zip Code*

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Cinthya Hernandez	9/13/2022
Name	*Date*
cinthya84th@gmail.com	91401
Email	*Zip Code*

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Betsaida lopez	9/13/2022
Name	*Date*
blopezparedes@yahoo.com	91343
Email	*Zip Code*

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Maria	9/13/2022
Name	*Date*
mariarios395@gmail.com	91402
Email	*Zip Code*

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Johann Deapera	9/13/2022
Name	*Date*
johann.deapera@gmail.com	91402
Email	*Zip Code*

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Marisa Quero	9/13/2022
Name	*Date*
marisacamila80@yahoo.com	91402
Email	*Zip Code*

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Diana ovando lopez	9/13/2022
Name	*Date*
dianaovandolopez@yahoo.com	91402
Email	*Zip Code*

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Marco Haro	9/13/2022
Name	*Date*
mharo113@yahoo.com	91345
Email	*Zip Code*

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Maribel Vasquez	9/13/2022
Name	*Date*
v.marii18@gmail.com	91331
Email	*Zip Code*

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Luis serrato	9/13/2022
Name	*Date*
serratoluis80@gmail.com	91343
Email	*Zip Code*

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Lay Ann De Villar	9/13/2022
Name	*Date*
julayann@gmail.com	91331
Email	*Zip Code*

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Mariana peralat	9/13/2022
Name	*Date*
mariana.plopez@yahoo.com	91331
Email	*Zip Code*

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Rosa Marroquin	9/13/2022
Name	*Date*
rosyamart1@ifloud.com	91335
Email	*Zip Code*

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Karina Leon	9/13/2022
Name	*Date*
karinaleon6969@gmail.com	91343
Email	*Zip Code*

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Karla Aguilar	9/13/2022
Name	*Date*
karlitaa26@yahoo.com	91343
Email	*Zip Code*

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Esmeralda Hernandez	9/13/2022
Name	*Date*
es_mera_lda@yahoo.com	91402
Email	*Zip Code*

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Kenia Portillo	9/13/2022
Name	*Date*
keniaportillo50@yahoo.com	91402
Email	*Zip Code*

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Elizabeth Huizar	9/13/2022
Name	*Date*
elizabethhuizar03@gmail.com	93352
Email	*Zip Code*

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Mirna Castillo	9/13/2022
Name	*Date*
mirnacastilloh385@gmail.com	91402
Email	*Zip Code*

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¡Gracias!

Erika pacheco	9/13/2022
Name	*Date*
seca614@gmail.com	91402
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Angelica Hernandez	9/13/2022
Name	*Date*
arhdz91@yahoo.com	91402
Email	*Zip Code*

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Paola Esparza	9/13/2022
Name	*Date*
paolavergara30@gmail.com	91405
Email	*Zip Code*

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Teresa Menacho	9/13/2022
Name	*Date*
pashn.x.vida@gmail.com	91331
Email	*Zip Code*

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Elvin Mata	9/13/2022
Name	*Date*
Volumebmx76@hotmail.com	91402
Email	*Zip Code*

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Maria Coria Camacho	9/13/2022
Name	*Date*
Cinderella79s@gmail.com	91402
Email	*Zip Code*

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Delia huerta	9/13/2022
Name	*Date*
deliahuerta889@yahoo.com	91331
Email	*Zip Code*

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Angelica Reyes	9/13/2022
Name	*Date*
angelicagonzalez558@yahoo.com	91405
Email	*Zip Code*

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Mayra Ramirez	9/13/2022
Name	*Date*
	91402
Email	*Zip Code*

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Carlos Baez	9/15/2022
Name	*Date*
clnbaez777@gmail.com	91402
Email	*Zip Code*

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Miguel Martinez	9/15/2022
Name	*Date*
miguelmtz_13@hotmail.com	91402
Email	*Zip Code*

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Devin Diaz	9/16/2022
Name	*Date*
ddiaz@brightstarschools.org	91403
Email	*Zip Code*

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Shaahil paaloba	9/16/2022
Name	*Date*
infi7615@yahoo.com	91403
Email	*Zip Code*

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Judith Elguezabal	9/16/2022
Name	*Date*
judithelguezabal14@gmail.com	91331
Email	*Zip Code*

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Caley Lawrence	9/16/2022
Name	*Date*
clawrence@brightstarschools.org	91343
Email	*Zip Code*

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Natalie Wollaston	9/16/2022
Name	*Date*
natalie.wollaston.91@gmail.com	91335
Email	*Zip Code*

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Lacey Bianco	9/16/2022
Name	*Date*
lschmidt23@gmail.com	91331
Email	*Zip Code*

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Esmeralda Reynaga	9/16/2022
Name	*Date*
esmeralda.reynaga.3@gmail.com	91331
Email	*Zip Code*

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Juliana Christakis	9/16/2022
Name	*Date*
julianachristakis@gmail.com	91331
Email	*Zip Code*

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¡Gracias!

Natalie Lilley	9/16/2022
Name	*Date*
nmlilley@gmail.com	91343
Email	*Zip Code*

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Susana Teska	9/16/2022
Name	*Date*
idalymore79@yahoo.com	91342
Email	*Zip Code*

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Alejandra Rojas	9/16/2022
Name	*Date*
alehandrarojas81@gmail.com	91405
Email	*Zip Code*

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Janelle Beck	9/16/2022
Name	*Date*
beckvjanelle@gmail.com	91101
Email	*Zip Code*

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Evelyn Y Garcia	9/16/2022
Name	*Date*
evelynmarquez33@yahoo.com	91402
Email	*Zip Code*

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María I.Mata	9/16/2022
Name	*Date*
chimiss000510@gmail.com	91343
Email	*Zip Code*

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Marta Guzman	9/16/2022
Name	*Date*
martagusman@icloud.com	91343
Email	*Zip Code*

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Clarita Gomez	9/16/2022
Name	*Date*
claracastro2023@gmail.com	91343
Email	*Zip Code*

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Sandra Leal-Lopez	9/16/2022
Name	*Date*
leal_s128@hotmail.com	91331
Email	*Zip Code*

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Yanileth Paiz	9/16/2022
Name	*Date*
eskarlinpaiz@gmail.com	91343
Email	*Zip Code*

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Karla Sandoval	9/16/2022
Name	*Date*
karla_sandoval9984@yahoo.com	91343
Email	*Zip Code*

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Laura Ahumada	9/16/2022
Name	*Date*
lauralookie@yahoo.com	91340
Email	*Zip Code*

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Dalia Villarreal	9/16/2022
Name	*Date*
daliavillarreal3124@gmail.com	91402
Email	*Zip Code*

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Evendilyn Barrion	9/16/2022
Name	*Date*
jezzrell05@gmail.com	91402
Email	*Zip Code*

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Ivon Alejandro	9/16/2022
Name	*Date*
ivonalejandro01@gmail.com	91402
Email	*Zip Code*

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Edgar Tremillo	9/16/2022
Name	*Date*
edgar.tremillo@yahoo.com	91331
Email	*Zip Code*

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Maria de Lourdes	9/16/2022
Name	*Date*
romerolourdes127@gmail.com	91402
Email	*Zip Code*

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Idania González	9/16/2022
Name	*Date*
lopezmarcela011@gmail.com	91343
Email	*Zip Code*

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Monica Warner	9/16/2022
Name	*Date*
monica.warner82@gmail.com	91342
Email	*Zip Code*

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maria mercado	9/16/2022
Name	*Date*
isabellafuentes238@gmail.com	91343
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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¡Gracias!

Silvia Gómez	9/16/2022
Name	*Date*
silviapgomez2012@gmail.com	91402
Email	*Zip Code*

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Adriana Sanchez	9/16/2022
Name	*Date*
samchez221127@gmail.com	91343
Email	*Zip Code*

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María Gabriela Aguayo	9/16/2022
Name	*Date*
Gabiaguayo9@gmail.com	91402
Email	*Zip Code*

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Mayra Livier Galvan	9/16/2022
Name	*Date*
liviergalvan12@gmail.com	91402
Email	*Zip Code*

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Magnolia	9/16/2022
Name	*Date*
magnoliaramirez1985@gmail.com	91331
Email	*Zip Code*

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Eloisa	9/16/2022
Name	*Date*
elosolorio@iclouf.com	91402
Email	*Zip Code*

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Cyndi Pacheco	9/16/2022
Name	*Date*
cindypacheco26@yahoo.com	91605
Email	*Zip Code*

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Lucrecia Barrios	9/16/2022
Name	*Date*
amavel13@yahoo.com	91605
Email	*Zip Code*

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Jessica Archila-Ramos	9/16/2022
Name	*Date*
jessiearchi@hotmail.com	91331
Email	*Zip Code*

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Kitzia De Haro	9/16/2022
Name	*Date*
kitzia142009@hotmail.com	91402
Email	*Zip Code*

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Perla Velasquez	9/16/2022
Name	*Date*
pearlv90@yahoo.com	91331
Email	*Zip Code*

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Ana Baez	9/16/2022
Name	*Date*
anakaren_01123@yahoo.com	91402
Email	*Zip Code*

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Jocelyn alvarez	9/17/2022
Name	*Date*
jojo23lover@gmail.com	91402
Email	*Zip Code*

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Erwen Nomil	9/17/2022
Name	*Date*
erwenomil@gmail.com	91343
Email	*Zip Code*

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Marycel Fernandez	9/17/2022
Name	*Date*
gastonomil1.w@gmail.com	91343
Email	*Zip Code*

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Angie Trae Greenbarg	9/17/2022
Name	*Date*
atrae@brightstarschools.org	91343
Email	*Zip Code*

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Fatima tejeda	9/17/2022
Name	*Date*
fatmatejeda@icloud.com	91502
Email	*Zip Code*

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Catlyn Preffer	9/17/2022
Name	*Date*
catlynpreffer@gmail.com	90036
Email	*Zip Code*

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Maria carrillo	9/17/2022
Name	*Date*
isabeljosjenjaz@gmail.com	91331
Email	*Zip Code*

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¡Gracias!

Eloisa Solorio	9/17/2022
Name	*Date*
elodolorio@icloud.com	91402
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Reyna suarez Bernal	9/17/2022
Name	*Date*
reynaymax81711@gmail.com	91402
Email	*Zip Code*

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Patricia Leighton	9/17/2022
Name	*Date*
pleighton81@gmail.com	91331
Email	*Zip Code*

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¡Gracias!

Alyssa Calderon	9/17/2022
Name	*Date*
alyssacalderon779@gmail.com	9031Noble Ave North Hills Ca.91343
Email	*Zip Code*

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Rabia Asif	9/18/2022
Name	*Date*
rabia.asif07@gmail.com	91343
Email	*Zip Code*

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Veronica Chavez	9/18/2022
Name	*Date*
vcblessed@gmail.com	91331
Email	*Zip Code*

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TinaMarie Bayardo	9/18/2022
Name	*Date*
bettyboop4ob1tnt@gmail.com	91331
Email	*Zip Code*

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Johanna Escalante	9/18/2022
Name	*Date*
mibelle1029@gmail.com	91343
Email	*Zip Code*

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Beatriz Gutierrez	9/18/2022
Name	*Date*
bettyrrrr@yahoo.com	91331
Email	*Zip Code*

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Laurie Singer	9/19/2022
Name	*Date*
lsinger@brightstarschools.org	91307
Email	*Zip Code*

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Magaly Linares	9/19/2022
Name	*Date*
maggie28r@gmail.com	91405
Email	*Zip Code*

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Susana Ortega	9/20/2022
Name	*Date*
medinav99@yahoo.com	91331
Email	*Zip Code*

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Daniella Torrecilla	9/21/2022
Name	*Date*
dtorrecilla@brightstarschools.org	91406
Email	*Zip Code*

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Javier Contreras	9/28/2022
Name	*Date*
nflgifts09@yahoo.com	91342
Email	*Zip Code*

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Sandra Alberto	9/28/2022
Name	*Date*
Sandmas4@gmail.com	91331
Email	*Zip Code*

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Deisy Montano	9/28/2022
Name	*Date*
rivas5473@gmail.com	91402
Email	*Zip Code*

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Edward Vargas	9/28/2022
Name	*Date*
gabbby0900@gmail.com	91352
Email	*Zip Code*

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Vanessa Ramirez	9/28/2022
Name	*Date*
ramirezvanessa024@gmail.com	91402
Email	*Zip Code*

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Esmeralda dehijar	9/28/2022
Name	*Date*
esmetravi@icloud.com	91343
Email	*Zip Code*

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¡Gracias!

Estela Montes	9/28/2022
Name	*Date*
estelamontes2004@gmail.com	91343
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Fabiola Corchado	9/28/2022
Name	*Date*
corchado15@gmail.com	91402
Email	*Zip Code*

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Ana Beatriz Rivera	9/28/2022
Name	*Date*
riveraana2@yahoo.com	91343
Email	*Zip Code*

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Claudia Vazquez	9/28/2022
Name	*Date*
vazquezclaudia359@gmail.com	91324
Email	*Zip Code*

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Maribel Castillo	9/28/2022
Name	*Date*
maribelcastillo341@yahoo.com	91343
Email	*Zip Code*

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Dawn fagan	9/28/2022
Name	*Date*
drjckissable@yahoo.com	91331
Email	*Zip Code*

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Cecilia Martinez	9/28/2022
Name	*Date*
Cecimartinez317@gmail.com	91331
Email	*Zip Code*

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Yanel lopez	9/28/2022
Name	*Date*
yanellopez0415.@gmail.com	91402
Email	*Zip Code*

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Iridely burciaga	9/28/2022
Name	*Date*
burciagairidely5@gmail.com	91402
Email	*Zip Code*

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Claudia Escobar	9/28/2022
Name	*Date*
Naomi2love@me.com	91402
Email	*Zip Code*

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Claudia Miranda Perez	9/28/2022
Name	*Date*
miraacevedo@hotmail.com	91343
Email	*Zip Code*

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Margarita partida	9/28/2022
Name	*Date*
	91402
Email	*Zip Code*

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Evelin González	9/28/2022
Name	*Date*
eveling724@gmail.com	91406
Email	*Zip Code*

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Maria solis	9/28/2022
Name	*Date*
lupesolis1212@yahoo.com	91343
Email	*Zip Code*

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Nubia orellana	9/28/2022
Name	*Date*
nubiaorellana6969@gmail.com	91405
Email	*Zip Code*

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Maria J. Chereguino	9/28/2022
Name	*Date*
mjchereguino@hotmail.com	91342
Email	*Zip Code*

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Nadia Vazquez	9/28/2022
Name	*Date*
vazquezmiros88@gmail.com	91402
Email	*Zip Code*

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Guadalupe Dominguez	9/28/2022
Name	*Date*
lupedmgz70@gmail.com	91402
Email	*Zip Code*

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Angelica Reyes	9/28/2022
Name	*Date*
gonzalezangie502@gmail.com	91405
Email	*Zip Code*

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Esperanza Sandoval	9/28/2022
Name	*Date*
reyes107835@gmail.com	91402
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Aleesa Rogers	9/28/2022
Name	*Date*
aleesanicole1@gmail.com	91343
Email	*Zip Code*

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Lissett Reyes	9/28/2022
Name	*Date*
lissett_reyes1991@yahoo.com	91402
Email	*Zip Code*

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Alicia Ascencio	9/28/2022
Name	*Date*
8188267004as@gmail.com	91402
Email	*Zip Code*

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Sonia Lira	9/28/2022
Name	*Date*
savilalira@gmail.com	91402
Email	*Zip Code*

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Lilia Martinez	9/28/2022
Name	*Date*
lily0315mtz@hotmail.com	91402
Email	*Zip Code*

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Carla Aguirre	9/28/2022
Name	*Date*
carlamaguirre45@gmail.com	91343
Email	*Zip Code*

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Renata Salomon	9/28/2022
Name	*Date*
renatasalomon488@gmail.com	91343
Email	*Zip Code*

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Nora Murillo	9/28/2022
Name	*Date*
norarmurillo@hotmail.com	91402
Email	*Zip Code*

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Ana Carranza	9/28/2022
Name	*Date*
anavarranzacalixto1983@gmail.com	91343
Email	*Zip Code*

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perla pinedo	9/28/2022
Name	*Date*
pinedoperla2@gmail.com	91331
Email	*Zip Code*

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Name	*Date*
sheilih09@gmail.com	91402
Email	*Zip Code*

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Laura Ramirez	9/28/2022
Name	*Date*
princess_brisa31@yahoo.com	91343
Email	*Zip Code*

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Alejandro García	9/28/2022
Name	*Date*
alejandrog1372@icloud.com	91343
Email	*Zip Code*

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Vanesa Maria Murillo	9/28/2022
Name	*Date*
vaxesa.murillo@gmail.com	91402
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Luis Vivanco	9/28/2022
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ljvivanco77@gmail.com	91331
Email	*Zip Code*

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Kim Eliza Pedrigala	9/28/2022
Name	*Date*
kimcatapusan@yahoo.com	91402
Email	*Zip Code*

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Oralia Choc	9/28/2022
Name	*Date*
orchoc1@gmail.com	91343
Email	*Zip Code*

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Edwin angel	9/28/2022
Name	*Date*
angeledwin83@gmail.com	91343
Email	*Zip Code*

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Griselda Alvarez	9/28/2022
Name	*Date*
griss1083@gmail.com	91405
Email	*Zip Code*

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¡Gracias!

America Herrera	9/28/2022
Name	*Date*
america.geraldine711@gmail.com	91331
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Maria Diaz	9/28/2022
Name	*Date*
mariadiazmaxon@gmail.com	91331
Email	*Zip Code*

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Julieta Crisol	9/28/2022
Name	*Date*
julie13crisol@gmail.com	91343
Email	*Zip Code*

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Steven Aguilar	9/28/2022
Name	*Date*
saguilar46@gmail.com	91402
Email	*Zip Code*

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Josue Gomez	9/28/2022
Name	*Date*
josuegomez1108@gmail.com	91402
Email	*Zip Code*

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Alejandra Robles	9/28/2022
Name	*Date*
Ljndr_robles@yahoo.com	91402
Email	*Zip Code*

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Ruth Marroquin	9/28/2022
Name	*Date*
ruthkme@gmail.com	93534
Email	*Zip Code*

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Jose Antonio Nava	9/28/2022
Name	*Date*
jose.nava4383@gmail.com	91343
Email	*Zip Code*

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Cristian Guadamuz	9/28/2022
Name	*Date*
crisgarache30@gmail.com	91405
Email	*Zip Code*

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Jessica bautista	9/28/2022
Name	*Date*
vjmargaritatweety@gmail.com	91402
Email	*Zip Code*

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Maria Jesusa Torres	9/28/2022
Name	*Date*
majesusagtorres@gmail.com	91343
Email	*Zip Code*

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Esmirna de la cruz	9/28/2022
Name	*Date*
	91402
Email	*Zip Code*

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Esmeralda Rodriguez Meza	9/28/2022
Name	*Date*
esmyrodriguez27@gmail.com	91343
Email	*Zip Code*

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Cristina Garcia	9/28/2022
Name	*Date*
cristinaoraheta1993@gmail.com	91331
Email	*Zip Code*

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Betzabet Benitez	9/29/2022
Name	*Date*
lovebetza@live.com	91402
Email	*Zip Code*

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Cecilia Romero	9/29/2022
Name	*Date*
cecyrromero37@gmail.com	91343
Email	*Zip Code*

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Joshua Lilley	9/29/2022
Name	*Date*
jdlilley22@gmail.com	91325
Email	*Zip Code*

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Araceli Rosales	9/29/2022
Name	*Date*
araceliros88@yahoo.com	91331
Email	*Zip Code*

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Rosa Rosales	9/29/2022
Name	*Date*
araceliros88@yahoo.com	91331
Email	*Zip Code*

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¡Gracias!

Gustavo Vaz	10/10/2022
Name	*Date*
gvaz@brightstarschools.org	91406
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Gene Castro	10/10/2022
Name	*Date*
gcastro@brightstarschools.org	90012
Email	*Zip Code*

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Paulina Sylvester	10/10/2022
Name	*Date*
psylvester@brightstarschools.org	91207
Email	*Zip Code*

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THIANY ARMIJO	10/10/2022
Name	*Date*
ARMIJOTHIANY101299@GMAIL.COM	90018
Email	*Zip Code*

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Sunil Kewalramani	10/10/2022
Name	*Date*
sunilkewal@gmail.com	91356
Email	*Zip Code*

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Elyssa Arroyo	10/10/2022
Name	*Date*
earroyo@brightstarschools.org	91381
Email	*Zip Code*

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Vartan Gasparian	10/10/2022
Name	*Date*
vgasparian@brightstarschools.org	91406
Email	*Zip Code*

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Keben Perez	10/10/2022
Name	*Date*
kperez@brightstarschools.org	90007
Email	*Zip Code*

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Mayra Licea	10/10/2022
Name	*Date*
mlicea@brightstarschools.org	91331
Email	*Zip Code*

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Maggie Kwon	10/10/2022
Name	*Date*
hkwon@brightstarschools.org	90020
Email	*Zip Code*

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Thalia Gallegos	10/10/2022
Name	*Date*
tgallegos@brightstarschools.org	91401
Email	*Zip Code*

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Scott Layfield	10/10/2022
Name	*Date*
scottlayfield@hotmail.com	90272
Email	*Zip Code*

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Melissa Ignacio	10/10/2022
Name	*Date*
m.ignacio95@yahoo.com	91343
Email	*Zip Code*

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Raquel Martinez	10/10/2022
Name	*Date*
ramartinez@brightstarschools.org	90230
Email	*Zip Code*

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Lois Levy	10/10/2022
Name	*Date*
loisslevy@gmail.com	90066
Email	*Zip Code*

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Talar Samuelian	10/10/2022
Name	*Date*
talar29@gmail.com	91601
Email	*Zip Code*

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Eric Alexander Rodriguez	10/10/2022
Name	*Date*
erodriguez@brightstarschools.org	91607
Email	*Zip Code*

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Louisa Wee	10/10/2022
Name	*Date*
louisawee@gmail.com	91604
Email	*Zip Code*

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Karlyn Yngve	10/10/2022
Name	*Date*
klassones@roadrunner.com	91605
Email	*Zip Code*

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Chanel Williams	10/10/2022
Name	*Date*
chanelhungerford@gmail.com	91505
Email	*Zip Code*

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¡Gracias!

Richard Myers	10/10/2022
Name	*Date*
rmyers@brightstarschools.org	90293
Email	*Zip Code*

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Breana Baskerville	10/10/2022
Name	*Date*
bbaskerville@brightstarschools.org	91343
Email	*Zip Code*

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Jillian Santoro	10/10/2022
Name	*Date*
j.bobean78@gmail.com	91606
Email	*Zip Code*

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Eliza Gi Yoon Kim	10/10/2022
Name	*Date*
egykim@yahoo.com	91326
Email	*Zip Code*

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Olivia Martinez	10/10/2022
Name	*Date*
omartinez@brightstarschools.org	90018
Email	*Zip Code*

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Sue Chae	10/10/2022
Name	*Date*
schae@brightstarschools.org	90020
Email	*Zip Code*

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Colleen Trejo	10/10/2022
Name	*Date*
trejo.colleen@gmail.com	90247
Email	*Zip Code*

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Mylene Belista	10/10/2022
Name	*Date*
msbelista21@gmail.com	91402
Email	*Zip Code*

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Mariana Ramirez	10/10/2022
Name	*Date*
mari12345673359@gmail.com	91343
Email	*Zip Code*

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Maria Murillo	10/10/2022
Name	*Date*
isamurillo1977@icloud.com	91405
Email	*Zip Code*

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Brenda Alay	10/10/2022
Name	*Date*
5040brendaalay@gmail.com	91343
Email	*Zip Code*

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Jacqueline Valenzuela	10/10/2022
Name	*Date*
jvalenn244@gmail.com	91316
Email	*Zip Code*

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Monica Garcia	10/10/2022
Name	*Date*
mgarcia92010@gmail.com	91402
Email	*Zip Code*

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Sofia Sanchez	10/10/2022
Name	*Date*
sofia110408@gmail.com	91306
Email	*Zip Code*

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Elena Arias	10/10/2022
Name	*Date*
elena@la-allstars.org	90033
Email	*Zip Code*

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Leonardo Ruben Gallardo	10/10/2022
Name	*Date*
lrg037@gmail.com	90022
Email	*Zip Code*

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Evelyn Marquez	10/10/2022
Name	*Date*
evelynmarquez33@yahoo.com	91402
Email	*Zip Code*

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Jason Mercado	10/10/2022
Name	*Date*
kunasoon@gmail.com	91402
Email	*Zip Code*

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Karla G Dominguez	10/10/2022
Name	*Date*
karladominguez0623@gmail.com	91402
Email	*Zip Code*

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¡Gracias!

Leydi galvez	10/10/2022
Name	*Date*
galvezleidy55@icloud.com	91406
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Ben Katcher	10/10/2022
Name	*Date*
benkatcher@gmail.com	91208
Email	*Zip Code*

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Wendy Sedano	10/10/2022
Name	*Date*
wendysedano5@gmail.com	91402
Email	*Zip Code*

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¡Gracias!

Elena Arrroyo	10/10/2022
Name	*Date*
l50arroyo@gmail.com	91402
Email	*Zip Code*

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Andrew Murr	10/11/2022
Name	*Date*
andrew.murr@att.net	90020
Email	*Zip Code*

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Stephen Green	10/11/2022
Name	*Date*
	07094
Email	*Zip Code*

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Juan Carlos atilano	10/11/2022
Name	*Date*
atilanoj@yahoo.com	91402
Email	*Zip Code*

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¡Gracias!

Donny Faaliliu	10/11/2022
Name	*Date*
donny.faaliliu@la-allstars.org	90028
Email	*Zip Code*

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Ben Gonzalez	10/11/2022
Name	*Date*
ben@la-allstars.org	90028
Email	*Zip Code*

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Georgina Gines	10/11/2022
Name	*Date*
georgina@la-allstats.org	90670
Email	*Zip Code*

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Christopher Vaimili	10/11/2022
Name	*Date*
cvaimili@gmail.com	90713
Email	*Zip Code*

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Alberto Castaneda	10/11/2022
Name	*Date*
castanedaa99@gmail.com	90038
Email	*Zip Code*

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Fatima Acuna	10/11/2022
Name	*Date*
fatima.acuna.258@my.csun.edu	90650
Email	*Zip Code*

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Mirca Mora	10/11/2022
Name	*Date*
mircamora584@gmail.com	90007
Email	*Zip Code*

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Genoveva Cortes	10/11/2022
Name	*Date*
crimsonlatina@gmail.com	91030
Email	*Zip Code*

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Laura Reed	10/11/2022
Name	*Date*
laurareed24@gmail.com	90026
Email	*Zip Code*

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Aminta Calderon	10/11/2022
Name	*Date*
calderon0125@yahoo.com	91405
Email	*Zip Code*

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Olivia Acosta	10/11/2022
Name	*Date*
Olivia771@yahoo.com	91325
Email	*Zip Code*

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Tabitha Rodriguez	10/11/2022
Name	*Date*
rodrigueztabitha88@gmail.com	91331
Email	*Zip Code*

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¡Gracias!

James Min	10/12/2022
Name	*Date*
jamesminfwd@gmail.com	91326
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

I fully support the proposed Valor Academy Elementary school. I urge you, Councilwoman Monica Rodriguez, to stand with children and families and support a permanent elementary school at 15526 Plummer Street.

Valor Schools have not only provided children an exceptional education, but they have also been wonderful partners to the North Hills community, recently hosting a Family Fair with the Neighborhood Council and participating in neighborhood clean-ups.

Valor has even agreed to maintain the existing house to historic standards.

Please stand with the 1,500 families who attend Valor Schools within Council District 7 and support a permanent elementary school at 15526 Plummer Street.

Thank you!

/

Apoyo totalmente la propuesta de la escuela primaria Valor Academy. Le insto, concejal Mónica Rodríguez, a apoyar a los niños y las familias y apoyar una escuela primaria permanente en 15526 Plummer Street.

Las Escuelas Valor no solo han brindado a los niños una educación excepcional, sino que también han sido socios maravillosos para la comunidad de North Hills, recientemente organizaron una Feria Familiar con el Consejo Vecinal y participaron en limpiezas del vecindario.

Valor incluso acordó mantener la casa existente a estándares históricos.

Apoye a las 1,500 familias que asisten a las Escuelas Valor dentro del Distrito 7 y apoye una escuela primaria permanente en 15526 Plummer Street.

¡Gracias!

Dora Dome	10/12/2022
Name	*Date*
dora.dome@gmail.com	94610
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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¡Gracias!

Dioselina Carranza	10/12/2022
Name	*Date*
	91402
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

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Thank you!

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¡Gracias!

Sujey baltodano	10/13/2022
Name	*Date*
baltodanosujey@gmail.com	91343
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

I fully support the proposed Valor Academy Elementary school. I urge you, Councilwoman Monica Rodriguez, to stand with children and families and support a permanent elementary school at 15526 Plummer Street.

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¡Gracias!

James McGRath	10/13/2022
Name	*Date*
james.j.mcgrath@outlook.com	91436
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

I fully support the proposed Valor Academy Elementary school. I urge you, Councilwoman Monica Rodriguez, to stand with children and families and support a permanent elementary school at 15526 Plummer Street.

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Thank you!

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¡Gracias!

Veronica	10/14/2022
Name	*Date*
vhurley@brightstarschools.org	91350
Email	*Zip Code*

Petition: North Hills hearts Valor Schools

I fully support the proposed Valor Academy Elementary school. I urge you, Councilwoman Monica Rodriguez, to stand with children and families and support a permanent elementary school at 15526 Plummer Street.

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¡Gracias!

Darryl Garris	10/26/2022
Name	*Date*
garris.darryl@gmail.com	91367
Email	*Zip Code*

Letter of Support for Bright Star Schools' Valor Academy Elementary School

Esther Ahn
LA City Planning Department
Via email: esther.ahn@lacity.org

Re: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn,

After-School All-Stars, Los Angeles strongly supports Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. Additionally, they have been a strong partner of ours since 2011. Since then, we have been able to support and provide afterschool and expanded learning programs for close to 800 students in seven schools, including Valor Academy Elementary School.

Why we support Bright Star Schools and Valor Academy Elementary School:

- **Bright Star Schools provide a high-quality, free public education** for students of all backgrounds and abilities from transitional kindergarten through 12th grade. Additionally, they provide up to 6 years of higher education support for their alumni.

- **Bright Star Schools is a nonprofit organization that operates 9 charter public schools across Los Angeles, all authorized by the LAUSD.** Bright Star Schools' three schools serving North Hills include Valor Academy Elementary School, Valor Academy Middle School, and Valor Academy High School.

- **Bright Star Schools was selected by the owner of 15526 Plummer Street to purchase the property and build a campus for their existing elementary school that will benefit the community for generations to come.** A strong public education system is critical to the future of North Hills' children, their families, and our community. Bright Star Schools is an important community partner that is committed to the future of North Hills.

- **Bright Star Schools will, and has always planned to, preserve the historic home on the property at 15526 Plummer Street.** Bright Star Schools has been in full support of preserving the home and has plans to preserve the home's historical defining features.

Governor Arnold Schwarzenegger
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- **Bright Star's Valor Academy Elementary School students, families, teachers, and staff deserve a permanent home.** The children of North Hills and the surrounding communities are the future of our city. They deserve a beautiful, permanent school campus where they can learn and grow, and in the years to come, where their children and their grandchildren can too.

Thank you for considering Bright Star Schools' project to benefit our North Hills community.

Sincerely,



Donny Faaliliu
Senior Vice President of Leadership and Community Outreach
After-School All-Stars, Los Angeles

Esther Ahn <esther.ahn@lacity.org>

Re: CASE NUMBER CPC-2022-5865-CU-SPR - 15526 Plummer Street

1 message

aimee tremillo <aimee.tremillo@yahoo.com> Wed, Feb 1, 2023 at 7:17 PM
To: esther.ahn@lacity.org

Dear Mrs. Ahn,

My name is Aimee Santiago and I am the parent of a student who attends Valor Academy Elementary School.

I am writing to support Bright Star Schools' project to build a permanent building for Valor Elementary School at 15526 Plummer Street.

This location is important to me because it will be located closer to our residence.

Valor Elementary has been a wonderful place for my daughter to learn and grow. Specifically, the school has benefited our family by helping her focusing in learning.

I fully support the school building a permanent building at 15526 Plummer so that more children in the community can benefit from receiving an education there.

Sincerely

Aimee Santiago

Didi Hirsch
MENTAL HEALTH SERVICES

Letter of Support for Bright Star Schools' Valor Academy Elementary School

Esther Ahn
LA City Planning Department
Via email: esther.ahn@lacity.org

Re: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn,

Didi Hirsch Mental Health Services supports Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Didi Hirsch has provided voluntary, school-based mental health services at the Bright Star Valor Academy Schools for the past ten years and our partnership has continued to grow through the years. Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. Therapists from Didi Hirsch help provide much needed mental health support to help meet student needs.

Reasons why we support **Bright Star Schools** and **Valor Academy Elementary School**:

- **Bright Star Schools provide a high-quality, free public education** for students of all backgrounds and abilities from transitional kindergarten through 12th grade. Additionally, they provide up to 6 years of higher education support for their alumni.

- **Bright Star Schools is a nonprofit organization that operates 9 charter public schools across Los Angeles, all authorized by the LAUSD.** Bright Star Schools' three schools serving North Hills include Valor Academy Elementary School, Valor Academy Middle School, and Valor Academy High School.

- **Bright Star Schools was selected by the owner of 15526 Plummer Street to purchase the property and build a campus for their existing elementary school that will benefit the community for generations to come.** A strong public education system is critical to the future of North Hills' children, their families, and our community. Bright Star Schools is an important community partner that is committed to the future of North Hills.

- **Bright Star Schools will, and has always planned to, preserve the historic home on the property at 15526 Plummer Street.** Bright Star Schools has been in full support of preserving the home and has plans to preserve the home's historical defining features.

Bright Star's Valor Academy Elementary School students, families, teachers, and staff deserve a permanent home. The children of North Hills and the surrounding communities are the future of our city. They deserve a beautiful, permanent school campus where they can learn and grow, and in the years to come, where their children and their grandchildren can too.

We are pleased to lend our support to the Bright Star Schools' project to benefit the North Hills community.

Sincerely,

Rachel Gloer, LCSW

Rachel Gloer, LCSW
Vice President, Whole Person Care
Didi Hirsch Mental Health Services
4760 South Sepulveda Blvd.
Culver City, CA 90230

GREATER SAN FERNANDO VALLEY
CHAMBER OF COMMERCE

November 8, 2022

Esther Ahn
LA City Planning Department
Via email: esther.ahn@lacity.org

Re: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn:

The Greater San Fernando Valley Chamber of Commerce **SUPPORTS** Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. The Chamber shares a strong passion for workforce development, and through our partnership with Bright Star, we can connect employers to talent through Bright Star's students.

In addition to our growing workforce development partnership, the Chamber supports Bright Star Schools and Valor Academy Elementary School because it provides a high-quality, free public education for students of all backgrounds and abilities from transitional kindergarten through 12th grade. They stand apart from other schools because they also provide up to 6 years of higher education support for their alumni.

A robust public education system is critical to the future of North Hills' children, their families, and our community. Bright Star Schools has a successful history of operating charter public schools across Los Angeles, with three in the San Fernando Valley, all authorized by LAUSD. Bright Star Schools is an important community partner committed to the future of North Hills.

Bright Star Schools does not have a permanent home in North Hills, and it's critical for students, families, teachers, and staff to have a permanent location where they can learn and grow.

Thank you for considering Bright Star Schools' project to benefit our North Hills community, and we ask that you approve their conditional use permit.

Sincerely,

Nancy Hoffman Vanyek, ACE
Chief Executive Officer

7120 Hayvenhurst Avenue, Suite 114 • Van Nuys • CA • 91406
(818) 989-0300 FAX (818) 989-3836

HARVARD WESTLAKE SCHOOL

Letter of Support for Bright Star Schools' Valor Academy Elementary School

Esther Ahn
LA City Planning Department
Via email: esther.ahn@lacity.org

Re: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn,

Harvard-Westlake School strongly supports Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. Additionally, they have developed a strong relationship with Harvard-Westlake that includes a number of after-school and summer program partnerships.

Why we support Bright Star Schools and Valor Academy Elementary School:

- **Bright Star Schools provide a high-quality, free public education** for students of all backgrounds and abilities from transitional kindergarten through 12th grade. Additionally, they provide up to 6 years of higher education support for their alumni.

- **Bright Star Schools is a nonprofit organization that operates 9 charter public schools across Los Angeles, all authorized by the LAUSD.** Bright Star Schools' three schools serving North Hills include Valor Academy Elementary School, Valor Academy Middle School, and Valor Academy High School.

- **Bright Star Schools was selected by the owner of 15526 Plummer Street to purchase the property and build a campus for their existing elementary school that will benefit the community for generations to come.** A strong public education system is critical to the future of North Hills' children, their families, and our community. Bright Star Schools is an important community partner that is committed to the future of North Hills.

- **Bright Star Schools will, and has always planned to, preserve the historic home on the property at 15526 Plummer Street.** Bright Star Schools has been in full support of preserving the home and has plans to preserve the home's historical defining features.

- **Bright Star's Valor Academy Elementary School students, families, teachers, and staff deserve a permanent home.** The children of North Hills and the surrounding communities are the future of our city. They deserve a beautiful, permanent school campus where they can learn and grow, and in the years to come, where their children and their grandchildren can too.

Thank you for considering Bright Star Schools' project to benefit our North Hills community.

Sincerely,



Ari Engelberg
Head of Communications & Strategic Initiatives
Harvard-Westlake School

Esther Ahn <esther.ahn@lacity.org>

Letters of Support for Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

1 message

May Oey <moey@brightstarschools.org> Thu, Dec 8, 2022 at 8:21 AM
To: esther.ahn@lacity.org
Cc: paola.bassignana@lacity.org, liz.saldivar@lacity.org, councilmember.rodriguez@lacity.org

Dear Ms. Ahn,

I hope this message finds you well!

My name is May Oey, and I'm the founding principal of Valor Academy Elementary School, a Bright Star School. Valor Elementary is the proud home of the Cubs, and we provide our ~370 students from transitional kindergarten through 4th grade with rigorous academic, holistic and inclusive support, and rich life opportunities beyond the classroom so they thrive.

Bright Star Schools is seeking to build a permanent school campus for our Valor Cubs at 15526 Plummer (Case Number CPC-2022-5865-CU-SPR). Since our founding in 2016, we've had to move our campus three times, which is disruptive to our students and families.

Additionally, our current location is space-constrained, and with a new facility, we could enroll approximately 550 students and serve many more North Hills families. In addition to adding state-of-the-art classrooms for our Cubs, we'd also be able to provide them with a large outdoor play space.

I'm pleased to share with you **254 petitions of support for the project from families and community members.** The petitions are addressed to Councilmember Rodriguez, who I've cc'd here as well.

Also attached are **five letters of support from our community partners: Worthy Beyond Purpose, New Horizons** in North Hills**, PUC Clinical Counseling Program, Didi Hirsch Mental Health Services, and Harvard-Westlake School.** We are a committed community partner and appreciate the partnership and support of these organizations.

Additionally, I've included some **letters from our students**, who wanted to share what they love about Valor Elementary!

At Valor Elementary, we're proud to have served students and families since 2016, and we're a committed community member! We have a **98% parent satisfaction rate**, and a **99% parent participation rate** at school events. It has been our pleasure to partner with our families so our students and school thrive!

Our focus on the whole child, which includes **social-emotional learning and mindfulness**, was recently featured in an article on WebMD and on NBC 4 News.

Additionally, our work to innovate a new teacher pipeline through the **Bright Star Schools Teacher Residency program in partnership with Alder Graduate School of Education,** was featured on Spectrum 1 News, in La Opinion, and in two segments on Estrella TV on both the 12pm news and 5pm news.

As one of our teachers said, “At Valor Academy Elementary School, we're all a family. We look out for each other. We help each other grow. We are trying to extend what we are learning here to the world so that we can make the world a better place.”

At Bright Star Schools, we stand with our students for nearly 20 years, from their first day of transitional kindergarten to their graduation from college or higher education.

We’re hopeful to secure a permanent campus for our Cubs and their families at 15526 Plummer Street to support their very bright futures!

Should you need any additional information, please reach out.

With gratitude,

May Oey
Founding Principal
Valor Academy Elementary School
Bright Star Schools

---

7 attachments

Didi Hirsch Letter of Support-Bright Star Schools and VAES.rg.pdf
139K

Letter of Support for Bright Star Schools Valor Academy Elementary School PUC CCP.docx
22K

Harvard-Westlake Letter of Support for Bright Star Schools.pdf
182K

NH for Bright Star Schools 11.18.2022.pdf
1103K

VAES Cub Council letters.pdf
212K

Worthy Beyond Purpose Letter of Support for Valor Academy Elementary School.docx
175K

254 Signed Petitions in Support of VAES 120622.pdf
2830K

NEW HORIZONS

Bold Futures. Unlimited Possibilities.

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Letter of Support for Bright Star Schools' Valor Academy Elementary School

Esther Ahn
LA City Planning Department
Via email: esther.ahn@lacity.org
Re: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn,

New Horizons: Serving individuals with Special Needs strongly supports Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. Additionally, they have been a strong partner of ours. We look forward to their continued partnership to enhance and provide value to our community.

Why we support Bright Star Schools and Valor Academy Elementary School:

- **Bright Star Schools provide a high-quality, free public education** for students of all backgrounds and abilities from transitional kindergarten through 12th grade. Additionally, they provide up to 6 years of higher education support for their alumni.

- **Bright Star Schools is a nonprofit organization that operates 9 charter public schools across Los Angeles, all authorized by the LAUSD.** Bright Star Schools' three schools serving North Hills include Valor Academy Elementary School, Valor Academy Middle School, and Valor Academy High School.

- **Bright Star Schools was selected by the owner of 15526 Plummer Street to purchase the property and build a campus for their existing elementary school that will benefit the community for generations to come.** A strong public education system is critical to the future of North Hills' children, their families, and our community. Bright Star Schools is an important community partner that is committed to the future of North Hills.

- **Bright Star Schools will, and has always planned to, preserve the historic home on the property at 15526 Plummer Street.** Bright Star Schools has been in full support of preserving the home and has plans to preserve the home's historical defining features.

- **Bright Star's Valor Academy Elementary School students, families, teachers, and staff deserve a permanent home.** The children of North Hills and the surrounding communities are the future of our city. They deserve a beautiful, permanent school campus where they can learn and grow, and in the years to come, where their children and their grandchildren can too.

Thank you for considering Bright Star Schools' project to benefit our North Hills community.

Sincerely,

John C. Brauer
President and CEO
New Horizons

Esther Ahn <esther.ahn@lacity.org>

(no subject)

1 message

Norma Laureano <normalaureano818@gmail.com> Thu, Jan 26, 2023 at 12:34 PM
To: "esther.ahn@lacity.org" <esther.ahn@lacity.org>

Hola buenas tardes señorita Ester, mi nombre es Norma Laureano soy mamá de Valeria Arana mi hija pertenece a la escuela Valor Academy y estoy apoyando el proyecto para que se haga la escuela en 15526 Plummer ya que necesitamos un lugar estable para nuestros hijos que son el futuro de este país gracias por atender mi mensaje que tenga un bonito día.

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Phoenix House CALIFORNIA

PHOENIX HOUSES OF LOS ANGELES, INC

December 7, 2022

Esther Ahn
LA City Planning Department
Via email: esther.ahn@lacity.org

Re: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn,

Phoenix House of California strongly supports Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. Additionally, they have been a strong partner of ours. We work closely with them to provide mental health and substance use prevention services for their students and see how this will continue to promote the need to serve the youth in this community.

Why we support Bright Star Schools and Valor Academy Elementary School:

- **Bright Star Schools provide a high-quality, free public education** for students of all backgrounds and abilities from transitional kindergarten through 12th grade. Additionally, they provide up to 6 years of higher education support for their alumni.

- **Bright Star Schools is a nonprofit organization that operates 9 charter public schools across Los Angeles, all authorized by the LAUSD.** Bright Star Schools' three schools serving North Hills include Valor Academy Elementary School, Valor Academy Middle School, and Valor Academy High School.

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- **Bright Star Schools will, and has always planned to, preserve the historic home on the property at 15526 Plummer Street.** Bright Star Schools has been in full support of preserving the home and has plans to preserve the home's historical defining features.

- **Bright Star's Valor Academy Elementary School students, families, teachers, and staff deserve a permanent home.** The children of North Hills and the surrounding communities are the future of our city. They deserve a beautiful, permanent school campus where they can learn and grow, and in the years to come, where their children and their grandchildren can too.

Thank you for considering Bright Star Schools' project to benefit our North Hills community.

Sincerely,

DocuSigned by:
EE6C405C7A18447...

Alice Gleghorn, Ph.D.
President and CEO
Phoenix House California
11600 Eldridge Avenue
Lake View Terrace, CA 91342

Letter of Support for Bright Star Schools' Valor Academy Elementary School

Esther Ahn
LA City Planning Department
Via email: esther.ahn@lacity.org

Re: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn,

The PUC Clinical Counseling Program strongly supports Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. Additionally, they have been a strong partner of ours. We partner through mental health services. We provide Bright Star Schools with mental health support. They care about their students' mental state and want to provide them access to support services to remove barriers to learning.

Why we support Bright Star Schools and Valor Academy Elementary School:

- **Bright Star Schools provide a high-quality, free public education** for students of all backgrounds and abilities from transitional kindergarten through 12th grade. Additionally, they provide up to 6 years of higher education support for their alumni.

- **Bright Star Schools is a nonprofit organization that operates 9 charter public schools across Los Angeles, all authorized by the LAUSD.** Bright Star Schools' three schools serving North Hills include Valor Academy Elementary School, Valor Academy Middle School, and Valor Academy High School.

- **Bright Star Schools was selected by the owner of 15526 Plummer Street to purchase the property and build a campus for their existing elementary school that will benefit the community for generations to come.** A strong public education system is critical to the future of North Hills' children, their families, and our community. Bright Star Schools is an important community partner that is committed to the future of North Hills.

- **Bright Star Schools will, and has always planned to, preserve the historic home on the property at 15526 Plummer Street.** Bright Star Schools has been in full support of preserving the home and has plans to preserve the home's historical defining features.

- **Bright Star's Valor Academy Elementary School students, families, teachers, and staff deserve a permanent home.** The children of North Hills and the surrounding communities are the future of our city. They deserve a beautiful, permanent school campus where they can learn and grow, and in the years to come, where their children and their grandchildren can too.

Thank you for considering Bright Star Schools' project to benefit our North Hills community.

Sincerely,



Dr. Christine Sartiaguda, LMFT, Ed.D.
Director of Clinical Service, PUC Schools

12/06/22

Dear Council Woman Rodriguez

Hi! my name is Lucy I go to Valor Academy Elementary School and I am in 4th grade. I have been at this School for 6 years. I want to tell you a few things I love about VAES. First thing I love is that there are after School clubs for example, I am in art club. Next thing I love, is that teachers help you when you need it! Lastly, I love that they provide School lunchs for us. I hope you have a good day!

Love,

Lucy

12/06/22

Dear Council women Rodriguez

MY name is melvin. MY grade is 3rd grade, I have been at Valor Academy for 3 years, Some thing I love about MY School is I always feel safe at School I hope you have a good week.

Sincerly,

Melvin

Dear

Councilwoman Rodriguez

My name is Ethan i am good at bowling and i go to valor academy Elimentre School one thing i love about valor is people are kind. another reson i love valor is teachers always care. My last reson i love vaes is we provide meterials

Sicerly

Ethan

12-06-22

Dear Council Woman Rodirguez,

Hi my name is Ciara. I have been in valor academy elementary school for 5 years. I am in 4th grade. What I love about valor academy elementary is that there are kind teachers and people, Teachers keep us safe. Teachers and Counselors are very caring. There are kind students.

Sincery Ciara.

12/06/22

Dear Council Women Rodriguez,
my name is Castiel. I'm from Valor Academy Elementary School I'm from third grade. I have been here for four years. Something that I love about Vaes is that they keep us safe, and they have alot of materials, and they cheer us up. I hope you have a good and I hope you can come to our Winter Show.

Sincerly Castiel

12/06/22

Dear Council woman Rodriguez.

I am Leah Muñoz. I am in 4th grade. I am here to talk about Valor Academy Elementary School. What I love about Vaes is everyone is very welcoming and Kind! Also, teachers help us learn new things. Fanily. I love how everyone is so caring!

Sincerely

Leah

valor academy elementary school 12/06/22

Dear concil Rodrigyes

My name is Martin im in third grade I have been in valor for four years. Something I like about valor is how they keep us safe and have a lot of materials and have nice teacher. Bye have a nice day.

Sincerly

Martin

12/06/22

Dear Council Woman Rodriguez,

My name is Tessa Rivas and I am a 4th grade Student at Valor Academy Elementary School. I am here to share with you a few things I love about my School. First of all I love how the teachers share equality with others! Next I love how our teacher's make learning fun! Lastly I love how teachers help us learn new things! By the way Please come to our winter Show on friday the 9th at 8:45 AM. Thank you for your time.

Sincerly

Tessa Rivas

12-08-22

Dear council woman Rodriguez,

Hi, my name is Maryana lamin 4th grade and I have been a student at valor Academy Elementary school since third grade. The teachers give you help right away. If you have trouble with something will make sure that you safe.

Maryana

12/06/22

Dear, Council Woman Rodriguez,

My name is Collette. I'm in 3rd grade and this is my first year at Valor Academy Elementary School. Something I love about VAES is that Students learn new things everyday! Another thing I love about Vaes is that the teachers are so nice!

Sincerely,

Collette

12/06/22

Dear Council woman Rodriguez,

My name is Dua. I'm in third grade and this is my fourth year at Valor Academy. Something I love about my School is how kind the teachers are and how the teachers keep us Safe. Another thing I like about VAES is how the Students learn New Knowledge.

Sincerely, Dua

Adam

Dear Council woman Rodriguez,
my Name is Adam and You can
have fun in this School
because, this is a fun School

Sincerely
Adam

Esther Ahn
LA City Planning Department

SUBJECT: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn,

The Valley Industry and Commerce Association (VICA) supports Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. Additionally, they have been a strong partner of ours.

Why we support Bright Star Schools and Valor Academy Elementary School:

- **Bright Star Schools provide a high-quality, free public education** for students of all backgrounds and abilities from transitional kindergarten through 12th grade. Additionally, they provide up to 6 years of higher education support for their alumni.

- **Bright Star Schools is a nonprofit organization that operates 9 charter public schools across Los Angeles, all authorized by the LAUSD.** Bright Star Schools' three schools serving North Hills include Valor Academy Elementary School, Valor Academy Middle School, and Valor Academy High School.

- **Bright Star Schools was selected by the owner of 15526 Plummer Street to purchase the property and build a campus for their existing elementary school that will benefit the community for generations to come.** A strong public education system is critical to the future of North Hills' children, their families, and our community. Bright Star Schools is an important community partner that is committed to the future of North Hills.

- **Bright Star Schools will, and has always planned to, preserve the historic home on the property at 15526 Plummer Street.** Bright Star Schools has been in full support of preserving the home and has plans to preserve the home's historical defining features.

- **Bright Star's Valor Academy Elementary School students, families, teachers, and staff deserve a permanent home.** The children of North Hills and the surrounding communities are the future of our city. They deserve a beautiful, permanent school campus where they can learn and grow, and in the years to come, where their children and their grandchildren can too.

For these reasons, VICA urges you to support Bright Star Schools' project to benefit our North Hills community.

Sincerely,

Victor Berrellez
VICA Chair

Stuart Waldman
VICA President



Esther Ahn
LA City Planning Department
Via email: esther.ahn@lacity.org

Re: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

Dear Ms. Ahn,

Worthy Beyond Purpose strongly supports Bright Star Schools' project to build a permanent elementary school campus for Valor Academy Elementary School at 15526 Plummer Street in North Hills.

Bright Star Schools serves nearly 1,500 students and their families in the North Hills community through their Valor Academy charter public schools. Additionally, they have been a strong partner of ours. In 2021, we brought our mindfulness & meditation program into the third grade classes at Valor Academy Elementary School (VAES). We love the students and their desire to learn and explore new techniques that help them feel and manage their emotions. With the tireless support of the teachers and the administration, in 2021, we have grown our program to reach the fourth graders as well. VAES is, hands down, one of our very favorite schools and we look forward to a lifetime of partnership with them.

Why we support Bright Star Schools and Valor Academy Elementary School:

- **Bright Star Schools provide a high-quality, free public education** for students of all backgrounds and abilities from transitional kindergarten through 12th grade. Additionally, they provide up to 6 years of higher education support for their alumni.

- **Bright Star Schools is a nonprofit organization that operates 9 charter public schools across Los Angeles, all authorized by the LAUSD.** Bright Star Schools' three schools serving North Hills include Valor Academy Elementary School, Valor Academy Middle School, and Valor Academy High School.

- **Bright Star Schools was selected by the owner of 15526 Plummer Street to purchase the property and build a campus for their existing elementary school that will benefit the community for generations to come.** A strong public education system is critical to the future of North Hills' children, their families, and our community.

Bright Star Schools is an important community partner that is committed to the future of North Hills.

- **Bright Star Schools will, and has always planned to, preserve the historic home on the property at 15526 Plummer Street.** Bright Star Schools has been in full support of preserving the home and has plans to preserve the home's historical defining features.

- **Bright Star's Valor Academy Elementary School students, families, teachers, and staff deserve a permanent home.** The children of North Hills and the surrounding communities are the future of our city. They deserve a beautiful, permanent school campus where they can learn and grow, and in the years to come, where their children and their grandchildren can too.

Thank you for considering Bright Star Schools' project to benefit our North Hills community.

Sincerely,

Connie Clotworthy
Executive Director
Worthy Beyond Purpose

Esther Ahn <esther.ahn@lacity.org>

CPC2022-5865 CU-SPR Bright Star/Valor Academy

2 messages

Anita Goldbaum <ag16113@yahoo.com> Fri, Jan 6, 2023 at 12:14 PM
To: Esther Ahn <esther.ahn@lacity.org>
Cc: Debora Masterson <deborawkart@gmail.com>

Hello Ms. Ahn,

Wishing you a Happy Healthy New Year.

I have additional questions about the Valor Academy request for a Conditional Use Permit for the 15524 and 15526 Plummer Street, North Hills, CA 91343 properties.

I have major concerns about the traffic issues allowing this school to be built on these 2 properties. It is a misfit, a round peg in a square hole, and an outlier in a residential zoned community. Plus there is the issue of the historical Plummer Family 1914 home that would be sabotaged, in essence, into an office and lounge for the teaching staff per their documents.

How even handed is it that the Los Angeles Consortium, that has already been advised that the property has been voted and approved as Historical, has not been on the City Council agenda because of Covid protocols? It is unjust!

My concerns also have to do with studies that should be done or have been done regarding these property. Has the Vehicle Miles Traveled Analysis been done? The Access, Safety, and Circulation Evaluation, and the Access Assessment to evaluate the project's traffic impacts? Does the project require a Site Plan Review (SPR) entitlement as the project exceeds the threshold of creating 500 or more average daily vehicle trips? Doing these studies, under their requested "expedited petition" is one sided and partial as "money talks" and the average citizen who is objecting to this project essentially has no voice. That is me as a resident of North Hills and of "We the People" and this objection letter is my voice.

My request is that the Conditional Use Permit for a large 2 story building, plus the other buildings, and the additional projects on these two properties for the large school Valor Academy not be granted. It is a flawed and unsuitable location. It should be rejected.

Again, thank you for allowing me to voice my opposition to this project.

Anita Goldbaum
North Hills, CA 91343

Esther Ahn <esther.ahn@lacity.org> Mon, Jan 9, 2023 at 2:46 PM
To: Anita Goldbaum <ag16113@yahoo.com>
Cc: Debora Masterson <deborawkart@gmail.com>

Good afternoon and Happy New Year to you and yours as well.

Regarding the project's Site Plan Review entitlement, that is correct. I believe it was triggered by the expected daily vehicle trips which exceeded the 500 trip threshold slightly. The proper traffic analysis has been done by the Applicant and their study has been reviewed by the Department of Transportation (LADOT) as well. This is from what I can see so far but, ultimately, the decision to act on the project lies with the City Planning Commission.

The nomination of the project site for Historical Cultural Monument status has been considered in the project's environmental review and I am hopeful that the HCM status moves forward as soon as possible. The last I heard, the HCM approval was tentatively scheduled to go before the Planning and Land Use Management Committee (PLUM) sometime this month. Unfortunately, the Planning Department does not have a role in scheduling or deciding upon HCM nominations, so it will be scheduled by the City Clerk's Office according to their agenda availabilities.

Thank you for the additional comments you have provided as I will be including this email into the public record and case file.

Best,
Esther

[Quoted text hidden]

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Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
T: (213) 978-1486 | Planning4LA.org
E-NEWS

Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-SPR 15524-15526 Plummer Street, North Hills, CA 91343

2 messages

Anita Goldbaum <ag16113@yahoo.com> Thu, Dec 22, 2022 at 4:15 PM
To: Esther Ahn <esther.ahn@lacity.org>

December 22, 2022

Dear Ms. Ahn,

I attended the Planning Commission Hearing officiated by you regarding the application of BrightStar/Valor Schools for a CPU for 15524 and 15526 Plummer Street, North Hills, CA 91343 properties.

The presentation by the school representatives and the architect spoke with Spanish translations where necessary describing and in support of the Valor Elementary School project. I understand their position but they do not want to hear and or recognize the issues and the concerns that the residents and community have.

This Plummer Street property with the intact 1914 home and the working farm property in North Hills is the last of that period in the San Fernando Valley. The Plummer Street Street Project Consortium has communicated with the city and been designated by the Los Angeles Historical Foundation to restore and renovate the house, build a museum, and create a green open space that is needed for the health and well being of the residents of the San Fernando Valley. As we all know dealing with Los Angeles city bureaucracy takes time and that is what the Consortium is dealing with.

My concerns are many. Traffic and automobile trips on Plummer Street will increase by at least 1000 trips per day as they are projecting a student body of 552 students. There are 2 lanes of traffic in each direction on Plummer St. with curb street parking going east and west. How will those coming from the east on Plummer turn left into the proposed school access/driveway without creating a major traffic jam either bringing or picking up students from school? Parents coming from the west will stop traffic flow if they cannot access the driveway of the school in an easy manner. From what I have observed looking at the neighborhood street map there are no through streets between Sepulveda Blvd on the east and Woodley on the west with the 405 Freeway in the middle of these streets. The same issue deals with North /South between Nordhoff to Plummer and Lassen to Plummer which are residential communities. Many will try to navigate those residential streets with little success. So how will traffic be mitigated? Will there be “No Parking” signs in front of the school? If so that takes parking away from the residents on Plummer Street. This is not an acceptable location for BrightStar/Valor Academy or for the community to deal with.

Another concern I have after hearing the presentation has to do with the parking spaces on the school grounds. They are proposing 49 spaces. Will the teachers, administrators, teaching assistants, maintenance and kitchen staff, that provides food for the 93% of students who are eligible for free meals use all of them? Then where do parents or guests park since there is a minimal amount of parking on Plummer St.? What about when they have evening and or weekend events. Where do guest park? Here is another reason to reject their request for a Conditional Use Permit (CUP) when it will disrupt a peaceful residential community. Then there are the issue of noise, air quality since the site is less that 500 feet from the freeway, nd the use of taxpayer dollars to build this project when there are a large number of elementary schools in North Hills, with a decrease in the student population in Los Angeles.

To me those who spoke in favor of CUP for the school,the administrator, the architect, the traffic resource person, and those who work at the school to championed this project, regarding issues of traffic, noise, air quality, the size of the project in a residential community, the parents of students who attend or have attended Bright Star schools, as well as teachers and other school employees have a vested interest to see this happen, but the North Hills community does not.

Again the issue of poverty, language, ethnicity, travel distance should not be the measure of how a land use decision for a Conditional Use Permit for a large 2 story school, plus other buildings, play area, parking facility, and the proposed remodel of the 1914 Plummer Family home should be made. If this CUP is approved this development will destroy the peace and quiet of a residential community, create a traffic nightmare, and the stealing of documented day of yore.

These Plummer Street properties empower we the people to tell the stories of pioneer families so the present and future generations can cherish them. Do not allow this school project to go forward. There is only one Plummer house and farm on Plummer Street in North Hills which was and is named for this prominent San Fernando Valley settler family.

Thank you for allowing me to voice my concerns and point of view..

Anita Goldbaum
North Hills, CA. 91343

Esther Ahn <esther.ahn@lacity.org> Thu, Dec 22, 2022 at 4:42 PM
To: Anita Goldbaum <ag16113@yahoo.com>

Good afternoon,

Thank you for your detailed follow up comments.

I just wanted to clarify that it was my decision not to translate every comment spoken in English into Spanish in the interest of time. I wanted to ensure that everyone was given adequate time to speak and that I was accurately recording the testimonies for the case, so I apologize if it seemed like certain comments from the neighbors held less weight for any reason. I took detailed notes for every single speaker and did not want to keep callers waiting too long since everyone from City staff and the Applicant team spoke English fluently.

Aside from that, thank you again for both your oral and written comments. I'm confirming receipt of this email for inclusion in the case file and public record.

Best,
Esther
[Quoted text hidden]
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LOS ANGELES CITY PLANNING

Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
T: (213) 978-1486 | Planning4LA.org
E-NEWS

Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-CU-SPR 15524 and 15526 Plummer Street, North Hills, CA 91343

1 message

agold16113@aol.com <agold16113@aol.com> Wed, Dec 14, 2022 at 8:37 PM
Reply-To: agold16113@aol.com
To: "esther.ahn@lacity.org" <esther.ahn@lacity.org>
Cc: "councilmember.rodriguez@lacity.org" <councilmember.rodriguez@lacity.org>, "councilmember.lee@lacity.org" <councilmember.lee@lacity.org>

Hello Ms. Ahn,

I understand that you are the person we are to mail comments to regarding the property at 15524 and 15526 Plummer Street, North Hills, CA 91343, Case: CPC-2022-5865-CU-SPR. It is the case and property in question regarding Bright Star Schools/Valor Academy and the North Hills Preservation Consortium safeguarding of the historic "Plummer Street Home Project."

On December 20, 2022 Case Number CPC-2022-5865-CU-SPR will be heard. There is a historical home and adjacent open green space property that is being contested by Bright Star Schools-Valor Academy and the North Hills Preservation Consortium. The addresses for these properties are 15524 and 15526 Plummer Street in North Hills, CA 91343.
The historical home was the Plummer family residence that was built in1914 and the last home in the San Fernando Valley of that era still standing and the adjacent property that was their family farm. The Plummer family home was voted by the Cultural Heritage Commission board members as a historical home with a 100% vote.

The North Hills Preservation Consortium has named this 'The Plummer Street Project" lead by Debora Masterson since April, 2021. The Consortium presented plans to restore the home, create a museum, and a new park for the community. Los Angeles City Councilwoman Monica Rodriguez of Council District 7 reached out to the owner with an initial offer of 1.2 million dollars to purchase the properties long before Bright Star-Valor Academy entered the picture. It can and has become contentious and appalling when the issues of "ethnicity," "poverty," and "money" are part of the conversation where it does not belong.

Bright Star Schools-Valor Academy has submitted plans to build a new publicly funded charter elementary school in North Hills on these 2 parcels. A large two story building is proposed for the open area with a parking lot and using the 1914 historic home as their administrative offices. The properties would be lost to the community and history. North Hills has 12 elementary schools, plus middle schools, and a high school in a community of 5.5 square miles. Los Angeles tax payer dollars would be used to purchase, build, and maintain this proposed school and property. What we in North Hills and the San Fernando Valley need are open green spaces a desired result that the Los Angeles County Board of Supervisors latest survey and review shows is an objective and desired result for Los Angeles County. There is no need to have this property become an elementary school when there are other alternative properties and only this one historic Plummer family home that still stands and the adjacent property that can become a park for all members of the community..

Here is a perfect course of action for you to come to the aid of our community and support The Plummer Street Project and stand in opposition to the property being razed and basically destroy the history of the 1914 Plummer family home and the working farm for another elementary school that is not necessary when school enrollment and attendance in Los Angeles is down. Plus, they already have an elementary school, yet they say not near the homes of some students. I find that a questionable argument. Most students in Los Angeles travel a distance to get to their schools. There are many negative points at issue if the school is allowed to be built. The property is within 500 feet of the 405 Freeway, noise for neighbors from the children playing outdoors, planned events on weekends where guests would need street parking, congestion on Plummer Street-a main travel street, with the arrival and departure of students with the other schools in close proximity which would create a traffic nightmare, delivery of food and supplies by purveyors of items needed by a school in the morning or during the school day to function. These are just a few of the issues that I see and I am sure there are many other topics that I am not cognizant of. Enrollment in Los Angeles elementary schools has declined and the important and critical need for parks and open green space in Los Angeles and the community of North Hills is an essential health necessity. Plus, the eradication of the historical family home and farm of the Plummer Family for a school that has other options is to ignore and pay no attention to the needs of the community of North Hills, the San Fernando Valley and of past history.

.I urge you to not approve the requested Conditional Use Permit for Bright Star Valor Academy for these properties at 15524 and 15526 Plummer Street, North Hills, CA 91343 for a 2 story school and parking lot and modifying the home for

their administrative offices. It will certainly be the destruction of the past history of the 1914 Plummer family house and the green area that was their family farm. Once more we do not need another elementary school in North Hills. We need the preservation of the Plummer House and the adjacent green space/park for all the people. A denial for a Conditional Use Permit should be the finding for this zoning revision and alteration. Rather,Bright Star the City Planning Department should recommend that the property should be preserved as it is labeled "historic" and allow for the preservation of San Fernando Valley history through the North Valley Preservation Consortium and the City of Los Angeles.

.

Thank you for taking the time to read my letter.

Anita Goldbaum
North Hills, CA 91343
818 326 7133

Esther Ahn <esther.ahn@lacity.org>

[EPS Intake Request] EPS Intake form submission

silvia saucedogroup.com <silvia@saucedogroup.com> Tue, Dec 13,
To: Esther Ahn <esther.ahn@lacity.org>

Hello Esther,

Here is our environmental consultant's response to the CREED letter:

> The references, and AERMOD data, can be found on our FTP site here: https://rinconconsultants.exavault.com/share/view/39sbc-1sr83qpq.
>
> I would like to note that the Schremp, Gordon 2017 reference is a personal communication from 2017 that is used in Section VI, *Energy*, of the IS-MND as follows: "One gallon of gasoline is equivalent to approximately 109,786 Btu (CARB 2015), **while one gallon of diesel is equivalent to approximately 127,460 Btu (Schremp 2017)."** While it is personal communication, we have provided a report from the California Air Resources Board (CARB) that provides the same factor for converting diesel to British thermal units (Btu). Please refer to page 30 of the CARB 2018 reference (see screenshot).

Section 3: Fuel Specifications

Specifications (e.g., aromatics in diesel) for transportation fuels in California are different compared to federal specifications. The CA-GREET3.0 model uses California fuel specifications and changes made to the Argonne version of the model are detailed in Table 22.

Table 22. Comparison of Fuel Properties and Specifications

Parameter	CA-GREET2.0		GREET1_2016		CA-GREET3.0
CARBOB	119.54	MJ/gal	N/A. GREET1_2016 tabulates U.S. gasoline blendstock properties (LHV = 116,090 Btu/gal), but not CARBOB		Same as CA-GREET2.0
	113,300	Btu/gal			
	2,767	g/gal			
CaRFG	115.82	MJ/gal	118.37	MJ/gal	Same as CA-GREET2.0
	109,772	Btu/gal	112,194	Btu/gal	
	2,788	g/gal	2,836	g/gal	
Ultra-Low Sulfur Diesel	134.47	MJ/gal	136.62	MJ/gal	Same as CA-GREET2.0
	127,460	Btu/gal	129,488	Btu/gal	
	3,142	g/gal	3,206	g/gal	

> Finally, the McLeod, S. 2019 reference is an error on our part from a different project that was transferred into this project. This reference has no relation to the analysis for this project and, as you can see from searching the full IS-MND document, is not referenced in any of the analyses.

Please note: Office will be closed December 21, 2022 and re-open January 3, 2023.

Silvia Saucedo, Principal
Saucedo Group
323-243-4556

From: silvia saucedogroup.com <silvia@saucedogroup.com>
Sent: Thursday, December 8, 2022 3:41 PM
To: Esther Ahn <esther.ahn@lacity.org>
Subject: Re: [EPS Intake Request] EPS Intake form submission

Hi Esther,

Rincon compiled the data requested by SCAQMD and uploaded it to their FTP site: https://rinconconsultants.exavault.com/share/view/39n1v-f2duildj.

SCAQMD stated they wanted the info by 12/13, so we are definitely early. You can decide when to provide.

We would prefer a hearing in early Feb, if possible.

Silvia

Please note: Office will be closed December 21, 2022 and re-open January 3, 2023.

Silvia Saucedo, Principal
Saucedo Group
323-243-4556

From: Esther Ahn <esther.ahn@lacity.org>
Sent: Thursday, December 8, 2022 12:37 PM
To: silvia saucedogroup.com <silvia@saucedogroup.com>
Subject: Re: [EPS Intake Request] EPS Intake form submission

Great! I just sent out a calendar invite for Tuesday, 2:00-3:00pm. I am comfortable keeping the Hearing Officer hearing date as is since no decision will be made. I will announce during the he that the review period will remain open and the MND will not be formally adopted until all comments/supplemental materials are complete.

I've begun looking at possible CPC dates for 2023, but will hold off on making a formal request until our check-in next week to get a better sense of our project timeline.

On Wed, Dec 7, 2022 at 5:02 PM silvia saucedogroup.com <silvia@saucedogroup.com> wrote:

> Thank you.
>
> Our environmental consultant is addressing the items in the AQMD letter and will provide a response.

Esther Ahn <esther.ahn@lacity.org>

RE: CPC-2022-5865-CU-SPR

1 message

Ashwin Mills <ashwinmills@gmail.com> Mon, Dec 5, 2022 at 8:15 AM
To: Esther.ahn@lacity.org

I have read through the Initial Documents and the Environmental Review that have been submitted by Brightstar for their plan to build a new publicly-funded charter elementary school in North Hills and the root issue is being overlooked. We do not need another elementary school in North Hills. We already have 12 elementary schools in a town of 5.5 square miles. We have an elementary school every 2.18 miles in our small town. We do not need another elementary school.
Long before Brightstar came into the picture, our community has been working on a better plan that we call The Plummer Street Project. Since April 2021, we have been working on designating the historic house that is situated on the property and built in 1914, as a Los Angeles Historic Cultural Monument. Our grass-roots organization called The North Hills Preservation Consortium, presented our plan to restore the house, create a small museum and new park for the community, to to the owner, to our councilwoman CD7 Monica Rodriguez, and to our North Hills East Neighborhood Council in August 2021. Councilwoman Monica Rodriguez reached out to the owner with an initial offering of $1.2 million to purchase the properties. We have offered to create a 501c3 non-profit organization to manage the historic house and museum, if that would please the city.
North Hills is in the Very High Need for park space. The Los Angeles County Park Needs Assessment Survey https://lacountyparkneeds.org/wp-content/root/FinalReportAppendixA/ StudyArea_130.pdf identified North Hills in the Very High need for park space. We have only one park in North Hills. North Hills has .5 park acres per 1,000 people compared to the rest of LA County which averages 3.3 park acres per 1,000. As North Hills becomes more dense with multi-unit dwellings, it is imperative that we have more pocket parks. Parks are a crucial part of any community, not only for the well-being of our residents, but also to mitigate climate change. Unpaved ground absorbs water and parks reduce the urban heat island effect due to the abundance of asphalt and concrete in urban areas.
So my question to Los Angeles City Planning is why is this root issue not being addressed? We have 12 elementary schools and 1 park. Brightstar has checked all the correct boxes, dotted their I's and crossed their T's, but after all is said and done, it is just plain wrong to approve the construction of a new elementary school in North Hills.

Thank you for your consideration,

Ashwin Mills
--
-Ashwin Mills
www.gardentemple.com

Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-CU-SPR

Garden Temple <gardentemple1@gmail.com> Thu, Dec 29, 2022 at 11:49 PM
To: Debora Masterson <deborawkart@gmail.com>
Cc: Cristian Tafoya <cristian.tafoya@lacity.org>, Esther Ahn <esther.ahn@lacity.org>, Monica Rodriguez <councilmember.rodriguez@lacity.org>, Paola Bassignana <paola.bassignana@lacity.org>

To the council members:

I am a resident of North Hills, only a few doors down from the proposed elementary school on Plummer St. The prospect of having another elementary school in North Hills as opposed to a much needed park space is grim. I strongly urge you to vote against this construction. The residents of North Hills would do far better with a park space than another elementary school.

While I nor my neighbors have been consulted about the proposed school, we have been in talks with one of our community leaders, Deborah about a proposed park space. The residents of North Hills should have a say in this matter- Plummer street is a large and busy street- to be made busier by the inclusion of a new school.

Construction will also surely prove to be a bilious affair for those of us in the nearby community- and for what benefit? To procure a multi-storied, ill-fitting, unnecessary, elementary school, sandwiched between single story residences, whose tarmac-laden pathways will serve as excellent heat amplifiers in our already fiery north valley.

Please consider those who will be affected by this decision- do not make any choice lightly. It is rare to have an opportunity to provide a community a public space that can be enjoyed by all- a park is the right choice for 15526 Plummer St.

Make the right choice.

Best,

Ashwin Mills
Langdon Ave.

On Thu, Dec 29, 2022 at 3:48 PM Debora Masterson <deborawkart@gmail.com> wrote:
[Quoted text hidden]
--
Ashwin Mills
Garden Temple
Office: 818-783-0079
Cell: 818-730-1431

Esther Ahn <esther.ahn@lacity.org>

15526 Plummer Street

1 message

Benito el Gato <benitoelgato333@gmail.com> Thu, Nov 10, 2022 at 3:3
To: esther.ahn@lacity.org

Hello Ms. Ahn,

I am writing a in opposition to the plan to build an elementary school at 15526 Plummer Street. Bright Star Schools, a charter school company with nine schools in LA is planning to purchase a historic home on Plummer Street and move one of their schools, Valor Academy, to North Hills, where there are already three Bright Star Schools. However, a 60-member community group named the North Hills Preservation Consortium has a competing plan for the property on Plummer Street. They want to transform the property into a museum dedicated to San Fernando's agricultural history and build a much-needed park.

1.
LA is OVERSATURATED WITH SCHOOLS! we don't need more.
There are 12 existing elementary schools in North Hills, a town of 5.5 square miles. The neighborhood does not need to build another school. My child attends Carlos Santana Arts Academy, where there is a Dual Language program teaching children to read and write in both English and Spanish. It is a regular public school that was built only 9 years ago, when more classrooms were needed. If Valor Academy moves closer and grows bigger, Santana's enrollment will shrink as a result. Consequently, Santana will have to lay off teachers, combine multiple grades into single classrooms, and will have more empty classrooms. We do not need schools fighting over students. We need to invest in the schools we have already built—with taxpayer dollars. We need the LAUSD to look at the big picture, because this charter school is not.
2. Traffic is already gridlocked during school drop off/pick up hours. Valor Academy will be half a block away from Sepulveda Middle School and Carlos Santana Arts Academy -- creating a traffic nightmare. Santana parents will be tempted to avoid Plummer Street and instead approach Santana from the South — dropping their children on the wrong side Columbus Ave or making a U-turn where there is a blind curve. There will be car accidents and someone may hit a pedestrian.

3. Building a new school on the Plummer Street property is not the best use of the oldest house in North Hills. The house built in 1914 has been identified as a histori resource and is being considered to become LA's newest Historic Cultural Monument. A community group, the North Hills Preservation Consortium, want to restore the house and create a museum featuring the agricultural legacy of the San Fernando Valley. The want to create a new open space for the entire community. The Valc Academy plan will not restore the house and it will not be open to the public. They will build upon some of the last open space available in North Hills.

4. The neighborhood is in need of open space. ALL OF LOS ANGELES NEEDS MORE OPEN SPACE! A Needs Assessment was conducted by LA County. Mission Hills/Panorama City/North Hills have an average of 0.5 park acres per 1,000, while LA County has an average of 3.3 park acres per 1,000 people. They described the need for a park on this particular stretch of Plummer Street as "Very High." The community is in dire need of open space that can be used by everyone.

I hope you appreciate that North Hills is not a good location for this charter school.

Thank you,
Benjamin Schlau
LAUSD parent

Esther Ahn <esther.ahn@lacity.org>

CD7 Comment for 12/20/22 Hearing (CPC-2022-5865--CU-SPR)

Paola Bassignana <paola.bassignana@lacity.org> Fri, Dec 16, 2022 at 6:17 PM
To: Esther Ahn <esther.ahn@lacity.org>
Cc: Cristian Tafoya <cristian.tafoya@lacity.org>

Hi Esther,

At this time the Council Office has not taken a position on this project, and is looking forward to the staff report to help inform the decision making process. However, on behalf of Councilwoman Rodriguez, I would like to state for the record going before the Hearing Officer on Tuesday, December 20, 2022 regarding Case # CPC-2022-5865--CU-SPR that the Council Office requests the aforementioned case not be scheduled for a CPC hearing prior to the issuance of a decision on the related Historical Cultural Monument (case #CHC-2022-3646-HCM) by the PLUM committee and Council.

Thank you,
Paola

--

MONICA RODRIGUEZ
LA CITY COUNCILWOMAN, 7TH DISTRICT

Paola Bassignana, Director of Planning and Economic Development

Councilwoman Monica Rodriguez, 7th District

200 N Spring Street, Rm 455, Los Angeles, CA 90012

Phone: 213-703-0980 Fax: 213-847-0707

www.monicarodriguez.org

Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

1 message

Claudia Mejia <cgmejia@usc.edu> Wed, Nov 2, 2022 at 9:59 AM
To: esther.ahn@lacity.org

Good morning,

I hope this email finds you well. I am Claudia Mejia, a 4th-year architecture student at the University of Southern California studying Architecture. After reading about the planning being made for 15526 Plummer Street, I must say I was not too excited to hear about the plans of constructing a school. As an architecture major, hearing about more construction being done in an area with little to no green spaces causes major problems to the environment around. Although providing another learning center for children seems ideal, we cannot forget about the environment. Additionally, being from Panorama City, there are many schools around the area that could use touch up and could be grown to serve more students If needed.

There are many reasons why this school should not be constructed on this street, however, I will only bring up a few. The school is being planned to use the main road, Plummer, for all the drop-off, creating massive traffic jams and congested streets all around the residential neighborhood.

I have had the privilege to get a full scholarship to study abroad in Mexico City this semester and it amazes me how advanced Mexico City is to Los Angeles. Almost every corner has a park/courtyard. These small little parks create an environment that Los Angeles is lacking. A necessary environment for humans in which they can be one with nature.

All in all, I hope you consider the few points I brought up in this email and we take the environment into consideration. Remember, cities are within nature, nature is not within cities. The environment gives us life, we must treasure it and begin un-designing now. The time is now. We are already late.

Thank you for your time,

--

Claudia G. Mejía
University of Southern California | B. Architecture

December 8, 2022

To: Esther Ahn

RE: CPC-2022-5865-CU-SPR

The community of North Hills has been working on a plan that we call The Plummer Street Project. Since April 2021, we have been working on designating the historic house that is situated on the property and built in 1914, as a Los Angeles Historic Cultural Monument. Our grass-roots organization called The North Hills Preservation Consortium, presented the plan to restore the house, create a small museum and new park for the community, to the owner, to the councilwoman CD7 Monica Rodriguez, and to North Hills East Neighborhood Council in August 2021. Councilwoman Monica Rodriguez reached out to the owner with an initial offering of $1.2 million to purchase the properties. We have offered to create a 501c3 non-profit organization to manage the historic house and museum, if that would please the city.

Creating a Park and a Museum at this property would bring together the residents of North Hills and surrounding areas. In-addition having a museum that would teach the younger generation and those that are new to the area the history of North Hills which is a big plus.

This park could be the community's hub. Having this park will provide a space to go to especially during the increasingly hot summers.

North Hills has a sufficient number of elementary schools but lacks outdoor space for its residents.

Please let's use this property for the good of all.

Regards

Fran Potaski
15921 Malden St
North Hills, CA

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RACHAEL E. KOSS
AIDAN P. MARSHALL
TARA C. RENGIFO

Of Counsel
MARC D. JOSEPH
DANIEL L. CARDOZO

December 2, 2022

Via Email and U.S. Mail

Vince Bertoni, Director
Planning Department
City of Los Angeles
200 N. Spring St., Suite 525
Los Angeles, CA 90012
Email: vince.bertoni@lacity.org; planning.recordsmgmt@lacity.org

Holly Wolcott, City Clerk
Office of the City Clerk
City of Los Angeles
200 N. Spring St., Room 360
Los Angeles, CA 90012
Email: cityclerk@lacity.org

Via Email Only

Esther Ahn
Email: esther.ahn@lacity.org

Via Online Portal

https://recordsrequest.lacity.org/requests/new

Re: Request for *Immediate Access* to Public Records - Valor Elementary School Project (ENV-2022-5866-MND)

Dear Mr. Bertoni, Ms. Wolcott and Ms. Ahn:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") to request ***immediate access*** to any and all records referring or related to the Valor Elementary School Project (ENV-2022-5866-MND) ("Project") proposed by Bright Star Schools ("Applicant"). This request includes, but is not limited to, any and all file materials, applications, correspondence, resolutions, memos, notes, analyses, electronic mail messages, files, maps, charts, and/or any other documents related to the Project.

The Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades transitional kindergarten through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The Project would also include 30,726 sf of open space

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and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf). The Project site is located at 15526-15544 Plummer Street, Los Angeles, CA 91343 (APNs 265-601-5007 and 265-601-5008).

This request is made pursuant to the California Public Records Act, Government Code §§ 6250, et seq. In addition, we request these materials pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of the government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information be narrowly construed.

We request ***immediate access*** to review the above documents pursuant to section 6253(a) of the Public Records Act, which requires public records to be "open to inspection at all times during the office hours of the state or local agency" and provides that "every person has a right to inspect any public record." Gov. Code § 6253(a). Therefore, the 10-day response period applicable to a "request for a copy of records" under Section 6253(c) does not apply to this request.

Pursuant to Government Code section 6253.9, if the requested documents are in electronic format, please email them using a file hosting program such as NextRequest, Sharepoint or a similar service. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into chunks of 10 MB or less), they may be emailed to me as attachments.

Please use the following contact information for all correspondence regarding this request:

Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Ste. 1000
South San Francisco, CA 94080
Email: ssannadan@adamsbroadwell.com
Phone: (650) 589-1660

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Thank you for your assistance with this matter.

Sincerely,



Sienna Shankel
Legal Assistant

SLS:acp

6420-003acp

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RACHAEL E. KOSS
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Of Counsel
MARC D. JOSEPH
DANIEL L. CARDOZO

December 2, 2022

Via Email and U.S. Mail

Vince Bertoni, Director
Planning Department
City of Los Angeles
200 N. Spring St., Suite 525
Los Angeles, CA 90012
Email: vince.bertoni@lacity.org; planning.recordsmgmt@lacity.org

Holly Wolcott, City Clerk
Office of the City Clerk
City of Los Angeles
200 N. Spring St., Room 360
Los Angeles, CA 90012
Email: cityclerk@lacity.org

Via Email Only

Esther Ahn
Email: esther.ahn@lacity.org

Via Online Portal

https://recordsrequest.lacity.org/requests/new

Re: Request for Access to Documents Referenced in the Mitigated Negative Declaration for the Valor Elementary School Project (ENV-2022-5866-MND)

Dear Mr. Bertoni, Ms. Wolcott and Ms. Ahn:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") to request immediate access to all documents referenced or relied upon in the Mitigated Negative Declaration ("MND") prepared for the Valor Elementary School Project (ENV-2022-5866-MND) ("Project") proposed by Bright Star Schools ("Applicant"). *This request excludes a copy of the MND and its appendices. This request also excludes any documents that are currently available on the Project's webpage on the City of Los Angeles website, as of today's date*.[1]

[1] Accessed https://planning.lacity.org/development-services/negative-declaration-public-notices on December 2, 2022.

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The Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades transitional kindergarten through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf). The Project site is located at 15526-15544 Plummer Street, Los Angeles, CA 91343 (APNs 265-601-5007 and 265-601-5008).

Our request for access to all documents referenced in the MND is made pursuant to the California Environmental Quality Act ("CEQA"), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire comment period.[2]

If the requested documents are in electronic format, please email them using a file hosting program such as NextRequest, Sharepoint or a similar service. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into chunks of 10 MB or less), they may be emailed to me as attachments.

Please use the following contact information for all correspondence regarding this request:

Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Ste. 1000
South San Francisco, CA 94080
Email: ssannadan@adamsbroadwell.com
Phone: (650) 589-1660

[2] *See* Public Resources Code § 21092(b)(1) (stating that "all documents referenced in the draft environmental impact report or negative declaration" shall be made "available for review"); 14 Cal. Code Reg. § 15072(g)(4) (stating that all documents incorporated by reference in the MND . . . "shall be readily accessible to the public"); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007) (EIR must transparently incorporate and describe the reference materials relied on in its analysis); *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 ("[W]hatever is required to be considered in an EIR must be in that formal report. . ."), internal citations omitted.

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Thank you for your assistance with this matter.

Sincerely,

Sienna Shankel
Legal Assistant

SLS:acp

6420-002acp

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December 2, 2022

Via Email and U.S. Mail

Vince Bertoni, Director
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200 N. Spring St., Suite 525
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Email: vince.bertoni@lacity.org

Holly Wolcott, City Clerk
Office of the City Clerk
City of Los Angeles
200 N. Spring St., Room 360
Los Angeles, CA 90012
Email: cityclerk@lacity.org

Via Email Only

Esther Ahn
Email: esther.ahn@lacity.org

Re: Request for Mailed Notice of Actions and Public Hearings – Valor Elementary School Project (ENV-2022-5866-MND)

Dear Mr. Bertoni, Ms. Wolcott, and Ms. Ahn:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the Valor Elementary School Project (ENV-2022-5866-MND) ("Project") proposed by Bright Star Schools ("Applicant"), as well as a copy of the environmental review document when it is made available for public review.

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152 and 21167(f), and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

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The Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades transitional kindergarten through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf). The Project site is located at 15526-15544 Plummer Street, Los Angeles, CA 91343 (APNs 265-601-5007 and 265-601-5008).

Please use the following contact information for all correspondence regarding this request:

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Email: ssannadan@adamsbroadwell.com
Phone: (650) 589-1660

Thank you for your assistance with this matter.

Sincerely,

Sienna Shankel
Legal Assistant

SLS:acp

6420-001acp

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December 14, 2022

Via Email and Overnight Mail
Esther Ahn, Planner
Planning Department
City of Los Angeles
200 N. Spring St. Room 763
Los Angeles, CA 90012
Email: esther.ahn@lacity.org

Re: Comments on the Mitigated Negative Declaration for the Valor Elementary School Project (ENV-2022-5866-MND)

Dear Ms. Ahn:

On behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"), we respectfully submit these comments on the City of Los Angeles' ("City") Mitigated Negative Declaration[1] ("MND") prepared for the Valor Elementary School Project (ENV-2022-5866-MND) ("Project") proposed by Bright Star Schools ("Applicant") and prepared pursuant to the California Environmental Quality Act ("CEQA")[2] by the City of Los Angeles ("City").

The Project proposes to construct a one and two-story, 26.5-foot-tall, elementary school building with 28 classrooms, totaling 23,538 square-feet. for grades transitional kindergarten ("TK") through 4; a 3,182 square-foot multi-purpose room, administrative spaces, corridors, storage spaces, and covered outdoor dining, and a surface parking lot with an ingress/egress driveway off Plummer Street.[3] The elementary school building would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The Project would also include 30,726 sf of open space and landscaping, including two play areas totaling 13,060 square-feet.

[1] City of Los Angeles, Mitigated Negative Declaration, Valor Elementary School Project ("MND") Case No: ENV-2022-5866-MND (November 2022) available at https://planning.lacity.org/odocument/4665dfef-ecad-42b5-80b6-575ca5e17851/ENV-2022-5866.pdf
[2] Public Resources Code § 21000 *et seq.*; 14 Cal. Code Regs. ("C.C.R.") §§ 15000 *et seq.*
[3] MND, p .1.

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The Project site located at 15526-15544 Plummer Street, Los Angeles, CA 91343, on Assessor Parcel Numbers ("APN") 265-601-5007 and 265-601-5008, which are approximately 1.30 acres in size, and 0.76 acre in size respectively. The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. The site contains 56 trees/shrubs (including nine protected native trees/shrubs and 32 non-protected significant trees), and two street trees.

Our review of the MND demonstrates that the MND fails to comply with CEQA. As explained more fully below, the MND fails to accurately disclose the extent of the Project's potentially significant impacts on air quality, public health, hazards, public services, and noise. There is more than a fair argument that the Project will result in significant, unmitigated impacts in each of these areas. The City may not approve the Project until the City prepares an Environmental Impact Report ("EIR") that adequately analyzes the Project's potentially significant impacts and incorporates all feasible mitigation measures to avoid or minimize these impacts. As a result of these deficiencies, the City also cannot make the requisite findings to approve the Project under the City's municipal code.[4]

These comments were prepared with the assistance of environmental health, air quality, and GHG expert Dr. James Clark, Ph.D., and noise expert Ani Toncheva of Wilson Ihrig. Comments and curriculum vitae of Dr. Clark are attached to this letter as Attachment A.[5] Ms. Toncheva's comments and curriculum vitae are included as Attachment B.[6] Attachments A and B are fully incorporated herein and submitted to the City herewith. Therefore, the City must separately respond to the technical comments in Attachments A and B.

For the reasons discussed herein, and in the attached expert comments, CREED LA urges the City to remedy the deficiencies in the MND by preparing a legally adequate EIR and recirculating it for public review and comment.[7]

---

[4] Pub. Res. Code § 21081; *Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 883.

[5] **Attachment A:** Comments on Valor Elementary School Project (December 13, 2022) ("Clark Comments").

[6] **Attachment B:** Comments on Valor Elementary School Project (December 14, 2022) ("Toncheva Comments").

[7] We reserve the right to supplement these comments at later hearings on this Project. Gov. Code § 65009(b); Public Resources Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199–1203; *see Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

I. STATEMENT OF INTEREST

CREED LA is an unincorporated association of individuals and labor organizations formed to ensure that the construction of major urban projects in the Los Angeles region proceed in a manner that minimizes public and worker health and safety risks, avoids, or mitigates environmental and public service impacts, and fosters long-term sustainable construction and development opportunities. The association includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the Los Angeles region.

Individual members of CREED LA live in the City of Los Angeles, and work, recreate, and raise their families in the City and surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health, and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist on site.

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

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

II. AN EIR IS REQUIRED

CEQA is designed to inform decision-makers and the public about the potential, significant environmental effects of a project.[8] "CEQA's fundamental goal [is] fostering informed decision-making."[9] "The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind."[10]

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an EIR, except in certain limited circumstances.[11] The EIR is the very heart of CEQA.[12] The EIR acts like an "environmental 'alarm bell' whose purpose is to alert the public and its responsible officials to environmental changes before they have reached the ecological points of no return."[13] The EIR aids an agency in identifying, analyzing, disclosing, and, to the extent possible, avoiding a project's significant environmental effects through implementing feasible mitigation measures.[14] The EIR also serves "to demonstrate to an apprehensive citizenry that the [agency] has analyzed and considered the ecological implications of its action."[15] Thus, an EIR "protects not only the environment but also informed self-government."[16]

An EIR is required if "there is substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment."[17] The EIR aids an agency in identifying, analyzing, disclosing, and, to the extent possible, avoiding a project's significant environmental effects through implementing feasible mitigation measures.[18] In very limited circumstances, an agency may avoid preparing an EIR by issuing a negative declaration, a written statement briefly indicating that a project will have no significant impact. Because "[t]he adoption of a negative declaration . . . has a terminal effect on the environmental review process" by allowing the agency to dispense with the duty to

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[8] 14 Cal. Code Regs. ("CEQA Guidelines") § 15002, subd. (a)(1).
[9] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 402.
[10] *Bozung v. LAFCO* (1975) 13 Cal.3d 263, 283.
[11] See, e.g., Pub. Resources Code, § 21100.
[12] *Dunn-Edwards v. Bay Area Air Quality Management Dist.* (1992) 9 Cal.App.4th 644, 652.
[13] *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1220.
[14] Pub. Resources Code § 21002.1(a); CEQA Guidelines § 15002(a), (f).
[15] *No Oil, Inc. v. City of Richmond* (1974) 13 Cal.3d 68, 86.
[16] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.
[17] Pub. Resources Code, § 21080, subd. (d) (emphasis added); CEQA Guidelines, § 15064; see also *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 927; *Mejia v. City of Richmond* (2005) 13 Cal.App.4th 322.
[18] Pub. Resources Code, § 21002.1, subd. (a); CEQA Guidelines, § 15002, subd. (a) & (f).

prepare an EIR, negative declarations are allowed only in cases where there is not even a "fair argument" that the project will have a significant environmental effect.[19]

Under the fair argument standard, a lead agency "shall" prepare an EIR whenever substantial evidence in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.[20] The phrase "significant effect on the environment" is defined as "a substantial, or potentially substantial, adverse change in the environment."[21] In certain circumstances, a project with potentially significant impacts can be modified by the adoption of mitigation measures to reduce the impacts to a level of insignificance. In such cases, an agency may satisfy its CEQA obligation by preparing a mitigated negative declaration.[22] A mitigated negative declaration, however, is subject to the fair argument standard. Thus, an MND is inadequate, and an EIR is required, whenever substantial evidence in the record supports a "fair argument" that significant impacts may occur, even with the imposition of mitigation measures.

The "fair argument" standard is an exceptionally "low threshold" favoring environmental review in an EIR rather than a negative declaration.[23] The "fair argument" standard requires the preparation of an EIR if any substantial evidence in the record indicates that a project may have an adverse environmental effect.[24] As a matter of law, substantial evidence includes both expert and lay opinion.[25] Even if other substantial evidence supports the opposite conclusion, the agency nevertheless must prepare an EIR.[26] Under the "fair argument" standard, CEQA always resolves the benefit of the doubt in favor of the public and the environment.

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[19] *Citizens of Lake Murray v. San Diego* (1989) 129 Cal.App.3d 436, 440; Pub. Resources Code, §§ 21100, 21064.
[20] Pub. Res. Code §§21080(d), 21082.2(d); 14 Cal. Code Reg. §§ 15002(k)(3), 15064(f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *No Oil, Inc. v. City of Richmond* (1974) 13 Cal.3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601-1602.
[21] Pub. Resources Code, § 21068.
[22] Pub. Resources Code, § 21064.5; CEQA Guidelines, § 15064, subd. (f)(2).
[23] *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.
[24] CEQA Guidelines, § 15064, subd. (f)(1); *Pocket Protectors v. City of Sacramento, supra*, 124 Cal.App.4th at 931.
[25] Pub. Resources Code, § 21080, subd. (e)(1); CEQA Guidelines, § 15064, subd. (f)(5).
[26] *Arviv Enterprises v. South Valley Area Planning Comm.* (2002) 101 Cal.App.4th 1333, 1346; *Stanislaus Audubon v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical Gardens v. City of Encinitas* (1994) 29 Cal.App.4th 1597.

III. SUBSTANTIAL EVIDENCE SUPPORTS A FAIR ARGUMENT THAT THE PROJECT MAY RESULT IN SIGNIFICANT IMPACTS REQUIRING AN EIR AND THE CITY LACKS SUBTANTIAL EVIDENCE TO RELY ON AN MND

A. There is a Fair Argument that the Project May Result in Significant, Unmitigated Health Risk Impacts

1. The City Failed to Proceed in the Manner Required by Law By Failing to Conduct a Preliminary Endangerment Assessment Pursuant to the California Education Code.

The MND includes a Phase I environmental site assessment ("ESA") report that identifies several recognized environmental conditions ("REC") and concludes that a Phase II ESA be completed for the site.[27] While a Phase II ESA was completed for the Project site, the City failed to conduct a Preliminary Endangerment Assessment as required under the California Education Code.[28]

The Education Code outlines a three-step process in assessing whether there has been a release of hazardous waste at a school site consisting of Step 1. Phase I ESA, Step 2. PEA, and Step 3. Response action.[29] The PEA required by Step 2 requires consultation with the Department of Toxic Substances Control ("DTSC") and to enter into an Environmental Oversight Agreement with DTSC, then contract with a qualified environmental consultant to prepare an assessment according to DTSC guidelines.[30] Here, the City failed to consult with DTSC in violation of the Education Code. Additionally, based on the results of the Phase I completed for the Project, there is a fair argument that if the City had consulted with DTSC, a PEA would be required. The City must retract the MND and proceed with consultation with DTSC to prepare a PEA for the Project.

2. The MND Fails to Disclose and Analyze the Potentially Significant Health Risk to Students and Staff from Air Emissions Released from Adjacent Sites

The MND fails to disclose the potential health impacts of placing schoolchildren next to existing sources of pollution located adjacent to the Project

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[27] MND, Appendix F, p. v.
[28] Ed. Code §17213.1(a)(4)(B).
[29] *See* Ed. Code §§17213.1(a), 17213.1(a)(4), 17213.1(a)(7)
[30] Ed. Code §17213.1(a)(4)(B).

site. Dr. Clark found that there are a number of sources that emit toxic air contaminants including VOCs, diesel exhaust, and particulate matter permitted by the South Coast Air Quality Management District ("SCAQMD") surrounding the Project site.[31] According to the SCAQMD's Facility Information Detail ("FIND") website, there are at least 6 different permitted sites within ½ mile of the Project Site as seen in Figure 5 of Dr. Clark's comments.[32] The MND completely ignores these potential sources of pollution in its air quality analysis and as such fails as an informational document under CEQA.

3. There is Substantial Evidence Supporting a Fair Argument That the Project Will Result in Significant, Unmitigated Health Risks from Exposure to Freeway Emissions

The MND's statement that that health risks are less than significant is unsupported because the MND omits an analysis of several sources of pollution, resulting in underestimated emissions calculations. Dr. Clark reviewed the additional sources, and concludes that, when considered with the other emissions identified in the MND, the resulting health impacts on schoolchildren may be significant. The Project's health risk impacts must be accurately disclosed, analyzed, and mitigated in an EIR.

An agency must support its findings of a project's potential environmental impacts with concrete evidence, with "sufficient information to foster informed public participation and to enable the decision makers to consider the environmental factors necessary to make a reasoned decision."[33] A project's health risks "must be 'clearly identified' and the discussion must include 'relevant specifics' about the environmental changes attributable to the Project and their associated health outcomes."[34]

Dr. Clark found that the MND's health risk analysis is little more than a screening assessment of impacts based on unverifiable data. Additionally, he found the Project will result in a significant health risk to the students and staff at the Project site.

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[31] Clark Comments, p. 7.
[32] Clark Comments, p. 7.
[33] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516.
[34] *Id.* at 518.

First, Dr. Clark notes that the input files for the Project's HRA were not included in the attachments to the HRA.[35] The Project's HRA states:

> TAC emissions associated with vehicle traffic on I-405 were estimated based on the methodology and spreadsheet developed by the UC Davis-Caltrans Air Quality Project, Estimating Mobile Source Air Toxics Emissions [MSAT]: A Step-By-Step Project Analysis Methodology (2006). This spreadsheet was designed to estimate the total amount of the six pollutants of concern discussed in Section 2.2, Toxic Air Contaminants, based on total organic gases emission factors and diesel particulate emission factors from EMFAC2021… The spreadsheet outputs from the UC Davis-Caltrans MSAT model and composite emission rates are contained in Appendix A.[36]

However, these spreadsheets were not included with the HRA and as such act as a black-box precluding analysis of the sufficiency of the HRA by preventing validation of the HRA model inputs.[37]

Dr. Clark used the same input parameters listed in the AERMOD input file utilized in the HRA for the Project and found that I-405 produces concentrations of TACs at the Project Site that are 1.5 times higher than presented in the HRA, resulting in a significant, unmitigated impact.[38]

Additionally, while reviewing the AERMOD model inputs used in the HRA, Dr. Clark found that the AERMOD analysis relies on source terms from a model that is not commonly used to assess emissions from freeways and excludes components in the analysis including the actual assumed emission rate of each chemical of concern ("COC") from each class of vehicle moving along I-405. By using an uncommon methodology and omitting the spreadsheets necessary to verify the HRA, the City fails to adequately analyze the Project's health risk impacts.

Finally, according to Dr. Clark, analyses of health risks from I-405 emissions feature a critical flaw leading to inaccurate estimations of Project emissions. The MND's AERMOD modeling calculations of ground-level concentrations of DPM fail to account for building downwash, which occurs when the wind flows over and around buildings and impacts the dispersion of pollution from nearby sources.[39] The

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[35] Clark Comments, p. 8.
[36] MND, Appendix B, PDF p. 12.
[37] Clark Comments, p. 9.
[38] Clark Comments, p. 9.
[39] Clark Comments, p. 31.

MND's air quality analysis fails to explain why building elevations were not considered in the HRA. An updated HRA that accounts for elevation differences must be prepared and included in an EIR.

The City must prepare a new HRA that properly identifies the inputs and methodology used to calculate the operational health risk of the Project.

B. The City Lacks Substantial Evidence to Support the MND's Conclusion that Noise Impacts Would Be Less Than Significant with Mitigation

The CEQA Guidelines require an MND to consider "whether a project would result in…[g]eneration of a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project . . ."[40] The MND's noise analysis fails to accurately disclose the Project's potentially significant noise impacts and fails to mitigate them. Ms. Toncheva concludes that the Project's construction and operational noise impacts remain significant and unmitigated notwithstanding the mitigation measures proposed in the MND. Ms. Toncheva's comments provide substantial evidence supporting a fair argument that an EIR is required to accurately disclose and mitigate these impacts.

1. The MND Fails to Establish an Adequate Baseline to Measure Project Noise Impacts.

CEQA directs a lead agency to find that a Project would result in a significant impact if the Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.[41] In order to establish a baseline to measure noise impacts it is common practice to conduct measurements of ambient noise at locations surrounding a proposed project. Here, the MND's noise impact analysis is based on two measurements of only 15 minutes each[42] and one 14-hour long-term measurement on May 25th and 26th.[43] Ms. Toncheva explains that the limited data collected to evaluate the Project's noise impacts may not be representative of the loudest times of day because the noise environment is affected by transportation sources that can change from hour to hour and day to day.[44] Ms. Toncheva states

[40] CEQA Guidelines, Appendix G, Sec. XII(d).
[41] CEQA Guidelines, Appendix G.
[42] MND, p. 102.
[43] MND, p. 103.
[44] Toncheva Comments, p. 1.

that best practices call for documentation of the existing condition with measurements at different times over several days.[45] Furthermore, the long-term noise measurement purports to document these changes, but the measurement was taken from the back of the project site where it is partially shielded from both nearby streets and does not capture traffic patterns at residences close to Plummer Street.[46] Ms. Toncheva found that the short-term Leq at location ST-1 is more than 10 dB higher than the same time frame at LT-1.[47] Therefore, the long term measurement taken for the Project's noise analysis are not representative of the noise environment surrounding the Project.

Ms. Toncheva states in her comments that higher baseline noise levels at the residences on Plummer Street would result in a noise environment that exceeds the normally acceptable CNEL levels for single-family homes per the Land Use and Noise Compatibility Matrix.[48] The City must prepare an updated baseline analysis that incorporates noise measurements taken at locations surrounding the Project site over a multi-day period in order to properly establish the baseline used in the noise analysis.

2. The MND Fails to Analyze Impacts to All Relevant Noise-Sensitive Receptors

The MND fails to accurately analyze the severity of construction noise impacts on sensitive receptors because it relies on incorrect distances between on-site noise sources and off-site receptors. Ms. Toncheva explains that this error is due to the MND's failure to properly acknowledge how construction sites operate in the MND's selection of where to measure noise levels in relation to sensitive receptors.

The construction noise calculations use a minimum receptor distance of 50 feet, per the cited LAMC threshold. However, multiple phases of ongoing construction activity, including grading work, may be as close as 6 feet from the adjacent residences, resulting in higher Lmax levels (108 dB).[49]

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[45] Toncheva Comments, p. 1.
[46] Toncheva Comments, p. 1.
[47] Toncheva Comments, p. 1.
[48] Toncheva Comments, p. 1. *see also* MND, p. 105.
[49] Toncheva Comments, p. 2.

Ms. Toncheva modeled the Project's construction noise at 15516 Plummer Street, which is a single-family residence adjacent to the project site and 6 feet east of the project boundary, using the Federal Highway Administration's ("FHWA") Roadway Construction Noise Model ("RCNM") and found that the Project would result in a 30+ dBA increase over the MND noise threshold during construction [50]

Given this failure of analysis the MND failed to accurately assess the severity of the Project's noise impacts on all sensitive receptors, and fails to adequately mitigate them. The City must prepare an EIR to accurately analyze and mitigate these impacts.

3. Mitigation Measures Fail to Reduce Noise Impacts Below Levels of Significance

The MND concludes that noise impacts will be less than significant with implementation of mitigation measure RCM-1, which requires that a barrier be erected during construction.[51] However, this measure is less effective than asserted in the MND. Ms. Toncheva notes that the 12-foot barrier would result in a dBA reduction of 15, which will not be enough to reduce the impacts to nearby sensitive receptors to non-significant levels.[52]

Ms. Toncheva found that the mitigation offered by the MND is wholly insufficient. She explains that a reduction of even 15 dBA (the maximum reduction that mitigation measure RCM-1 would provide) is inadequate to mitigate noise impacts at the nearby residences of the Project.[53] Ms. Toncheva explains that these errors were the result of the City's reliance on the incorrect interpretation of Municipal Code noise standards, as discussed above. As a result, the noise mitigation proposed in the MND will be ineffective to reduce noise impacts below levels of significance and is not adequate to support a finding of no significant impact with mitigation.

4. The MND Fails to Analyze Operational Noise Impacts

The MND does not provide a quantitative analysis for noise from on-site operations such as activity in the play area, trash-hauling, or traffic noise and other activity during pick up/drop off along the driveway directly adjacent to residences.

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[50] Toncheva Comments, p. 3.
[51] MND, pp. 108-109.
[52] Toncheva Comments, p. 2.
[53] Toncheva Comments, p. 2.

Ms. Toncheva notes that these activities may result in an increase of 5 dB or more over the ambient, resulting in a significant impact. The City must conduct a quantified noise analysis to determine if additional mitigation measures are necessary to reduce the Projects potentially significant operational noise impacts.

C. The MND Fails to Analyze and Mitigate the Project's Potentially Significant Energy Impacts

The MND is inadequate as an environmental document because it fails to properly disclose, analyze, and mitigate the Project's potentially significant impacts on energy use. The City cannot approve the Project until an EIR is prepared and circulated to resolve these issues and comply with CEQA's requirements. Namely, the City's construction energy analysis fails to quantify and adequately assess the Project's energy consumption impacts during Project construction.

The MND states that Project construction energy use would result through the consumption of gasoline and diesel fuel. The energy use analysis does not analyze electricity use from the existing power grid despite the requirement under mitigation measure AQ-1 which stipulates that "[e]lectricity shall be supplied to the site from the existing power grid to support the electric construction equipment."[54] Electricity use from the existing power grid is not included or analyzed in the Project's construction energy use analysis. As a result, the MND lacks substantial evidence to conclude that construction-phase impact related to energy consumption would be less than significant.[55]

The City must revise the construction energy use analysis to include the expected electricity use and include the results of the analysis in an EIR.

D. The MND Fails to Account for the Public Services That Will Be Needed to Support the Project

An MND must consider the effect of changes to the environment that can result from the expansion of services.[56] Here, the MND states that the Project would not place an unanticipated burden on police protection services.[57] However, the MND fails to include any information or analysis on how this conclusion was reached.

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[54] MND, p. 48.
[55] MND, p. 63.
[56] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553.
[57] MND, p. 116.

Additionally, the Project is within the Mission Hills-Panorama City-North Hills Community Plan ("Community Plan") Area which includes goals and objectives to ensure proper police protection of new developments.[58] The Community Plan includes the following policies and related programs that are applicable to the Project:

- 8-2.2 Ensure that landscaping around buildings be placed so as not to impede visibility.
    - Program: Discretionary land use reviews and approvals by the Department of City Planning with consultation from the Los Angeles Police Department.

- 8-2.3 Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security.
    - Program: Discretionary land use reviews and approvals by the Department of City Planning with consultation from the Los Angeles Police Department.[59]

Policies 8-2.2 and 8-2.3 both include a program requirement that consultation be completed with LAPD as part of a project's land use review process in order to ensure the safety of the future occupants of a project, in this case children and teachers primarily. However, the MND does not include any analysis of the Project's conformance with the Community Plan and provides no evidence that the required consultation has been completed. Instead, the MND states that the "Project would comply with all applicable regulations required by the LAPD during the plan check process."[60]

This approach improperly defers required analysis of the Project's potential impacts to public services that may be uncovered during LAPD's review of the Project and defers mitigation measures that may be required through consultation with LAPD. As a result, the MND fails to demonstrate consistency with mandatory public protection policies in the Community Plan, in violation of CEQA and land use law.

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[58] City of Los Angeles, Mission Hills-Panorama City-North Hills Community Plan (1999) p. III-16, available at https://planning.lacity.org/odocument/fee68461-843f-48da-92e9-49a01d1f09e3/Mission_Hills-Panorama_City-North_Hills_Community_Plan.pdf
[59] Community Plan, p. III-16.
[60] MND, p. 116.

For example, LAPD's review of the project may find that additional lighting is necessary for the Project to protect the students and staff, this would in turn increase the Project's energy use and GHG impacts. Similarly, consultation with LAPD may require alteration to the Project's landscaping plan changing the number of protected trees and shrubs to be replaced resulting in nonconformance with the City's tree protection policies.[61] The MND is silent on these issues.

Given the massively significant impacts that crime, violence, and shootings at schools have wreaked on American children and their families in recent years, it is incumbent on the City to take every feasible step to ensure that schools are built safely and in compliance with all Police Department land use policies. The MND's failure to demonstrate compliance with Policies 8-2.2 and 8-2.3 is inexcusable.

The City failed to proceed in the manner required by law by failing analyze consistency with the Community Plan's public protection policies and lacks substantial evidence to support its conclusion that the Project's public services impacts would be less than significant. The City must complete the required consultation with LAPD and analyze the environmental impacts of any required Project design changes to the Project in an EIR.

E. The MND Fails to Mitigate Potentially Significant Impacts to Protected Species and Failed to Consult with Responsible Wildlife Agencies

The MND states that the Project would result in the removal of 9 protected native trees and 32 non-protected significant trees.[62] Eight of the protected trees to be removed are Southern California black walnut trees [*Juglans californica*] which are listed by the California Department of Fish and Wildlife in the California Natural Diversity Database ("CNDDB") on the Special Vascular Plants, Bryophytes, And Lichens List[63] and recognized by the United States Department of Agriculture as "severely threatened by urbanization. According to the USDA, the Nature Conservancy, in cooperation with the state of California, is giving high priority to acquiring vegetative/habitat data on the woodland and is listed as one of

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[61] "[P]rotected tree/shrub removals would be replaced at a 1:4 ratio by planting 36 trees on-site. Non-protected tree removals would be replaced at a 1:1 ratio by planting 32 trees on-site." MND, p. 20
[62] MND, p. 54.
[63] California Department of Fish and Wildlife, Biogeographic Data Branch, California Natural Diversity Database, Special Vascular Plants, Bryophytes, And Lichens List (October 2022) available at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline

California's rare and imperiled natural communities.[64] CDFW regularly provides comments on projects that deal with removal of South Coast black walnut. However, it is not clear whether the CDFW was consulted as a trustee agency for this Project.

Under CEQA, a project that affects the habitat of an endangered, rare, or threatened species is considered to be a project of statewide significance that requires state agency review of a CEQA document prepared for the project.[65] In addition, when preparing its CEQA document, the lead agency must consult with CDFW and obtain written findings from CDFW on the impact of the project on the continued existence of any State-listed endangered or threatened species.[66]

The CDFW regularly provides substantive comments and recommendations to the City regarding the removal of South Coast black walnut trees. For example, a recent City of Los Angeles project, The James Street Four (4) Single-Family Residences, Case Number: ENV-2018-1130-MND[67], which required the removal of 11 Southern California Black Walnut trees did include consultation with the CDFW resulting in the following recommended mitigation measures:

- Mitigation Measure #2: CDFW recommends the City work with a certified arborist familiar with Southern California black walnut tree life history to update the Protected Tree Report and Tree Locations on Project Landscaping Plan for 434, 438, and 442 West James Street. Specifically, CDFW recommends modifying the plans to reflect a total of 20 replacement Southern California black walnut trees appropriately spaced to accommodate growth horizontally, vertically, and laterally below ground. CDFW also recommends that each landscaping plan and/or Protected Tree Report be updated to disclose/provide planting instructions specifying appropriate spacing between each replacement tree. [68]

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[64] U.S.D.A., Fire Effects Information System, Index of Species Information, *Juglans californica*, available at https://www.fs.usda.gov/database/feis/plants/tree/jugcal/all.html
[65] 14 CCR § 15206(b)(5). "A project which would substantially affect sensitive wildlife habitats including but not limited to riparian lands, wetlands, bays, estuaries, marshes, and habitats for endangered, rare and threatened species as defined by Section 15380 of this Chapter."
[66] PRC § 21104.2.
[67] City of Los Angeles, James Street Four (4) Single-Family Residences MND, SCH 2020100088 (October 6, 2020) available at https://ceqanet.opr.ca.gov/2020100088/2
[68] California Department of Fish and Wildlife, Letter re James Street Four (4) Single-Family Residences, MND, SCH #2020100088, City of Los Angeles, Los Angeles County (November 9, 2020) p. 3. available at https://files.ceqanet.opr.ca.gov/265078-2/attachment/cjEnN_Le0w7OINF2hj__LUpxX0DG-Af32QhutP1XGnwh8DFEvrYIyXncLOILCv5RJD4GRhuEoXopL13p0

- Mitigation Measure #3: CDFW recommends that trees planted for mitigation be monitored, maintained, and inspected as described in the Protected Tree Report. CDFW recommends long-term monitoring, maintenance, and inspection until all planted trees survive to produce reproductive structures (i.e., catkins). [69]

- Mitigation Measure #4: If the City observes changes, stress, or failure of planted Southern California black walnut trees, as recommended in the Protected Tree Report, CDFW recommends consulting with a certified arborist or tree specialist to assess the tree and provide specific recommendations. There should be no net loss of Southern California black walnut trees. If any replacement trees fail, CDFW recommends City replace those trees until a minimum of 20 total trees survive to produce catkins.[70]

The City failed to submit the MND to the State Clearinghouse ("SCH") and consult with CDFW as a trustee agency, as required under CEQA. When questioned by the California Office of Planning and Research why the Project was not submitted to the SCH, the City's internal email exchange shows that they determined that the Project was not affected by CCR §§ 15205 and 15206.[71] The City has violated CEQA by failing to submit the MND to the SCH and failing to consult with CDFW.

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

A. The City Cannot Approve the Project's Conditional Use Permit

The Project seeks approval of a Conditional Use Permit to allow development of a public school in the RA-1 zone ("CUP") pursuant to LAMC § 12.24.[72] The MND fails to accurately disclose and mitigate significant impacts, as discussed herein. Therefore, the Project currently fails to meet the LAMC requirements to obtain a CUP. LAMC § 12.24(E) requires the following findings be made to approve the CUP:

> (1) that the project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region;

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[69] *Id,* at p. 4
[70] *Ibid.*
[71] **Exhibit C**: Email from Maria Reyes, City of Los Angeles to Esther Ahn, City of Los Angeles, re: SCH Number (New SCH Number), (November 22, 2022).
[72] LAMC § 12.24(U)(24).

(2) that the project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety; and

(3) that the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

The Project as analyzed above **will** adversely affect public health due to the Project's proximity to I-405 and the unmitigated impacts to future students and school staff, **will** adversely affect adjacent properties due to unmitigated noise impacts and, and **does not** comply with the applicable community plan by failing to consult with LAPD prior to Project approval.

Additionally, the MND's analysis of air quality ignores substantial evidence that the Census Tract 6037117201, which contains the Project site, is a designated disadvantaged community under Senate Bill 535.[73]

Census tract 6037117201 is in the top 10th percentile of communities impacted by diesel particulate matter, the top 6th percentile of communities impacted by traffic, and the top 5th percentile of communities impacted by ozone in the State of California.[74] The City must reanalyze the air quality and health risk impacts of the Project and consider the public well-being of this already burdened community in an EIR. Given the Project's location in a region with one of the nation's worst records for air quality, in a disadvantaged community already overly burdened by exposure to harmful air contaminants, it is impossible to find that the Project is consistent with the Municipal Code. The Project cannot be found to not adversely affect the public health, welfare and safety of students and staff present at the Project site. The City must prepare an EIR that includes a statement of overriding considerations to justify the use of the Project site.

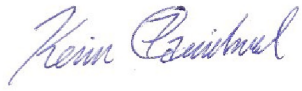
[73] California Office of Environmental Health Hazard Assessment, SB 535 Disadvantaged Communities (2022) available at https://oehha.ca.gov/calenviroscreen/sb535
[74] Clark Comments, p. 4.

V. CONCLUSION

For the reasons discussed above, the MND for the Project remains wholly inadequate under CEQA. There is substantial evidence supporting a fair argument that the Project has numerous potentially significant, unmitigated impacts. The City must prepare and circulate an EIR to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. Until the City prepares an EIR, the City may not lawfully approve the Project.

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

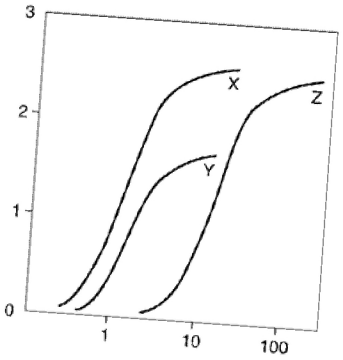
Sincerely,



Kevin Carmichael

KTC:ljl

EXHIBIT A



Clark & Associates
Environmental Consulting, Inc.

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December 13, 2022

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Kevin Carmichael

Subject: Comments On Initial Study/Mitigated Negative Declaration (IS/MND) For Valor Elementary School Project, Los Angeles, CA 91343 Case Number: ENV-2022-5866-MND

Dear Mr. Carmichael:

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to the 2022 City of Los Angeles' (the City's) draft environmental impact report ("DEIR") of the above referenced project.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

Project Description:

According to the City, Bright Star Schools (the "Applicant") proposes to redevelop the site located at 15526-15544 Plummer Street ("Project Site" or "Site), which encompasses approximately 2.06 acres (approximately 89,629 square feet [sf]), into an elementary school. The Site consists of two parcels identified by Assessor Parcel Number (APN) 265-601-5007, which is approximately 1.30 acres in size, and APN 265-601-5008, which is approximately 0.76 acre in size.

The Project Site is in an urbanized area. Land uses surrounding the Project Site include Plummer Street to the north, with single-family residences beyond; single- and multi-family residences to the east, with an apartment building for senior citizens (Plummer Village) and

commercial uses beyond; single- and multi-family residences to the south, with Vincennes Street beyond; and single-family residences to the west, with Orion Avenue beyond. The Project Site is also located approximately 440 feet east of Interstate 405 (I-405).



Figure 1: Site Location

The Valor Elementary School Project ("Proposed Project" or "Project") involves the construction of a one and two-story, 26.5-foot-tall, elementary school building with 28 classrooms (totaling 23,538 sf) for grades transitional kindergarten (TK) through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces, and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The elementary school building would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf), a kindergarten play area (totaling 1,300 sf).

Figure 2 Project Location

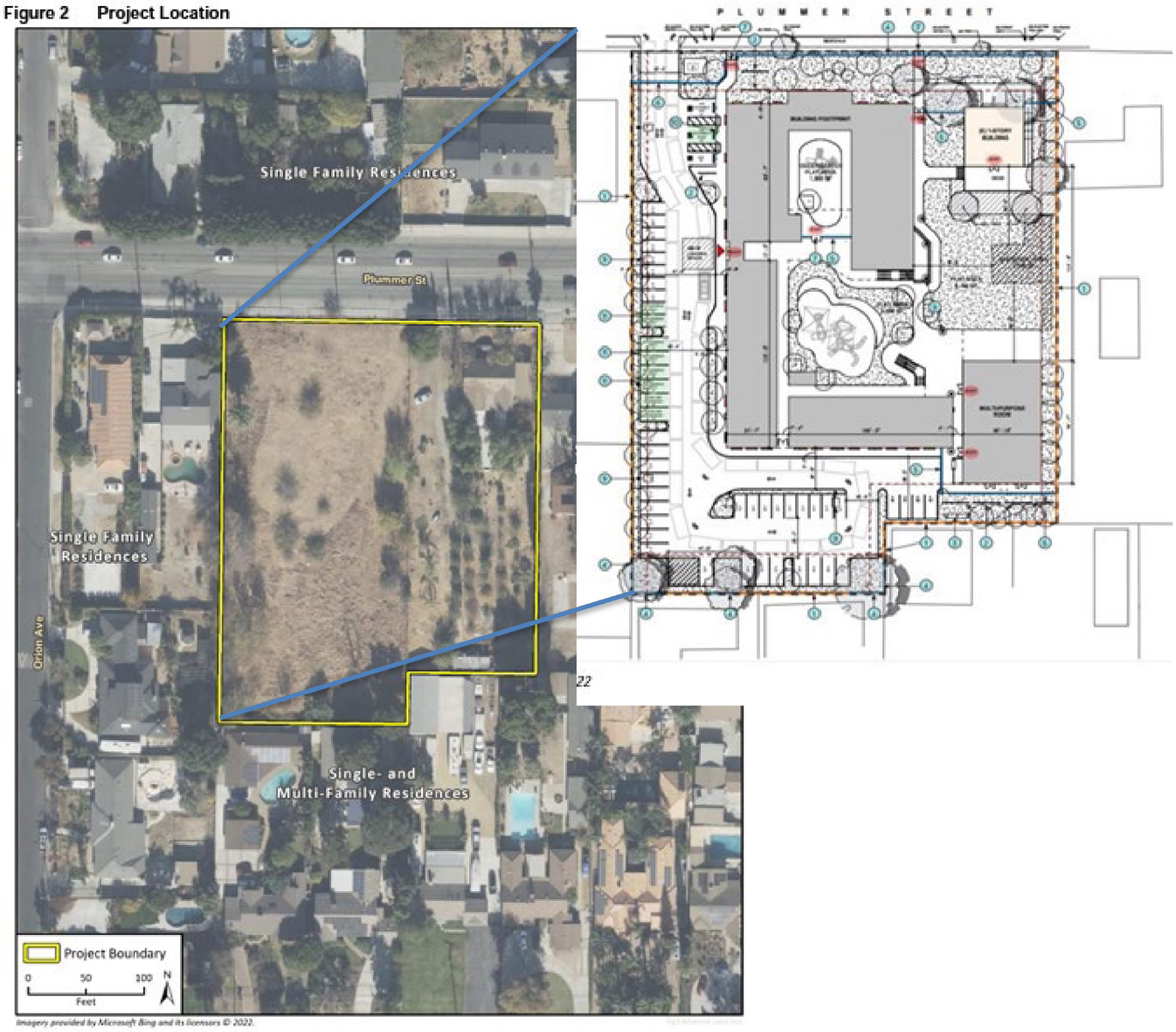

Figure 2: Project Location and Site Plan

Project construction is expected to commence in September 2023. Construction activities would occur on weekdays between 8:00 a.m. and 3:00 p.m. The Project would require excavation of approximately 12,500 cubic yards (cy) of soil material. Of the 12,500 cy of soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site.

There are potentially significant air quality and public health impacts that are not addressed in the City's analysis that must be addressed in a draft environmental impact report ("DEIR").

Specific Comments:

1. The City's Air Quality Analysis Fails To Consider The Existing Air Quality Burden In The Already Impacted Census Tract.

The City's analysis of pollutants in this section of the response ignores substantial evidence from publicly available data demonstrating that the census tract in which the Project Site resides is in the top 10th percentile for pollution burden, traffic, and DPM exposure in California. Under Senate Bill 535 (SB 535), the California Environmental Protection Agency (CalEPA) was charged with identifying disadvantaged communities. CalEPA was tasked with basing the designations on geographic, socioeconomic, public health, and environmental hazard criteria. In response, CalEPA's Environmental Health and Hazard Assessment (OEHHA) compiled the CalEnviroScreen data tool. CalEPA generally defines communities in terms of census tracts and identifies four types of geographic areas as disadvantaged: (1) census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0; (2) census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores; (3) census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen 4.0; (4) and areas under the control of federally recognized Tribes.

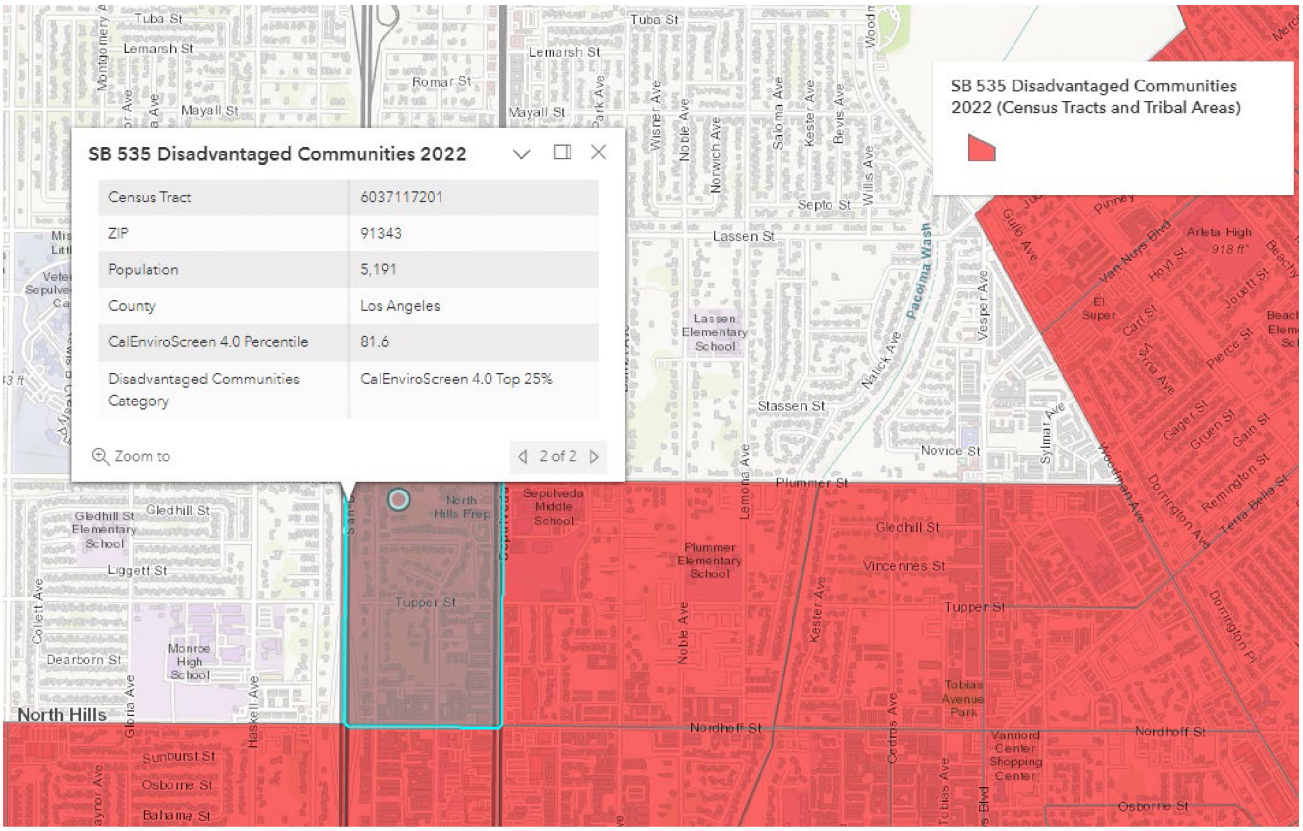

Figure 3: CalEnviroScreen 4.0 Analysis Of Census Tract 6037117201

The designation for Census Tract 6037117201, which contains the Project Site, shows that the Census Tract is a designated disadvantaged community under SB 535.

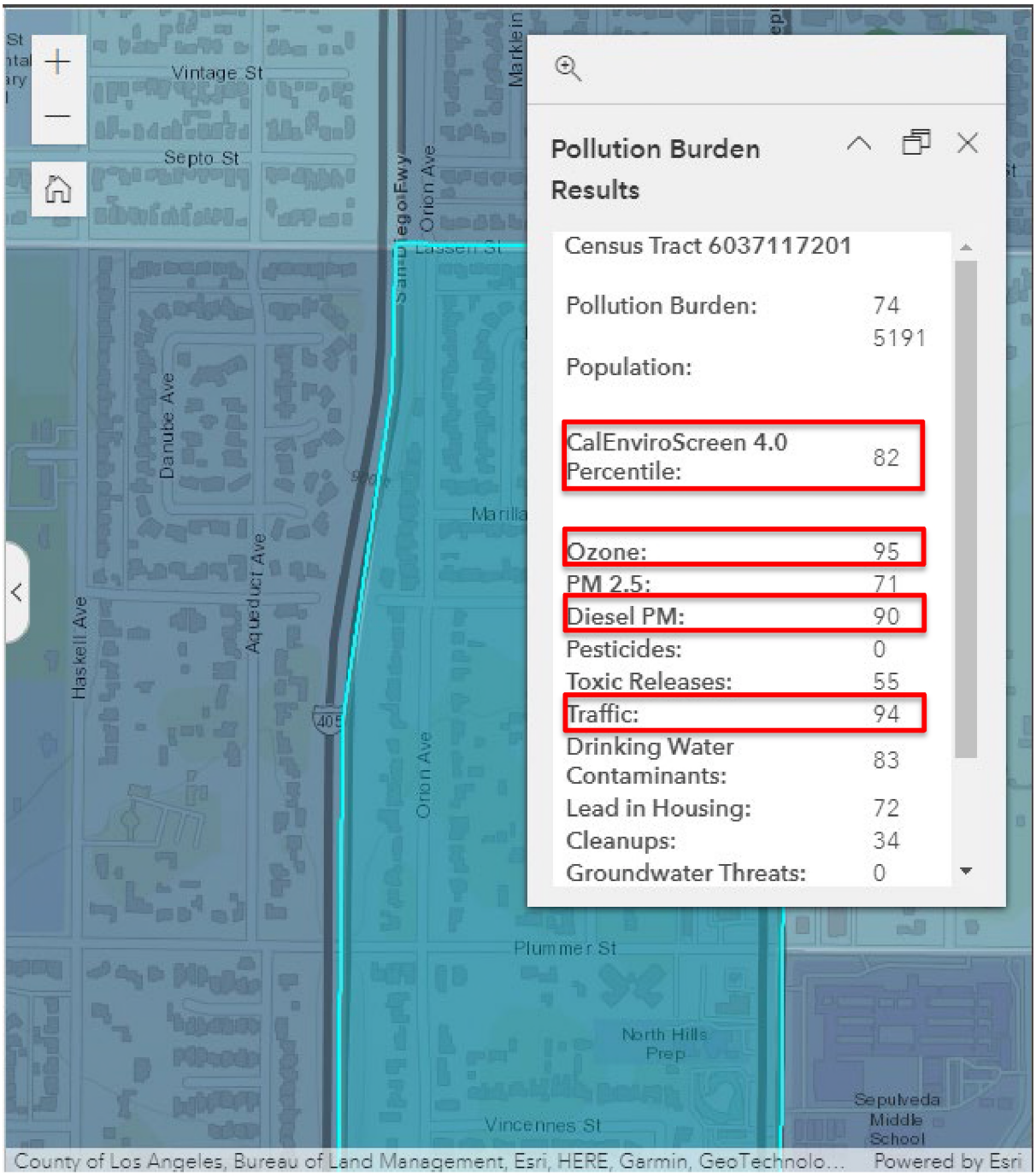

Figure 4: CalEnviroScreen 4.0 Pollution Burden Results For Project Site Location

Census tract 6037117201 is in the top 10th percentile of communities impacted by diesel particulate matter, the top 6th percentile of communities impacted by traffic, and the top 5th percentile of communities impacted by ozone in the State of California. The City must reanalyze the air quality and traffic impacts of the Project and consider the public well-being of this already burdened community in an environmental impact report (EIR).

2. The IS/MND Fails To Consider The Impacts Of Adjacent Sites On The Project Site And Does Not Comply With The California Education Code Regarding The Assessment Of Environmental Contaminants At Proposed School Sites.

The IS/MND fails to consider the impacts of the adjacent sites on the Project site. Immediately adjacent to the Project site are a number of sources that are permitted by the South Coast Air Quality Management District (SCAQMD). According to the SCAQMD's Facility Information Detail (FIND) website, there are at least 6 different permitted sites within ½ mile of the Project Site. The sites emit a number of potential toxic air contaminants including VOCs, diesel exhaust, and particulate matter.

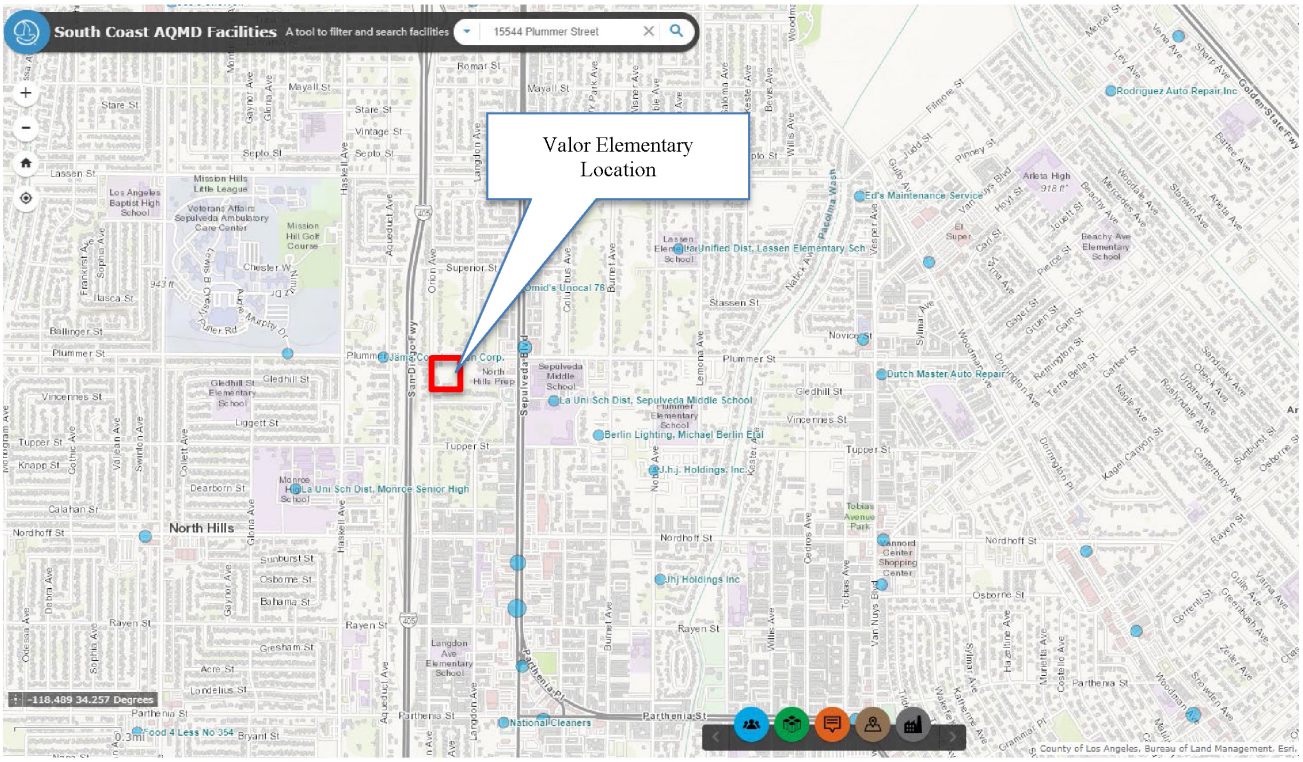

Figure 5: SCAQMD FIND Results For Permitted Facilities Near Project Site

In addition to failing to assess the impacts of offsite emissions on the students and staff that will be using the Project Site, the City has failed to comply with the California Education Code requirements for assessing whether there has been a release of hazardous wastes at the school site or if the hazardous materials reaching the school site pose a health risk to the sensitive receptors present at the site. Using the three step process outlined by the DTSC Site Mitigation and Restoration Program's Schools Unit (Step 1: Phase 1 Environmental Site Assessment; Step 2: Preliminary Endangerment Assessment (PEA); and, Step 3: Response Action) it is clear that the City and the

Proponent have failed to perform the necessary analysis of health risks from chemicals that will impact the students at this time. According to the DTSC's website:

> "A Preliminary Environmental Assessment is required when there is potential contamination on the school site. This can be determined through a Phase I Environmental Site Assessment or districts may elect to proceed directly to a Preliminary Environmental Assessment based on site knowledge (Ed. Code, § 17213.1, subsec. (a)(4)(B)). The assessment includes collection of environmental samples and evaluation of potential health risks. School districts enter into an Environmental Oversight Agreement with DTSC, then contract with a qualified environmental consultant to prepare an assessment according to DTSC guidelines. The assessment includes preparation of a work plan, collection and analysis of environmental samples, and preparation of a Preliminary Environmental Assessment report; (Ed. Code, § 17210, subsec. (b) and § 17213.1, subsec. (a)(4)(B)). The report includes results of environmental sampling and a health risk assessment conducted according to DTSC guidelines (Ed. Code, § 17213.1, subsec. (a)(4)(B)). As required by the Education Code (Ed. Code, § 17213.1, subsec. (a)(6)), school districts must make the report available for public review and comment before DTSC's final determination. DTSC is required to approve or disapprove the Preliminary Environmental Assessment Report within 30 days of close of public review period (Ed. Code, § 17213.1, subsec. (a)(6)(A)) or within 30 days of the school district's approval of the Environmental Impact Report for the school (Ed. Code, § 17213.1, subsec. (a)(6)(B)). If the assessment identifies no significant health or environmental risks, the school district will receive a "No Further Action" determination letter from DTSC (Ed. Code, § 17213.1, subsec. (a)(9)) and the process is complete. If the assessment identifies potential contamination, further action will be required."

Clearly the City and the Applicant have failed to meet their requirements to assess all risks to students and staff under the Education Code and must complete a PEA, which includes its own Health Risk Analysis (HRA), prior to the preparation of the IS/MND. The City must immediately move to an EIR to assess those risks and develop a comprehensive remediation plan to ensure the health and safety of the sensitive receptors on site.

3. The City Has Failed To Provide All Of The Necessary Appendices And Worksheets To The Health Risk Analysis Of The Freeway Emission Impacts To Allow For Validation Of The City's Analysis

A review of the Appendix B to this IS/MND, the Health Risk Analysis for the Project, references files not included in the final report. According to Section 3.1.1. Air Dispersion Modeling of Appendix B, "TAC emissions associated with vehicle traffic on I-405 were estimated based on the

methodology and spreadsheet developed by the UC Davis-Caltrans Air Quality Project, Estimating Mobile Source Air Toxics Emissions [MSAT]: A Step-By-Step Project Analysis Methodology (2006). This spreadsheet was designed to estimate the total amount of the six pollutants of concern discussed in Section 2.2, Toxic Air Contaminants, based on total organic gases emission factors and diesel particulate emission factors from EMFAC2021… The spreadsheet outputs from the UC Davis-Caltrans MSAT model and composite emission rates are contained in Appendix A." Appendix A to the HRA is listed as the AERMOD Output Files. The failure to include the referenced spreadsheet(s) makes it impossible to validate the model inputs.

4. The City's Reliance On Local Significance Thresholds (LSTs) Ignores The Substantial Impacts To Residents Near The Project

According to the City of Los Angeles' 2019 Air Quality and Health Effects Guidance, airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and include both carcinogens and non-carcinogens defined as TACs.[1] Diesel exhaust, in particular DPM, is classified by the State of California as a TAC. The determination of a significance threshold is based on a ***quantitative risk analysis*** that requires the City to perform a multistep, quantitative health risk analysis for TACs. [2] Despite this clear guidance, no effort is made in the IS/MND to quantify the potential health impacts from emissions generated by construction activities or operational activities from the Project on these sensitive receptors.

According to SCAQMD[3], LSTs are only applicable to criteria pollutants: oxides of nitrogen (NO_X), carbon monoxide (CO), particulate matter less than 10 microns in aerodynamic diameter (PM_{10}) and particulate matter less than 2.5 microns in aerodynamic diameter ($PM_{2.5}$), not to TACs. 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.

[1] City of Los Angeles. 2019. Air Quality and Health Effects Guidance. Pg 6.

[2] City of Los Angeles. 2019. Air Quality and Health Effects Guidance. Pg 9, pg 36.

[3] http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds

For TACs, there are no LSTs, nor levels of significance based on the pounds per day. According to the City of Los Angeles' 2019 Air Quality And Health Effects Guidance airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and include both carcinogens and non-carcinogens are defined as toxic air contaminants.[4] Diesel exhaust, in particular diesel particulate matter, is classified by the State of California as a toxic air contaminant. Instead, the determination of a significance threshold is based on a ***quantitative risk analysis*** that requires the City to perform a multistep, quantitative health risk analysis for TACs. [5]

The City failed to perform this analysis, and therefore lacks supporting evidence for its conclusion that the Project would not result in significant health effects. The City's failure to perform such an analysis is clearly a major flaw in the IS/MND and may be placing the residents of the adjacent structures at risk from the construction phase of the Project.

5. The City's Analysis Appears To Focus Only On Diesel Particulate Matter (DPM) Emissions From The Freeway And Does Not Include A Speciated Analysis Of All TACs From The Freeway

While the primary source of particulate matter from freeways is diesel particulate exhaust, other emissions that will impact students and staff at the Valor Elementary Project Site from freeways include carbon dioxide (CO_2), carbon monoxide (CO), hydrocarbons (HC), nitrogen oxides (NO_X), particulate matter (PM), and substances known as mobile source air toxics (MSATs), such as benzene, formaldehyde, acetaldehyde, 1,3-butadiene, toluene, ethylbenzene, xylenes, and acetaldehyde. Each of these compounds, along with secondary by-products, such as ozone and secondary aerosols (e.g., nitrates and inorganic and organic acids), can cause adverse effects on health and the environment.[6]

Diesel exhaust contains nearly 40 toxic substances, including toxic air contaminants (TACs) and may pose a serious public health risk for residents in the vicinity of the facility. TACs are airborne

[4] City of Los Angeles. 2019. Air Quality and Health Effects Guidance. Pg 6.

[5] City of Los Angeles. 2019. Air Quality and Health Effects Guidance. Pg 9, pg 36.

[6] HEI. 2010. Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects. January, 2010.

substances that are capable of causing short-term (acute) and/or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. The current California list of TACs includes approximately 200 compounds, including particulate emissions from diesel-fueled engines.

Diesel exhaust has been linked to a range of serious health problems including an increase in respiratory disease, lung damage, cancer, and premature death.[7,8,9] Fine DPM is deposited deep in the lungs in the smallest airways and can result in increased respiratory symptoms and disease; decreased lung function, particularly in children and individuals with asthma; alterations in lung tissue and respiratory tract defense mechanisms; and premature death.[10] Exposure to DPM increases the risk of lung cancer. It also causes non-cancer effects including chronic bronchitis, inflammation of lung tissue, thickening of the alveolar walls, immunological allergic reactions, and airway constriction.[11] DPM is a TAC that is recognized by state and federal agencies as causing severe health risk because it contains toxic materials, unlike $PM_{2.5}$ and PM_{10}.[12]

It is evident that the HRA provided as an Appendix to the IS/MND fails to include all of the compounds associated with freeway emissions. The HRA therefore is an underestimate of the impacts that will burden the students, staff, and parents associated with the Project. The City must revise the HRA to include all compounds associated with freeway emissions in its analysis of risk in an EIR.

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[7] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998; see also California Air Resources Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health#:~:text=Diesel%20Particulate%20Matter%20and%20Health&text=In%201998%2C%20CARB%20identified%20DPM,and%20other%20adverse%20health%20effects.

[8] U.S. EPA, Health Assessment Document for Diesel Engine Exhaust, Report EPA/600/8-90/057F, May 2002.

[9] Environmental Defense Fund, Cleaner Diesel Handbook, Bring Cleaner Fuel and Diesel Retrofits into Your Neighborhood, April 2005; http://www.edf.org/documents/4941_cleanerdieselhandbook.pdf, accessed July 5, 2020.

[10] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998.

[11] Findings of the Scientific Review Panel on The Report on Diesel Exhaust as adopted at the Panel's April 22, 1998 Meeting.

[12] Health & Safety Code § 39655(a) (defining "toxic air contaminant" as air pollutants "which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412 (b)) is a toxic air contaminant.")

6. Using the Same Input Parameters As The AERMOD Model Presented In Appendix B, Produces Exposure Concentrations Approximately 1.5 Times Higher Than In The Model Presented In The HRA

Using the same input parameters listed in AERMOD input file utilized in the Health Risk Analysis for the Project (Appendix B) to the IS/MND, produces concentrations at the Project Site 1.5 times higher than presented in the HRA. The input parameters listed in the Rincon model are presented in an Appendix to this letter.

The 10 highest values from Rincon HRA are included below.

** CONC OF FREEWAY IN MICROGRAMS/M**3 **

GROUP ID		AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	NETWORK GRID-ID
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	2ND HIGHEST VALUE IS	5.22373 AT	(364484.65, 3790044.89, 235.00, 235.00, 0.00)	GC	UCART1
	3RD HIGHEST VALUE IS	5.20670 AT	(364484.65, 3790029.89, 235.00, 235.00, 0.00)	GC	UCART1
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	5TH HIGHEST VALUE IS	5.17212 AT	(364484.65, 3789999.89, 235.00, 235.00, 0.00)	GC	UCART1
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	8TH HIGHEST VALUE IS	5.11738 AT	(364484.65, 3789954.89, 235.00, 235.00, 0.00)	GC	UCART1
	9TH HIGHEST VALUE IS	5.09801 AT	(364484.65, 3789939.89, 235.00, 235.00, 0.00)	GC	UCART1
	10TH HIGHEST VALUE IS	5.07809 AT	(364484.65, 3789924.89, 235.00, 235.00, 0.00)	GC	UCART1
I405S	1ST HIGHEST VALUE IS	4.36772 AT	(364484.65, 3790059.89, 235.00, 235.00, 0.00)	GC	UCART1
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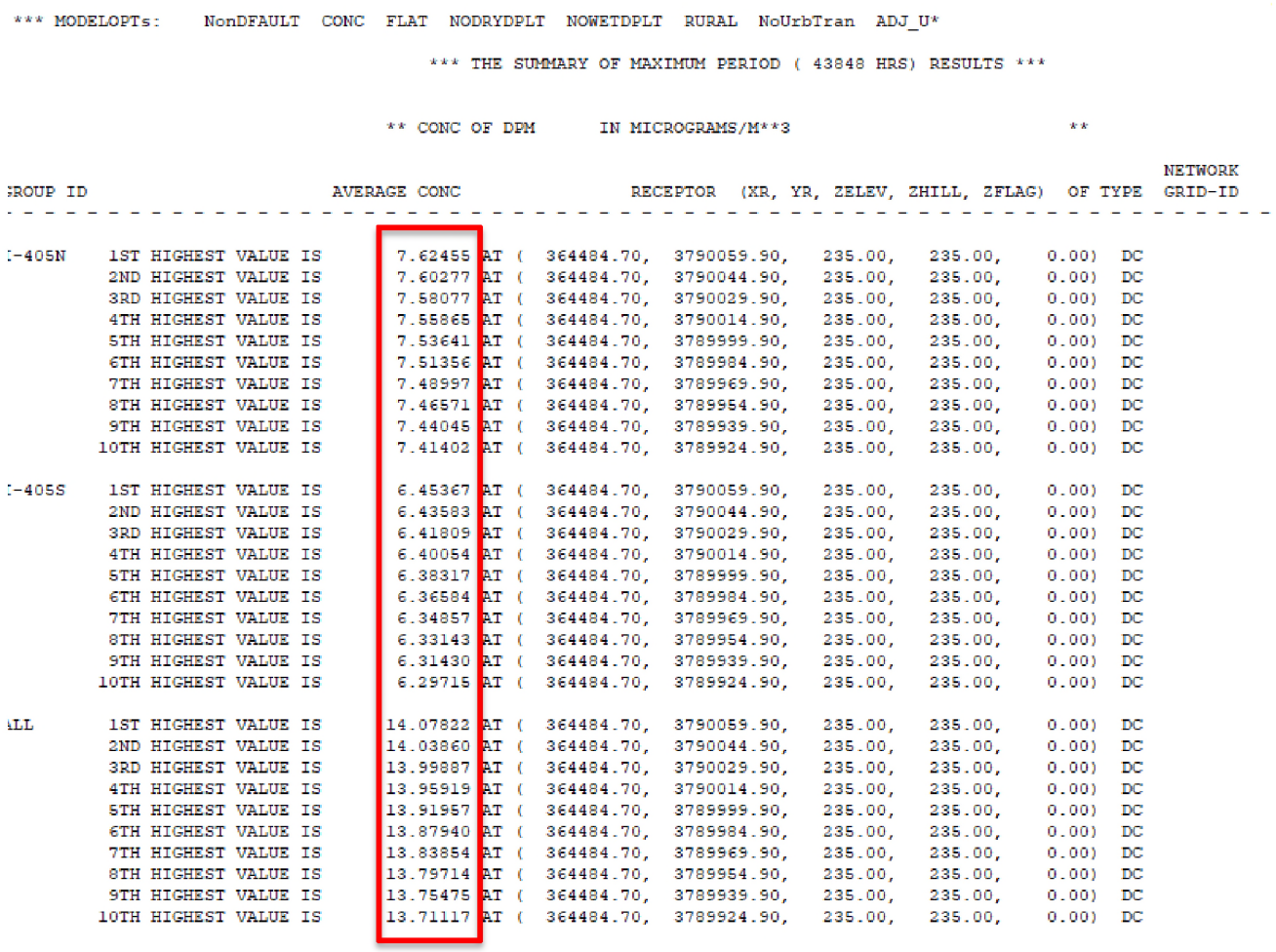
The output for the same model run by my office is presented below.



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*** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                                  *** THE SUMMARY OF MAXIMUM PERIOD ( 43848 HRS) RESULTS ***

                                  ** CONC OF DPM      IN MICROGRAMS/M**3                    **

GROUP ID                        AVERAGE CONC              RECEPTOR  (XR, YR, ZELEV, ZHILL, ZFLAG)  OF TYPE  NETWORK GRID-ID
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -

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          10TH HIGHEST VALUE IS      7.41402 AT (  364484.70,  3789924.90,   235.00,   235.00,    0.00)  DC

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ALL        1ST HIGHEST VALUE IS     14.07822 AT (  364484.70,  3790059.90,   235.00,   235.00,    0.00)  DC
           2ND HIGHEST VALUE IS     14.03860 AT (  364484.70,  3790044.90,   235.00,   235.00,    0.00)  DC
           3RD HIGHEST VALUE IS     13.99887 AT (  364484.70,  3790029.90,   235.00,   235.00,    0.00)  DC
           4TH HIGHEST VALUE IS     13.95919 AT (  364484.70,  3790014.90,   235.00,   235.00,    0.00)  DC
           5TH HIGHEST VALUE IS     13.91957 AT (  364484.70,  3789999.90,   235.00,   235.00,    0.00)  DC
           6TH HIGHEST VALUE IS     13.87940 AT (  364484.70,  3789984.90,   235.00,   235.00,    0.00)  DC
           7TH HIGHEST VALUE IS     13.83854 AT (  364484.70,  3789969.90,   235.00,   235.00,    0.00)  DC
           8TH HIGHEST VALUE IS     13.79714 AT (  364484.70,  3789954.90,   235.00,   235.00,    0.00)  DC
           9TH HIGHEST VALUE IS     13.75475 AT (  364484.70,  3789939.90,   235.00,   235.00,    0.00)  DC
          10TH HIGHEST VALUE IS     13.71117 AT (  364484.70,  3789924.90,   235.00,   235.00,    0.00)  DC
```

Since the results of the model are in doubt based on the re-analysis of the AERMOD run, the City must re-run the model to confirm the model output presented in the HRA.

7. The City's Air Quality Analysis Includes Simplifying Assumptions That Underestimates The Impacts Of Freeway Emissions On The Project Site.

A review of the AERMOD input file utilized in the Health Risk Analysis for the Project (Appendix B) to the IS/MND shows simplifying assumptions made by Rincon Consultants, Inc (Rincon), the Proponent's consultant, that result in underestimations of the freeway exhaust impacts. According to the Executive Summary of Appendix B, The Project entails development of one and two-story, 26.5-foot-tall elementary school building with 28 classrooms for grades transitional kindergarten through fourth. In addition, the Project would construct a multi-purpose room, two play

areas, a kindergarten play area, administrative spaces, corridors and storage spaces, and a surface parking lot with an ingress/egress driveway off Plummer Street.

In Section 3.1.1. Air Dispersion Modeling of Appendix B, Rincon states "Specific meteorology and terrain data from SCAQMD's Van Nuys Airport air monitoring station (of the closest station to the project site) and the United States Geological Survey (USGS) Digital Elevation Model (DEM) data for the Van Nuys and San Fernando Quadrangle were input to the model. The project site base elevation is approximately 264 meters above mean sea level (amsl). I-405 varies in elevation between approximately 256 and 274 meters amsl along the length of the approximately one-mile segment modeled. The dispersion model considers these differences in topography. The I-405 mainline within a half-mile of the project site was modeled as line volume sources in AERMOD. The presence of buildings and other structures disturbs downwind air flow. However, building downwash is only calculated for point sources and is not appropriate to include in AERMOD for this HRA. The plume height was based on an average for light- and heavy-duty vehicles (SBCAPCD 2020)." The model presented in the HRA assumes a flat model domain, eliminating an consideration of the differing elevation between the source of pollution and the receptor. The Applicant fails to describe why the elevation difference was not included in the model.

The source terms utilized in the are based on a model that is generally not utilized to assess existing emissions from roadways. According to Section 3.1.1 Air Dispersion Modeling, "Mobile source TAC emissions associated with vehicle traffic on I-405 were estimated based on the methodology and spreadsheet developed by the UC Davis-Caltrans Air Quality Project, Estimating Mobile Source Air Toxics Emissions [MSAT]: A Step-By-Step Project Analysis Methodology (2006). This spreadsheet was designed to estimate the total amount of the six pollutants of concern discussed in Section 2.2, Toxic Air Contaminants, based on total organic gases emission factors and diesel particulate emission factors from EMFAC2021. The analysis was based on year 2024 composite emission factors. The UC Davis-Caltrans spreadsheet contains speciation factors from the CARB, and the USEPA's Motor Vehicle Emission Simulator (MOVES; USEPA 2016) was used to supplement missing values for acrolein. These emission and speciation factors were then multiplied by traffic volumes for the mainline to obtain total emissions from I-405 within one-half mile of the project site." Since the Applicant has not included the MSAT spreadsheets, the source terms cannot be validated. Additionally, a review of the AERMOD input file shows that for the simulation the Applicant assumed

a standard emission rate of 1 gram of pollutant per sec (g/sec) divided among all of the volume sources assumed present on I-405. The missing components in the analysis presented include the actual assumed emission rate of each COC from each class of vehicle moving along I-405. The resulting analysis is little more than a screening assessment of impacts based on unverifiable data. The City must require a complete analysis of the impacts in an EIR.

Conclusion

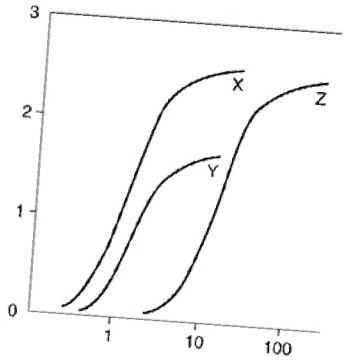
The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant unmitigated impacts if the DEIR is approved without significant revision. The City must re-evaluate the significant impacts identified in this letter by requiring the preparation of a revised DEIR.

Sincerely,



EXHIBIT A

CV



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well-recognized toxicologist, air modeler, and health scientist. He has 30 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling, RESRAD, GENII); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: Pamela Butler Vs. Mallinckrodt, Inc. & Cotter Corporation. Case No.: 4:2018cv01701 United States District Court Eastern District of Missouri Eastern Division

Case: Kenneth Edward Koterba Vs. Mallinckrodt, Inc. & Cotter Corporation. Case No.: 4:2018cv01702 United States District Court Eastern District of Missouri Eastern Division

Case: Anthony Hines Vs. Mallinckrodt, Inc. & Cotter Corporation. Case No.: 4:2018cv01703 United States District Court Eastern District of Missouri Eastern Division

Case: Emery David Walick, III Vs. Mallinckrodt, Inc. & Cotter Corporation. Case No.: 4:2018cv01704 United States District Court Eastern District of Missouri Eastern Division

Client: Humphrey, Farrington & McClain, P.C., Independence, Missouri

Dr. Clark performed a historical dose reconstruction for community members exposed to radioactive waste released into the environment from the St. Louis Air Port Site (SLAPS) and the Hazelwood Interim Storage Site (HISS). The releases resulted in impacts to soils, sediments, surface waters, and groundwater in the vicinity of the SLAPS and HISS sites. The analysis was performed in general accordance with the methods outlined by the Agency for Toxic Substances Control (ATSDR) for assessing radiation doses from historical source areas in North St. Louis County, Missouri.

Case Result: Trial Pending

Case: Don Strong, et al. vs. Republic Services, Inc., Bridgeton Landfill, LLC, vs. Cotter Corporation, N.S.L., Case No.: 17SL-CC01632-01 Circuit Court of St. Louis County, State of Missouri, Division 17

Client: Humphrey, Farrington & McClain, P.C., Independence, Missouri

Dr. Clark performed a historical dose reconstruction for community members from radiologically impacted material (RIM) releases from the adjacent West Lake Landfill. The analysis was performed in general accordance with the methods outlined by the Agency for Toxic Substances Control (ATSDR) for assessing radiation doses from historical source areas in North St. Louis County, Missouri.

Case Result: Settlement in favor of plaintiff.

Case: Arnold Goldstein, Hohn Covas, Gisela Janette La Bella, et al.. vs. Exxon Mobil Corporation, PBF Energy Inc., Torrance Refining Company LLC, et al., Case No.: 2:17-cv-02477DSF United States District Court for the Central District of California

Client: Sher Edlging, LLP, San Francisco, California and Matern Law Group , PC., El Segundo, California

Dr. Clark performed a historical dose reconstruction for community members from an active 700 acre petroleum refinery in Los Angeles. The analysis included a multi-year dispersion model was performed in general accordance with the methods outlined by the U.S. EPA and the SCAQMD for assessing the health impacts in Torrance, California. The results of the analysis are being used as the basis for injunctive relief for the communities surrounding the refinery.

Case Result: Trial Pending

Case: Scott D. McClurg, et al. v. Mallinckrodt Inc. and Cotter Corporation. Lead Case No.: 4:12CV00361 AGF United States District Court Eastern District of Missouri Eastern Division

Client: Environmental Law Group, Birmingham, AL.

Dr. Clark performed a historical dose reconstruction for community members and workers exposed to radioactive waste released into the environment from the St. Louis Air Port Site (SLAPS) and the Hazelwood Interim Storage Site (HISS). The releases resulted in impacts to soils, sediments, surface waters, and groundwater in the vicinity of the SLAPS and HISS sites. The analysis included the incorporation of air dispersion modeling across the community to determine ground-level air concentrations and deposition of thorium and uranium isotopes and their respective daughter products. The dose reconstruction considered all relevant pathways to determine total doses of radiation received across the community from 1946 through 2017.

Case Result: Settlement in favor of plaintiff.

Case: Mary Ann Piccolo V. Headwaters Incorporated, et al. Seventh Judicial Court In and For Carbon County, State of Utah. Case No. 130700053

Client: Law Offices of Roy L. Mason. Annapolis, MD

Dr. Clark performed a dose assessment of an individual occupationally exposed to metals and silica from fly ash who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding his exposure and later development of cancer.

Case Result: Settlement in favor of plaintiff.

Case: Tracey Coleman V. Headwaters Incorporated, et al. Seventh Judicial Court In and For Carbon County, State of Utah. Case No. 140902847

Client: Law Offices of Roy L. Mason. Annapolis, MD

Dr. Clark performed a dose assessment of an individual occupationally exposed to metals and silica from fly ash who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding his exposure and later development of cancer.

Case Result: Settlement in favor of plaintiff.

Case: David Dominguez and Amanda Dominguez V. Cytec Industries, Inc et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. BC533123

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to hexavalent chromium who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding her exposure and later development of cancer.

Case Result: Settlement in favor of plaintiff.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client(s) – Multiple

Indoor Air Evaluations, California: Performed multiple indoor air screening evaluations and risk characterizations consistent with California Environmental Protection Agency's (Cal/EPA) Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) methodologies. Characterizations included the use of DTSC's modified Johnson & Ettinger Model and USEPA models, as well as the attenuation factor model currently advocated by Cal/EPA's Office of Environmental Health and Hazard Assessment (OEHHA).

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model were used to estimate acute and chronic exposure concentrations to multiple contaminants and were be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark managed the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Immanent and Substantial Endangerment Order. Dr. Clark assisted the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)
Association for Environmental Health and Sciences (AEHS)
American Chemical Society (ACS)
International Society of Environmental Forensics (ISEF)
Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

Sullivan, P., **J.J. J. Clark,** F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities.* Elsevier, Inc. Burlington, MA.

Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet.* Elsevier, Inc. Burlington, MA.

Sullivan, P., Agardy, F.J., and **J.J.J. Clark**. 2005. *The Environmental Science of Drinking Water.* Elsevier, Inc. Burlington, MA.

Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions.* Trafford Publishing, Victoria B.C.

Clark, J.J.J. 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment.* Art Diaz, Ed.. Oxford University Press: New York.

Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment.* Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equialency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. Organohalogen Compounds, Volume 70 (2008) page 002254.

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

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research.* 105:194-199.

Rosenfeld, P.E., **Clark, J. J.,** Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" Water Science & Technology. 55(5): 345-357.

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.

Clark, J.J.J. 2003. "Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophnoxyacetic Acid (2,4-D) in California Drinking Water Supplies." National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

Rosenfeld, P. and **J.J.J. Clark**. 2003. "Understanding Historical Use, Chemical Properties, Toxicity, and Regulatory Guidance" National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Phoenix, AZ. February 21, 2003.

Clark, J.J.J., Brown A. 1999. Perchlorate Contamination: Fate in the Environment and Treatment Options. In Situ and On-Site Bioremediation, Fifth International Symposium. San Diego, CA, April, 1999.

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Clark, J.J.J., Brown, A., Rodriguez, R. 1998. The Public Health Implications of MtBE and Perchlorate in Water: Risk Management Decisions for Water Purveyors. Proceedings of the National Ground Water Association, Anaheim, CA, June 3-4, 1998.

Clark J.J.J., Brown, A., Ulrey, A. 1997. Impacts of Perchlorate On Drinking Water In The Western United States. U.S. EPA Symposium on Biological and Chemical Reduction of Chlorate and Perchlorate, Cincinnati, OH, December 5, 1997.

Clark, J.J.J.; Corbett, G.E.; Kerger, B.D.; Finley, B.L.; Paustenbach, D.J. 1996. Dermal Uptake of Hexavalent Chromium In Human Volunteers: Measures of Systemic Uptake From Immersion in Water At 22 PPM. Toxicologist. 30(1):14.

Dodge, D.G.; **Clark, J.J.J.**; Kerger, B.D.; Richter, R.O.; Finley, B.L.; Paustenbach, D.J. 1996. Assessment of Airborne Hexavalent Chromium In The Home Following Use of Contaminated Tapwater. Toxicologist. 30(1):117-118.

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Harber, P.H.; Gong, H., Jr.; Lachenbruch, A.; **Clark, J.**; Hsu, P. (1992). Respiratory Pattern Effect of Acute Sulfur Dioxide Exposure in Asthmatics. American Review of Respiratory Disease. 145(4):A88.

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Ozone Exposures in Residents of Los Angeles County. American Review of Respiratory Disease. 141(4):A70.

Tierney, D.F. and **J.J.J. Clark.** (1990). Lung Polyamine Content Can Be Increased By Spermidine Infusions Into Hyperoxic Rats. American Review of Respiratory Disease. 139(4):A41.

EXHIBIT B

AERMOD Model Of I-405 Emissions

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** BREEZE AERMOD
** Trinity Consultants
** VERSION  11.0

CO STARTING
CO TITLEONE  Valor Elementary Exposure To DPM From I-405
CO MODELOPT  CONC  FLAT  NODRYDPLT  NOWETDPLT  NOURBTRAN
CO RUNORNOT  RUN
CO AVERTIME  PERIOD
CO POLLUTID  DPM
CO FINISHED

SO STARTING
SO ELEVUNIT  METERS
SO LOCATION  405N0726  VOLUME    364442.881  3790945.012  0
** SRCDESCR  405N0726
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SO SRCPARAM  405N0734  0.02381  1.43  22.83  1.33
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SO SRCPARAM  405N0738  0.02381  1.43  22.83  1.33
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SO SRCPARAM  405N0740  0.02381  1.43  22.83  1.33
SO SRCPARAM  405N0741  0.02381  1.43  22.83  1.33
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      7.2  7.2  7.2  7.2
268   SO EMISFACT  405N0726  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
269   SO EMISFACT  405N0726  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
270   SO EMISFACT  405N0726  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
271   SO EMISFACT  405N0726  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
272   SO EMISFACT  405N0727  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
273   SO EMISFACT  405N0727  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
274   SO EMISFACT  405N0727  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
275   SO EMISFACT  405N0727  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
276   SO EMISFACT  405N0727  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
277   SO EMISFACT  405N0728  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
278   SO EMISFACT  405N0728  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
279   SO EMISFACT  405N0728  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
280   SO EMISFACT  405N0728  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
281   SO EMISFACT  405N0728  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
282   SO EMISFACT  405N0729  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
283   SO EMISFACT  405N0729  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
284   SO EMISFACT  405N0729  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
285   SO EMISFACT  405N0729  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
286   SO EMISFACT  405N0729  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
287   SO EMISFACT  405N0730  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
288   SO EMISFACT  405N0730  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
289   SO EMISFACT  405N0730  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
290   SO EMISFACT  405N0730  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
291   SO EMISFACT  405N0730  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
292   SO EMISFACT  405N0731  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
293   SO EMISFACT  405N0731  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
294   SO EMISFACT  405N0731  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
295   SO EMISFACT  405N0731  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
296   SO EMISFACT  405N0731  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
297   SO EMISFACT  405N0732  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
298   SO EMISFACT  405N0732  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
299   SO EMISFACT  405N0732  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
300   SO EMISFACT  405N0732  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
301   SO EMISFACT  405N0732  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
302   SO EMISFACT  405N0733  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
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      7.2  7.2  7.2  7.2
303   SO EMISFACT  405N0733  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
304   SO EMISFACT  405N0733  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
305   SO EMISFACT  405N0733  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
306   SO EMISFACT  405N0733  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
307   SO EMISFACT  405N0734  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
308   SO EMISFACT  405N0734  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
309   SO EMISFACT  405N0734  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
310   SO EMISFACT  405N0734  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
311   SO EMISFACT  405N0734  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
312   SO EMISFACT  405N0735  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
313   SO EMISFACT  405N0735  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
314   SO EMISFACT  405N0735  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
315   SO EMISFACT  405N0735  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
316   SO EMISFACT  405N0735  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
317   SO EMISFACT  405N0736  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
318   SO EMISFACT  405N0736  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
319   SO EMISFACT  405N0736  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
320   SO EMISFACT  405N0736  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
321   SO EMISFACT  405N0736  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
322   SO EMISFACT  405N0737  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
323   SO EMISFACT  405N0737  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
324   SO EMISFACT  405N0737  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
325   SO EMISFACT  405N0737  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
326   SO EMISFACT  405N0737  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
327   SO EMISFACT  405N0738  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
328   SO EMISFACT  405N0738  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
329   SO EMISFACT  405N0738  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
330   SO EMISFACT  405N0738  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
331   SO EMISFACT  405N0738  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
332   SO EMISFACT  405N0739  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
333   SO EMISFACT  405N0739  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
334   SO EMISFACT  405N0739  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
335   SO EMISFACT  405N0739  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
336   SO EMISFACT  405N0739  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
337   SO EMISFACT  405N0740  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
338   SO EMISFACT  405N0740  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
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339   SO EMISFACT  405N0740  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
340   SO EMISFACT  405N0740  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
341   SO EMISFACT  405N0740  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
342   SO EMISFACT  405N0741  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
343   SO EMISFACT  405N0741  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
344   SO EMISFACT  405N0741  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
345   SO EMISFACT  405N0741  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
346   SO EMISFACT  405N0741  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
347   SO EMISFACT  405N0742  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
348   SO EMISFACT  405N0742  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
349   SO EMISFACT  405N0742  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
350   SO EMISFACT  405N0742  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
351   SO EMISFACT  405N0742  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
352   SO EMISFACT  405N0743  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
353   SO EMISFACT  405N0743  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
354   SO EMISFACT  405N0743  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
355   SO EMISFACT  405N0743  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
356   SO EMISFACT  405N0743  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
357   SO EMISFACT  405N0744  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
358   SO EMISFACT  405N0744  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
359   SO EMISFACT  405N0744  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
360   SO EMISFACT  405N0744  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
361   SO EMISFACT  405N0744  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
362   SO EMISFACT  405N0745  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
363   SO EMISFACT  405N0745  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
364   SO EMISFACT  405N0745  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
365   SO EMISFACT  405N0745  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
366   SO EMISFACT  405N0745  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
367   SO EMISFACT  405N0746  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
368   SO EMISFACT  405N0746  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
369   SO EMISFACT  405N0746  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
370   SO EMISFACT  405N0746  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
371   SO EMISFACT  405N0746  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
372   SO EMISFACT  405N0747  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
373   SO EMISFACT  405N0747  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
374   SO EMISFACT  405N0747  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
375   SO EMISFACT  405N0747  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
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      0.0  0.0  0.0  0.0
376   SO EMISFACT  405N0747  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
377   SO EMISFACT  405N0748  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
378   SO EMISFACT  405N0748  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
379   SO EMISFACT  405N0748  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
380   SO EMISFACT  405N0748  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
381   SO EMISFACT  405N0748  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
382   SO EMISFACT  405N0749  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
383   SO EMISFACT  405N0749  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
384   SO EMISFACT  405N0749  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
385   SO EMISFACT  405N0749  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
386   SO EMISFACT  405N0749  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
387   SO EMISFACT  405N0750  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
388   SO EMISFACT  405N0750  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
389   SO EMISFACT  405N0750  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
390   SO EMISFACT  405N0750  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
391   SO EMISFACT  405N0750  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
392   SO EMISFACT  405N0751  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
393   SO EMISFACT  405N0751  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
394   SO EMISFACT  405N0751  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
395   SO EMISFACT  405N0751  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
396   SO EMISFACT  405N0751  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
397   SO EMISFACT  405N0752  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
398   SO EMISFACT  405N0752  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
399   SO EMISFACT  405N0752  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
400   SO EMISFACT  405N0752  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
401   SO EMISFACT  405N0752  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
402   SO EMISFACT  405N0753  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
403   SO EMISFACT  405N0753  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
404   SO EMISFACT  405N0753  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
405   SO EMISFACT  405N0753  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
406   SO EMISFACT  405N0753  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
407   SO EMISFACT  405N0754  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
408   SO EMISFACT  405N0754  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
409   SO EMISFACT  405N0754  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
410   SO EMISFACT  405N0754  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
411   SO EMISFACT  405N0754  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
412   SO EMISFACT  405N0755  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
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      7.2  7.2  7.2  7.2
413   SO EMISFACT  405N0755  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
414   SO EMISFACT  405N0755  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
415   SO EMISFACT  405N0755  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
416   SO EMISFACT  405N0755  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
417   SO EMISFACT  405N0756  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
418   SO EMISFACT  405N0756  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
419   SO EMISFACT  405N0756  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
420   SO EMISFACT  405N0756  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
421   SO EMISFACT  405N0756  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
422   SO EMISFACT  405N0757  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
423   SO EMISFACT  405N0757  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
424   SO EMISFACT  405N0757  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
425   SO EMISFACT  405N0757  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
426   SO EMISFACT  405N0757  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
427   SO EMISFACT  405N0758  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
428   SO EMISFACT  405N0758  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
429   SO EMISFACT  405N0758  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
430   SO EMISFACT  405N0758  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
431   SO EMISFACT  405N0758  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
432   SO EMISFACT  405N0759  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
433   SO EMISFACT  405N0759  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
434   SO EMISFACT  405N0759  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
435   SO EMISFACT  405N0759  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
436   SO EMISFACT  405N0759  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
437   SO EMISFACT  405N0760  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
438   SO EMISFACT  405N0760  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
439   SO EMISFACT  405N0760  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
440   SO EMISFACT  405N0760  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
441   SO EMISFACT  405N0760  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
442   SO EMISFACT  405N0761  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
443   SO EMISFACT  405N0761  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
444   SO EMISFACT  405N0761  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
445   SO EMISFACT  405N0761  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
446   SO EMISFACT  405N0761  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
447   SO EMISFACT  405N0762  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
448   SO EMISFACT  405N0762  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
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449   SO EMISFACT  405N0762  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
450   SO EMISFACT  405N0762  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
451   SO EMISFACT  405N0762  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
452   SO EMISFACT  405N0763  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
453   SO EMISFACT  405N0763  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
454   SO EMISFACT  405N0763  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
455   SO EMISFACT  405N0763  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
456   SO EMISFACT  405N0763  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
457   SO EMISFACT  405N0764  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
458   SO EMISFACT  405N0764  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
459   SO EMISFACT  405N0764  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
460   SO EMISFACT  405N0764  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
461   SO EMISFACT  405N0764  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
462   SO EMISFACT  405N0765  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
463   SO EMISFACT  405N0765  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
464   SO EMISFACT  405N0765  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
465   SO EMISFACT  405N0765  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
466   SO EMISFACT  405N0765  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
467   SO EMISFACT  405N0766  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
468   SO EMISFACT  405N0766  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
469   SO EMISFACT  405N0766  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
470   SO EMISFACT  405N0766  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
471   SO EMISFACT  405N0766  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
472   SO EMISFACT  405N0767  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
473   SO EMISFACT  405N0767  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
474   SO EMISFACT  405N0767  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
475   SO EMISFACT  405N0767  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
476   SO EMISFACT  405N0767  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
477   SO EMISFACT  405S0676  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
478   SO EMISFACT  405S0676  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
479   SO EMISFACT  405S0676  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
480   SO EMISFACT  405S0676  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
481   SO EMISFACT  405S0676  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
482   SO EMISFACT  405S0677  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
483   SO EMISFACT  405S0677  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
484   SO EMISFACT  405S0677  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
485   SO EMISFACT  405S0677  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
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      0.0  0.0  0.0  0.0
486   SO EMISFACT  405S0677  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
487   SO EMISFACT  405S0678  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
488   SO EMISFACT  405S0678  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
489   SO EMISFACT  405S0678  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
490   SO EMISFACT  405S0678  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
491   SO EMISFACT  405S0678  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
492   SO EMISFACT  405S0679  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
493   SO EMISFACT  405S0679  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
494   SO EMISFACT  405S0679  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
495   SO EMISFACT  405S0679  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
496   SO EMISFACT  405S0679  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
497   SO EMISFACT  405S0680  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
498   SO EMISFACT  405S0680  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
499   SO EMISFACT  405S0680  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
500   SO EMISFACT  405S0680  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
501   SO EMISFACT  405S0680  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
502   SO EMISFACT  405S0681  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
503   SO EMISFACT  405S0681  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
504   SO EMISFACT  405S0681  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
505   SO EMISFACT  405S0681  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
506   SO EMISFACT  405S0681  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
507   SO EMISFACT  405S0682  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
508   SO EMISFACT  405S0682  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
509   SO EMISFACT  405S0682  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
510   SO EMISFACT  405S0682  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
511   SO EMISFACT  405S0682  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
512   SO EMISFACT  405S0683  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
513   SO EMISFACT  405S0683  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
514   SO EMISFACT  405S0683  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
515   SO EMISFACT  405S0683  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
516   SO EMISFACT  405S0683  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
517   SO EMISFACT  405S0684  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
518   SO EMISFACT  405S0684  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
519   SO EMISFACT  405S0684  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
520   SO EMISFACT  405S0684  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
521   SO EMISFACT  405S0684  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
522   SO EMISFACT  405S0685  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
```

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      7.2  7.2  7.2  7.2
523   SO EMISFACT  405S0685  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
524   SO EMISFACT  405S0685  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
525   SO EMISFACT  405S0685  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
526   SO EMISFACT  405S0685  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
527   SO EMISFACT  405S0686  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
528   SO EMISFACT  405S0686  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
529   SO EMISFACT  405S0686  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
530   SO EMISFACT  405S0686  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
531   SO EMISFACT  405S0686  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
532   SO EMISFACT  405S0687  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
533   SO EMISFACT  405S0687  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
534   SO EMISFACT  405S0687  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
535   SO EMISFACT  405S0687  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
536   SO EMISFACT  405S0687  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
537   SO EMISFACT  405S0688  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
538   SO EMISFACT  405S0688  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
539   SO EMISFACT  405S0688  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
540   SO EMISFACT  405S0688  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
541   SO EMISFACT  405S0688  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
542   SO EMISFACT  405S0689  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
543   SO EMISFACT  405S0689  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
544   SO EMISFACT  405S0689  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
545   SO EMISFACT  405S0689  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
546   SO EMISFACT  405S0689  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
547   SO EMISFACT  405S0690  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
548   SO EMISFACT  405S0690  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
549   SO EMISFACT  405S0690  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
550   SO EMISFACT  405S0690  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
551   SO EMISFACT  405S0690  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
552   SO EMISFACT  405S0691  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
553   SO EMISFACT  405S0691  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
554   SO EMISFACT  405S0691  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
555   SO EMISFACT  405S0691  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
556   SO EMISFACT  405S0691  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
557   SO EMISFACT  405S0692  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
558   SO EMISFACT  405S0692  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
```

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559   SO EMISFACT  405S0692  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
560   SO EMISFACT  405S0692  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
561   SO EMISFACT  405S0692  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
562   SO EMISFACT  405S0693  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
563   SO EMISFACT  405S0693  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
564   SO EMISFACT  405S0693  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
565   SO EMISFACT  405S0693  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
566   SO EMISFACT  405S0693  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
567   SO EMISFACT  405S0694  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
568   SO EMISFACT  405S0694  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
569   SO EMISFACT  405S0694  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
570   SO EMISFACT  405S0694  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
571   SO EMISFACT  405S0694  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
572   SO EMISFACT  405S0695  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
573   SO EMISFACT  405S0695  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
574   SO EMISFACT  405S0695  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
575   SO EMISFACT  405S0695  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
576   SO EMISFACT  405S0695  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
577   SO EMISFACT  405S0696  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
578   SO EMISFACT  405S0696  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
579   SO EMISFACT  405S0696  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
580   SO EMISFACT  405S0696  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
581   SO EMISFACT  405S0696  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
582   SO EMISFACT  405S0697  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
583   SO EMISFACT  405S0697  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
584   SO EMISFACT  405S0697  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
585   SO EMISFACT  405S0697  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
586   SO EMISFACT  405S0697  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
587   SO EMISFACT  405S0698  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
588   SO EMISFACT  405S0698  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
589   SO EMISFACT  405S0698  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
590   SO EMISFACT  405S0698  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
591   SO EMISFACT  405S0698  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
592   SO EMISFACT  405S0699  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
593   SO EMISFACT  405S0699  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
594   SO EMISFACT  405S0699  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
595   SO EMISFACT  405S0699  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
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      0.0  0.0  0.0  0.0
596   SO EMISFACT  405S0699  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
597   SO EMISFACT  405S0700  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
598   SO EMISFACT  405S0700  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
599   SO EMISFACT  405S0700  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
600   SO EMISFACT  405S0700  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
601   SO EMISFACT  405S0700  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
602   SO EMISFACT  405S0701  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
603   SO EMISFACT  405S0701  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
604   SO EMISFACT  405S0701  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
605   SO EMISFACT  405S0701  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
606   SO EMISFACT  405S0701  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
607   SO EMISFACT  405S0702  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
608   SO EMISFACT  405S0702  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
609   SO EMISFACT  405S0702  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
610   SO EMISFACT  405S0702  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
611   SO EMISFACT  405S0702  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
612   SO EMISFACT  405S0703  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
613   SO EMISFACT  405S0703  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
614   SO EMISFACT  405S0703  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
615   SO EMISFACT  405S0703  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
616   SO EMISFACT  405S0703  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
617   SO EMISFACT  405S0704  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
618   SO EMISFACT  405S0704  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
619   SO EMISFACT  405S0704  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
620   SO EMISFACT  405S0704  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
621   SO EMISFACT  405S0704  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
622   SO EMISFACT  405S0705  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
623   SO EMISFACT  405S0705  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
624   SO EMISFACT  405S0705  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
625   SO EMISFACT  405S0705  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
626   SO EMISFACT  405S0705  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
627   SO EMISFACT  405S0706  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
628   SO EMISFACT  405S0706  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
629   SO EMISFACT  405S0706  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
630   SO EMISFACT  405S0706  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
631   SO EMISFACT  405S0706  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
632   SO EMISFACT  405S0707  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
```

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      7.2  7.2  7.2  7.2
633   SO EMISFACT  405S0707  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
634   SO EMISFACT  405S0707  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
635   SO EMISFACT  405S0707  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
636   SO EMISFACT  405S0707  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
637   SO EMISFACT  405S0708  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
638   SO EMISFACT  405S0708  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
639   SO EMISFACT  405S0708  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
640   SO EMISFACT  405S0708  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
641   SO EMISFACT  405S0708  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
642   SO EMISFACT  405S0709  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
643   SO EMISFACT  405S0709  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
644   SO EMISFACT  405S0709  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
645   SO EMISFACT  405S0709  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
646   SO EMISFACT  405S0709  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
647   SO EMISFACT  405S0710  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
648   SO EMISFACT  405S0710  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
649   SO EMISFACT  405S0710  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
650   SO EMISFACT  405S0710  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
651   SO EMISFACT  405S0710  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
652   SO EMISFACT  405S0711  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
653   SO EMISFACT  405S0711  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
654   SO EMISFACT  405S0711  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
655   SO EMISFACT  405S0711  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
656   SO EMISFACT  405S0711  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
657   SO EMISFACT  405S0712  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
658   SO EMISFACT  405S0712  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
659   SO EMISFACT  405S0712  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
660   SO EMISFACT  405S0712  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
661   SO EMISFACT  405S0712  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
662   SO EMISFACT  405S0713  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
663   SO EMISFACT  405S0713  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
664   SO EMISFACT  405S0713  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
665   SO EMISFACT  405S0713  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
666   SO EMISFACT  405S0713  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
667   SO EMISFACT  405S0714  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
668   SO EMISFACT  405S0714  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
```

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669  SO EMISFACT  405S0714  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
670  SO EMISFACT  405S0714  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
671  SO EMISFACT  405S0714  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
672  SO EMISFACT  405S0715  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
     7.2  7.2  7.2  7.2
673  SO EMISFACT  405S0715  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
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674  SO EMISFACT  405S0715  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
675  SO EMISFACT  405S0715  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
676  SO EMISFACT  405S0715  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
677  SO EMISFACT  405S0716  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
     7.2  7.2  7.2  7.2
678  SO EMISFACT  405S0716  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
679  SO EMISFACT  405S0716  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
680  SO EMISFACT  405S0716  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
681  SO EMISFACT  405S0716  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
682  SO EMISFACT  405S0717  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
     7.2  7.2  7.2  7.2
683  SO EMISFACT  405S0717  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
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684  SO EMISFACT  405S0717  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
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685  SO EMISFACT  405S0717  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
686  SO EMISFACT  405S0717  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
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688  SO SRCGROUP  I-405N  405N0734  405N0735  405N0736  405N0737  405N0738  405N0739
     405N0740  405N0741
689  SO SRCGROUP  I-405N  405N0742  405N0743  405N0744  405N0745  405N0746  405N0747
     405N0748  405N0749
690  SO SRCGROUP  I-405N  405N0750  405N0751  405N0752  405N0753  405N0754  405N0755
     405N0756  405N0757
691  SO SRCGROUP  I-405N  405N0758  405N0759  405N0760  405N0761  405N0762  405N0763
     405N0764  405N0765
692  SO SRCGROUP  I-405N  405N0766  405N0767
693  SO SRCGROUP  I-405S  405S0676  405S0677  405S0678  405S0679  405S0680  405S0681
     405S0682  405S0683
694  SO SRCGROUP  I-405S  405S0684  405S0685  405S0686  405S0687  405S0688  405S0689
     405S0690  405S0691
695  SO SRCGROUP  I-405S  405S0692  405S0693  405S0694  405S0695  405S0696  405S0697
     405S0698  405S0699
696  SO SRCGROUP  I-405S  405S0700  405S0701  405S0702  405S0703  405S0704  405S0705
     405S0706  405S0707
697  SO SRCGROUP  I-405S  405S0708  405S0709  405S0710  405S0711  405S0712  405S0713
     405S0714  405S0715
698  SO SRCGROUP  I-405S  405S0716  405S0717
699  SO SRCGROUP  ALL
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RE DISCCART  364514.7  3790059.9
** RCPDESCR  fine grid
RE DISCCART  364524.7  3790059.9
** RCPDESCR  fine grid
RE DISCCART  364534.7  3790059.9
** RCPDESCR  fine grid
RE DISCCART  364544.7  3790059.9
** RCPDESCR  fine grid
RE DISCCART  364554.7  3790059.9
** RCPDESCR  fine grid
RE DISCCART  364564.7  3790059.9
** RCPDESCR  fine grid
RE DISCCART  364574.7  3790059.9
** RCPDESCR  fine grid
RE FINISHED

ME STARTING
ME SURFFILE  "C:\Users\jclar\OneDrive\CLARKA~1\PR3138~1\KVNY_V~1\KVNY_V9.SFC"
** SURFFILE  "C:\Users\jclar\OneDrive\CLARKA~1\PR3138~1\KVNY_V~1\KVNY_V9.SFC"
ME PROFFILE  "C:\Users\jclar\OneDrive\CLARKA~1\PR3138~1\KVNY_V~1\KVNY_V9.PFL"
** PROFFILE  "C:\Users\jclar\OneDrive\CLARKA~1\PR3138~1\KVNY_V~1\KVNY_V9.PFL"
ME SURFDATA  23130 2012
ME UAIRDATA  3190 2012
ME PROFBASE  235  METERS
ME FINISHED

OU STARTING
OU FILEFORM  FIX
OU PLOTFILE  PERIOD  I-405N  I-405N`PERIOD.plt  10000
OU PLOTFILE  PERIOD  I-405S  I-405S`PERIOD.plt  10001
OU PLOTFILE  PERIOD  ALL  ALL`PERIOD.plt  10002
OU POSTFILE  PERIOD  I-405N  UNFORM  I-405N`PERIOD.bin  10003
OU POSTFILE  PERIOD  I-405S  UNFORM  I-405S`PERIOD.bin  10004
OU POSTFILE  PERIOD  ALL  UNFORM  ALL`PERIOD.bin  10005
OU FINISHED

** ************************************************************************
** It is recommended that the user not edit any data below this line
** ************************************************************************

** BUILDING BLD  0  0  264.52  7.9248  14
** BUILDING IDN  1BMRZ1EH
** BUILDING CRN  364543.1  3790038.5
** BUILDING CRN  364519.4  3790038.8
** BUILDING CRN  364517.8  3789964.4
** BUILDING CRN  364535.8  3789965
** BUILDING CRN  364536.5  3790009
** BUILDING CRN  364545.3  3790009.4
** BUILDING CRN  364546  3790017.3
** BUILDING CRN  364543.1  3790018.2
** BUILDING CRN  364543.1  3790027.7
** BUILDING CRN  364561.8  3790026.5
** BUILDING CRN  364562.8  3789988.5
** BUILDING CRN  364576.4  3789988.5
** BUILDING CRN  364576.7  3790038.8
** BUILDING CRN  364543.1  3790038.5
** BUILDING BLD  0  0  263.70  7.9248  7
** BUILDING IDN  1BMRZ1EI
** BUILDING CRN  364542.5  3789976.4
** BUILDING CRN  364542.2  3789964.1
** BUILDING CRN  364568.8  3789964.1
** BUILDING CRN  364567.5  3789976.7
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** BUILDING CRN  364568.1  3789976.7
** BUILDING CRN  364568.5  3789976.7
** BUILDING CRN  364542.5  3789976.4

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** TAG PRM  0  1  F  F  1  255,0,255,0
** TAG CRD       364451.3,3789927.6,0
** TAG NAM  9FIOJ02T
** TAG PRM  0  1  F  F  1  255,0,255,0
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3776870.5
** TERRFILE  C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PR7D71~1\AERMOD\SAN_FERNANDO30M.DEM  0  2
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3790731.9
** AMPTYPE  DEM
** AMPDATUM  2
** AMPZONE  11
** AMPHEMISPHERE  N

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,0.0174532925199433]],PROJECTION["Universal_Transverse_Mercator"],PARAMETER["Zone",11],UN
IT["Meter",1,AUTHORITY["EPSG","9001"]]]
** PROJECTION  UTM
** DATUM  WGE
** UNITS  METER
** ZONE  11
** HEMISPHERE  N
** ORIGINLON  0
** ORIGINLAT  0
** PARALLEL1  0
** PARALLEL2  0
** AZIMUTH  0
** SCALEFACT  0
** FALSEEAST  0
** FALSENORTH  0

** POSTFMT  UNFORM
** TEMPLATE USERDEFINED
** AERMODEXE  AERMOD_EPA_22112_64.EXE
** AERMAPEXE  AERMAP_EPA_18081_64.EXE


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** BREEZE AERMOD
** Trinity Consultants
** VERSION  11.0

CO STARTING
CO TITLEONE  Valor Elementary Exposure To DPM From I-405
CO MODELOPT  CONC  FLAT  NODRYDPLT  NOWETDPLT  NOURBTRAN
CO RUNORNOT  RUN
CO AVERTIME  PERIOD
CO POLLUTID  DPM
CO FINISHED

SO STARTING
SO ELEVUNIT  METERS
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      0.0  0.0  0.0  0.0
270   SO EMISFACT  405N0726  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
271   SO EMISFACT  405N0726  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
272   SO EMISFACT  405N0727  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
273   SO EMISFACT  405N0727  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
274   SO EMISFACT  405N0727  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
275   SO EMISFACT  405N0727  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
276   SO EMISFACT  405N0727  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
277   SO EMISFACT  405N0728  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
278   SO EMISFACT  405N0728  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
279   SO EMISFACT  405N0728  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
280   SO EMISFACT  405N0728  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
281   SO EMISFACT  405N0728  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
282   SO EMISFACT  405N0729  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
283   SO EMISFACT  405N0729  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
284   SO EMISFACT  405N0729  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
285   SO EMISFACT  405N0729  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
286   SO EMISFACT  405N0729  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
287   SO EMISFACT  405N0730  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
288   SO EMISFACT  405N0730  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
289   SO EMISFACT  405N0730  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
290   SO EMISFACT  405N0730  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
291   SO EMISFACT  405N0730  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
292   SO EMISFACT  405N0731  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
293   SO EMISFACT  405N0731  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
294   SO EMISFACT  405N0731  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
295   SO EMISFACT  405N0731  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
296   SO EMISFACT  405N0731  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
297   SO EMISFACT  405N0732  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
298   SO EMISFACT  405N0732  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
299   SO EMISFACT  405N0732  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
300   SO EMISFACT  405N0732  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
301   SO EMISFACT  405N0732  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
302   SO EMISFACT  405N0733  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
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      7.2  7.2  7.2  7.2
303   SO EMISFACT  405N0733  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
304   SO EMISFACT  405N0733  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
305   SO EMISFACT  405N0733  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
306   SO EMISFACT  405N0733  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
307   SO EMISFACT  405N0734  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
308   SO EMISFACT  405N0734  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
309   SO EMISFACT  405N0734  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
310   SO EMISFACT  405N0734  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
311   SO EMISFACT  405N0734  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
312   SO EMISFACT  405N0735  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
313   SO EMISFACT  405N0735  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
314   SO EMISFACT  405N0735  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
315   SO EMISFACT  405N0735  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
316   SO EMISFACT  405N0735  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
317   SO EMISFACT  405N0736  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
318   SO EMISFACT  405N0736  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
319   SO EMISFACT  405N0736  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
320   SO EMISFACT  405N0736  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
321   SO EMISFACT  405N0736  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
322   SO EMISFACT  405N0737  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
323   SO EMISFACT  405N0737  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
324   SO EMISFACT  405N0737  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
325   SO EMISFACT  405N0737  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
326   SO EMISFACT  405N0737  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
327   SO EMISFACT  405N0738  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
328   SO EMISFACT  405N0738  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
329   SO EMISFACT  405N0738  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
330   SO EMISFACT  405N0738  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
331   SO EMISFACT  405N0738  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
332   SO EMISFACT  405N0739  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
333   SO EMISFACT  405N0739  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
334   SO EMISFACT  405N0739  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
335   SO EMISFACT  405N0739  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
336   SO EMISFACT  405N0739  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
337   SO EMISFACT  405N0740  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
338   SO EMISFACT  405N0740  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
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339   SO EMISFACT  405N0740  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
340   SO EMISFACT  405N0740  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
341   SO EMISFACT  405N0740  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
342   SO EMISFACT  405N0741  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
343   SO EMISFACT  405N0741  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
344   SO EMISFACT  405N0741  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
345   SO EMISFACT  405N0741  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
346   SO EMISFACT  405N0741  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
347   SO EMISFACT  405N0742  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
348   SO EMISFACT  405N0742  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
349   SO EMISFACT  405N0742  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
350   SO EMISFACT  405N0742  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
351   SO EMISFACT  405N0742  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
352   SO EMISFACT  405N0743  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
353   SO EMISFACT  405N0743  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
354   SO EMISFACT  405N0743  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
355   SO EMISFACT  405N0743  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
356   SO EMISFACT  405N0743  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
357   SO EMISFACT  405N0744  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
358   SO EMISFACT  405N0744  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
359   SO EMISFACT  405N0744  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
360   SO EMISFACT  405N0744  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
361   SO EMISFACT  405N0744  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
362   SO EMISFACT  405N0745  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
363   SO EMISFACT  405N0745  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
364   SO EMISFACT  405N0745  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
365   SO EMISFACT  405N0745  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
366   SO EMISFACT  405N0745  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
367   SO EMISFACT  405N0746  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
368   SO EMISFACT  405N0746  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
369   SO EMISFACT  405N0746  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
370   SO EMISFACT  405N0746  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
371   SO EMISFACT  405N0746  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
372   SO EMISFACT  405N0747  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
373   SO EMISFACT  405N0747  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
374   SO EMISFACT  405N0747  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
375   SO EMISFACT  405N0747  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
```

```
      0.0  0.0  0.0  0.0
376   SO EMISFACT  405N0747  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
377   SO EMISFACT  405N0748  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
378   SO EMISFACT  405N0748  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
379   SO EMISFACT  405N0748  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
380   SO EMISFACT  405N0748  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
381   SO EMISFACT  405N0748  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
382   SO EMISFACT  405N0749  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
383   SO EMISFACT  405N0749  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
384   SO EMISFACT  405N0749  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
385   SO EMISFACT  405N0749  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
386   SO EMISFACT  405N0749  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
387   SO EMISFACT  405N0750  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
388   SO EMISFACT  405N0750  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
389   SO EMISFACT  405N0750  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
390   SO EMISFACT  405N0750  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
391   SO EMISFACT  405N0750  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
392   SO EMISFACT  405N0751  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
393   SO EMISFACT  405N0751  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
394   SO EMISFACT  405N0751  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
395   SO EMISFACT  405N0751  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
396   SO EMISFACT  405N0751  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
397   SO EMISFACT  405N0752  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
398   SO EMISFACT  405N0752  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
399   SO EMISFACT  405N0752  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
400   SO EMISFACT  405N0752  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
401   SO EMISFACT  405N0752  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
402   SO EMISFACT  405N0753  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
403   SO EMISFACT  405N0753  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
404   SO EMISFACT  405N0753  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
405   SO EMISFACT  405N0753  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
406   SO EMISFACT  405N0753  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
407   SO EMISFACT  405N0754  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
408   SO EMISFACT  405N0754  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
409   SO EMISFACT  405N0754  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
410   SO EMISFACT  405N0754  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
411   SO EMISFACT  405N0754  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
412   SO EMISFACT  405N0755  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
```

```
      7.2  7.2  7.2  7.2
413   SO EMISFACT  405N0755  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
414   SO EMISFACT  405N0755  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
415   SO EMISFACT  405N0755  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
416   SO EMISFACT  405N0755  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
417   SO EMISFACT  405N0756  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
418   SO EMISFACT  405N0756  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
419   SO EMISFACT  405N0756  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
420   SO EMISFACT  405N0756  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
421   SO EMISFACT  405N0756  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
422   SO EMISFACT  405N0757  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
423   SO EMISFACT  405N0757  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
424   SO EMISFACT  405N0757  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
425   SO EMISFACT  405N0757  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
426   SO EMISFACT  405N0757  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
427   SO EMISFACT  405N0758  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
428   SO EMISFACT  405N0758  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
429   SO EMISFACT  405N0758  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
430   SO EMISFACT  405N0758  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
431   SO EMISFACT  405N0758  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
432   SO EMISFACT  405N0759  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
433   SO EMISFACT  405N0759  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
434   SO EMISFACT  405N0759  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
435   SO EMISFACT  405N0759  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
436   SO EMISFACT  405N0759  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
437   SO EMISFACT  405N0760  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
438   SO EMISFACT  405N0760  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
439   SO EMISFACT  405N0760  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
440   SO EMISFACT  405N0760  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
441   SO EMISFACT  405N0760  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
442   SO EMISFACT  405N0761  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
443   SO EMISFACT  405N0761  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
444   SO EMISFACT  405N0761  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
445   SO EMISFACT  405N0761  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
446   SO EMISFACT  405N0761  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
447   SO EMISFACT  405N0762  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
448   SO EMISFACT  405N0762  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
```

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449   SO EMISFACT  405N0762  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
450   SO EMISFACT  405N0762  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
451   SO EMISFACT  405N0762  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
452   SO EMISFACT  405N0763  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
453   SO EMISFACT  405N0763  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
454   SO EMISFACT  405N0763  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
455   SO EMISFACT  405N0763  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
456   SO EMISFACT  405N0763  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
457   SO EMISFACT  405N0764  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
458   SO EMISFACT  405N0764  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
459   SO EMISFACT  405N0764  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
460   SO EMISFACT  405N0764  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
461   SO EMISFACT  405N0764  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
462   SO EMISFACT  405N0765  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
463   SO EMISFACT  405N0765  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
464   SO EMISFACT  405N0765  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
465   SO EMISFACT  405N0765  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
466   SO EMISFACT  405N0765  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
467   SO EMISFACT  405N0766  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
468   SO EMISFACT  405N0766  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
469   SO EMISFACT  405N0766  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
470   SO EMISFACT  405N0766  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
471   SO EMISFACT  405N0766  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
472   SO EMISFACT  405N0767  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
473   SO EMISFACT  405N0767  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
474   SO EMISFACT  405N0767  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
475   SO EMISFACT  405N0767  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
476   SO EMISFACT  405N0767  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
477   SO EMISFACT  405S0676  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
478   SO EMISFACT  405S0676  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
479   SO EMISFACT  405S0676  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
480   SO EMISFACT  405S0676  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
481   SO EMISFACT  405S0676  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
482   SO EMISFACT  405S0677  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
483   SO EMISFACT  405S0677  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
484   SO EMISFACT  405S0677  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
485   SO EMISFACT  405S0677  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
```

```
      0.0  0.0  0.0  0.0
486   SO EMISFACT  405S0677  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
487   SO EMISFACT  405S0678  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
488   SO EMISFACT  405S0678  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
489   SO EMISFACT  405S0678  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
490   SO EMISFACT  405S0678  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
491   SO EMISFACT  405S0678  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
492   SO EMISFACT  405S0679  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
493   SO EMISFACT  405S0679  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
494   SO EMISFACT  405S0679  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
495   SO EMISFACT  405S0679  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
496   SO EMISFACT  405S0679  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
497   SO EMISFACT  405S0680  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
498   SO EMISFACT  405S0680  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
499   SO EMISFACT  405S0680  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
500   SO EMISFACT  405S0680  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
501   SO EMISFACT  405S0680  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
502   SO EMISFACT  405S0681  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
503   SO EMISFACT  405S0681  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
504   SO EMISFACT  405S0681  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
505   SO EMISFACT  405S0681  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
506   SO EMISFACT  405S0681  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
507   SO EMISFACT  405S0682  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
508   SO EMISFACT  405S0682  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
509   SO EMISFACT  405S0682  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
510   SO EMISFACT  405S0682  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
511   SO EMISFACT  405S0682  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
512   SO EMISFACT  405S0683  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
513   SO EMISFACT  405S0683  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
514   SO EMISFACT  405S0683  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
515   SO EMISFACT  405S0683  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
516   SO EMISFACT  405S0683  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
517   SO EMISFACT  405S0684  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
518   SO EMISFACT  405S0684  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
519   SO EMISFACT  405S0684  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
520   SO EMISFACT  405S0684  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
521   SO EMISFACT  405S0684  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
522   SO EMISFACT  405S0685  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
```

```
      7.2  7.2  7.2  7.2
523   SO EMISFACT  405S0685  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
524   SO EMISFACT  405S0685  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
525   SO EMISFACT  405S0685  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
526   SO EMISFACT  405S0685  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
527   SO EMISFACT  405S0686  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
528   SO EMISFACT  405S0686  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
529   SO EMISFACT  405S0686  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
530   SO EMISFACT  405S0686  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
531   SO EMISFACT  405S0686  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
532   SO EMISFACT  405S0687  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
533   SO EMISFACT  405S0687  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
534   SO EMISFACT  405S0687  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
535   SO EMISFACT  405S0687  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
536   SO EMISFACT  405S0687  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
537   SO EMISFACT  405S0688  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
538   SO EMISFACT  405S0688  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
539   SO EMISFACT  405S0688  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
540   SO EMISFACT  405S0688  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
541   SO EMISFACT  405S0688  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
542   SO EMISFACT  405S0689  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
543   SO EMISFACT  405S0689  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
544   SO EMISFACT  405S0689  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
545   SO EMISFACT  405S0689  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
546   SO EMISFACT  405S0689  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
547   SO EMISFACT  405S0690  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
548   SO EMISFACT  405S0690  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
549   SO EMISFACT  405S0690  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
550   SO EMISFACT  405S0690  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
551   SO EMISFACT  405S0690  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
552   SO EMISFACT  405S0691  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
553   SO EMISFACT  405S0691  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
554   SO EMISFACT  405S0691  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
555   SO EMISFACT  405S0691  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
556   SO EMISFACT  405S0691  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
557   SO EMISFACT  405S0692  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
558   SO EMISFACT  405S0692  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
```

```
559   SO EMISFACT  405S0692  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
560   SO EMISFACT  405S0692  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
561   SO EMISFACT  405S0692  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
562   SO EMISFACT  405S0693  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
563   SO EMISFACT  405S0693  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
564   SO EMISFACT  405S0693  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
565   SO EMISFACT  405S0693  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
566   SO EMISFACT  405S0693  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
567   SO EMISFACT  405S0694  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
568   SO EMISFACT  405S0694  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
569   SO EMISFACT  405S0694  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
570   SO EMISFACT  405S0694  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
571   SO EMISFACT  405S0694  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
572   SO EMISFACT  405S0695  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
573   SO EMISFACT  405S0695  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
574   SO EMISFACT  405S0695  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
575   SO EMISFACT  405S0695  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
576   SO EMISFACT  405S0695  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
577   SO EMISFACT  405S0696  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
578   SO EMISFACT  405S0696  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
579   SO EMISFACT  405S0696  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
580   SO EMISFACT  405S0696  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
581   SO EMISFACT  405S0696  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
582   SO EMISFACT  405S0697  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
583   SO EMISFACT  405S0697  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
584   SO EMISFACT  405S0697  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
585   SO EMISFACT  405S0697  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
586   SO EMISFACT  405S0697  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
587   SO EMISFACT  405S0698  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
588   SO EMISFACT  405S0698  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
589   SO EMISFACT  405S0698  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
590   SO EMISFACT  405S0698  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
591   SO EMISFACT  405S0698  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
592   SO EMISFACT  405S0699  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
593   SO EMISFACT  405S0699  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
594   SO EMISFACT  405S0699  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
595   SO EMISFACT  405S0699  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
```

```
      0.0  0.0  0.0  0.0
596   SO EMISFACT  405S0699  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
597   SO EMISFACT  405S0700  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
598   SO EMISFACT  405S0700  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
599   SO EMISFACT  405S0700  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
600   SO EMISFACT  405S0700  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
601   SO EMISFACT  405S0700  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
602   SO EMISFACT  405S0701  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
603   SO EMISFACT  405S0701  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
604   SO EMISFACT  405S0701  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
605   SO EMISFACT  405S0701  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
606   SO EMISFACT  405S0701  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
607   SO EMISFACT  405S0702  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
608   SO EMISFACT  405S0702  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
609   SO EMISFACT  405S0702  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
610   SO EMISFACT  405S0702  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
611   SO EMISFACT  405S0702  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
612   SO EMISFACT  405S0703  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
613   SO EMISFACT  405S0703  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
614   SO EMISFACT  405S0703  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
615   SO EMISFACT  405S0703  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
616   SO EMISFACT  405S0703  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
617   SO EMISFACT  405S0704  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
618   SO EMISFACT  405S0704  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
619   SO EMISFACT  405S0704  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
620   SO EMISFACT  405S0704  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
621   SO EMISFACT  405S0704  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
622   SO EMISFACT  405S0705  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
623   SO EMISFACT  405S0705  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
624   SO EMISFACT  405S0705  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
625   SO EMISFACT  405S0705  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
626   SO EMISFACT  405S0705  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
627   SO EMISFACT  405S0706  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
628   SO EMISFACT  405S0706  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
629   SO EMISFACT  405S0706  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
630   SO EMISFACT  405S0706  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
631   SO EMISFACT  405S0706  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
632   SO EMISFACT  405S0707  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
```

```
      7.2  7.2  7.2  7.2
633   SO EMISFACT  405S0707  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
634   SO EMISFACT  405S0707  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
635   SO EMISFACT  405S0707  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
636   SO EMISFACT  405S0707  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
637   SO EMISFACT  405S0708  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
638   SO EMISFACT  405S0708  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
639   SO EMISFACT  405S0708  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
640   SO EMISFACT  405S0708  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
641   SO EMISFACT  405S0708  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
642   SO EMISFACT  405S0709  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
643   SO EMISFACT  405S0709  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
644   SO EMISFACT  405S0709  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
645   SO EMISFACT  405S0709  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
646   SO EMISFACT  405S0709  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
647   SO EMISFACT  405S0710  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
648   SO EMISFACT  405S0710  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
649   SO EMISFACT  405S0710  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
650   SO EMISFACT  405S0710  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
651   SO EMISFACT  405S0710  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
652   SO EMISFACT  405S0711  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
653   SO EMISFACT  405S0711  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
654   SO EMISFACT  405S0711  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
655   SO EMISFACT  405S0711  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
656   SO EMISFACT  405S0711  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
657   SO EMISFACT  405S0712  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
658   SO EMISFACT  405S0712  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
659   SO EMISFACT  405S0712  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
660   SO EMISFACT  405S0712  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
661   SO EMISFACT  405S0712  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
662   SO EMISFACT  405S0713  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
663   SO EMISFACT  405S0713  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
664   SO EMISFACT  405S0713  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
665   SO EMISFACT  405S0713  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
666   SO EMISFACT  405S0713  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
667   SO EMISFACT  405S0714  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
      7.2  7.2  7.2  7.2
668   SO EMISFACT  405S0714  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
      0.0  0.0  0.0  0.0
```

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669  SO EMISFACT  405S0714  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
670  SO EMISFACT  405S0714  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
671  SO EMISFACT  405S0714  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
672  SO EMISFACT  405S0715  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
     7.2  7.2  7.2  7.2
673  SO EMISFACT  405S0715  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
674  SO EMISFACT  405S0715  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
675  SO EMISFACT  405S0715  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
676  SO EMISFACT  405S0715  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
677  SO EMISFACT  405S0716  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
     7.2  7.2  7.2  7.2
678  SO EMISFACT  405S0716  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
679  SO EMISFACT  405S0716  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
680  SO EMISFACT  405S0716  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
681  SO EMISFACT  405S0716  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
682  SO EMISFACT  405S0717  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  7.2  7.2  7.2  7.2
     7.2  7.2  7.2  7.2
683  SO EMISFACT  405S0717  HRDOW  7.2  7.2  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
684  SO EMISFACT  405S0717  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
685  SO EMISFACT  405S0717  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
     0.0  0.0  0.0  0.0
686  SO EMISFACT  405S0717  HRDOW  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0.0
687  SO SRCGROUP  I-405N  405N0726  405N0727  405N0728  405N0729  405N0730  405N0731
     405N0732  405N0733
688  SO SRCGROUP  I-405N  405N0734  405N0735  405N0736  405N0737  405N0738  405N0739
     405N0740  405N0741
689  SO SRCGROUP  I-405N  405N0742  405N0743  405N0744  405N0745  405N0746  405N0747
     405N0748  405N0749
690  SO SRCGROUP  I-405N  405N0750  405N0751  405N0752  405N0753  405N0754  405N0755
     405N0756  405N0757
691  SO SRCGROUP  I-405N  405N0758  405N0759  405N0760  405N0761  405N0762  405N0763
     405N0764  405N0765
692  SO SRCGROUP  I-405N  405N0766  405N0767
693  SO SRCGROUP  I-405S  405S0676  405S0677  405S0678  405S0679  405S0680  405S0681
     405S0682  405S0683
694  SO SRCGROUP  I-405S  405S0684  405S0685  405S0686  405S0687  405S0688  405S0689
     405S0690  405S0691
695  SO SRCGROUP  I-405S  405S0692  405S0693  405S0694  405S0695  405S0696  405S0697
     405S0698  405S0699
696  SO SRCGROUP  I-405S  405S0700  405S0701  405S0702  405S0703  405S0704  405S0705
     405S0706  405S0707
697  SO SRCGROUP  I-405S  405S0708  405S0709  405S0710  405S0711  405S0712  405S0713
     405S0714  405S0715
698  SO SRCGROUP  I-405S  405S0716  405S0717
699  SO SRCGROUP  ALL
700  SO FINISHED
701
702  RE STARTING
703  RE DISCCART  364522  3789971
704  RE DISCCART  364522  3789971
705  RE DISCCART  364523  3789983
706  RE DISCCART  364523  3789983
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  RE DISCCART  364514.7  3790029.9
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RE DISCCART  364564.7  3790059.9
** RCPDESCR  fine grid
RE DISCCART  364574.7  3790059.9
** RCPDESCR  fine grid
RE FINISHED

ME STARTING
ME SURFFILE  "C:\Users\jclar\OneDrive\CLARKA~1\PR3138~1\KVNY_V~1\KVNY_V9.SFC"
** SURFFILE  "C:\Users\jclar\OneDrive\CLARKA~1\PR3138~1\KVNY_V~1\KVNY_V9.SFC"
ME PROFFILE  "C:\Users\jclar\OneDrive\CLARKA~1\PR3138~1\KVNY_V~1\KVNY_V9.PFL"
** PROFFILE  "C:\Users\jclar\OneDrive\CLARKA~1\PR3138~1\KVNY_V~1\KVNY_V9.PFL"
ME SURFDATA  23130 2012
ME UAIRDATA  3190 2012
ME PROFBASE  235  METERS
ME FINISHED

OU STARTING
OU FILEFORM  FIX
OU PLOTFILE  PERIOD  I-405N  I-405N`PERIOD.plt  10000
OU PLOTFILE  PERIOD  I-405S  I-405S`PERIOD.plt  10001
OU PLOTFILE  PERIOD  ALL  ALL`PERIOD.plt  10002
OU POSTFILE  PERIOD  I-405N  UNFORM  I-405N`PERIOD.bin  10003
OU POSTFILE  PERIOD  I-405S  UNFORM  I-405S`PERIOD.bin  10004
OU POSTFILE  PERIOD  ALL  UNFORM  ALL`PERIOD.bin  10005
OU FINISHED


  *** Message Summary For AERMOD Model Setup ***

  --------- Summary of Total Messages --------

 A Total of            0 Fatal Error Message(s)
 A Total of            9 Warning Message(s)
 A Total of            0 Informational Message(s)


    ******** FATAL ERROR MESSAGES ********
              ***  NONE  ***


    ********   WARNING MESSAGES   ********
 CO W151       7       MODOPT: Non-DFAULT NoUrbTran option selected on MODELOPT
 Keyword
 ME W186     937       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold
 used          0.50
 ME W187     937       MEOPEN: ADJ_U* Option for Stable Low Winds used in
 AERMET
 OU W565     941       PERPLT: Possible Conflict With Dynamically Allocated FUNIT
 PLOTFILE
 OU W565     942       PERPLT: Possible Conflict With Dynamically Allocated FUNIT
 PLOTFILE
 OU W565     943       PERPLT: Possible Conflict With Dynamically Allocated FUNIT
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     PLOTFILE
 970 OU W565     944       PERPST: Possible Conflict With Dynamically Allocated FUNIT
     POSTFILE
 971 OU W565     945       PERPST: Possible Conflict With Dynamically Allocated FUNIT
     POSTFILE
 972 OU W565     946       PERPST: Possible Conflict With Dynamically Allocated FUNIT
     POSTFILE
 973
 974 ***********************************
 975 *** SETUP Finishes Successfully ***
 976 ***********************************
 977
 978 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                         ***        12/13/22
 979  *** AERMET - VERSION  16216 ***
      ***                                                              ***
      17:15:37
 980
                                PAGE   1
 981 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
 982
 983                                          ***     MODEL SETUP OPTIONS SUMMARY       ***
 984 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
     - - - - - - - - - - - - - - - - - -
 985
 986 ** Model Options Selected:
 987      * Model Allows User-Specified Options
 988      * Model Is Setup For Calculation of Average CONCentration Values.
 989      * NO GAS DEPOSITION Data Provided.
 990      * NO PARTICLE DEPOSITION Data Provided.
 991      * Model Uses NO DRY DEPLETION. DDPLETE  =  F
 992      * Model Uses NO WET DEPLETION. WETDPLT  =  F
 993      * Stack-tip Downwash.
 994      * Model Assumes Receptors on FLAT Terrain.
 995      * Use Calms Processing Routine.
 996      * Use Missing Data Processing Routine.
 997      * No Exponential Decay.
 998      * Model Uses RURAL Dispersion Only.
 999      * ADJ_U*   - Use ADJ_U* option for SBL in AERMET
1000      * CCVR_Sub - Meteorological data includes CCVR substitutions
1001      * TEMP_Sub - Meteorological data includes TEMP substitutions
1002      * Model Assumes No FLAGPOLE Receptor Heights.
1003      * The User Specified a Pollutant Type of: DPM
1004
1005 **Model Calculates PERIOD Averages Only
1006
1007 **This Run Includes:     84 Source(s);       3 Source Group(s); and     124 Receptor(s)
1008
1009                 with:      0 POINT(s), including
1010                            0 POINTCAP(s) and      0 POINTHOR(s)
1011                  and:     84 VOLUME source(s)
1012                  and:      0 AREA type source(s)
1013                  and:      0 LINE source(s)
1014                  and:      0 RLINE/RLINEXT source(s)
1015                  and:      0 OPENPIT source(s)
1016                  and:      0 BUOYANT LINE source(s) with a total of     0 line(s)
1017                  and:      0 SWPOINT source(s)
1018
1019
1020 **Model Set To Continue RUNning After the Setup Testing.
1021
1022 **The AERMET Input Meteorological Data Version Date:  16216
1023
1024 **Output Options Selected:
1025          Model Outputs Tables of PERIOD Averages by Receptor
1026          Model Outputs External File(s) of Concurrent Values for Postprocessing
```

(POSTFILE Keyword)
Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
m for Missing Hours
b for Both Calm and
Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 235.00 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
Emission Units = GRAMS/SEC ; Emission Rate Unit Factor = 0.10000E+07
Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.6 MB of RAM.

**Input Runstream File:
aermod.inp

**Output Print File:
aermod.out

FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22
*** AERMET - VERSION 16216 ***
*** ***
17:15:37

PAGE 2

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER EMISSION RATE INIT. PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	SZ	SOURCE SCALAR VARY BY
405N0726	0	0.23810E-01	364442.9	3790945.0	235.0	1.43	22.83	1.33	NO HRDOW
405N0727	0	0.23810E-01	364441.5	3790895.8	235.0	1.43	22.83	1.33	NO HRDOW
405N0728	0	0.23810E-01	364440.1	3790846.7	235.0	1.43	22.83	1.33	NO HRDOW
405N0729	0	0.23810E-01	364438.8	3790797.5	235.0	1.43	22.83	1.33	NO HRDOW
405N0730	0	0.23810E-01	364437.4	3790748.3	235.0	1.43	22.83	1.33	NO HRDOW
405N0731	0	0.23810E-01	364429.1	3790699.8	235.0	1.43	22.83	1.33	NO HRDOW
405N0732	0	0.23810E-01	364420.6	3790651.3	235.0	1.43	22.83	1.33	NO HRDOW
405N0733	0	0.23810E-01	364412.0	3790602.9	235.0	1.43	22.83	1.33	NO HRDOW
405N0734	0	0.23810E-01	364403.0	3790554.5	235.0	1.43	22.83	1.33	NO HRDOW
405N0735	0	0.23810E-01	364393.9	3790506.2	235.0	1.43	22.83	1.33	NO HRDOW
405N0736	0	0.23810E-01	364384.8	3790457.8	235.0	1.43	22.83	1.33	NO HRDOW

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1066    405N0737         0   0.23810E-01  364377.1 3790409.3   235.0     1.43    22.83
        1.33     NO    HRDOW
1067    405N0738         0   0.23810E-01  364372.8 3790360.3   235.0     1.43    22.83
        1.33     NO    HRDOW
1068    405N0739         0   0.23810E-01  364369.8 3790311.2   235.0     1.43    22.83
        1.33     NO    HRDOW
1069    405N0740         0   0.23810E-01  364368.9 3790262.0   235.0     1.43    22.83
        1.33     NO    HRDOW
1070    405N0741         0   0.23810E-01  364368.0 3790212.8   235.0     1.43    22.83
        1.33     NO    HRDOW
1071    405N0742         0   0.23810E-01  364367.1 3790163.6   235.0     1.43    22.83
        1.33     NO    HRDOW
1072    405N0743         0   0.23810E-01  364366.1 3790114.4   235.0     1.43    22.83
        1.33     NO    HRDOW
1073    405N0744         0   0.23810E-01  364365.2 3790065.2   235.0     1.43    22.83
        1.33     NO    HRDOW
1074    405N0745         0   0.23810E-01  364364.3 3790016.0   235.0     1.43    22.83
        1.33     NO    HRDOW
1075    405N0746         0   0.23810E-01  364363.4 3789966.9   235.0     1.43    22.83
        1.33     NO    HRDOW
1076    405N0747         0   0.23810E-01  364362.1 3789917.7   235.0     1.43    22.83
        1.33     NO    HRDOW
1077    405N0748         0   0.23810E-01  364360.5 3789868.5   235.0     1.43    22.83
        1.33     NO    HRDOW
1078    405N0749         0   0.23810E-01  364358.9 3789819.3   235.0     1.43    22.83
        1.33     NO    HRDOW
1079    405N0750         0   0.23810E-01  364357.3 3789770.2   235.0     1.43    22.83
        1.33     NO    HRDOW
1080    405N0751         0   0.23810E-01  364356.2 3789721.0   235.0     1.43    22.83
        1.33     NO    HRDOW
1081    405N0752         0   0.23810E-01  364355.0 3789671.8   235.0     1.43    22.83
        1.33     NO    HRDOW
1082    405N0753         0   0.23810E-01  364353.8 3789622.6   235.0     1.43    22.83
        1.33     NO    HRDOW
1083    405N0754         0   0.23810E-01  364352.6 3789573.4   235.0     1.43    22.83
        1.33     NO    HRDOW
1084    405N0755         0   0.23810E-01  364351.5 3789524.2   235.0     1.43    22.83
        1.33     NO    HRDOW
1085    405N0756         0   0.23810E-01  364350.3 3789475.0   235.0     1.43    22.83
        1.33     NO    HRDOW
1086    405N0757         0   0.23810E-01  364349.1 3789425.8   235.0     1.43    22.83
        1.33     NO    HRDOW
1087    405N0758         0   0.23810E-01  364348.6 3789376.7   235.0     1.43    22.83
        1.33     NO    HRDOW
1088    405N0759         0   0.23810E-01  364348.0 3789327.5   235.0     1.43    22.83
        1.33     NO    HRDOW
1089    405N0760         0   0.23810E-01  364347.5 3789278.3   235.0     1.43    22.83
        1.33     NO    HRDOW
1090    405N0761         0   0.23810E-01  364346.9 3789229.1   235.0     1.43    22.83
        1.33     NO    HRDOW
1091    405N0762         0   0.23810E-01  364346.4 3789179.9   235.0     1.43    22.83
        1.33     NO    HRDOW
1092    405N0763         0   0.23810E-01  364345.8 3789130.7   235.0     1.43    22.83
        1.33     NO    HRDOW
1093    405N0764         0   0.23810E-01  364345.0 3789081.5   235.0     1.43    22.83
        1.33     NO    HRDOW
1094    405N0765         0   0.23810E-01  364344.2 3789032.3   235.0     1.43    22.83
        1.33     NO    HRDOW
1095    FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
        I-405                          ***        12/13/22
1096     *** AERMET - VERSION  16216 ***
         ***                                                                  ***
         17:15:37
1097
                                    PAGE   3
1098     *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
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*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER INIT. PART.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	SZ	URBAN SOURCE	SCALAR VARY BY
405N0766	0	0.23810E-01	364343.4	3788983.1	235.0	1.43	22.83	1.33	NO	HRDOW
405N0767	0	0.23810E-01	364342.6	3788933.9	235.0	1.43	22.83	1.33	NO	HRDOW
405S0676	0	0.23810E-01	364420.3	3790946.7	235.0	1.43	22.83	1.33	NO	HRDOW
405S0677	0	0.23810E-01	364419.4	3790897.6	235.0	1.43	22.83	1.33	NO	HRDOW
405S0678	0	0.23810E-01	364418.5	3790848.4	235.0	1.43	22.83	1.33	NO	HRDOW
405S0679	0	0.23810E-01	364417.7	3790799.2	235.0	1.43	22.83	1.33	NO	HRDOW
405S0680	0	0.23810E-01	364416.8	3790750.0	235.0	1.43	22.83	1.33	NO	HRDOW
405S0681	0	0.23810E-01	364409.9	3790701.3	235.0	1.43	22.83	1.33	NO	HRDOW
405S0682	0	0.23810E-01	364403.0	3790652.6	235.0	1.43	22.83	1.33	NO	HRDOW
405S0683	0	0.23810E-01	364393.7	3790604.2	235.0	1.43	22.83	1.33	NO	HRDOW
405S0684	0	0.23810E-01	364384.2	3790556.0	235.0	1.43	22.83	1.33	NO	HRDOW
405S0685	0	0.23810E-01	364374.6	3790507.7	235.0	1.43	22.83	1.33	NO	HRDOW
405S0686	0	0.23810E-01	364365.0	3790459.5	235.0	1.43	22.83	1.33	NO	HRDOW
405S0687	0	0.23810E-01	364358.2	3790410.9	235.0	1.43	22.83	1.33	NO	HRDOW
405S0688	0	0.23810E-01	364356.0	3790361.7	235.0	1.43	22.83	1.33	NO	HRDOW
405S0689	0	0.23810E-01	364353.8	3790312.6	235.0	1.43	22.83	1.33	NO	HRDOW
405S0690	0	0.23810E-01	364351.6	3790263.4	235.0	1.43	22.83	1.33	NO	HRDOW
405S0691	0	0.23810E-01	364349.5	3790214.3	235.0	1.43	22.83	1.33	NO	HRDOW
405S0692	0	0.23810E-01	364348.4	3790165.1	235.0	1.43	22.83	1.33	NO	HRDOW
405S0693	0	0.23810E-01	364347.4	3790115.9	235.0	1.43	22.83	1.33	NO	HRDOW
405S0694	0	0.23810E-01	364346.3	3790066.7	235.0	1.43	22.83	1.33	NO	HRDOW
405S0695	0	0.23810E-01	364345.2	3790017.5	235.0	1.43	22.83	1.33	NO	HRDOW
405S0696	0	0.23810E-01	364344.1	3789968.3	235.0	1.43	22.83	1.33	NO	HRDOW
405S0697	0	0.23810E-01	364343.0	3789919.1	235.0	1.43	22.83	1.33	NO	HRDOW
405S0698	0	0.23810E-01	364341.9	3789869.9	235.0	1.43	22.83	1.33	NO	HRDOW
405S0699	0	0.23810E-01	364340.8	3789820.8	235.0	1.43	22.83	1.33	NO	HRDOW
405S0700	0	0.23810E-01	364339.7	3789771.6	235.0	1.43	22.83			

```
      1.33     NO    HRDOW
1135  405S0701         0   0.23810E-01  364338.6 3789722.4   235.0     1.43    22.83
      1.33     NO    HRDOW
1136  405S0702         0   0.23810E-01  364337.6 3789673.2   235.0     1.43    22.83
      1.33     NO    HRDOW
1137  405S0703         0   0.23810E-01  364336.5 3789624.0   235.0     1.43    22.83
      1.33     NO    HRDOW
1138  405S0704         0   0.23810E-01  364335.4 3789574.8   235.0     1.43    22.83
      1.33     NO    HRDOW
1139  405S0705         0   0.23810E-01  364334.3 3789525.6   235.0     1.43    22.83
      1.33     NO    HRDOW
1140  405S0706         0   0.23810E-01  364333.2 3789476.4   235.0     1.43    22.83
      1.33     NO    HRDOW
1141  405S0707         0   0.23810E-01  364332.1 3789427.3   235.0     1.43    22.83
      1.33     NO    HRDOW
1142  405S0708         0   0.23810E-01  364331.1 3789378.1   235.0     1.43    22.83
      1.33     NO    HRDOW
1143  405S0709         0   0.23810E-01  364330.0 3789328.9   235.0     1.43    22.83
      1.33     NO    HRDOW
1144  405S0710         0   0.23810E-01  364328.9 3789279.7   235.0     1.43    22.83
      1.33     NO    HRDOW
1145  405S0711         0   0.23810E-01  364327.9 3789230.5   235.0     1.43    22.83
      1.33     NO    HRDOW
1146  405S0712         0   0.23810E-01  364326.8 3789181.3   235.0     1.43    22.83
      1.33     NO    HRDOW
1147  405S0713         0   0.23810E-01  364325.7 3789132.1   235.0     1.43    22.83
      1.33     NO    HRDOW
1148  FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
      I-405                         ***        12/13/22
1149   *** AERMET - VERSION  16216 ***
       ***                                                                  ***
       17:15:37
1150
                                  PAGE   4
1151   *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1152
1153
1154                                                  *** VOLUME SOURCE DATA ***
1155
1156                 NUMBER EMISSION RATE                      BASE    RELEASE    INIT.
                     INIT.   URBAN  EMISSION RATE
1157     SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
         SZ     SOURCE  SCALAR VARY
1158       ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
           (METERS)              BY
1159   - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
       - - - - - - - - - - - - - - - - - -
1160
1161   405S0714         0   0.23810E-01  364324.6 3789082.9   235.0     1.43    22.83
       1.33     NO    HRDOW
1162   405S0715         0   0.23810E-01  364323.6 3789033.7   235.0     1.43    22.83
       1.33     NO    HRDOW
1163   405S0716         0   0.23810E-01  364322.6 3788984.6   235.0     1.43    22.83
       1.33     NO    HRDOW
1164   405S0717         0   0.23810E-01  364321.7 3788935.4   235.0     1.43    22.83
       1.33     NO    HRDOW
1165   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                         ***        12/13/22
1166   *** AERMET - VERSION  16216 ***
       ***                                                                  ***
       17:15:37
1167
                                  PAGE   5
1168   *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1169
1170
```

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs
I-405N	405N0726 , 405N0727 , 405N0728 , 405N0729 , 405N0730 , 405N0731 , 405N0732 , 405N0733 ,
	405N0734 , 405N0735 , 405N0736 , 405N0737 , 405N0738 , 405N0739 , 405N0740 , 405N0741 ,
	405N0742 , 405N0743 , 405N0744 , 405N0745 , 405N0746 , 405N0747 , 405N0748 , 405N0749 ,
	405N0750 , 405N0751 , 405N0752 , 405N0753 , 405N0754 , 405N0755 , 405N0756 , 405N0757 ,
	405N0758 , 405N0759 , 405N0760 , 405N0761 , 405N0762 , 405N0763 , 405N0764 , 405N0765 ,
	405N0766 , 405N0767 ,
I-405S	405S0676 , 405S0677 , 405S0678 , 405S0679 , 405S0680 , 405S0681 , 405S0682 , 405S0683 ,
	405S0684 , 405S0685 , 405S0686 , 405S0687 , 405S0688 , 405S0689 , 405S0690 , 405S0691 ,
	405S0692 , 405S0693 , 405S0694 , 405S0695 , 405S0696 , 405S0697 , 405S0698 , 405S0699 ,
	405S0700 , 405S0701 , 405S0702 , 405S0703 , 405S0704 , 405S0705 , 405S0706 , 405S0707 ,
	405S0708 , 405S0709 , 405S0710 , 405S0711 , 405S0712 , 405S0713 , 405S0714 , 405S0715 ,
	405S0716 , 405S0717 ,
ALL	405N0726 , 405N0727 , 405N0728 , 405N0729 , 405N0730 , 405N0731 , 405N0732 , 405N0733 ,
	405N0734 , 405N0735 , 405N0736 , 405N0737 , 405N0738 , 405N0739 , 405N0740 , 405N0741 ,
	405N0742 , 405N0743 , 405N0744 , 405N0745 , 405N0746 , 405N0747 , 405N0748 , 405N0749 ,
	405N0750 , 405N0751 , 405N0752 , 405N0753 , 405N0754 , 405N0755 , 405N0756 , 405N0757 ,
	405N0758 , 405N0759 , 405N0760 , 405N0761 , 405N0762 , 405N0763 , 405N0764 , 405N0765 ,
	405N0766 , 405N0767 , 405S0676 , 405S0677 , 405S0678 , 405S0679 , 405S0680 , 405S0681 ,
	405S0682 , 405S0683 , 405S0684 , 405S0685 , 405S0686 , 405S0687 , 405S0688 , 405S0689 ,
	405S0690 , 405S0691 , 405S0692 , 405S0693 , 405S0694 , 405S0695 , 405S0696 , 405S0697 ,

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs
	405S0698 , 405S0699 , 405S0700 , 405S0701 , 405S0702 , 405S0703 , 405S0704 , 405S0705 ,
	405S0706 , 405S0707 , 405S0708 , 405S0709 , 405S0710 , 405S0711 , 405S0712 , 405S0713 ,
	405S0714 , 405S0715 , 405S0716 , 405S0717 ,

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0726 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

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1259
1260                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
1261
1262    SOURCE ID = 405N0727     ; SOURCE TYPE = VOLUME   :
1263     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
1264    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
1265                                                DAY OF WEEK = WEEKDAY
1266       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
1267       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
1268      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1269                                                DAY OF WEEK = SATURDAY
1270       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1271       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1272      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1273                                                DAY OF WEEK = SUNDAY
1274       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1275       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1276      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1277    FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
        I-405                          ***        12/13/22
1278     *** AERMET - VERSION  16216 ***
         ***                                                                    ***
         17:15:37
1279
                                    PAGE   9
1280    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1281
1282                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
1283
1284    SOURCE ID = 405N0728     ; SOURCE TYPE = VOLUME   :
1285     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
1286    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
1287                                                DAY OF WEEK = WEEKDAY
1288       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
1289       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
1290      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1291                                                DAY OF WEEK = SATURDAY
1292       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1293       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1294      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1295                                                DAY OF WEEK = SUNDAY
1296       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1297       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
```

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0729 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SATURDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SUNDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0730 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SATURDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6					

```
      .0000E+00    7  .0000E+00    8  .0000E+00
1337   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
1338  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1339                                          DAY OF WEEK = SUNDAY
1340   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
1341   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
1342  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1343 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
1344  *** AERMET - VERSION  16216 ***
      ***                                                              ***
      17:15:37
1345
                                PAGE  12
1346  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1347
1348                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                       WEEK (HRDOW) *
1349
1350  SOURCE ID = 405N0731     ; SOURCE TYPE = VOLUME   :
1351   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
      SCALAR   HOUR   SCALAR   HOUR   SCALAR
1352  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
      - - - - - - - - - - - - - - - - - - - -
1353                                          DAY OF WEEK = WEEKDAY
1354   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .7200E+01
1355   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
      .7200E+01   15  .7200E+01   16  .7200E+01
1356  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1357                                          DAY OF WEEK = SATURDAY
1358   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
1359   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
1360  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1361                                          DAY OF WEEK = SUNDAY
1362   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
1363   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
1364  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1365 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
1366  *** AERMET - VERSION  16216 ***
      ***                                                              ***
      17:15:37
1367
                                PAGE  13
1368  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1369
1370                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                       WEEK (HRDOW) *
1371
1372  SOURCE ID = 405N0732     ; SOURCE TYPE = VOLUME   :
1373   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
      SCALAR   HOUR   SCALAR   HOUR   SCALAR
1374  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
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     - - - - - - - - - - - - - - - - - - - - -
1375                                                DAY OF WEEK = WEEKDAY
1376       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
1377       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
1378      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
1379                                                DAY OF WEEK = SATURDAY
1380       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1381       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1382      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
1383                                                DAY OF WEEK = SUNDAY
1384       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1385       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1386      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
1387   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                          ***        12/13/22
1388    *** AERMET - VERSION  16216 ***
        ***                                                                    ***
        17:15:37
1389
                                    PAGE  14
1390    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1391
1392                      * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                          WEEK (HRDOW) *
1393
1394    SOURCE ID = 405N0733     ; SOURCE TYPE = VOLUME   :
1395     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
1396    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
1397                                                DAY OF WEEK = WEEKDAY
1398       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
1399       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
1400      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
1401                                                DAY OF WEEK = SATURDAY
1402       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1403       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1404      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
1405                                                DAY OF WEEK = SUNDAY
1406       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1407       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1408      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
1409   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                          ***        12/13/22
1410    *** AERMET - VERSION  16216 ***
        ***                                                                    ***
        17:15:37
1411
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*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0734 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22

*** AERMET - VERSION 16216 ***

*** ***

17:15:37

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0735 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00

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    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                              PAGE  17
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405N0736     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - - - -
                                          DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
   17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                          DAY OF WEEK = SATURDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                          DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                              PAGE  18
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405N0737     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - - - -
                                          DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
   17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
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1490 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
1491 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
1492 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

1494 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
1495 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
1496 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

1499

1500 *** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*
1501
1502 * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *
1503
1504 SOURCE ID = 405N0738 ; SOURCE TYPE = VOLUME :
1505 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR
1506 - - -

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 SCALAR   HOUR   SCALAR   HOUR   SCALAR
- - - -
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*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0741 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.7200E+01	9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01
15	.7200E+01	16	.7200E+01	17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22

*** AERMET - VERSION 16216 ***

*** ***

17:15:37

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0742 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.7200E+01	9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01
15	.7200E+01	16	.7200E+01	17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SUNDAY

1604 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
1605 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
1606 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00
1607 FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22
1608 *** AERMET - VERSION 16216 *** *** ***
17:15:37
1609

PAGE 24
1610 *** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*
1611
1612 * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *
1613
1614 SOURCE ID = 405N0743 ; SOURCE TYPE = VOLUME :
1615 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR
1616 - - -

17 .7200E+01 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

DAY OF WEEK = SATURDAY

1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00

9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00

17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

DAY OF WEEK = SUNDAY

1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00

9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00

17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0745 ; SOURCE TYPE = VOLUME :

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

- - - -

```
 SOURCE ID = 405N0746     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -
                                          DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
   17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                          DAY OF WEEK = SATURDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                          DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                               PAGE  28
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405N0747     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -
                                          DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
   17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                          DAY OF WEEK = SATURDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                          DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
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*** AERMET - VERSION  16216 ***
***                                                                    ***
17:15:37

                                PAGE  29
*** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                  * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                  WEEK (HRDOW) *

SOURCE ID = 405N0748     ; SOURCE TYPE = VOLUME   :
 HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
 SCALAR   HOUR   SCALAR   HOUR   SCALAR
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
                                                DAY OF WEEK = WEEKDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .7200E+01
   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
   .7200E+01   15  .7200E+01   16  .7200E+01
  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SATURDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SUNDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
*** AERMET - VERSION  16216 ***
***                                                                    ***
17:15:37

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*** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                  * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                  WEEK (HRDOW) *

SOURCE ID = 405N0749     ; SOURCE TYPE = VOLUME   :
 HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
 SCALAR   HOUR   SCALAR   HOUR   SCALAR
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
                                                DAY OF WEEK = WEEKDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .7200E+01
   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
   .7200E+01   15  .7200E+01   16  .7200E+01
  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SATURDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
```

DAY OF WEEK = SUNDAY

1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00

9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00

17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0750 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .7200E+01

9 .7200E+01 10 .7200E+01 11 .7200E+01 12 .7200E+01 13 .7200E+01 14 .7200E+01 15 .7200E+01 16 .7200E+01

17 .7200E+01 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

DAY OF WEEK = SATURDAY

1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00

9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00

17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

DAY OF WEEK = SUNDAY

1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00

9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00

17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0751 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .7200E+01

```
      9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
      .7200E+01   15  .7200E+01   16  .7200E+01
     17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SATURDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SUNDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                        ***
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 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405N0752     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -
                                              DAY OF WEEK = WEEKDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .7200E+01
      9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
      .7200E+01   15  .7200E+01   16  .7200E+01
     17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SATURDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SUNDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                        ***
 17:15:37

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 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
```

```
                    WEEK (HRDOW) *
1833
1834    SOURCE ID = 405N0753     ; SOURCE TYPE = VOLUME   :
1835     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
1836    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
1837                                                DAY OF WEEK = WEEKDAY
1838       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
1839       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
1840      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1841                                                DAY OF WEEK = SATURDAY
1842       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1843       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1844      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1845                                                DAY OF WEEK = SUNDAY
1846       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1847       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1848      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1849    FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
        I-405                          ***        12/13/22
1850     *** AERMET - VERSION  16216 ***
         ***                                                                    ***
         17:15:37
1851
                                    PAGE  35
1852    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1853
1854                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
1855
1856    SOURCE ID = 405N0754     ; SOURCE TYPE = VOLUME   :
1857     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
1858    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
1859                                                DAY OF WEEK = WEEKDAY
1860       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
1861       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
1862      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1863                                                DAY OF WEEK = SATURDAY
1864       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1865       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1866      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1867                                                DAY OF WEEK = SUNDAY
1868       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1869       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1870      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
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* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0755 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SATURDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SUNDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0756 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SATURDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14					

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      .0000E+00   15  .0000E+00   16  .0000E+00
1910    17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1911                                          DAY OF WEEK = SUNDAY
1912     1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
1913     9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
1914    17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1915 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
1916  *** AERMET - VERSION  16216 ***
      ***                                                                  ***
      17:15:37
1917
                                PAGE  38
1918  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1919
1920                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
1921
1922  SOURCE ID = 405N0757     ; SOURCE TYPE = VOLUME   :
1923   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
       SCALAR   HOUR   SCALAR   HOUR   SCALAR
1924  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
      - - - - - - - - - - - - - - - - - - - -
1925                                          DAY OF WEEK = WEEKDAY
1926     1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .7200E+01
1927     9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
      .7200E+01   15  .7200E+01   16  .7200E+01
1928    17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1929                                          DAY OF WEEK = SATURDAY
1930     1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
1931     9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
1932    17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1933                                          DAY OF WEEK = SUNDAY
1934     1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
1935     9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
1936    17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
1937 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
1938  *** AERMET - VERSION  16216 ***
      ***                                                                  ***
      17:15:37
1939
                                PAGE  39
1940  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
1941
1942                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
1943
1944  SOURCE ID = 405N0758     ; SOURCE TYPE = VOLUME   :
1945   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
       SCALAR   HOUR   SCALAR   HOUR   SCALAR
1946  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
      - - - - - - - - - - - - - - - - - - - -
1947                                          DAY OF WEEK = WEEKDAY
```

1948 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .7200E+01
1949 9 .7200E+01 10 .7200E+01 11 .7200E+01 12 .7200E+01 13 .7200E+01 14 .7200E+01 15 .7200E+01 16 .7200E+01
1950 17 .7200E+01 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00
1951 DAY OF WEEK = SATURDAY
1952 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
1953 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
1954 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00
1955 DAY OF WEEK = SUNDAY
1956 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
1957 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
1958 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00
1959 FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22
1960 *** AERMET - VERSION 16216 *** *** ***
17:15:37
1961
PAGE 40
1962 *** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*
1963
1964 * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *
1965
1966 SOURCE ID = 405N0759 ; SOURCE TYPE = VOLUME :
1967 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR
1968 - - -

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1985
1986                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
1987
1988    SOURCE ID = 405N0760     ; SOURCE TYPE = VOLUME   :
1989     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
1990    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
1991                                                DAY OF WEEK = WEEKDAY
1992       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
1993       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
1994      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1995                                                DAY OF WEEK = SATURDAY
1996       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
1997       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
1998      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
1999                                                DAY OF WEEK = SUNDAY
2000       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2001       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2002      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2003    FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
        I-405                          ***        12/13/22
2004     *** AERMET - VERSION  16216 ***
         ***                                                                    ***
         17:15:37
2005
                                    PAGE  42
2006    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2007
2008                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
2009
2010    SOURCE ID = 405N0761     ; SOURCE TYPE = VOLUME   :
2011     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
2012    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
2013                                                DAY OF WEEK = WEEKDAY
2014       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
2015       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
2016      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2017                                                DAY OF WEEK = SATURDAY
2018       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2019       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2020      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2021                                                DAY OF WEEK = SUNDAY
2022       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2023       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
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* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0762 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SATURDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SUNDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0763 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SATURDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6					

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      .0000E+00    7  .0000E+00    8  .0000E+00
2063   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
2064  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2065                                          DAY OF WEEK = SUNDAY
2066   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
2067   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
2068  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2069  FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
      I-405                        ***        12/13/22
2070   *** AERMET - VERSION  16216 ***
       ***                                                                    ***
       17:15:37
2071
                                PAGE  45
2072   *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2073
2074                     * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                         WEEK (HRDOW) *
2075
2076   SOURCE ID = 405N0764     ; SOURCE TYPE = VOLUME   :
2077    HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
       SCALAR   HOUR   SCALAR   HOUR   SCALAR
2078   - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
       - - - - - - - - - - - - - - - - - - - -
2079                                          DAY OF WEEK = WEEKDAY
2080   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .7200E+01
2081   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
       .7200E+01   15  .7200E+01   16  .7200E+01
2082  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2083                                          DAY OF WEEK = SATURDAY
2084   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
2085   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
2086  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2087                                          DAY OF WEEK = SUNDAY
2088   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
2089   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
2090  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2091  FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
      I-405                        ***        12/13/22
2092   *** AERMET - VERSION  16216 ***
       ***                                                                    ***
       17:15:37
2093
                                PAGE  46
2094   *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2095
2096                     * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                         WEEK (HRDOW) *
2097
2098   SOURCE ID = 405N0765     ; SOURCE TYPE = VOLUME   :
2099    HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
       SCALAR   HOUR   SCALAR   HOUR   SCALAR
2100   - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
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- - - - - - - - - - - - - - - - - - - - -
                                                DAY OF WEEK = WEEKDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .7200E+01
   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
   .7200E+01   15  .7200E+01   16  .7200E+01
  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SATURDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SUNDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                        ***
 17:15:37

                               PAGE  47
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405N0766     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - -
                                                DAY OF WEEK = WEEKDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .7200E+01
   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
   .7200E+01   15  .7200E+01   16  .7200E+01
  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SATURDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SUNDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                        ***
 17:15:37
```

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405N0767 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22

*** AERMET - VERSION 16216 ***

*** ***

17:15:37

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0676 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00

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      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
     .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                         ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                               PAGE  50
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0677     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -

                                          DAY OF WEEK = WEEKDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
     .0000E+00    7  .0000E+00    8  .7200E+01
      9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
     .7200E+01   15  .7200E+01   16  .7200E+01
     17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                          DAY OF WEEK = SATURDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
     .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
     .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                          DAY OF WEEK = SUNDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
     .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
     .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                         ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                               PAGE  51
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0678     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -

                                          DAY OF WEEK = WEEKDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
     .0000E+00    7  .0000E+00    8  .7200E+01
      9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
     .7200E+01   15  .7200E+01   16  .7200E+01
     17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
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2215 DAY OF WEEK = SATURDAY
2216 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
2217 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
2218 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00
2219 DAY OF WEEK = SUNDAY
2220 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
2221 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
2222 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00
2223 FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22
2224 *** AERMET - VERSION 16216 *** *** ***
17:15:37
2225
PAGE 52
2226 *** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*
2227
2228 * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *
2229
2230 SOURCE ID = 405S0679 ; SOURCE TYPE = VOLUME :
2231 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR
2232 - - -

```
 SCALAR   HOUR   SCALAR   HOUR   SCALAR
- - - -
```

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0682 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.7200E+01	9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01
15	.7200E+01	16	.7200E+01	17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22

*** AERMET - VERSION 16216 ***

*** ***

17:15:37

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0683 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.7200E+01	9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01
15	.7200E+01	16	.7200E+01	17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SUNDAY

```
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                                PAGE  57
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0684     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - - - -
                                            DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
   17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                            DAY OF WEEK = SATURDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                            DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                                PAGE  58
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0685     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - - - -
                                            DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
```

```
      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SATURDAY
       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SUNDAY
       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                                PAGE  59
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0686     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -

                                              DAY OF WEEK = WEEKDAY
       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .7200E+01
       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
       .7200E+01   15  .7200E+01   16  .7200E+01
      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SATURDAY
       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SUNDAY
       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                                PAGE  60
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *
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 SOURCE ID = 405S0687     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -
                                              DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
   17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SATURDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                               PAGE  61
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0688     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -
                                              DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
   17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SATURDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
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* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0689   ; SOURCE TYPE = VOLUME   :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0690   ; SOURCE TYPE = VOLUME   :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

```
   .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                                PAGE  64
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0691     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - - - -
                                                DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
    9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
    .7200E+01   15  .7200E+01   16  .7200E+01
   17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SATURDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
    .0000E+00   15  .0000E+00   16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
   .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                                PAGE  65
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0692     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - - - -
                                                DAY OF WEEK = WEEKDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
    .0000E+00    7  .0000E+00    8  .7200E+01
```

```
      9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
      .7200E+01   15  .7200E+01   16  .7200E+01
     17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SATURDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SUNDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                               PAGE  66
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0693     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - - - - - - - - - - - - - -
                                              DAY OF WEEK = WEEKDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .7200E+01
      9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
      .7200E+01   15  .7200E+01   16  .7200E+01
     17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SATURDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
                                              DAY OF WEEK = SUNDAY
      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
     .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                    ***
 17:15:37

                               PAGE  67
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
```

```
                    WEEK (HRDOW) *
2559
2560   SOURCE ID = 405S0694     ; SOURCE TYPE = VOLUME   :
2561    HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
        SCALAR   HOUR   SCALAR   HOUR   SCALAR
2562   - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
       - - - - - - - - - - - - - - - - - - - -
2563                                                DAY OF WEEK = WEEKDAY
2564      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
          .0000E+00    7  .0000E+00    8  .7200E+01
2565      9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
          .7200E+01   15  .7200E+01   16  .7200E+01
2566     17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
         .0000E+00   23  .0000E+00   24  .0000E+00
2567                                                DAY OF WEEK = SATURDAY
2568      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
          .0000E+00    7  .0000E+00    8  .0000E+00
2569      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
          .0000E+00   15  .0000E+00   16  .0000E+00
2570     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
         .0000E+00   23  .0000E+00   24  .0000E+00
2571                                                DAY OF WEEK = SUNDAY
2572      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
          .0000E+00    7  .0000E+00    8  .0000E+00
2573      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
          .0000E+00   15  .0000E+00   16  .0000E+00
2574     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
         .0000E+00   23  .0000E+00   24  .0000E+00
2575   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                          ***        12/13/22
2576    *** AERMET - VERSION  16216 ***
        ***                                                                    ***
        17:15:37
2577
                                  PAGE  68
2578    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2579
2580                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
2581
2582   SOURCE ID = 405S0695     ; SOURCE TYPE = VOLUME   :
2583    HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
        SCALAR   HOUR   SCALAR   HOUR   SCALAR
2584   - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
       - - - - - - - - - - - - - - - - - - - -
2585                                                DAY OF WEEK = WEEKDAY
2586      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
          .0000E+00    7  .0000E+00    8  .7200E+01
2587      9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
          .7200E+01   15  .7200E+01   16  .7200E+01
2588     17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
         .0000E+00   23  .0000E+00   24  .0000E+00
2589                                                DAY OF WEEK = SATURDAY
2590      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
          .0000E+00    7  .0000E+00    8  .0000E+00
2591      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
          .0000E+00   15  .0000E+00   16  .0000E+00
2592     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
         .0000E+00   23  .0000E+00   24  .0000E+00
2593                                                DAY OF WEEK = SUNDAY
2594      1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
          .0000E+00    7  .0000E+00    8  .0000E+00
2595      9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
          .0000E+00   15  .0000E+00   16  .0000E+00
2596     17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
         .0000E+00   23  .0000E+00   24  .0000E+00
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* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0696 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SATURDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SUNDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0697 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00
DAY OF WEEK = SATURDAY															
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14					

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      .0000E+00   15  .0000E+00   16  .0000E+00
2636    17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2637                                          DAY OF WEEK = SUNDAY
2638     1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
2639     9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
2640    17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2641 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
2642  *** AERMET - VERSION  16216 ***
      ***                                                                  ***
      17:15:37
2643
                                PAGE  71
2644  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2645
2646                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
2647
2648  SOURCE ID = 405S0698     ; SOURCE TYPE = VOLUME   :
2649   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
      SCALAR   HOUR   SCALAR   HOUR   SCALAR
2650  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
      - - - - - - - - - - - - - - - - - - - -
2651                                          DAY OF WEEK = WEEKDAY
2652     1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .7200E+01
2653     9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
      .7200E+01   15  .7200E+01   16  .7200E+01
2654    17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2655                                          DAY OF WEEK = SATURDAY
2656     1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
2657     9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
2658    17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2659                                          DAY OF WEEK = SUNDAY
2660     1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
      .0000E+00    7  .0000E+00    8  .0000E+00
2661     9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
      .0000E+00   15  .0000E+00   16  .0000E+00
2662    17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2663 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
2664  *** AERMET - VERSION  16216 ***
      ***                                                                  ***
      17:15:37
2665
                                PAGE  72
2666  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2667
2668                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
2669
2670  SOURCE ID = 405S0699     ; SOURCE TYPE = VOLUME   :
2671   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
      SCALAR   HOUR   SCALAR   HOUR   SCALAR
2672  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
      - - - - - - - - - - - - - - - - - - - -
2673                                          DAY OF WEEK = WEEKDAY
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2674       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
2675       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
2676      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2677                                                DAY OF WEEK = SATURDAY
2678       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2679       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2680      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2681                                                DAY OF WEEK = SUNDAY
2682       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2683       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2684      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2685 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
2686  *** AERMET - VERSION  16216 ***
      ***                                                                    ***
      17:15:37
2687
                                  PAGE  73
2688  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2689
2690                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                       WEEK (HRDOW) *
2691
2692  SOURCE ID = 405S0700     ; SOURCE TYPE = VOLUME   :
2693   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
      SCALAR   HOUR   SCALAR   HOUR   SCALAR
2694  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
      - - - - - - - - - - - - - - - - - - - -
2695                                                DAY OF WEEK = WEEKDAY
2696       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
2697       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
2698      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2699                                                DAY OF WEEK = SATURDAY
2700       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2701       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2702      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2703                                                DAY OF WEEK = SUNDAY
2704       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2705       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2706      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2707 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
2708  *** AERMET - VERSION  16216 ***
      ***                                                                    ***
      17:15:37
2709
                                  PAGE  74
2710  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
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2711
2712                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
2713
2714    SOURCE ID = 405S0701     ; SOURCE TYPE = VOLUME   :
2715     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
2716    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
2717                                                DAY OF WEEK = WEEKDAY
2718       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
2719       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
2720      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2721                                                DAY OF WEEK = SATURDAY
2722       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2723       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2724      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2725                                                DAY OF WEEK = SUNDAY
2726       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2727       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2728      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2729    FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
        I-405                          ***        12/13/22
2730     *** AERMET - VERSION  16216 ***
         ***                                                                    ***
         17:15:37
2731
                                    PAGE  75
2732     *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2733
2734                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
2735
2736    SOURCE ID = 405S0702     ; SOURCE TYPE = VOLUME   :
2737     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
2738    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
2739                                                DAY OF WEEK = WEEKDAY
2740       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
2741       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
2742      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2743                                                DAY OF WEEK = SATURDAY
2744       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2745       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2746      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
          .0000E+00   23  .0000E+00   24  .0000E+00
2747                                                DAY OF WEEK = SUNDAY
2748       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2749       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
```

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0703 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = WEEKDAY

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0704 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = WEEKDAY

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6

```
      .0000E+00    7  .0000E+00    8  .0000E+00
2789   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
2790  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2791                                          DAY OF WEEK = SUNDAY
2792   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
2793   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
2794  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2795 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
2796  *** AERMET - VERSION  16216 ***
      ***                                                                    ***
      17:15:37
2797
                                PAGE  78
2798  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2799
2800                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
2801
2802  SOURCE ID = 405S0705     ; SOURCE TYPE = VOLUME   :
2803   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
       SCALAR   HOUR   SCALAR   HOUR   SCALAR
2804  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
      - - - - - - - - - - - - - - - - - - - -
2805                                          DAY OF WEEK = WEEKDAY
2806   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .7200E+01
2807   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
       .7200E+01   15  .7200E+01   16  .7200E+01
2808  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2809                                          DAY OF WEEK = SATURDAY
2810   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
2811   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
2812  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2813                                          DAY OF WEEK = SUNDAY
2814   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
       .0000E+00    7  .0000E+00    8  .0000E+00
2815   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
       .0000E+00   15  .0000E+00   16  .0000E+00
2816  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
      .0000E+00   23  .0000E+00   24  .0000E+00
2817 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
2818  *** AERMET - VERSION  16216 ***
      ***                                                                    ***
      17:15:37
2819
                                PAGE  79
2820  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2821
2822                    * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                        WEEK (HRDOW) *
2823
2824  SOURCE ID = 405S0706     ; SOURCE TYPE = VOLUME   :
2825   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
       SCALAR   HOUR   SCALAR   HOUR   SCALAR
2826  - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
```

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- - - - - - - - - - - - - - - - - - - - -
                                                DAY OF WEEK = WEEKDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .7200E+01
   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
   .7200E+01   15  .7200E+01   16  .7200E+01
  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SATURDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SUNDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                        ***
 17:15:37

                               PAGE  80
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                   * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                   WEEK (HRDOW) *

 SOURCE ID = 405S0707     ; SOURCE TYPE = VOLUME   :
  HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
  SCALAR   HOUR   SCALAR   HOUR   SCALAR
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - -
                                                DAY OF WEEK = WEEKDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .7200E+01
   9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
   .7200E+01   15  .7200E+01   16  .7200E+01
  17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SATURDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
                                                DAY OF WEEK = SUNDAY
   1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
   .0000E+00    7  .0000E+00    8  .0000E+00
   9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
   .0000E+00   15  .0000E+00   16  .0000E+00
  17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
  .0000E+00   23  .0000E+00   24  .0000E+00
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                        ***
 17:15:37
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*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0708 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22

*** AERMET - VERSION 16216 ***

*** ***

17:15:37

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0709 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.7200E+01
9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01	15	.7200E+01	16	.7200E+01
17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00	16	.0000E+00
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00	24	.0000E+00

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00	8	.0000E+00

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2903       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2904      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
2905   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                         ***        12/13/22
2906    *** AERMET - VERSION  16216 ***
        ***                                                                    ***
        17:15:37
2907
                                    PAGE  83
2908    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2909
2910                      * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                          WEEK (HRDOW) *
2911
2912    SOURCE ID = 405S0710     ; SOURCE TYPE = VOLUME   :
2913     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
2914    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
2915                                                DAY OF WEEK = WEEKDAY
2916       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
2917       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
2918      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
2919                                                DAY OF WEEK = SATURDAY
2920       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2921       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2922      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
2923                                                DAY OF WEEK = SUNDAY
2924       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
2925       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
2926      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
2927   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                         ***        12/13/22
2928    *** AERMET - VERSION  16216 ***
        ***                                                                    ***
        17:15:37
2929
                                    PAGE  84
2930    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
2931
2932                      * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                          WEEK (HRDOW) *
2933
2934    SOURCE ID = 405S0711     ; SOURCE TYPE = VOLUME   :
2935     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
2936    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
2937                                                DAY OF WEEK = WEEKDAY
2938       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
2939       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
2940      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
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2941 DAY OF WEEK = SATURDAY
2942 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
2943 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
2944 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00
2945 DAY OF WEEK = SUNDAY
2946 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00 8 .0000E+00
2947 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00 16 .0000E+00
2948 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00 24 .0000E+00
2949 FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22
2950 *** AERMET - VERSION 16216 *** *** 17:15:37
2951
PAGE 85
2952 *** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*
2953
2954 * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *
2955
2956 SOURCE ID = 405S0712 ; SOURCE TYPE = VOLUME :
2957 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR
2958 - - -

```
 SCALAR   HOUR   SCALAR   HOUR   SCALAR
- - - -
```

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0715 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.7200E+01	9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01
15	.7200E+01	16	.7200E+01	17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SUNDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

FF *** AERMOD - VERSION 22112 *** *** Valor Elementary Exposure To DPM From I-405 *** 12/13/22

*** AERMET - VERSION 16216 ***

*** ***

17:15:37

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = 405S0716 ; SOURCE TYPE = VOLUME :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

DAY OF WEEK = WEEKDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.7200E+01	9	.7200E+01	10	.7200E+01	11	.7200E+01	12	.7200E+01	13	.7200E+01	14	.7200E+01
15	.7200E+01	16	.7200E+01	17	.7200E+01	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SATURDAY

1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00	9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00
15	.0000E+00	16	.0000E+00	17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00
22	.0000E+00	23	.0000E+00	24	.0000E+00								

DAY OF WEEK = SUNDAY

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3056       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
3057       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
3058      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
3059   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                          ***        12/13/22
3060    *** AERMET - VERSION  16216 ***
        ***                                                                    ***
        17:15:37
3061
                                    PAGE  90
3062    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
3063
3064                      * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
                          WEEK (HRDOW) *
3065
3066    SOURCE ID = 405S0717     ; SOURCE TYPE = VOLUME   :
3067     HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR   SCALAR   HOUR
         SCALAR   HOUR   SCALAR   HOUR   SCALAR
3068    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - - -
3069                                                DAY OF WEEK = WEEKDAY
3070       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .7200E+01
3071       9  .7200E+01   10  .7200E+01   11  .7200E+01   12  .7200E+01   13  .7200E+01   14
           .7200E+01   15  .7200E+01   16  .7200E+01
3072      17  .7200E+01   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
3073                                                DAY OF WEEK = SATURDAY
3074       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
3075       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
3076      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
3077                                                DAY OF WEEK = SUNDAY
3078       1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6
           .0000E+00    7  .0000E+00    8  .0000E+00
3079       9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14
           .0000E+00   15  .0000E+00   16  .0000E+00
3080      17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22
           .0000E+00   23  .0000E+00   24  .0000E+00
3081   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                          ***        12/13/22
3082    *** AERMET - VERSION  16216 ***
        ***                                                                    ***
        17:15:37
3083
                                    PAGE  91
3084    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
3085
3086                                                  *** DISCRETE CARTESIAN RECEPTORS ***
3087                                                (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
3088                                                          (METERS)
3089
3090          ( 364522.0, 3789971.0,     235.0,     235.0,       0.0);         ( 364522.0,
              3789971.0,     235.0,     235.0,       0.0);
3091          ( 364523.0, 3789983.0,     235.0,     235.0,       0.0);         ( 364523.0,
              3789983.0,     235.0,     235.0,       0.0);
3092          ( 364523.0, 3789994.0,     235.0,     235.0,       0.0);         ( 364523.0,
              3789994.0,     235.0,     235.0,       0.0);
3093          ( 364523.0, 3790003.0,     235.0,     235.0,       0.0);         ( 364523.0,
              3790003.0,     235.0,     235.0,       0.0);
3094          ( 364540.0, 3789994.0,     235.0,     235.0,       0.0);         ( 364523.0,
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            3790020.0,     235.0,     235.0,       0.0);
3095        ( 364523.0, 3790028.0,     235.0,     235.0,       0.0);         ( 364523.0,
            3790036.0,     235.0,     235.0,       0.0);
3096        ( 364539.0, 3790025.0,     235.0,     235.0,       0.0);         ( 364539.0,
            3790035.0,     235.0,     235.0,       0.0);
3097        ( 364565.0, 3790035.0,     235.0,     235.0,       0.0);         ( 364570.0,
            3790003.0,     235.0,     235.0,       0.0);
3098        ( 364566.0, 3789991.0,     235.0,     235.0,       0.0);         ( 364565.0,
            3789968.0,     235.0,     235.0,       0.0);
3099        ( 364546.0, 3789974.0,     235.0,     235.0,       0.0);         ( 364546.0,
            3789974.0,     235.0,     235.0,       0.0);
3100        ( 364524.0, 3790013.0,     235.0,     235.0,       0.0);         ( 364524.0,
            3790013.0,     235.0,     235.0,       0.0);
3101        ( 364551.0, 3790013.0,     235.0,     235.0,       0.0);         ( 364551.0,
            3790013.0,     235.0,     235.0,       0.0);
3102        ( 364484.7, 3789924.9,     235.0,     235.0,       0.0);         ( 364494.7,
            3789924.9,     235.0,     235.0,       0.0);
3103        ( 364504.7, 3789924.9,     235.0,     235.0,       0.0);         ( 364514.7,
            3789924.9,     235.0,     235.0,       0.0);
3104        ( 364524.7, 3789924.9,     235.0,     235.0,       0.0);         ( 364534.7,
            3789924.9,     235.0,     235.0,       0.0);
3105        ( 364544.7, 3789924.9,     235.0,     235.0,       0.0);         ( 364554.7,
            3789924.9,     235.0,     235.0,       0.0);
3106        ( 364564.7, 3789924.9,     235.0,     235.0,       0.0);         ( 364574.7,
            3789924.9,     235.0,     235.0,       0.0);
3107        ( 364484.7, 3789939.9,     235.0,     235.0,       0.0);         ( 364494.7,
            3789939.9,     235.0,     235.0,       0.0);
3108        ( 364504.7, 3789939.9,     235.0,     235.0,       0.0);         ( 364514.7,
            3789939.9,     235.0,     235.0,       0.0);
3109        ( 364524.7, 3789939.9,     235.0,     235.0,       0.0);         ( 364534.7,
            3789939.9,     235.0,     235.0,       0.0);
3110        ( 364544.7, 3789939.9,     235.0,     235.0,       0.0);         ( 364554.7,
            3789939.9,     235.0,     235.0,       0.0);
3111        ( 364564.7, 3789939.9,     235.0,     235.0,       0.0);         ( 364574.7,
            3789939.9,     235.0,     235.0,       0.0);
3112        ( 364484.7, 3789954.9,     235.0,     235.0,       0.0);         ( 364494.7,
            3789954.9,     235.0,     235.0,       0.0);
3113        ( 364504.7, 3789954.9,     235.0,     235.0,       0.0);         ( 364514.7,
            3789954.9,     235.0,     235.0,       0.0);
3114        ( 364524.7, 3789954.9,     235.0,     235.0,       0.0);         ( 364534.7,
            3789954.9,     235.0,     235.0,       0.0);
3115        ( 364544.7, 3789954.9,     235.0,     235.0,       0.0);         ( 364554.7,
            3789954.9,     235.0,     235.0,       0.0);
3116        ( 364564.7, 3789954.9,     235.0,     235.0,       0.0);         ( 364574.7,
            3789954.9,     235.0,     235.0,       0.0);
3117        ( 364484.7, 3789969.9,     235.0,     235.0,       0.0);         ( 364494.7,
            3789969.9,     235.0,     235.0,       0.0);
3118        ( 364504.7, 3789969.9,     235.0,     235.0,       0.0);         ( 364514.7,
            3789969.9,     235.0,     235.0,       0.0);
3119        ( 364524.7, 3789969.9,     235.0,     235.0,       0.0);         ( 364534.7,
            3789969.9,     235.0,     235.0,       0.0);
3120        ( 364544.7, 3789969.9,     235.0,     235.0,       0.0);         ( 364554.7,
            3789969.9,     235.0,     235.0,       0.0);
3121        ( 364564.7, 3789969.9,     235.0,     235.0,       0.0);         ( 364574.7,
            3789969.9,     235.0,     235.0,       0.0);
3122        ( 364484.7, 3789984.9,     235.0,     235.0,       0.0);         ( 364494.7,
            3789984.9,     235.0,     235.0,       0.0);
3123        ( 364504.7, 3789984.9,     235.0,     235.0,       0.0);         ( 364514.7,
            3789984.9,     235.0,     235.0,       0.0);
3124        ( 364524.7, 3789984.9,     235.0,     235.0,       0.0);         ( 364534.7,
            3789984.9,     235.0,     235.0,       0.0);
3125        ( 364544.7, 3789984.9,     235.0,     235.0,       0.0);         ( 364554.7,
            3789984.9,     235.0,     235.0,       0.0);
3126        ( 364564.7, 3789984.9,     235.0,     235.0,       0.0);         ( 364574.7,
            3789984.9,     235.0,     235.0,       0.0);
3127        ( 364484.7, 3789999.9,     235.0,     235.0,       0.0);         ( 364494.7,
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          3789999.9,     235.0,     235.0,       0.0);
3128      ( 364504.7, 3789999.9,     235.0,     235.0,       0.0);         ( 364514.7,
          3789999.9,     235.0,     235.0,       0.0);
3129      ( 364524.7, 3789999.9,     235.0,     235.0,       0.0);         ( 364534.7,
          3789999.9,     235.0,     235.0,       0.0);
3130      ( 364544.7, 3789999.9,     235.0,     235.0,       0.0);         ( 364554.7,
          3789999.9,     235.0,     235.0,       0.0);
3131      ( 364564.7, 3789999.9,     235.0,     235.0,       0.0);         ( 364574.7,
          3789999.9,     235.0,     235.0,       0.0);
3132      ( 364484.7, 3790014.9,     235.0,     235.0,       0.0);         ( 364494.7,
          3790014.9,     235.0,     235.0,       0.0);
3133      ( 364504.7, 3790014.9,     235.0,     235.0,       0.0);         ( 364514.7,
          3790014.9,     235.0,     235.0,       0.0);
3134      ( 364524.7, 3790014.9,     235.0,     235.0,       0.0);         ( 364534.7,
          3790014.9,     235.0,     235.0,       0.0);
3135  FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
      I-405                          ***        12/13/22
3136   *** AERMET - VERSION  16216 ***
       ***                                                                  ***
       17:15:37
3137
                                    PAGE  92
3138   *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
3139
3140                                                 *** DISCRETE CARTESIAN RECEPTORS ***
3141                                               (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
3142                                                          (METERS)
3143
3144      ( 364544.7, 3790014.9,     235.0,     235.0,       0.0);         ( 364554.7,
          3790014.9,     235.0,     235.0,       0.0);
3145      ( 364564.7, 3790014.9,     235.0,     235.0,       0.0);         ( 364574.7,
          3790014.9,     235.0,     235.0,       0.0);
3146      ( 364484.7, 3790029.9,     235.0,     235.0,       0.0);         ( 364494.7,
          3790029.9,     235.0,     235.0,       0.0);
3147      ( 364504.7, 3790029.9,     235.0,     235.0,       0.0);         ( 364514.7,
          3790029.9,     235.0,     235.0,       0.0);
3148      ( 364524.7, 3790029.9,     235.0,     235.0,       0.0);         ( 364534.7,
          3790029.9,     235.0,     235.0,       0.0);
3149      ( 364544.7, 3790029.9,     235.0,     235.0,       0.0);         ( 364554.7,
          3790029.9,     235.0,     235.0,       0.0);
3150      ( 364564.7, 3790029.9,     235.0,     235.0,       0.0);         ( 364574.7,
          3790029.9,     235.0,     235.0,       0.0);
3151      ( 364484.7, 3790044.9,     235.0,     235.0,       0.0);         ( 364494.7,
          3790044.9,     235.0,     235.0,       0.0);
3152      ( 364504.7, 3790044.9,     235.0,     235.0,       0.0);         ( 364514.7,
          3790044.9,     235.0,     235.0,       0.0);
3153      ( 364524.7, 3790044.9,     235.0,     235.0,       0.0);         ( 364534.7,
          3790044.9,     235.0,     235.0,       0.0);
3154      ( 364544.7, 3790044.9,     235.0,     235.0,       0.0);         ( 364554.7,
          3790044.9,     235.0,     235.0,       0.0);
3155      ( 364564.7, 3790044.9,     235.0,     235.0,       0.0);         ( 364574.7,
          3790044.9,     235.0,     235.0,       0.0);
3156      ( 364484.7, 3790059.9,     235.0,     235.0,       0.0);         ( 364494.7,
          3790059.9,     235.0,     235.0,       0.0);
3157      ( 364504.7, 3790059.9,     235.0,     235.0,       0.0);         ( 364514.7,
          3790059.9,     235.0,     235.0,       0.0);
3158      ( 364524.7, 3790059.9,     235.0,     235.0,       0.0);         ( 364534.7,
          3790059.9,     235.0,     235.0,       0.0);
3159      ( 364544.7, 3790059.9,     235.0,     235.0,       0.0);         ( 364554.7,
          3790059.9,     235.0,     235.0,       0.0);
3160      ( 364564.7, 3790059.9,     235.0,     235.0,       0.0);         ( 364574.7,
          3790059.9,     235.0,     235.0,       0.0);
3161  FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
      I-405                          ***        12/13/22
3162   *** AERMET - VERSION  16216 ***
       ***                                                                  ***
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*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
(1=YES; 0=NO)

1 1 1

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*** THE PERIOD (43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: I-405N ***
INCLUDING SOURCE(S): 405N0726 , 405N0727 , 405N0728 , 405N0729 , 405N0730 ,
405N0731 , 405N0732 , 405N0733 , 405N0734 , 405N0735 , 405N0736 , 405N0737 , 405N0738 ,
405N0739 , 405N0740 , 405N0741 , 405N0742 , 405N0743 , 405N0744 , 405N0745 , 405N0746 ,
405N0747 , 405N0748 , 405N0749 , 405N0750 , 405N0751 , 405N0752 , 405N0753 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
364522.00	3789971.00	5.51729	364522.00	3789971.00	5.51729
364523.00	3789983.00	5.48846	364523.00	3789983.00	5.48846
364523.00	3789994.00	5.49789	364523.00	3789994.00	5.49789
364523.00	3790003.00	5.50547	364523.00	3790003.00	5.50547
364540.00	3789994.00	4.89810	364523.00	3790020.00	5.51955
364523.00	3790028.00	5.52612	364523.00	3790036.00	5.53267
364539.00	3790025.00	4.95072	364539.00	3790035.00	4.95729
364565.00	3790035.00	4.22992	364570.00	3790003.00	4.09821
364566.00	3789991.00	4.18529	364565.00	3789968.00	4.19748
364546.00	3789974.00	4.70209	364546.00	3789974.00	4.70209
364524.00	3790013.00	5.47451	364524.00	3790013.00	5.47451
364551.00	3790013.00	4.58250	364551.00	3790013.00	4.58250
364484.70	3789924.90	7.41402	364494.70	3789924.90	6.77693
364504.70	3789924.90	6.23675	364514.70	3789924.90	5.77302
364524.70	3789924.90	5.37054	364534.70	3789924.90	5.01791
364544.70	3789924.90	4.70642	364554.70	3789924.90	4.42930
364564.70	3789924.90	4.18115	364574.70	3789924.90	3.95766
364484.70	3789939.90	7.44045	364494.70	3789939.90	6.79911
364504.70	3789939.90	6.25563	364514.70	3789939.90	5.78928
364524.70	3789939.90	5.38464	364534.70	3789939.90	5.03023
364544.70	3789939.90	4.71724	364554.70	3789939.90	4.43884
364564.70	3789939.90	4.18958	364574.70	3789939.90	3.96515
364484.70	3789954.90	7.46571	364494.70	3789954.90	6.82041

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3275          364504.70    3789954.90        6.27380                        364514.70
              3789954.90         5.80495
3276          364524.70    3789954.90        5.39827                        364534.70
              3789954.90         5.04214
3277          364544.70    3789954.90        4.72769                        364554.70
              3789954.90         4.44805
3278          364564.70    3789954.90        4.19773                        364574.70
              3789954.90         3.97238
3279          364484.70    3789969.90        7.48997                        364494.70
              3789969.90         6.84090
3280          364504.70    3789969.90        6.29133                        364514.70
              3789969.90         5.82007
3281          364524.70    3789969.90        5.41142                        364534.70
              3789969.90         5.05364
3282          364544.70    3789969.90        4.73779                        364554.70
              3789969.90         4.45694
3283          364564.70    3789969.90        4.20559                        364574.70
              3789969.90         3.97933
3284          364484.70    3789984.90        7.51356                        364494.70
              3789984.90         6.86083
3285          364504.70    3789984.90        6.30838                        364514.70
              3789984.90         5.83478
3286          364524.70    3789984.90        5.42420                        364534.70
              3789984.90         5.06481
3287          364544.70    3789984.90        4.74759                        364554.70
              3789984.90         4.46556
3288          364564.70    3789984.90        4.21318                        364574.70
              3789984.90         3.98605
3289          364484.70    3789999.90        7.53641                        364494.70
              3789999.90         6.88018
3290          364504.70    3789999.90        6.32495                        364514.70
              3789999.90         5.84912
3291          364524.70    3789999.90        5.43668                        364534.70
              3789999.90         5.07571
3292  FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
      I-405                          ***        12/13/22
3293   *** AERMET - VERSION  16216 ***
       ***                                                                   ***
       17:15:37
3294
                                  PAGE  96
3295   *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
3296
3297                               *** THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION   VALUES
                                   FOR SOURCE GROUP: I-405N   ***
3298                                   INCLUDING SOURCE(S):     405N0726    , 405N0727    ,
                                       405N0728    , 405N0729    , 405N0730    ,
3299                  405N0731    , 405N0732    , 405N0733    , 405N0734    , 405N0735    ,
                      405N0736    , 405N0737    , 405N0738    ,
3300                  405N0739    , 405N0740    , 405N0741    , 405N0742    , 405N0743    ,
                      405N0744    , 405N0745    , 405N0746    ,
3301                  405N0747    , 405N0748    , 405N0749    , 405N0750    , 405N0751    ,
                      405N0752    , 405N0753    ,  . . .      ,
3302
3303                                        *** DISCRETE CARTESIAN RECEPTOR POINTS ***
3304
3305                                     ** CONC OF DPM      IN
                                         MICROGRAMS/M**3                          **
3306
3307          X-COORD (M)   Y-COORD (M)        CONC                      X-COORD (M)   Y-COORD
              (M)        CONC
3308   - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
       - - - - - - - - - - - - - - - - - - -
3309          364544.70    3789999.90        4.75713                        364554.70
              3789999.90         4.47395
3310          364564.70    3789999.90        4.22057                        364574.70
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            3789999.90        3.99256
3311        364484.70    3790014.90        7.55865                         364494.70
            3790014.90        6.89906
3312        364504.70    3790014.90        6.34116                         364514.70
            3790014.90        5.86313
3313        364524.70    3790014.90        5.44887                         364534.70
            3790014.90        5.08637
3314        364544.70    3790014.90        4.76647                         364554.70
            3790014.90        4.48214
3315        364564.70    3790014.90        4.22777                         364574.70
            3790014.90        3.99889
3316        364484.70    3790029.90        7.58077                         364494.70
            3790029.90        6.91780
3317        364504.70    3790029.90        6.35722                         364514.70
            3790029.90        5.87699
3318        364524.70    3790029.90        5.46090                         364534.70
            3790029.90        5.09686
3319        364544.70    3790029.90        4.77565                         364554.70
            3790029.90        4.49018
3320        364564.70    3790029.90        4.23481                         364574.70
            3790029.90        4.00506
3321        364484.70    3790044.90        7.60277                         364494.70
            3790044.90        6.93645
3322        364504.70    3790044.90        6.37319                         364514.70
            3790044.90        5.89078
3323        364524.70    3790044.90        5.47288                         364534.70
            3790044.90        5.10729
3324        364544.70    3790044.90        4.78474                         364554.70
            3790044.90        4.49811
3325        364564.70    3790044.90        4.24173                         364574.70
            3790044.90        4.01110
3326        364484.70    3790059.90        7.62455                         364494.70
            3790059.90        6.95495
3327        364504.70    3790059.90        6.38907                         364514.70
            3790059.90        5.90451
3328        364524.70    3790059.90        5.48480                         364534.70
            3790059.90        5.11767
3329        364544.70    3790059.90        4.79378                         364554.70
            3790059.90        4.50598
3330        364564.70    3790059.90        4.24859                         364574.70
            3790059.90        4.01706
3331 FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
     I-405                        ***        12/13/22
3332  *** AERMET - VERSION  16216 ***
      ***                                                                    ***
      17:15:37
3333
                                  PAGE  97
3334  *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
3335
3336                              *** THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION   VALUES
                                  FOR SOURCE GROUP: I-405S   ***
3337                                  INCLUDING SOURCE(S):     405S0676    , 405S0677    ,
                                      405S0678    , 405S0679    , 405S0680    ,
3338                 405S0681    , 405S0682    , 405S0683    , 405S0684    , 405S0685    ,
                     405S0686    , 405S0687    , 405S0688    ,
3339                 405S0689    , 405S0690    , 405S0691    , 405S0692    , 405S0693    ,
                     405S0694    , 405S0695    , 405S0696    ,
3340                 405S0697    , 405S0698    , 405S0699    , 405S0700    , 405S0701    ,
                     405S0702    , 405S0703    ,  . . .      ,
3341
3342                                      *** DISCRETE CARTESIAN RECEPTOR POINTS ***
3343
3344                                    ** CONC OF DPM      IN
                                        MICROGRAMS/M**3                          **
3345
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	X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
3348	364522.00	3789971.00	4.85673	364522.00	3789971.00	4.85673
3349	364523.00	3789983.00	4.83387	364523.00	3789983.00	4.83387
3350	364523.00	3789994.00	4.84125	364523.00	3789994.00	4.84125
3351	364523.00	3790003.00	4.84727	364523.00	3790003.00	4.84727
3352	364540.00	3789994.00	4.36363	364523.00	3790020.00	4.85864
3353	364523.00	3790028.00	4.86399	364523.00	3790036.00	4.86934
3354	364539.00	3790025.00	4.40593	364539.00	3790035.00	4.41127
3355	364565.00	3790035.00	3.81751	364570.00	3790003.00	3.70866
3356	364566.00	3789991.00	3.78118	364565.00	3789968.00	3.79190
3357	364546.00	3789974.00	4.20549	364546.00	3789974.00	4.20549
3358	364524.00	3790013.00	4.82303	364524.00	3790013.00	4.82303
3359	364551.00	3790013.00	4.10750	364551.00	3790013.00	4.10750
3360	364484.70	3789924.90	6.29715	364494.70	3789924.90	5.82587
3361	364504.70	3789924.90	5.41719	364514.70	3789924.90	5.05939
3362	364524.70	3789924.90	4.74355	364534.70	3789924.90	4.46271
3363	364544.70	3789924.90	4.21136	364554.70	3789924.90	3.98508
3364	364564.70	3789924.90	3.78034	364574.70	3789924.90	3.59425
3365	364484.70	3789939.90	6.31430	364494.70	3789939.90	5.84071
3366	364504.70	3789939.90	5.43012	364514.70	3789939.90	5.07074
3367	364524.70	3789939.90	4.75354	364534.70	3789939.90	4.47154
3368	364544.70	3789939.90	4.21917	364554.70	3789939.90	3.99202
3369	364564.70	3789939.90	3.78652	364574.70	3789939.90	3.59976
3370	364484.70	3789954.90	6.33143	364494.70	3789954.90	5.85553
3371	364504.70	3789954.90	5.44304	364514.70	3789954.90	5.08205
3372	364524.70	3789954.90	4.76348	364534.70	3789954.90	4.48030
3373	364544.70	3789954.90	4.22691	364554.70	3789954.90	3.99887
3374	364564.70	3789954.90	3.79259	364574.70	3789954.90	3.60516
3375	364484.70	3789969.90	6.34857	364494.70	3789969.90	5.87033
3376	364504.70	3789969.90	5.45592	364514.70	3789969.90	5.09332
3377	364524.70	3789969.90	4.77336	364534.70	3789969.90	4.48899
3378	364544.70	3789969.90	4.23457	364554.70	3789969.90	4.00562

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3379          364564.70    3789969.90        3.79855                        364574.70
              3789969.90         3.61044
3380          364484.70    3789984.90        6.36584                        364494.70
              3789984.90         5.88521
3381          364504.70    3789984.90        5.46883                        364514.70
              3789984.90         5.10457
3382          364524.70    3789984.90        4.78321                        364534.70
              3789984.90         4.49761
3383          364544.70    3789984.90        4.24214                        364554.70
              3789984.90         4.01228
3384          364564.70    3789984.90        3.80442                        364574.70
              3789984.90         3.61562
3385          364484.70    3789999.90        6.38317                        364494.70
              3789999.90         5.90015
3386          364504.70    3789999.90        5.48178                        364514.70
              3789999.90         5.11584
3387          364524.70    3789999.90        4.79303                        364534.70
              3789999.90         4.50620
3388  FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
      I-405                          ***        12/13/22
3389   *** AERMET - VERSION  16216 ***
       ***                                                                   ***
       17:15:37
3390
                                    PAGE  98
3391   *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
3392
3393                                *** THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION   VALUES
                                    FOR SOURCE GROUP: I-405S   ***
3394                                    INCLUDING SOURCE(S):     405S0676    , 405S0677    ,
                                        405S0678    , 405S0679    , 405S0680    ,
3395                  405S0681    , 405S0682    , 405S0683    , 405S0684    , 405S0685    ,
                      405S0686    , 405S0687    , 405S0688    ,
3396                  405S0689    , 405S0690    , 405S0691    , 405S0692    , 405S0693    ,
                      405S0694    , 405S0695    , 405S0696    ,
3397                  405S0697    , 405S0698    , 405S0699    , 405S0700    , 405S0701    ,
                      405S0702    , 405S0703    ,  . . .      ,
3398
3399                                     *** DISCRETE CARTESIAN RECEPTOR POINTS ***
3400
3401                                     ** CONC OF DPM      IN
                                         MICROGRAMS/M**3                          **
3402
3403          X-COORD (M)   Y-COORD (M)        CONC                       X-COORD (M)   Y-COORD
              (M)        CONC
3404   - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
       - - - - - - - - - - - - - - - - - - -
3405          364544.70    3789999.90        4.24965                        364554.70
              3789999.90         4.01887
3406          364564.70    3789999.90        3.81021                        364574.70
              3789999.90         3.62072
3407          364484.70    3790014.90        6.40054                        364494.70
              3790014.90         5.91510
3408          364504.70    3790014.90        5.49473                        364514.70
              3790014.90         5.12710
3409          364524.70    3790014.90        4.80283                        364534.70
              3790014.90         4.51475
3410          364544.70    3790014.90        4.25712                        364554.70
              3790014.90         4.02540
3411          364564.70    3790014.90        3.81592                        364574.70
              3790014.90         3.62574
3412          364484.70    3790029.90        6.41809                        364494.70
              3790029.90         5.93017
3413          364504.70    3790029.90        5.50774                        364514.70
              3790029.90         5.13836
3414          364524.70    3790029.90        4.81263                        364534.70
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            3790029.90        4.52326
3415        364544.70    3790029.90        4.26454                    364554.70
            3790029.90        4.03187
3416        364564.70    3790029.90        3.82159                    364574.70
            3790029.90        3.63071
3417        364484.70    3790044.90        6.43583                    364494.70
            3790044.90        5.94538
3418        364504.70    3790044.90        5.52085                    364514.70
            3790044.90        5.14970
3419        364524.70    3790044.90        4.82245                    364534.70
            3790044.90        4.53179
3420        364544.70    3790044.90        4.27195                    364554.70
            3790044.90        4.03833
3421        364564.70    3790044.90        3.82724                    364574.70
            3790044.90        3.63565
3422        364484.70    3790059.90        6.45367                    364494.70
            3790059.90        5.96068
3423        364504.70    3790059.90        5.53404                    364514.70
            3790059.90        5.16111
3424        364524.70    3790059.90        4.83232                    364534.70
            3790059.90        4.54036
3425        364544.70    3790059.90        4.27940                    364554.70
            3790059.90        4.04482
3426        364564.70    3790059.90        3.83289                    364574.70
            3790059.90        3.64059
3427   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                          ***        12/13/22
3428    *** AERMET - VERSION  16216 ***
        ***                                                              ***
        17:15:37
3429
                                    PAGE  99
3430    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
3431
3432                                *** THE PERIOD ( 43848 HRS) AVERAGE CONCENTRATION   VALUES
                                    FOR SOURCE GROUP: ALL      ***
3433                                    INCLUDING SOURCE(S):     405N0726    , 405N0727    ,
                                        405N0728    , 405N0729    , 405N0730    ,
3434                  405N0731    , 405N0732    , 405N0733    , 405N0734    , 405N0735    ,
                      405N0736    , 405N0737    , 405N0738    ,
3435                  405N0739    , 405N0740    , 405N0741    , 405N0742    , 405N0743    ,
                      405N0744    , 405N0745    , 405N0746    ,
3436                  405N0747    , 405N0748    , 405N0749    , 405N0750    , 405N0751    ,
                      405N0752    , 405N0753    ,  . . .      ,
3437
3438                                          *** DISCRETE CARTESIAN RECEPTOR POINTS ***
3439
3440                                       ** CONC OF DPM      IN
                                           MICROGRAMS/M**3                          **
3441
3442          X-COORD (M)   Y-COORD (M)        CONC                      X-COORD (M)   Y-COORD
              (M)        CONC
3443    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
        - - - - - - - - - - - - - - - - - - -
3444          364522.00    3789971.00       10.37402                    364522.00
              3789971.00       10.37402
3445          364523.00    3789983.00       10.32233                    364523.00
              3789983.00       10.32233
3446          364523.00    3789994.00       10.33913                    364523.00
              3789994.00       10.33913
3447          364523.00    3790003.00       10.35275                    364523.00
              3790003.00       10.35275
3448          364540.00    3789994.00        9.26173                    364523.00
              3790020.00       10.37819
3449          364523.00    3790028.00       10.39011                    364523.00
              3790036.00       10.40202
```

3450	364539.00	3790025.00	9.35665	364539.00
	3790035.00	9.36857		
3451	364565.00	3790035.00	8.04742	364570.00
	3790003.00	7.80688		
3452	364566.00	3789991.00	7.96647	364565.00
	3789968.00	7.98938		
3453	364546.00	3789974.00	8.90758	364546.00
	3789974.00	8.90758		
3454	364524.00	3790013.00	10.29754	364524.00
	3790013.00	10.29754		
3455	364551.00	3790013.00	8.69000	364551.00
	3790013.00	8.69000		
3456	364484.70	3789924.90	13.71117	364494.70
	3789924.90	12.60280		
3457	364504.70	3789924.90	11.65394	364514.70
	3789924.90	10.83241		
3458	364524.70	3789924.90	10.11409	364534.70
	3789924.90	9.48062		
3459	364544.70	3789924.90	8.91778	364554.70
	3789924.90	8.41438		
3460	364564.70	3789924.90	7.96149	364574.70
	3789924.90	7.55191		
3461	364484.70	3789939.90	13.75475	364494.70
	3789939.90	12.63982		
3462	364504.70	3789939.90	11.68575	364514.70
	3789939.90	10.86001		
3463	364524.70	3789939.90	10.13818	364534.70
	3789939.90	9.50177		
3464	364544.70	3789939.90	8.93641	364554.70
	3789939.90	8.43086		
3465	364564.70	3789939.90	7.97610	364574.70
	3789939.90	7.56491		
3466	364484.70	3789954.90	13.79714	364494.70
	3789954.90	12.67594		
3467	364504.70	3789954.90	11.71685	364514.70
	3789954.90	10.88700		
3468	364524.70	3789954.90	10.16175	364534.70
	3789954.90	9.52244		
3469	364544.70	3789954.90	8.95460	364554.70
	3789954.90	8.44692		
3470	364564.70	3789954.90	7.99032	364574.70
	3789954.90	7.57753		
3471	364484.70	3789969.90	13.83854	364494.70
	3789969.90	12.71123		
3472	364504.70	3789969.90	11.74726	364514.70
	3789969.90	10.91339		
3473	364524.70	3789969.90	10.18478	364534.70
	3789969.90	9.54263		
3474	364544.70	3789969.90	8.97236	364554.70
	3789969.90	8.46257		
3475	364564.70	3789969.90	8.00415	364574.70
	3789969.90	7.58977		
3476	364484.70	3789984.90	13.87940	364494.70
	3789984.90	12.74604		
3477	364504.70	3789984.90	11.77721	364514.70
	3789984.90	10.93936		
3478	364524.70	3789984.90	10.20741	364534.70
	3789984.90	9.56242		
3479	364544.70	3789984.90	8.98972	364554.70
	3789984.90	8.47784		
3480	364564.70	3789984.90	8.01760	364574.70
	3789984.90	7.60167		
3481	364484.70	3789999.90	13.91957	364494.70
	3789999.90	12.78033		
3482	364504.70	3789999.90	11.80674	364514.70
	3789999.90	10.96496		

*** MODELOPTs: NonDFAULT CONC FLAT NODRYDPLT NOWETDPLT RURAL NoUrbTran ADJ_U*

*** THE PERIOD (43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): 405N0726 , 405N0727 , 405N0728 , 405N0729 , 405N0730 ,
405N0731 , 405N0732 , 405N0733 , 405N0734 , 405N0735 , 405N0736 , 405N0737 , 405N0738 ,
405N0739 , 405N0740 , 405N0741 , 405N0742 , 405N0743 , 405N0744 , 405N0745 , 405N0746 ,
405N0747 , 405N0748 , 405N0749 , 405N0750 , 405N0751 , 405N0752 , 405N0753 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
364544.70	3789999.90	9.00679	364554.70	3789999.90	8.49281
364564.70	3789999.90	8.03078	364574.70	3789999.90	7.61328
364484.70	3790014.90	13.95919	364494.70	3790014.90	12.81416
364504.70	3790014.90	11.83589	364514.70	3790014.90	10.99023
364524.70	3790014.90	10.25170	364534.70	3790014.90	9.60111
364544.70	3790014.90	9.02359	364554.70	3790014.90	8.50754
364564.70	3790014.90	8.04370	364574.70	3790014.90	7.62463
364484.70	3790029.90	13.99887	364494.70	3790029.90	12.84797
364504.70	3790029.90	11.86495	364514.70	3790029.90	11.01535
364524.70	3790029.90	10.27353	364534.70	3790029.90	9.62012
364544.70	3790029.90	9.04019	364554.70	3790029.90	8.52204
364564.70	3790029.90	8.05640	364574.70	3790029.90	7.63577
364484.70	3790044.90	14.03860	364494.70	3790044.90	12.88183
364504.70	3790044.90	11.89404	364514.70	3790044.90	11.04048
364524.70	3790044.90	10.29533	364534.70	3790044.90	9.63908
364544.70	3790044.90	9.05669	364554.70	3790044.90	8.53644
364564.70	3790044.90	8.06897	364574.70	3790044.90	7.64675
364484.70	3790059.90	14.07822	364494.70		

```
          3790059.90       12.91563
          364504.70    3790059.90       11.92310                        364514.70
          3790059.90       11.06562
          364524.70    3790059.90       10.31713                        364534.70
          3790059.90        9.65803
          364544.70    3790059.90        9.07318                        364554.70
          3790059.90        8.55080
          364564.70    3790059.90        8.08148                        364574.70
          3790059.90        7.65765
FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
I-405                          ***        12/13/22
 *** AERMET - VERSION  16216 ***
 ***                                                                      ***
 17:15:37

                                PAGE 101
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*

                                        *** THE SUMMARY OF MAXIMUM PERIOD ( 43848 HRS)
                                        RESULTS ***


                                    ** CONC OF DPM      IN
                                    MICROGRAMS/M**3                          **

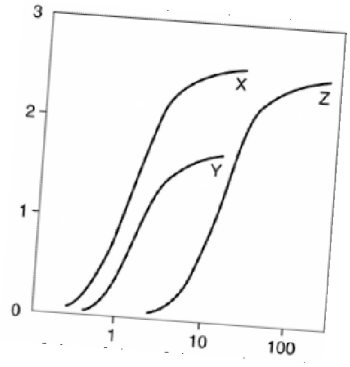

                     NETWORK
GROUP ID                        AVERAGE CONC                RECEPTOR  (XR, YR, ZELEV,
ZHILL, ZFLAG)  OF TYPE  GRID-ID
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - -

I-405N    1ST HIGHEST VALUE IS       7.62455 AT (  364484.70,  3790059.90,   235.00,
235.00,    0.00)  DC
          2ND HIGHEST VALUE IS       7.60277 AT (  364484.70,  3790044.90,   235.00,
          235.00,    0.00)  DC
          3RD HIGHEST VALUE IS       7.58077 AT (  364484.70,  3790029.90,   235.00,
          235.00,    0.00)  DC
          4TH HIGHEST VALUE IS       7.55865 AT (  364484.70,  3790014.90,   235.00,
          235.00,    0.00)  DC
          5TH HIGHEST VALUE IS       7.53641 AT (  364484.70,  3789999.90,   235.00,
          235.00,    0.00)  DC
          6TH HIGHEST VALUE IS       7.51356 AT (  364484.70,  3789984.90,   235.00,
          235.00,    0.00)  DC
          7TH HIGHEST VALUE IS       7.48997 AT (  364484.70,  3789969.90,   235.00,
          235.00,    0.00)  DC
          8TH HIGHEST VALUE IS       7.46571 AT (  364484.70,  3789954.90,   235.00,
          235.00,    0.00)  DC
          9TH HIGHEST VALUE IS       7.44045 AT (  364484.70,  3789939.90,   235.00,
          235.00,    0.00)  DC
         10TH HIGHEST VALUE IS       7.41402 AT (  364484.70,  3789924.90,   235.00,
         235.00,    0.00)  DC

I-405S    1ST HIGHEST VALUE IS       6.45367 AT (  364484.70,  3790059.90,   235.00,
235.00,    0.00)  DC
          2ND HIGHEST VALUE IS       6.43583 AT (  364484.70,  3790044.90,   235.00,
          235.00,    0.00)  DC
          3RD HIGHEST VALUE IS       6.41809 AT (  364484.70,  3790029.90,   235.00,
          235.00,    0.00)  DC
          4TH HIGHEST VALUE IS       6.40054 AT (  364484.70,  3790014.90,   235.00,
          235.00,    0.00)  DC
          5TH HIGHEST VALUE IS       6.38317 AT (  364484.70,  3789999.90,   235.00,
          235.00,    0.00)  DC
          6TH HIGHEST VALUE IS       6.36584 AT (  364484.70,  3789984.90,   235.00,
          235.00,    0.00)  DC
          7TH HIGHEST VALUE IS       6.34857 AT (  364484.70,  3789969.90,   235.00,
```

```
            235.00,    0.00)  DC
3555        8TH HIGHEST VALUE IS       6.33143 AT (  364484.70,  3789954.90,   235.00,
            235.00,    0.00)  DC
3556        9TH HIGHEST VALUE IS       6.31430 AT (  364484.70,  3789939.90,   235.00,
            235.00,    0.00)  DC
3557       10TH HIGHEST VALUE IS       6.29715 AT (  364484.70,  3789924.90,   235.00,
           235.00,    0.00)  DC
3558
3559   ALL       1ST HIGHEST VALUE IS      14.07822 AT (  364484.70,  3790059.90,   235.00,
       235.00,    0.00)  DC
3560        2ND HIGHEST VALUE IS      14.03860 AT (  364484.70,  3790044.90,   235.00,
            235.00,    0.00)  DC
3561        3RD HIGHEST VALUE IS      13.99887 AT (  364484.70,  3790029.90,   235.00,
            235.00,    0.00)  DC
3562        4TH HIGHEST VALUE IS      13.95919 AT (  364484.70,  3790014.90,   235.00,
            235.00,    0.00)  DC
3563        5TH HIGHEST VALUE IS      13.91957 AT (  364484.70,  3789999.90,   235.00,
            235.00,    0.00)  DC
3564        6TH HIGHEST VALUE IS      13.87940 AT (  364484.70,  3789984.90,   235.00,
            235.00,    0.00)  DC
3565        7TH HIGHEST VALUE IS      13.83854 AT (  364484.70,  3789969.90,   235.00,
            235.00,    0.00)  DC
3566        8TH HIGHEST VALUE IS      13.79714 AT (  364484.70,  3789954.90,   235.00,
            235.00,    0.00)  DC
3567        9TH HIGHEST VALUE IS      13.75475 AT (  364484.70,  3789939.90,   235.00,
            235.00,    0.00)  DC
3568       10TH HIGHEST VALUE IS      13.71117 AT (  364484.70,  3789924.90,   235.00,
           235.00,    0.00)  DC
3569
3570
3571    *** RECEPTOR TYPES:  GC = GRIDCART
3572                         GP = GRIDPOLR
3573                         DC = DISCCART
3574                         DP = DISCPOLR
3575   FF *** AERMOD - VERSION 22112  ***   ***  Valor Elementary Exposure To DPM From
       I-405                          ***        12/13/22
3576    *** AERMET - VERSION  16216 ***
        ***                                                                  ***
        17:15:37
3577
                                   PAGE 102
3578    *** MODELOPTs:    NonDFAULT  CONC  FLAT  NODRYDPLT  NOWETDPLT  RURAL  NoUrbTran  ADJ_U*
3579
3580    *** Message Summary : AERMOD Model Execution ***
3581
3582     --------- Summary of Total Messages --------
3583
3584    A Total of            0 Fatal Error Message(s)
3585    A Total of            9 Warning Message(s)
3586    A Total of          839 Informational Message(s)
3587
3588    A Total of        43848 Hours Were Processed
3589
3590    A Total of          604 Calm Hours Identified
3591
3592    A Total of          235 Missing Hours Identified (  0.54 Percent)
3593
3594
3595       ******** FATAL ERROR MESSAGES ********
3596                 ***  NONE  ***
3597
3598
3599       ********   WARNING MESSAGES   ********
3600    CO W151       7       MODOPT: Non-DFAULT NoUrbTran option selected on MODELOPT
        Keyword
3601    ME W186     937       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold
```

```
      used           0.50
3602  ME W187     937       MEOPEN: ADJ_U* Option for Stable Low Winds used in
      AERMET
3603  OU W565     941       PERPLT: Possible Conflict With Dynamically Allocated FUNIT
      PLOTFILE
3604  OU W565     942       PERPLT: Possible Conflict With Dynamically Allocated FUNIT
      PLOTFILE
3605  OU W565     943       PERPLT: Possible Conflict With Dynamically Allocated FUNIT
      PLOTFILE
3606  OU W565     944       PERPST: Possible Conflict With Dynamically Allocated FUNIT
      POSTFILE
3607  OU W565     945       PERPST: Possible Conflict With Dynamically Allocated FUNIT
      POSTFILE
3608  OU W565     946       PERPST: Possible Conflict With Dynamically Allocated FUNIT
      POSTFILE
3609
3610     ************************************
3611     *** AERMOD Finishes Successfully ***
3612     ************************************
3613
3614
```



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litgation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Immanent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (M*t*BE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of M*t*BE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of M*t*BE, and is suspected to be the primary cause of M*t*BE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been were used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client –Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)
Association for Environmental Health and Sciences (AEHS)
American Chemical Society (ACS)
California Redevelopment Association (CRA)
International Society of Environmental Forensics (ISEF)
Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

Sullivan, P., **J.J. J. Clark,** F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities.* Elsevier, Inc. Burlington, MA.

Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.

Sullivan, P., Agardy, F.J., and **J.J.J. Clark**. 2005. *The Environmental Science of Drinking Water*. Elsevier, Inc. Burlington, MA.

Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions.* Trafford Publishing, Victoria B.C.

Clark, J.J.J. 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment.* Art Diaz, Ed.. Oxford University Press: New York.

Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment.* Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equialency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. Organohalogen Compounds, Volume 70 (2008) page 002254.

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

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research.* 105:194-199.

Rosenfeld, P.E., **Clark, J. J.,** Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" Water Science & Technology. 55(5): 345-357.

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.

Clark, J.J.J. 2003. "Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophnoxyacetic Acid (2,4-D) in California Drinking Water Supplies." National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

Rosenfeld, P. and **J.J.J. Clark**. 2003. "Understanding Historical Use, Chemical Properties, Toxicity, and Regulatory Guidance" National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Phoenix, AZ. February 21, 2003.

Clark, J.J.J., Brown A. 1999. Perchlorate Contamination: Fate in the Environment and Treatment Options. In Situ and On-Site Bioremediation, Fifth International Symposium. San Diego, CA, April, 1999.

Clark, J.J.J. 1998. Health Effects of Perchlorate and the New Reference Dose (RfD). Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.

Browne, T., **Clark, J.J.J.** 1998. Treatment Options For Perchlorate In Drinking Water. Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.

Clark, J.J.J., Brown, A., Rodriguez, R. 1998. The Public Health Implications of MtBE and Perchlorate in Water: Risk Management Decisions for Water Purveyors. Proceedings of the National Ground Water Association, Anaheim, CA, June 3-4, 1998.

Clark J.J.J., Brown, A., Ulrey, A. 1997. Impacts of Perchlorate On Drinking Water In The Western United States. U.S. EPA Symposium on Biological and Chemical Reduction of Chlorate and Perchlorate, Cincinnati, OH, December 5, 1997.

Clark, J.J.J.; Corbett, G.E.; Kerger, B.D.; Finley, B.L.; Paustenbach, D.J. 1996. Dermal Uptake of Hexavalent Chromium In Human Volunteers: Measures of Systemic Uptake From Immersion in Water At 22 PPM. Toxicologist. 30(1):14.

Dodge, D.G.; **Clark, J.J.J.**; Kerger, B.D.; Richter, R.O.; Finley, B.L.; Paustenbach, D.J. 1996. Assessment of Airborne Hexavalent Chromium In The Home Following Use of Contaminated Tapwater. Toxicologist. 30(1):117-118.

Paulo, M.T.; Gong, H., Jr.; **Clark, J.J.J.** (1992). Effects of Pretreatment with Ipratroprium Bromide in COPD Patients Exposed to Ozone. American Review of Respiratory Disease. 145(4):A96.

Harber, P.H.; Gong, H., Jr.; Lachenbruch, A.; **Clark, J.**; Hsu, P. (1992). Respiratory Pattern Effect of Acute Sulfur Dioxide Exposure in Asthmatics. American Review of Respiratory Disease. 145(4):A88.

McManus, M.S.; Gong, H., Jr.; Clements, P.; **Clark, J.J.J.** (1991). Respiratory Response of Patients With Interstitial Lung Disease To Inhaled Ozone. American Review of Respiratory Disease. 143(4):A91.

Gong, H., Jr.; Simmons, M.S.; McManus, M.S.; Tashkin, D.P.; Clark, V.A.; Detels, R.; **Clark, J.J.** (1990). Relationship Between Responses to Chronic Oxidant and Acute

Ozone Exposures in Residents of Los Angeles County. American Review of Respiratory Disease. 141(4):A70.

Tierney, D.F. and **J.J.J. Clark.** (1990). Lung Polyamine Content Can Be Increased By Spermidine Infusions Into Hyperoxic Rats. American Review of Respiratory Disease. 139(4):A41.

EXHIBIT B

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

WI #22-005.35

December 14, 2022

Kevin T. Carmichael
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

SUBJECT: Comments on Valor Elementary School Project Noise and Vibration Study

Dear Mr. Carmichael,

Per your request, I have reviewed the Noise and Vibration Study for the Valor Elementary School Project Mitigated Negative Declaration (MND) in the Mission Hills – Panorama City – North Hills Community Plan Area in the City of Los Angeles, California. The proposed project involves the construction of a one and two-story elementary school building, a multi-purpose room, administrative offices, covered outdoor dining, and surface parking on the project site. The Noise and Vibration Impact Analysis is contained in Section XIII of the MND, with supplemental calculations in Appendix I Noise and Vibration Study (Noise Study).

The Project is surrounded by noise sensitive uses – residences directly adjacent to the east, south and west, and residences to the north across Plummer Street, as well as Plummer Village Senior Community Center to the east of the site.

Baseline Noise Level characterizations are Incomplete

The noise analysis relies on two short-term measurements of 15-minute duration, on Wednesday, May 25, 2022, between 8:57 a.m. and 9:31 a.m. (MND page 102) and one 14-hour long-term measurement on May 25th and 26th (MND page 103).

The manner in which the MND has determined the existing noise environment is poorly supported. The noise environment is affected by transportation sources that can change from hour to hour and day to day, and best practices call for documentation of the existing condition with measurements at different times over several days. The long-term noise measurement would seem to document these changes, but is located at the back of the project site, is partially shielded from both nearby streets and does not capture traffic patterns at residences close to Plummer Street. As shown in Tables 18 and 19, the short-term Leq at location ST-1 is more than 10 dB higher than the same time frame at LT-1.

Higher baseline noise levels at the residences on Plummer Street would result in a noise environment that exceeds the normally acceptable CNEL levels for single-family homes per the Land Use and Noise Compatibility Matrix presented (MND page 105).

The MND should include an updated baseline analysis that incorporates noise measurements taken at key locations over a multi-day period, and to provide supporting information to validate the results.

Thresholds of Significance are Not Properly Developed

Construction Noise

The Noise Study sites LAMC (City of Los Angeles Municipal Code) Section 112.05 construction threshold (MND page 108) of 75 dBA *maximum noise level at 50 feet from the source*. LA County Code of Ordinances Section 12.08.440[1] provides a more conservative daytime threshold *at residential structures* of 75 dB for short-term operation and 60 dBA for long-term operation (more than 10 days) of construction activities. The project Air Quality and Greenhouse Gas Study lists construction phase durations, all above 10 days (Appendix A, page 6). The grading work, for example, which the Noise Study analyses as a "high-intensity" construction scenario in Appendix B will last 43 days. Therefore, the 60 dB at residential structures county limit is more appropriate.

Impact Analyses are Incomplete

Construction Noise

The construction noise calculations use a minimum receptor distance of 50 feet, per cited LAMC threshold. However, multiple phases of ongoing construction activity, including grading work, may be as close as 6 feet from the adjacent residences, resulting in higher Lmax levels (108 dB).

RCM-1 (MND page 109) indicates the erecting of a noise barrier along the project boundaries. While the MND is correct that this could provide up to 15 dBA of reduction under optimistic circumstances, the barrier does not reduce predicted construction levels to below threshold of significance.

The calculations provided in Appendix B of the Noise Study use Spec Lmax reference levels for some equipment and Actual Lmax reference levels for others (per RCNM). This does not change the maximum predicted level, but it is unclear why these lower reference levels were selected.

A sample calculation taken from Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) is presented below compared to the MND analysis. Calculations were performed at 15516 Plummer Street, which is a single-family residence adjacent to the project site and 6 feet east of the project boundary.

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1 https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO

Table 1: Modeled Lmax Construction Noise Levels at 15516 Plummer Street

Equipment	Spec Lmax Source Level at 50 ft (dBA)	Calculated Noise Level at 6 ft (dBA)	Calculated Noise Level with 12-ft Barrier (dBA)	County Noise Limit (dBA)	Impact?
Grader	85	103	88	60	YES
Excavator	85	103	88	60	YES
Concrete Saw	90	108	93	60	YES
Activity Lmax:			93	60	YES

Based on the calculations above, a 30+ dBA increase over the MND noise threshold would occur during construction. At such levels, more study in an EIR is required, and mitigation to reduce the impact is required.

On-Site Operations Noise

The MND does not provide quantitative analysis for noise from on-site operations such as activity in the play area, trash-hauling, or traffic noise and other activity during pick up/drop off along the driveway directly adjacent to residences. These activities may result in an increase of 5 dB or more over the ambient, especially if amplified sound is used in the play area.

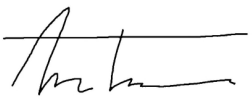
Conclusions

There are several errors and omissions in the MND noise analysis. Correcting these would potentially identify several significant impacts which require mitigation or an EIR.

Please feel free to contact me with any questions on this information.

Very truly yours,

WILSON IHRIG



Ani S. Toncheva
Senior Consultant

Wilson Ihrig Valor Elementary Noise A Toncheva 12142022.docx

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION



ANI TONCHEVA

Senior Consultant

Since joining the firm in 2011, Ani has conducted analyses for transit systems, vibration sensitive research facilities, public infrastructure, construction, and other environmental noise. She has contributed to literature reviews, including research on current practices of historical preservation. She has extensive experience working on construction projects in New York City and is well versed in local noise codes.

Education

- B.A., Physics; Bard College, New York

Professional Associations

- *Member*, National Council of Acoustical Consultants (NCAC)
- *Member*, Acoustical Society of America (ASA)
- *Board Member,* Transportation Research Forum (TRF), NY Chapter and International board

Research Paper

- NCHRP 25-25, *Current Practices to Address Construction Vibration and Potential Effects to Historic Buildings Adjacent to Transportation Projects*

Relevant Experience

BART Berryessa Station Transit Noise Impact and Mitigation, San Jose, CA Assisted with noise predictions and barrier design recommendations.

Massachusetts Bay Transportation Authority (MBTA) Green Line Extension (GLX), Boston, MA Lead analyst on noise predictions and barrier design.

RTD Eagle P3 Northwest Corridor Noise and Impacts, Denver, CO Assisted with data analysis and helped prepare final technical report.

Alameda CTC, I-880 Interchange Improvements Project (Whipple Road-Industrial Southwest and Industrial Parkway West), Hayward, CA Project Manager for traffic noise study.

Alameda CTC, I-80/Ashby Avenue Interchange Improvements, Berkeley, CA Project Manager for traffic noise study.

Millennium Bulk Terminal, Longview, WA Prepared noise analysis for the project's NEPA and SEPA environmental impact statements.

Peninsula Humane Society & SPCA Haskin Hill Sanctuary, Loma Mar, CA Prepared an environmental study for a planned animal sanctuary in Loma Mar.

Analog (ArtX) Hotel, Palo Alto, CA Prepared preliminary basis of design guidelines for a new five-story boutique hotel in a residential area.

Sunnydale Block 3A & 3B Mixed-Use Residential Development, San Francisco, CA Prepared a CCR Title 24 Noise Study Report for two, mixed-use, 5-story buildings.

Columbia University Medical Center Medical and Graduate Education Building, New York, NY Conducted baseline noise survey and performed attended noise measurements during preliminary construction work.

Hudson Yards Tower C Foundations and Utilities, New York, NY Conducted a baseline noise survey prior to construction work including a combination of long-term unattended and short-term attended noise measurements.

PANYNJ Lincoln Tunnel Helix Rehabilitation, NJ Assisted in developing construction noise control and mitigation plan and implementing a remote long-term noise monitoring program at three locations.

MSK 74th Street, New York, NY Conducted baseline noise survey, assisted in developing construction noise control and mitigation plan, and implemented a long-term noise monitoring program at two locations.

NY MTA No. 7 Line Subway Extension Ventilation Facility Construction, New York, NY The project involved mining and lining of two shafts and construction of a 2-story ventilation building.

NY MTA ESA/LIRR Grand Central Terminal Fit-Out, New York, NY Prepared the Contractor's noise and vibration control plan updates for fit-out work conducted underground at the Grand Central Terminal Suburban Level.

San Francisco Planning Department, Alameda Street Wet Weather Tunnel and Folsom Area Sewer Improvement, San Francisco, CA Noise and vibration analysis for Folsom Area stormwater infrastructure improvements.

World Trade Center Vehicle Security Center, New York, NY Conducted baseline noise surveys, assisted in developing construction noise control plans, and implementing a remote long-term noise monitoring program.

50 Pine Street Condominiums, New York, NY
Project involved evaluating mechanical noise at residential dwelling units for NYC noise code

Uptown Newport, Newport Beach, CA
Evaluation of noise levels due to mechanical equipment at adjacent property.

EXHIBIT C

Date : 11/22/2022 12:40:26 PM
From : "Maria Reyes"
To : "Esther Ahn"
Cc : "Brenda Kahinju"
Subject : Re: SCH Number (New SCH Number)

Thank you!

On Tue, Nov 22, 2022 at 12:28 PM Esther Ahn <esther.ahn@lacity.org> wrote:

> Hi Maria,
>
> Yes, I double-checked and this MND does not apply to the Code sections listed. There are no features of the project with State or State-/Area-/Regional-wide significance as it is an elementary school located on 2 lots of an urbanized area.
>
> Thanks so much!
> Esther
>
> On Tue, Nov 22, 2022 at 12:16 PM Maria Reyes <maria.reyes@lacity.org> wrote:
>
> > Esther Please confirm that your MND does not apply to the code below? So that I can confirm with the state.
> >
> > ---------- Forwarded message ---------
> > From: **Meng Heu** <Meng.Heu@opr.ca.gov>
> > Date: Tue, Nov 22, 2022 at 12:13 PM
> > Subject: SCH Number (New SCH Number)
> > To: Maria L Reyes <maria.reyes@lacity.org>
> >
> > Hello,
> >
> > Thank you for your CEQA document submission. We noticed that you only included a local review period for your submission, but it seems like this project potentially falls under California Code of Regulations (CCR) Section 15205 – Review by State Agencies and/or CCR Section 15206 – Projects of Statewide, Regional, or Areawide Significance.
> >
> > If this does fall under CCR Section 15205 or 15206, we will need to include a State review period in addition to the local review period and also assign

relevant State agencies to review your project.

Can you please verify that your agency determined this project does *not* fall under either CCR Section 15205 or 15206?

Meng Heu

Office of Planning and Research (OPR)

State Clearing House

***Note*: No reply, response, or information provided constitutes legal advice.

To view your submission, use the following link.
https://ceqasubmit.opr.ca.gov/Document/Index/283314/1

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Maria Reyes
Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Room 621
Los Angeles, CA 90012
T: (213) 978-1161 | Planning4LA.org



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Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
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Maria Reyes
Administrative Assistant

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December 7, 2022

Via Email and U.S. Mail
Vince Bertoni, Director
Planning Department
City of Los Angeles
200 N. Spring St., Suite 525
Los Angeles, CA 90012
Email: vince.bertoni@lacity.org

Esther Ahn, Planner
Planning Department
City of Los Angeles
200 N. Spring St., Room 763
Los Angeles, CA 90012
Email: esther.ahn@lacity.org

Via Email Only
Beatrice Pacheco, Chief Clerk
Los Angeles City Planning
Records Management
Email: beatrice.pacheco@lacity.org

Via Online Portal
https://recordsrequest.lacity.org/requests/new

Re: Request to Extend the Public Review and Comment Period for the Mitigated Negative Declaration for the Valor Elementary School Project (ENV-2022-5866-MND)

Dear Mr. Bertoni, Ms. Ahn, and Ms. Pacheco:

On behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"), we respectfully request that the City of Los Angeles ("City") extend the public review and comment period for the Mitigated Negative Declaration ("MND") prepared for the Valor Elementary School Project (ENV-2022-5866-MND) ("Project") proposed by Bright Star Schools ("Applicant") due to the City's failure to provide timely access to documents referenced in the MND during the public comment period.

The California Environmental Quality Act ("CEQA") and the CEQA Guidelines require that "all documents referenced" and "all documents incorporated by reference" in an environmental review document shall be "readily accessible to

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the public during the lead agency's normal working hours" during the entire public comment period.[1] On December 2, 2022, we requested that the City provide immediate access to any and all documents referenced or relied upon in the MND prepared for the Project.[2] On December 6, 2022, we received an email from the City Clerk notifying us that our request for documents referenced in the MND was closed and that the Clerk did not have any records pertinent to our request. Additionally, on December 5, 2022, we received an email from Beatrice Pacheco in the Planning Records Management Division advising us that our request was received but did not include any responsive documents. As of December 7, 2022, we have not received a substantive response from the City Planning Department with information on how to access the missing MND reference documents.

After reviewing the MND and its appendices we found that it did not contain critical reference documents. Specifically, the City failed to provide access to files from the MND's AERMOD dispersion model analysis. Access to the unlocked, underlying AERMOD files in their native format is necessary for the public to validate the findings in the MND's Health Risk Assessment. Additionally, the City has not provided hyperlinks to, or copies of, the following documents referenced in the MND:

- Campbell, R.H., C.J. Wills, P.J. Irvine, and B.J. Swanson. 2014. Preliminary geologic map of the Los Angeles 30' x 60' quadrangle, California, Version 2.1. [map.] California Geological Survey, Preliminary Geologic Map Series, scale 1:100,000.

- Crocker, Malcolm J. Crocker (Editor). 2007. *Handbook of Noise and Vibration Control Book*, ISBN: 978-0-471-39599-7, Wiley-VCH, October.

- Jefferson, G.T. 2010. A catalogue of late Quaternary vertebrates from California. *Natural History Museum of Los Angeles County Technical Report.* Volume 7, pp. 5-172

- Kinsler, Lawrence E. and R. Frey, Austin and B. Coppens, Alan and V. Sanders, James. 1999. Fundamentals of Acoustics, 4th Edition. ISBN 0-471-84789-5. Wiley-VCH, December 1999.

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[1] Pub. Resources Code § 21092(b)(1); 14 C.C.R. § 15072(g)(4); see *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.

[2] **Exhibit A**: Letter from Adams, Broadwell, Joseph & Cardozo ("ABJC") to the City of Los Angeles re: Request for Access to Documents Referenced in the Mitigated Negative Declaration for the Valor Elementary School Project (ENV-2022-5866-MND) (December 2, 2022).

- McLeod, S. 2019. Letter response to request for unpublished museum collections records. Los Angeles County Museum of Natural History dated August 6, 2018.

- Schremp, Gordon. 2017. Senior Fuels Specialist, California Energy Commission. Personal communication via phone and email regarding fuel consumption data by county with Lance Park, Associate Planner, Rincon Consultants, Inc. August 22, 2017.

- South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. April 1993.

- Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee.

- University of California Davis-Caltrans Air Quality Project. 2006. *Estimating Mobile Source Air Toxics Emissions: A Step-By-Step Project Analysis Methodology*.

- Intergovernmental Panel on Climate Change (IPCC). 2014. Climate Change 2014: Mitigation of Climate Change. Summary for Policymakers - Contribution of Working Group III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

- _____. 2007. GreenLA. An Action to Lead the Nation in Fighting Global Warming. May 2007.

- Parmesan, C. August 2006. Ecological and Evolutionary Responses to Recent Climate Change. Annual Review of Ecological Evolutionary Systems 37:637-669.

- _____. 2020. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2018. U. S. EPA #430-R-19-001. Washington, DC. April 13, 2020.

The courts have held that the failure to provide even a few pages of a CEQA document for a portion of the review and comment period invalidates the entire CEQA process, and that such a failure must be remedied by permitting additional

public comment.[3] It is also well settled that a CEQA document may not rely on hidden studies or documents that are not provided to the public.[4] By failing to make all documents referenced and incorporated by reference in the MND "readily available" during the current comment period, the City is violating the clear procedural mandates of CEQA to the detriment of CREED LA and other members of the public who wish to meaningfully review and comment on the MND.

Without access to all of the relevant documents relied upon and incorporated by reference by the City in its preparation of the MND during the entire public comment period, CREED LA and other members of the public are precluded from having this meaningful opportunity to review the MND. In particular, the public is unable to evaluate the accuracy of the analyses contained in the MND and the significance of any impacts the Project may or may not have on the environment.

Accordingly, we request that:

1) The City immediately provide us with access to the unlocked, underlying files from the MND's AERMOD dispersion model analysis in their native format, files from all other technical analyses in their native formats, as well any other documents referenced in the MND that have not been provided by the City.

2) The City extend the public review and comment period for the MND by at least 30 days from the date on which the City releases these documents for public review.

Given the shortness of time before the current comment deadline, please contact me as soon as possible with your response to this request, but no later than Friday, December 9, 2022.

Sincerely,

Kevin Carmichael

KTC:ljl

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[3] *Ultramar*, 17 Cal.App.4th at 699.

[4] *Santiago Cty. Water Dist. v. Cty. of Orange* (1981) 118 Cal.App.3d 818, 831 ("Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.").

Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-CU-SPR

1 message

Debora Masterson <deborawkart@gmail.com> Mon, Dec 5, 2022 at 3:18 AM
To: Esther Ahn <esther.ahn@lacity.org>

Dear Commissioners:

I have read through the Initial Documents and the Environmental Review that have been submitted by Brightstar for their plan to build a new publicly-funded charter elementary school in North Hills and the root issue is being overlooked. We do not need another elementary school in North Hills. We already have 12 elementary schools in a town of 5.5 square miles. We have an elementary school every 2.18 miles in our small town. We do not need another elementary school.

Long before Brightstar came into the picture, our community has been working on a better plan that we call The Plummer Street Project. Since April 2021, we have been working on designating the historic house that is situated on the property and built in 1914, as a Los Angeles Historic Cultural Monument. The Cultural Heritage Commission has unanimously approved the designation and we are awaiting final approval from LACC. Our grass-roots organization called The North Hills Preservation Consortium, presented our plan to obtain HCM designation, restore the house, create a small museum and new park for the community, to to the owner, to our councilwoman CD7 Monica Rodriguez, and to our North Hills East Neighborhood Council in August 2021. Councilwoman Monica Rodriguez reached out to the owner with an initial offering of $1.2 million to purchase the properties. We have offered to create a 501c3 non-profit organization to manage the historic house and museum, if that would please the city. Instead, the owner who doesn't live in our community, decided to sell his properties to Brightstar.

We have only one park in North Hills. North Hills is in the Very High Need for park space according to the Los Angeles County Park Needs Assessment Survey https://lacountyparkneeds.org/wp-content/root/FinalReportAppendixA/StudyArea_130.pdf North Hills has .5 park acres per 1,000 people compared to the rest of LA County which averages 3.3 park acres per 1,000. As North Hills becomes more dense with multi-unit dwellings, it is imperative that we have more pocket parks. Parks are a crucial part of any densely-populated community, not only for the well-being of our residents, but also to mitigate climate change. Unpaved ground absorbs water and parks reduce the urban heat island effect due to the abundance of asphalt and concrete in urban areas.

So my question to Los Angeles City Planning is why is this root issue not being addressed? We have 12 elementary schools and 1 park. Brightstar has checked all the correct boxes, dotted their I's and crossed their T's, but after all is said and done, it is just plain wrong to approve the construction of a new elementary school in North Hills.

Thank you for your consideration,

Debora Masterson

North Hills Preservation Consortium
plummerstreetproject@icloud.com
FB @PlummerStreetProject
#SavePlummerStreetProject
#PlummerStreetProject

Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-CU-SPR

2 messages

Debora Masterson <deborawkart@gmail.com> Sat, Nov 26, 2022 at 4:55 PM
To: Esther Ahn <esther.ahn@lacity.org>
Cc: Jill Akahoshi <jill.akahoshi@gmail.com>, Tina Purwin <tina@purwininsurance.com>, Charles Johnson <charliej6@msn.com>, Wil Negrete <wilnegrete@gmail.com>, Ervin Arevalo <ervin.arevalo@hotmail.com>, Wanda Weickert <cacwow@verizon.net>, Debra Francisco <djf7521@gmail.com>, Anita Goldbaum <ag16113@yahoo.com>

Dear Esther,

I hope you had a good Thanksgiving.

I am writing today about a notice that came to my attention via my neighbor about the Public Hearing scheduled for December 20, 2022 at 1pm regarding the proposed construction of a Valor Academy elementary school at 15526/15544 Plummer Street.

I added my email to the interested parties list several weeks ago after your suggestion. Why wasn't I notified about the public hearing? Why wasn't I notified about the Environmental Case Findings?

Also, I just tried the link and passcode for the hearing and it states the webinar starts at 11am. Is that correct?

Are you the Hearing Officer?

The notice states "IF you are unable to attend, you may contact the planner to provide written comment, obtain additional information, and/or review the project file." To whom should we be sending written comments?

I would like to know why the Environmental Case did not address the fact that they are building an elementary school within 500' of a freeway when **CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING ZONING INFORMATION FILE ZI NO. 2427 - FREEWAY ADJACENT ADVISORY NOTICE** states "Avoid locating the following sensitive uses within the project: schools, day care facilities and senior care centers."

I would like to know why LA City Planning is not addressing the fact that North Hills already has 12 elementary schools within 5.5 square miles of the proposed site and we do not need another school being built with our tax dollars during a time of declining enrollment and exorbitant building costs.

Sincerely,

Debora

North Hills Preservation Consortium
plummerstreetproject@icloud.com
FB @PlummerStreetProject
#SavePlummerStreetProject
#PlummerStreetProject

North Hills Preservation Consortium is dedicated to preserving the history and livability of our community.
"Keep the Vision"

IF YOU NO LONGER WISH TO RECEIVE UPDATES ON THE PLUMMER STREET PROJECT, REPLY 'STOP' IN THE SUBJECT LINE.

Esther Ahn <esther.ahn@lacity.org> Mon, Nov 28, 2022 at 3:28 PM
To: Debora Masterson <deborawkart@gmail.com>
Cc: Jill Akahoshi <jill.akahoshi@gmail.com>, Tina Purwin <tina@purwininsurance.com>, Charles Johnson <charliej6@msn.com>, Wil Negrete <wilnegrete@gmail.com>, Ervin Arevalo <ervin.arevalo@hotmail.com>, Wanda Weickert <cacwow@verizon.net>, Debra Francisco <djf7521@gmail.com>, Anita Goldbaum <ag16113@yahoo.com>

Good afternoon and I hope you had a wonderful Thanksgiving as well.

Regarding the hearing notice, I followed the legal procedures required by our Municipal Code which requires notice to a 500-foot radius as well as site posting & newspaper publication. Signing up for the Interested Parties List will ensure that you will, however, obtain a copy of the final decision letter in case you'd like to review it and/or appeal. Typically, the decision letter is only mailed out to adjacent properties, I believe.

The Environmental Case has recently become available for review. I wanted to ensure it was published well ahead of the public hearing so that members of the public may comment on both the project entitlements and any CEQA-related issues as well.

I am the Hearing Officer and I am also the assigned planner who can receive any written comments or submissions for inclusion in the case file and public record. I have been retaining all correspondence from you and will continue to do so until the project goes before the Commission so please feel free to continue sending any comments/submissions to me.

As part of the freeway-adjacency concerns, the project's environmental review included a supplemental Health Risk Assessment study as well as discussions on this matter in their air quality studies.

I would encourage you to pose any questions you have about the CEQA document or the proposed use at the Hearing Officer Hearing because the Applicant team will be there to provide you with a response. I've attached the Hearing Notice and Agenda below for your reference. The hearing is scheduled for 1:00pm, and not 11:00am, so please ensure you note the date/time if you plan on attending.

If you cannot attend, please continue sending any written correspondence to myself as I mentioned. There will also be another hearing before the City Planning Commission so you may have an opportunity to speak then as well.

Many thanks,
Esther
[Quoted text hidden]
--

Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
T: (213) 978-1486 | Planning4LA.org
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2 attachments

12_20 HO AGENDA .pdf
104K

CPC-2022-5865-CU-SPR Hearing Officer Hearing Notice.pdf
3961K

Esther Ahn <esther.ahn@lacity.org>

VALOR ACADEMY/BRIGHTSTAR CPC-2022-5865-SPR

2 messages

Debra Francisco <djf7521@gmail.com> Tue, Dec 20, 2022 at 6:05 PM
To: Esther Ahn <esther.ahn@lacity.org>

Dear Ms. Ahn - I was an attendee at today's hearing regarding Valor Academy's request for a CUP to construct a new school at the 15524/15526 Plummer St. location. I was able to speak and air my concerns and also that I do not support the construction of this school and urge that they not be granted said CUP.

While there were many comments from various organizations and local community residents who live near or adjacent to this property why was Debora Masterson of the LA Consortium not allowed to make a presentation as well as Valor? Was there a reason she was not permitted to provide her subject reports and input? I would respectfully like to know why and is that a normal procedure. I believe that both sides should have been presented at this hearing so everyone would be properly informed of what Valor Academy is proposing and what the opposition to their project is proposing as well. Without both sides being represented how can a proper decision be made.

In addition, I find grave fault with Valor Academy being allowed to rebuttal the statements made by the community both its residents and those from other organizations stating their concern as well as their reasons for not supporting this project. I have never attended meetings where a rebuttal was permitted. The party asking for the CUP made their presentations, the community and others provided comments both pro and con and that would have ended. Valor Academy being allowed to rebuttal is not "fair" in my opinion and if they were allowed the rebuttal then there should have been a comment to that rebuttal from the community as well; this is disturbing to me and thus created an "unfair advantage" as far as I am concerned toward Valor Academy.

The issues brought forth from Valor regarding equity, low income, language issues, having to drive to take their children to school are not issues for a decision on a Conditional Use Permit. Just about everyone can lay claim to those issues and that is not reason enough to allow Valor to receive a CUP. My mother had to drive me to all of my schools, grammar, middle and high school and there is no difference in our communities today; there are carpools, busses, and other modes of transportation.

The issue that Valor Academy presented that the "home" will remain is not forthcoming. They will not tear down the home, however, the inside of the property will be gutted, destroying the entire interior integrity of the home which maintains to this day, the 1914 crown moulding, the built ins, and other items that can never be replaced. They failed to state that in their presentation today that this will be done in order to create their Administration offices, which would result in wiring for computers, new desks, etc. and it will just become an outside shell.

Valor Academy can certainly find another location for their school in a more commercial area that would not encroach on the residents to enjoy the peace and quiet of their homes, nor destroy the historic value of this 1914 home, the oldest in our San Fernando Valley; once it is destroyed the history of our Valley and the way of life as it was known at that time will be destroyed. As I stated today at the hearing, this home is no less worthy to be saved than the Barbara Stanwyck home on Devonshire in Northridge and it is far older; the oldest home in the Valley.

Perhaps if Debora was allowed to make a presentation, others would have seen what would be proposed for this location and it is beautiful. The home would be restored and a grassy park area would be located adjacent to the home. Tours would be given by docents and would be of benefit to school children to learn about our Valley and also adults as well. There are plans to build a historic museum next to the home with artifacts from our Valley and also interest to everyone. The grassy area would have benches to sit and relax and enjoy lunch; school field trips could be scheduled at this home and preserve our history.
It will be a shame if this history was lost as it can never be regained again.

We do not need another school in North Hills; we have 12 schools and some of them are only filled to 1/2 capacity which these children can attend. Perhaps it would be temporary and the children can attend those schools until Valor Academy finds a more suitable place to build its school and those children can return. However, the Plummer St. location is not the place for another school and thus destroying a part of the San Fernando Valley history. Sometimes progress for progress sake is not the right thing to do; and this is not the right thing to do here.

I respectfully request that you vote NO to Valor Academy's request for a CUP to construct their school at the Plummer St. location.

Sincerely,
Debra Francisco
North Hills Resident Since 1985

Esther Ahn <esther.ahn@lacity.org> Thu, Dec 22, 2022 at 11:05 AM
To: Debra Francisco <djf7521@gmail.com>

Good morning,

Thank you for your comments.

At this time, there is only one project application filed at the subject location which is the Valor Academy project before us. The other project referenced by some members of the public is not a case that is filed before the City Planning Department so I cannot comment on that matter.

Accordingly, the Applicant is given time to make a presentation and then provide responses after every participants' testimony is heard.

In addition to your oral comments, I am confirming receipt of this email for further inclusion in the case file and public record.

Best,
Esther
[Quoted text hidden]
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LOS ANGELES CITY PLANNING

Esther Ahn
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E-NEWS

Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-CU-SPR

3 messages

Debora Masterson <deborawkart@gmail.com> Thu, Dec 29, 2022 at 3:48 PM
To: Esther Ahn <esther.ahn@lacity.org>
Cc: Monica Rodriguez <councilmember.rodriguez@lacity.org>, Cristian Tafoya <cristian.tafoya@lacity.org>, Paola Bassignana <paola.bassignana@lacity.org>

Esther Ahn,

Thank you for accepting these additional comments about the Brightstar plan for an elementary school at 15526/15544 PLUMMER STREET. I am the applicant for the Historic Cultural Monument application for the historic house at 15526 Plummer Street.

Here are my comments and questions about the initial hearing which took place on December 20, 2022 at 1pm.

From the beginning of the hearing, the Hearing Officer Esther Ahn and Brightstar representatives were talking in the present tense as if the plans have already been approved. Example: “We are building…We are providing…The school meets all development parameters. The drop-off and pick-up is entered off of Plummer St…There is a constant flow of traffic off of Plummer St. onto the site…”

The charter school was able to extend their presentation beyond their allotted time. The North Hills Preservation Consortium had asked to be able to also make a PPT presentation, but were declined. We were able to make 2-minute comments and were cut-off, if we went over. Then, the charter school was allowed unlimited time to rebut our arguments, but we were not allowed additional rebuttal time.

Hrag Hamalian showed a chart documenting their outreach to the community. I, and many others, can attest that their outreach was weak. Hrag Hamalian said he reached out to the community “time and time again”. That is not true. I was speaking to Brightstar’s marketing director John Bwarie 2 hours before a meeting that took place in the front yard of my neighbor’s house and Mr. Bwarie didn’t mention the meeting to me when we were speaking. I wasn’t invited, nor were any other residents around me. We suggested that Brightstar make a presentation to our grass-root organization North Hills Preservation Consortium and they never did. They said they preferred meeting with small groups and going door-to-door which in my opinion, was a ‘divide and conquer’ strategy.

In the CEQA it states, “No substantial evidence that the project will have a significant effect on the environment” and in the same paragraph states that the estimate is additional +1,000 car trips per day. That seems incompatible. How can +1000 additional car trips not have a significant effect on the environment?

It was stated that there was a RA-1 zone change? What is RE9-1? I have never heard that there was a zoning change. When did this happen?

Brightstar said their students are “100% eligible for CS universities.”… - ‘eligible’ what does that mean? All students from all schools are ‘eligible’ to attend CS universities.

Brightstar has no need to move their school from the Panorama City Baptist church because they just renewed their lease.

The Brightstar architect stated that the school buildings will blend in with the surrounding homes. This has got to be a joke?!! The property is surrounded by single-family, single-story homes. The school will have two-story buildings and they do not in any way, look similar to the custom ranch-style homes surrounding the properties.

The City Planning Hearing to vote on Brightstar is scheduled for 2-23-23. Brightstar submitted their initial plans to the city on August 18, 2022. They may have the green light in just 6 months. In contrast, the North Hills Preservation Consortium submitted our HCM nomination on January 22, 2022, 11 months ago and we still do not have the final designation, nor do we have a date for the LACC final hearing. We believe that Brightstar would prefer not to have the HCM and would request that the final Brightstar hearing not take place until the HCM final hearing with City Council has taken place.

Sincerely, Debora Masterson

North Hills Preservation Consortium
plummerstreetproject@icloud.com
FB @PlummerStreetProject
#SavePlummerStreetProject
#PlummerStreetProject

North Hills Preservation Consortium is dedicated to preserving the history and livability of our community.
“Keep the Vision"

Esther Ahn <esther.ahn@lacity.org> Thu, Dec 29, 2022 at 4:22 PM
To: Debora Masterson <deborawkart@gmail.com>
Cc: Monica Rodriguez <councilmember.rodriguez@lacity.org>, Cristian Tafoya <cristian.tafoya@lacity.org>, Paola Bassignana <paola.bassignana@lacity.org>

Good afternoon,

My apologies about speaking in present tense during the presentations. That is what I am accustomed to in describing proposed projects but there is absolutely no decision that has yet been made since I am not the decision-maker for the project.

Regarding the HCM nomination, I had last heard that the City Clerk expected the item to be on the next PLUM meeting some time in mid-January. I am hopeful that the HCM track will proceed prior to the CPC hearing as well, but the Planning Department has no control over scheduling items before City Councilmembers.

Thank you for your additional comments. I will be including them as part of the case file and public record.

Best,
Esther
[Quoted text hidden]
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Esther Ahn
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Councilmember Rodriguez <councilmember.rodriguez@lacity.org> Thu, Dec 29, 2022 at 4:23 PM
To: esther.ahn@lacity.org

Hello,

Thank you for taking the time to contact my office, and we appreciate your message. Due to the high volume of messages we receive, we will respond to your message in a timely manner.

Please do not hesitate to contact any of the district offices if you have any additional questions.

For media requests, please contact Walter Garcia at walter.garcia@lacity.org

We look forward to working together to provide the best services for our neighborhoods.

Pacoima District Office
13520 Van Nuys Blvd. Ste 209
Pacoima, CA 91331
818-485-0600

Sylmar District Office
14117 Hubbard St., D#1
Sylmar, CA 91342
818-756-8409

Sunland-Tujunga District Office
7747 Foothill Blvd.
Tujunga, CA 91042
818-352-3287

Los Angeles City Hall- Downtown
200 N. Spring St. Rm 455
Los Angeles, CA 90012
213-473-7007

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Sincerely,



Councilwoman Monica Rodriguez, 7th District
200 N Spring Street, Rm 455, Los Angeles, CA 90012
Phone: 213-473-7007 Fax: 213-847-0707
www.monicarodriguez.org



4/24 - 71

PETITION AGAINST ESTABLISHMENT OF SCHOOL AT 15526/15544 PLUMMER STREET

WE, the undersigned concerned residents, urge our leaders to prevent the establishment of a school, including but not limited to the currently proposed BrightStar's Valor Academy elementary school, at the location 15526/15544 Plummer Street or any location on Plummer Street between Sepulveda Blvd. and the #405 Freeway, for the following reasons:

1) **Traffic concerns:** The distance from 15544 Plummer Street to 15620 Plummer Street (home adjacent to the 405) is approximately 407 feet. Peak #405 freeway traffic coincides with school drop-off/pick-up traffic. Traffic is a big concern already on Plummer St. because of Sepulveda MS and Gifted/High Ability Magnet ½ block away. Charter schools typically do NOT offer bus service and do NOT exclusively attract local students which will increase the traffic issue.
2) **Pollution concerns:** the Los Angeles City Charter under Healthy Living states density within 500 feet of a freeway is to be discouraged.
3) **Noise concerns:** Valor Academy plans to have early childcare as well as late pick up, summer school, and fund-raising plans on the campus all year long, including evening events. This is incompatible with the single-family dwellings adjacent to the properties on three out of four property borders.
4) **21 schools in North Hills:** There is an abundance of school choices in North Hills. There are already 9 elementary schools, 7 middle schools, and 5 preschool/early education centers (not including many private homes providing childcare).
5) **1 Park:** North Hills has an average of 0.5 park acres per 1,000 people in contrast to the rest of LA County which has an average of 3.3 park acres per 1,000 people. North Hills is assessed in the 'very high' park need category. Our park vision is the park to be fenced and locked with someone on site during hours of operation.

Please include Full Name, Signature, Address, and Date in order to qualify.

FULL NAME (print)	SIGNATURE	ADDRESS	DATE
1. CARON JAMES GARRETT	Caron James Garrett	9608 LANGDON AVE	4-10-22
2. Mary Deutice	Mary Deutice	9555 Sepulveda Blvd Unit 2	4/10/22
3. Iwona Lunkiewicz	Lunkiewicz	9545 SEPULVEDA UNIT #2 NORTH HILLS, CA 91343	04/10/2022
4. JACEK LUNKIEWICZ		9545 SEPULVEDA UNIT 2 NORTH HILLS, CA 91343	04/10/2022
5. HayRon Lopez		9638 Orion Ave North Hills CA	4/10/2022
6. Silvia Lopez		15527 Superior	4/10/22
7. Daniel Arguello		15527 Superior St	4/10/22
8. Efra Gonzalez		15429 Vincennes	4-10-22

4

PETITION AGAINST ESTABLISHMENT OF SCHOOL AT 15526/15544 PLUMMER STREET

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FULL NAME (print)	SIGNATURE	ADDRESS	DATE
9. Rashid Fregoso	Rashid F.	15431 Superior St North Hills CA 91343	04/10-22
10. Mithra Rahmani		15431 Superior St. North Hills CA 91343	4/10/22
11. ~~LINDA KELSCH~~ ~~Linda Kelsch~~	Linda Kelsch	9505 Langdon Av North Hills 91343	4/10/22
12. CHARLES KELSCH	Charles Kelsch	9505 Langdon Av North Hills 91343	4/10/22
13. Wanda Weickert	Wanda Weickert	15445 Marilla North Hills 91342	4-10-22
14. Angela Panoncha	Angela Panoncha	15435 marilla North Hills CA 91343	4-10-22
15. W. PANONCHA	W. Panoncha	15435 MARILLA ST. N. HILLS, CA 91343	04/10/2022
16. Jodene Rubio		9535 Sepuveda Blvd unit 2 North Hills, 91343	04/10/2022

8

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17.	Jason Rubio		9535 Sepulveda Blvd Unit 2 North Hills 91343	04/10/2022
18.	George DeMarco		15444 Magnolia St North Hills 91343	4/10/22
19.	Tina Purwin		NH 91343 15535 Vincennes St	4-10-22
20.	Glen Humphrey		N.H 91343 15535 VINCENNES St	4/10/22
21.	JACKSON HUMPHREY		NH 91343 15535 Vincennes	4/10/22
22.	Jonah Humphrey		NH 91343 15535 Vincennes St	4/10/22
23.	Peter Gorsky		15429 VINCENNES ST	4/10/22
24.	Ken Wiedman		9328 Orion Ave	4/10/22
25.	KATHY SCHMIDT		9525 MARKLEIN N. H 91343	4/10/22
26.	LYNNE KRUGER		9501 MARKLEIN	4-10-22
27.	Charles H. Johnson		9424 Orion 91343	4-10-22

11

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28. Jacob Miranda		15654 Plummer St. North Hills 91343	4-10-22
29. Jennifer Miranda		15654 Plummer St North Hills 91343	4/10/22
30. Maverick Miranda		15654 Plummer St North Hills 913-43	4-10-22
31. Manny Miranda	Manny Miranda	15650 plummer	4-10-22
32. Valerie Miranda	Valerie Miranda	15650 Plummer	4-10-22
33. PATTY HOLLERS	Patty Hollers	9615 LANDON 91343	4-10-22
34. JERRY HOLLERS		9615 LANDON	4-10-22
35. Ibet Ganban		9638 Orion Ave North Hills	4/10/22
36. GINA PARCHAMENTO		9826 CANOGA AVE NORTH HILLS	4/10/22
37. Angelo & Val Mondragon		15445 Inecanos	4/10/22
38. VELIA Montenegro	Same	Same	4/10

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39.	JEFFERY PEDDIJANTO		9545 SEPULVEDA BLVD. # 1 NORTH HILLS	4/10/22
40.	Mana Garcia		9653 Langdon Ave. North Hills, 91343	4/10/22
41.	Teresa Garcia		9609 Langdon Ave N. Hills CA 91343	4/10/22
42.	RATHCHANEE WIWATTANASERI		9642 LANGDON AV NORTH HILLS, CA 91343	4/10/22
43.	Helen Griffin		9563 Langdon ave North Hills CA 91343	4/10/22
44.	Debora Masterson		9563 Langdon Ave North Hills CA	4/10/22
45.	Xochitl Hernandez		7522 Baird Ave. Reseda Ca.	4/11/22
46.	EVA PERLMAN		18355 Victory Blvd. Reseda CA 91335	4/11/22
47.	DEBRA J. FRANCISCO		16009 ECCLES ST. N. HILLS CA 91343	4-11-22
48.	DENNIS A. BUTKOVICH		16009 ECCLES ST. NORTH HILLS CA 91343	4/11/22
49.	HAROLD INE B. FRANCISCO		16009 ECCLES ST N. HILLS CA 91343	4-11-22

11

4-24

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FULL NAME (print)	SIGNATURE	ADDRESS	DATE
50. Michael Alan Roster	[signature]	12119 Riverside Dr. #304 Valley Village CA 91607	4-12-22
51. Felix Hachenberg	Felix Hachenberg	1745 Magnolia St. Granada Hills 91344	4-12-22
52. Richard A. Nixon	Richard A. Nixon	9602 Langdon Ave N.H. 91343	4-12-22
53. MARIA V. ALVAREZ	Maria V. Alvarez	9602 Langdon Av. North Hills CA 91343	
54. Samuel Campbell	[signature]	9556 Langdon Ave North Hills Ca	4/12/22
55. Emory Holmes II	[signature]	14039 Remington St Pacoima CA 91331	4/13/22
56. Brooke Rodriguez	Brooke Rodriguez	9551 Langdon Ave. No. Hills 91343	4-13-22
57. Magda Gomez	Magda Gomez	9608 Langdon North Hills 91343	4-14-22
58. MILLIE RIVERO	Millie Rivero	15921 Malden North Hills 91343	4-15-22
59. SLAMON PARA LAVENDER	[signature]	15855 Malden St. N. Hills CA 91343	4-15-22
60. Howard Twardoks	Howard Twardoks	15953 Malden St N. Hills Ca 91343	4-15-22

11

Jill has #61-81

5/10-138

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61.	JILL AKAKOSHI		9761 LANGDON AVE NORTH HILLS, CA 91343	4/12/2022
62.	NEKITA RICHARDSON	Nekita Richardson	9753 LANGDON AVE NORTH HILLS CA 91343	4/15/2022
63.	Alan Richardson	Alan Richardson	9753 LANGDON AVE NORTH HILLS, CA 91343	4/15/2022
64.	Margarita Ferrer		15504 Labrador St. North Hills CA 91343	4/15/2022.
65.	Jenny Villa		15541 VINCENNES NORTH HILLS, CA 91343	4/21/22
66.	TES VIVAR		15541 VINCENNES NORTH HILLS CA 91343	4/21/2022
67.	Chelsea Silos		15541 Vincennes st North Hills 91343	4/21/2022
68.	Michael Silos		15541 Vincennes st North Hills	4/21/2022
69.	MARTINA VILLAR		15541 VINCENNES ST. NORTH HILLS, CA	4/21/22
70.	ERICK ESTRADA		15412 KINZLEY NORTH HILLS, CA	4/23/22
71.	Mia Choi		15425 Superior North Hills. CA 91343	4/25/22

5/11 - 148

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Jennie Aijala	Jennie Aijala	15861 Malden St.	04/27/22
Phyllis Martin	Phyllis Martin	8604 Hazelle Ave North Hills, CA 91343	4/27/22
CYNTHIA PARKER	Cynthia Parker	15750 Chase St N Hills, CA 91343	4/29/22
George Batugo	George Batugo	16115 Magnolia St North Hills 91343	4/29/22
Patricia Cohen	Patricia Cohen	8041 Woodman Ave Panorama City CA 91402	4/29/22
Shirley Oles	Shirley Oles	8649 Collett Ave North Hills	4/29/22
Beatrice Remington	Beatrice Remington	15829 Chase St. North Hill, Ca 91343	5/3/22
David Magana		8609 Gloria ave. North Hills, CA. 91343	05-05-22
Dan Magana Jr		8615 Gloria Ave No. Hills, CA 91343	05-05-22.
Shawna Felix		16161 Madison St North Hills CA 91343	5/5/22

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93. Helen Twardoks	Helen Twardoks	15933 Malden St North Hills, CA 91342	4-15-2022
94. Fran Potaski	Fran Potaski	North Hills CA 91343 15921 Malden St	4-15-2022
95. J. Koslowsky	[signature]	10914 Rathburn Ave Porter Ranch CA 91326	4/17/2022
96. Evan Koslowsky	[signature]	13504 Valleyheart Dr N Sherman Oaks CA 91423	4/17/2022
97. CAROLE GARLAND	Carole Garland	10914 Rathburn Ave Porter Ranch CA 91326	4/17/2022
98. ROBERT KOSLOWSKY	[signature]	13504 Valleyheart Dr Sherman Oaks, CA 91423	4/17/2022
99. Sara Drost	Sara Drost	6906 Nestle Ave Resada, CA 91335	4/20/22
100. Celia Denecke	[signature]	10414 Cempston St N. Hollywood, CA	4/22/22
101. GERARD COSCIA	Gerard Coscia	16220 S.F. Mission GRANADA HILLS	4/24/22
102. James Rowerdink	[signature]	18900 Lahey St Porter Ranch	4/24/22

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50. Maria Ventura	[signature]	8835 Tobias Ave	
51. Cook rosas	[signature]	8926 orion	
52. Gregoria Soto	Gregoria Soto	9071 Rincon Ave	
53. Karina Rodriguez	Karina Rodriguez	11346 Adelphia Ave	
54. Maria B	M.B	8857 cedros	
55. Jazmin Rubio	[signature] K.	945 Willis Ave	4/30
56. Lissett Sanchez	Lissett Sanchez	14139 Delano St	4/30/2022
57. Guadalupe M		14662 Rayen	
58. Judith Velez	Judith Velez	13190 Bromont Ave Sylmar ca. 91342	4-30-2022
59. Kat Haro	Kat Haro	19200 Nordhoff St 701, Northridge CA	4-30-2022
60. Maria Cuevas	Maria Cuevas	12030 Sheldon 91324 Sun Valley	

Maria Lopez — Maria Lopez — 12030 Sheldon — 4-30-2022

Melvin Rico — [signature] — 11476 Neenach St. Sun Valley CA. 91352

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72. Claudia Macedo	Macedo	14913 Nurmis St. Sylmar	4/30/22
73. Wendy Zavala	Wendy Zavala	8814 Wilks ave.	4-30-22
74. Shirley Brown	[illegible]	13343 Varonen st	4-30-22
75. Pudor Estrada	[illegible]	12836 Sullivally	4-30-22
76. Doris Hernandez	Doris H	12030 Sheldrast Sunvalley	4-30 22
77. Joyce Lee	[illegible]	11845 Kathyann	4/30/22
78. Rima Mkhitarian	[illegible]	666 W. Doran St Glendale, CA 91203	4/30/22
79. Helen Angulano	[illegible]	12711 Branford Street Pacoima	4/30/22
80. Margaret Lopez	Margaret Lopez	9323 Telfair Ave. Sun Valley, CA	4/30/22
81. Manuel Gonzalez	Morisol Gonzalez	(818) 396-2679	4-30-29

10

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3) **Noise concerns:** Valor Academy plans to have early childcare as well as late pick up, summer school, and fund-raising plans on the campus all year long, including evening events. This is incompatible with the single-family dwellings adjacent to the properties on three out of four property borders.
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Please include Full Name, Signature, Address, and Date in order to qualify.

FULL NAME (print)	SIGNATURE	ADDRESS	DATE
61. Mireya Vides	[signature]	16750 Simonds St	4-30-22
62. Maria Calinte	Maria CA	13856 Hubbard	4.30.22
63. Ashley G. Villalobo	[signature]	9924 Bartee Av.	4/30/22
64. Catalina Jovel	[signature]	6935 hindsave North Hollywood CA 91605	
65. Flor A	Flor A	14669 Rayen St	4/30
66. Madejesus SU	madejesus SU	9924 bartee ab Arleta Cal	4-30-22
67. Janeth V			
68. Sylvia Aldana	Sylvia	1508 fifth st SF	4-30-22
69. Arely Rivera	[signature]	9125 Telfair St	4-30-22
70. Luis Marquez	[signature]	9125 telFair	4-30-22
71. Leticia Alvarado	[signature]	12234 E. Hershey St Sun Valley	4/30/22

FULL NAME (print)	SIGNATURE	ADDRESS	DATE

11

PETITION AGAINST ESTABLISHMENT OF SCHOOL AT 15526/15544 PLUMMER STREET

WE, the undersigned concerned residents, urge our leaders to prevent the establishment of a school, including but not limited to the currently proposed BrightStar's Valor Academy elementary school, at the location 15526/15544 Plummer Street or any location on Plummer Street between Sepulveda Blvd. and the #405 Freeway, for the following reasons:

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Please include Full Name, Signature, Address, and Date in order to qualify.

FULL NAME (print)	SIGNATURE	ADDRESS	DATE
39. Sergio Amescua		8969 Oneida Ave	4/30/22
40. Oralia Castro		12001 Allengen	4-30-22
41. Angelina Gonzalez			
42. Beatriz Martinez	Beatriz	Gruen St	4/30/22
43. Carlos Ales		(310) 429-6187	
44. Amparo Rivas		14130 Gruen st	4/30/22
45. Alex Flores		13594 Wingo	4/30/22
46. Irene Lopez		9601 Woodman Ave.	4/30/22
47. Emmanuel Martinez		14130 Gruen St	4/30/22
48. Maria Rodriguez	Maria Rodriguez	12100 Sheldon st	4-30-22
49. Betty A. Aguilar		11802 Peoria St. Sun Valley 91352	4/30/22

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FULL NAME (print)	SIGNATURE	ADDRESS	DATE
1. Matthew Meyer		4327 Freedom Pkwy #F Calabasas CA	4-30-22
2. Irene Mena-Acevedo		20301 Hiawatha St Chatsworth, CA 91311	4/30/22
3. Barbara Garcia		407 Fresh Meadows Simi Valley	4-30-22
4. Sarah Megan Heller		6201 Canby Ave Tarzana CA 91335	4/30/22
5. ARTURO. GONZALES		7414 SHIRLEY AVE RESEDA CA. 91335	4/30/22
6. Laura Rook	MARIA LOUDO	11541 ALT ST SUN VALLEY	4-30-22
7. Oscar Alonso	O. A.	9071 Rincon Ave Sun Valley 91352	4/30/22
8. Cristal Soto		9071 Rincon Ave Sun Valley 91352	04.30.2022

9

PETITION AGAINST ESTABLISHMENT OF SCHOOL AT 15526/15544 PLUMMER STREET

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FULL NAME (print)	SIGNATURE	ADDRESS	DATE
82. Elizabeth Torres	[signature]	Sun Valley	4-30-22
83. Catalina	[signature]	NORTHRIDGE	4-3-22
84. Maria W	[signature]	Panorama City	4/05/22
85.			
86.			
87.			
88.			
89.			
90.			
91.			
92.			

3

PETITION AGAINST ESTABLISHMENT OF SCHOOL AT 15526/15544 PLUMMER STREET

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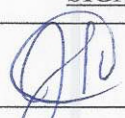
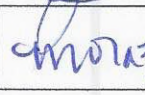
FULL NAME (print)	SIGNATURE	ADDRESS	DATE
Jessie Hoch		18675 Hillsboro Rd., Porter Ranch, CA 91326	4/24/22
Mindy Olazaba		15123 Kingsburg St Mission Hills, CA 91345	4/28/22

December 8, 2022

To: Esther Ahn

RE: CPC-2022-5865-CU-SPR

The community of North Hills has been working on a plan that we call The Plummer Street Project. Since April 2021, we have been working on designating the historic house that is situated on the property and built in 1914, as a Los Angeles Historic Cultural Monument. Our grass-roots organization called The North Hills Preservation Consortium, presented the plan to restore the house, create a small museum and new park for the community, to the owner, to the councilwoman CD7 Monica Rodriguez, and to North Hills East Neighborhood Council in August 2021. Councilwoman Monica Rodriguez reached out to the owner with an initial offering of $1.2 million to purchase the properties. We have offered to create a 501c3 non-profit organization to manage the historic house and museum, if that would please the city.

Creating a Park and a Museum at this property would bring together the residents of North Hills and surrounding areas. In-addition having a museum that would teach the younger generation and those that are new to the area the history of North Hills which is a big plus.

This park could be the community's hub. Having this park will provide a space to go to especially during the increasingly hot summers.

North Hills has a sufficient number of elementary schools but lacks outdoor space for its residents.

Please let's use this property for the good of all.

Regards

Fran Potaski
15921 Malden St
North Hills, CA

Esther Ahn <esther.ahn@lacity.org>

15544 Plummer St

1 message

I R <amri.ro@gmail.com> Wed, Jan 4, 2023 at 10:19 PM
To: "esther.ahn@lacity.org" <esther.ahn@lacity.org>

I would like to encourage the city to NOT move forward with the plans to build yet another school at the 15544 Plummer plot, it is already very congested.

Best,
-Irma ROsas

Esther Ahn <esther.ahn@lacity.org>

(no subject)

1 message

Isabel Carrillo <isabeljosjenjaz@gmail.com> Fri, Dec 16, 2022 at 9:24 AM
To: esther.ahn@lacity.org

Mi nombre es Maria carrillo.
Escribo para apoyar el proyecto de bright star school de construir un edificio permanente para la escuela primaria valor en 15526 plummer st.esta ubicación sería lo mejor para todos los niños que empiezan a formar parte de la familia valor academy y uno de ellos es mi hija joana carrillo ya que en la actualidad he tenido 2 hijos más en esta escuela y es frustrante que los cambien de lugar y no tengan algo estable.
Pero apesar de estos cambios esta escuela lo tiene todo academicamente.
Apoyo totalmente la construcción del edificio permanente en 15526 plummer st.
Para mi hija que apenas empieza k y me gustaría que ella tuviera algo más bonito estable ya que mis otros 2 hijos no pudieron. Hay más bebés en la familia y me gustaría que ellos pudieran disfrutar de esta nueva escuela y también la demás comunidad en general.
STTE:María carrillo

Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-CU-SPR and ENV-2022-5866-MND

2 messages

Jill Akahoshi <jill.akahoshi@gmail.com> Mon, Dec 12, 2022 at 5:02 PM
To: Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-CU-SPR and ENV-2022-5866-MND

Dear Esther,

I have been in the midst of a family emergency and have not been able to get through everything to make a complete list of comments and questions. As you had mentioned, I will be able to comment and ask questions even after this first public hearing on December 20 so hopefully I'll be able to get through more by then. In the meantime I have a few items to ask/comment on:

As this case is considered, we have heard much about there being so many schools in North Hills which there are, 12 elementary schools alone in an area of 5.31 square miles. During a time where LAUSD school enrollment is down and is projected to continue to decrease, it is responsible and reasonable to ask **"Is purchasing land and building new structures during a time when the cost of practically every is skyrocketing necessary? Is this a responsible use of public funds?"**

The public should be informed of the agreed upon sale price of 15526 Plummer Street and 15544 Plummer, costs associated with this project incurred so far and the projected cost of the building and development of this project as typically, public funds are used to fund these projects. The sale of the property was said to still be in escrow, disclosure of the sale price would not impede any negotiations, the deal has already been made. There is no reason for this non profit organization not to be fully transparent at this point.

I still do not understand what the ENV Action Date is, what does the end of the 20 day MND publication mean? I also do not understand why there is only an MND listed for this project, considering the fact that this project lies within 500 feet of the 405 freeway (schools are restricted from being within 500 feet of a freeway - **Z1-2427**)one of the busiest freeways in the country and that residents in North Hills are more likely to have asthma (88 percentile) than other census tracts in California (information from a CSUN graduate student project on North Hills East Resiliency). This project admittedly will generate more than 1000 additional daily trips to this area. A full EIR needs to be ordered right away and completed before anything else is decided.

Thank you,

Jill Akahoshi

Esther Ahn <esther.ahn@lacity.org> Tue, Dec 13, 2022 at 10:51 AM
To: Jill Akahoshi <jill.akahoshi@gmail.com>

Good morning,

There has been substantial evidence submitted to the record demonstrating that there will be no significant impacts, as defined by CEQA, with the imposition of Mitigation Measures and Regulatory Compliance Measures. Therefore, an EIR would not be required under CEQA. MNDs are required to have at least a 20-day public review period and I wanted to ensure that time frame was accommodated before the public hearing so that members of the public would have adequate time to prepare any questions and comments. This is only the Hearing Officer hearing though (for informational purposes only) and there will be another hearing when the project is considered before the City Planning Commission in February of next year.

Regarding your questions related to cost and real estate, I do not have information on this matter because it is not something we require from Applicants, but you are welcome to ask the question during the public hearing and direct it at the Applicant so that they may provide a response.

I will retain a copy of your email for inclusion in the case file so we have a record of it.

Many thanks,
Esther

[Quoted text hidden]

--

LOS ANGELES CITY PLANNING

Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
T: (213) 978-1486 | Planning4LA.org
E-NEWS

Esther Ahn <esther.ahn@lacity.org>

Plummer Street Project

1 message

Stedman, Karen <kstedman@ri-net.com> Tue, Dec 13, 2022 at 7:07 AM
To: "Esther.ahn@lacity.org" <Esther.ahn@lacity.org>

Hello Esther,

It's so important to preserve history and have respect for the community in which we all live. Let's please strive to make this world a better place for all.

I oppose the BrightStar Valor Academy. The neighborhood does not need another school.

Thank you,

Karen Stedman

This email transmission, including any attachments, is intended solely for the addressee named above, and may contain confidential or privileged information. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this e-mail is prohibited. If you have received this e-mail in error, please notify the sender immediately by reply email and destroy the message and its attachments.

Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

1 message

Laura Radke <radke.e.laura@gmail.com> Sun, Nov 27, 2022 at 3:22 PM
To: esther.ahn@lacity.org

Hi,

I would like to voice my support of the proposed project to restore the home located at 15526 Plummer Street and open the site to the public as a museum/park/open space. I think it's important to have a location dedicated to living history of the San Fernando Valley for my children and the community to learn and understand our past. Please add me to the list of stakeholders who are notified about future activities at this property.

Thank you,
Laura Radke
(323) 382-3439

Esther Ahn <esther.ahn@lacity.org>

Case # CPC-2020-5865-CU-SPR15526PlummerSt

1 message

Linda Edgington <gledgington@earthlink.net> Fri, Dec 16, 2022 at 9:07 AM
Reply-To: gledgington@earthlink.net
To: esther.ahn@lacity.org

Greetings Ms. Ahn,

I am writing to lend my support to those opposing the building of a charter school at the above address, hearing to be held 12/20/22.

You have no doubt received lengthier and more detailed positions against permitting a charter school on this property. My opinion reiterates that correspondence: I am against erasing early history of the valley; North Hills needs more open space (i.e. parks); the proposed school would be located too close to existing schools; there are adequate classrooms in the area.

Thank you for reviewing my opinion.

Linda S. Edgington

Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street & adjacent

1 message

Linda <lkelsch@pacbell.net> Mon, Dec 12, 2022 at 2:30 PM
To: "esther.ahn@lacity.org" <esther.ahn@lacity.org>
Cc: "superintendent@lausd.net" <superintendent@lausd.net>, "boardmembers@lausd.net" <boardmembers@lausd.net>

I am writing to you in hopes you will not approve a school build at **15526 Plummer Street. Building a** school there is a TERRIBLE idea.

Brightstar Valor should stay in its present location. It is already built & there is room to expand there. Moving the school would displace current students. It will require more water usage.

The property in question is a RESIDENTAL property and in a RESIDENTIAL neighborhood. It is a single story, single family dwelling which is surrounded on all sides by single story, single family dwellings.

There are already 12 existing elementary schools in North Hills, a town of 5.5 square miles with many empty classrooms. Another school is not needed or necessary.

Established trees would need to be removed which are needed for our air quality. New trees to replace some of those trees will require more water to be used

Traffic is already gridlocked during school drop off/pick up hours. Brightstar's Valor Academy would be approximately 1/2 block away from Sepulveda MS and 1/2 mile away from Carlos Santana ES, in the middle of the block on Plummer between Sepulveda Blvd. and Orion Ave., creating a *bigger* traffic nightmare. It will also create even more pollution/unhealthy air due to 1000 *more* idling vehicles that would result from school drop-offs/pickups.

We need open space. Mission Hills-Panorama City-North Hills have an average of 0.5 park acres per 1,000. LA County has an average of 3.3 park acres per 1,000 people. We are in dire need of open space preserved for the entire community. It would be great to restore the 1914 house, create a museum and new open space for the entire community. BrightStar Valor Academy's plan will not restore the house and it would not be open to the public. They will build upon some of the last open space available in North Hills. Building a school on the property will destroy the setting where the oldest house in North Hills is located. The house built in 1914 has been identified as a historic resource and is being considered to become LA's newest Historic Cultural Monument.

It is appalling BrightStar Valor would even consider building a school within approximately 500' of the 405 freeway. We live closer to Sepulveda (further east than 15526 Plummer) & the black freeway soot is a huge problem for us. See ZI NO. 2427- Freeway Adjacent Advisory Notice http://zimas.lacity.org/documents/zoneinfo/ZI2427.pdf states to "Avoid locating the following sensitive uses within the project: schools, day care facilities..." In April 2016, the LACC "...amended Articles 5 and 9 of Chapter IX of the L.A.M.C. requiring all new mechanically ventilated buildings located within 1,000 feet of the freeway to install air filtration media... Are the children going to be kept indoors at all times while at the school to avoid breathing in the black soot & exhaust fumes? No recess, no fresh air, no sunshine, no physical activity during the day?

Please do NOT approve a school build at 15526 Plummer Street & adjacent.

Thank you,
Linda Kelsch
North Hills, CA 91343

Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

2 messages

Linda Schwartz-Wright <Linda@awrightlaw.com> Mon, Oct 31, 2022 at 10:15 AM
To: "esther.ahn@lacity.org" <esther.ahn@lacity.org>

Hello!!

Please do all you can to prevent this unnecessary loss of a valuable historic property to a rich, deep pocketed businessperson, and for the following reasons:

- There are **already 12 existing elementary schools in North Hills,** a town of 5.5 square miles. We do not need to build another school.
- Building a new school on the property will destroy the setting where the oldest house in North Hills is located. **The house built in 1914 has been identified as a historic resource and is being considered to become LA's newest Historic Cultural Monument.**
- **Traffic is already gridlocked during school drop off/pick up hours.** Brightstar's Valor Academy will be 1/2 block away from Sepulveda MS and Carlos Santana ES in the middle of the block on Plummer between Sepulveda Blvd. and Orion Ave. creating a traffic nightmare.
- We want to restore the 1914 house, create a museum and new open space for the entire community. BrightStar Valor Academy's plan will not restore the house and it will not be open to the public. **They will build upon some of the last open space available in North Hills.**
- We need open space. Mission Hills-Panorama City-North Hills have an average of 0.5 park acres per 1,000. LA County has an average of 3.3 park acres per 1,000 people. **We are in dire need of open space preserved for the entire community.**

Thank you for your concern and assistance!

Linda Schwartz-Wright

Get Outlook for iOS

Esther Ahn <esther.ahn@lacity.org> Tue, Nov 1, 2022 at 10:00 AM
To: Linda Schwartz-Wright <Linda@awrightlaw.com>

Good morning,

Thank you for your comments.

I am confirming receipt of your email for inclusion in the case file and public record.

Many thanks,
Esther
[Quoted text hidden]
--

LOS ANGELES CITY PLANNING

Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
T: (213) 978-1486 | Planning4LA.org
E-NEWS

Esther Ahn <esther.ahn@lacity.org>

CPC 2022-5865-CU-SPR / 15526 Plummer

1 message

Marianne King <making@socal.rr.com> Mon, Dec 19, 2022 at 9:47 AM
To: esther.ahn@lacity.org

Hi Esther,

I won't be able to attend the Hearing Officer Hearing today but wanted to make the following comment/suggestions:

I appreciate that some of the large mature trees that will be preserved however overall a lot of trees are proposed to be removed, some of which could be preserved if a greater effort was made. This is a large site and as a proposed school, there certainly should be some flexibility and adjustments in the design to accommodate more of the existing trees on-site.

East Property Line – There is a row of existing tall Italian Cypress trees (tree# 12-17) along the east property line that will provide great screening for the adjacent residential properties from the school activities, such as the potential impacts of the turf field being so close (i.e. noise) and sports lights, etc.. The 8-foot high *with the existing tall trees* would go a step further to reduce impacts.

Black Walnuts – Every effort should be made to preserve tree# 44 which is huge and deserves to be preserved for the specimen that it is. Other trees, such as tree# 24, 27, 28 could be saved as a symbolic tribute to the history of the site. These trees are either within or very close to the proposed central play area. Here is an opportunity as a learning institution to teach our youth the importance of tree preservation and the history of these trees.

West Property Line – There are a lot of trees that could be saved along the west property line, such as tree# 50, 51 (Chinese Elms), and tree# 41-48.

As you know, the importance of preserving existing mature trees is almost critical at this point due to our excessive heat (especially in the Valley) and ongoing drought and water usage restrictions. The noted existing trees will provide ongoing benefits of significant natural shade and they need very little water. Removing large trees to be replaced with saplings is no longer (nor ever has been) true mitigation for the loss.

Thank you for your time,

Marianne King

Esther Ahn <esther.ahn@lacity.org>

RE: Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

1 message

Mimi Hess <hessmiriam@gmail.com>
To: "esther.ahn@lacity.org" <esther.ahn@lacity.org>

Wed, Nov

I am writing a in opposition to the plan to build an elementary school at 15526 Plummer Street. Bright Star Schools, a charter school company with nine schools in LA to purchase a historic home on Plummer Street and move one of their schools, Valor Academy, to North Hills, where there are already three Bright Star Schools. Howe member community group named the North Hills Preservation Consortium has a competing plan for the property on Plummer Street. They want to transform the prc museum dedicated to San Fernando's agricultural history and build a much-needed park.

1.
LA is OVERSATURATED WITH SCHOOLS! we don't need more.
There are 12 existing elementary schools in North Hills, a town of 5.5 square miles. The neighborhood does not need to build another school. My child attends Carlos Academy, where there is a Dual Language program teaching children to read and write in both English and Spanish. It is a regular public school that was built only 9 y when more classrooms were needed. If Valor Academy moves closer and grows bigger, Santana's enrollment will shrink as a result. Consequently, Santana will have tc teachers, combine multiple grades into single classrooms, and will have more empty classrooms. We do not need schools fighting over students. We need to invest ir we have already built—with taxpayer dollars. We need the LAUSD to look at the big picture, because this charter school is not.
2. Traffic is already gridlocked during school drop off/pick up hours. Valor Academy will be half a block away from Sepulveda Middle School and Carlos Santana Arts A creating a traffic nightmare. Santana parents will be tempted to avoid Plummer Street and instead approach Santana from the South — dropping their children on th Columbus Ave or making a U-turn where there is a blind curve. There will be car accidents and someone may hit a pedestrian.

3. Building a new school on the Plummer Street property is not the best use of the oldest house in North Hills. The house built in 1914 has been identified as a histori is being considered to become LA's newest Historic Cultural Monument. A community group, the North Hills Preservation Consortium, want to restore the house and museum featuring the agricultural legacy of the San Fernando Valley. The want to create a new open space for the entire community. The Valor Academy plan will not house and it will not be open to the public. They will build upon some of the last open space available in North Hills.

4. The neighborhood is in need of open space. ALL OF LOS ANGELES NEEDS MORE OPEN SPACE! A Needs Assessment was conducted by LA County. Mission Hills/Pa City/North Hills have an average of 0.5 park acres per 1,000, while LA County has an average of 3.3 park acres per 1,000 people. They described the need for a park o particular stretch of Plummer Street as "Very High." The community is in dire need of open space that can be used by everyone.

I hope you appreciate that North Hills is not a good location for this charter school.

Thank you,

Esther Ahn <esther.ahn@lacity.org>

esther.ahn@lacity.org

1 message

armin isip <mindane15@gmail.com> Wed, Nov 9, 2022 at 2:32 PM
To: esther.ahn@lacity.org

I am writing as a parent of children in LAUSD schools, and a resident of North Hills in opposition to the plan to build an elementary school at 15526 Plummer Street. Bright Star Schools, a charter school company with nine schools in LA, is planning to purchase a historic home on Plummer Street and move one of their schools, Valor Academy, to North Hills, where there are already three Bright Star Schools. However, a 60-member community group named the North Hills Preservation Consortium has a competing plan for the property on Plummer Street. They want to transform the property into a museum dedicated to San Fernando's agricultural history and build a much-needed park.

1. There are 12 existing elementary schools in North Hills, a town of 5.5 square miles. The neighborhood does not need to build another school. My child attends Carlos Santana Arts Academy, where there is a Dual Language program teaching children to read and write in both English and Spanish. It is a regular public school that was built only 9 years ago, when more classrooms were needed. If Valor Academy moves closer and grows bigger, Santana's enrollment will shrink as a result. Consequently, Santana will have to lay off teachers, combine multiple grades into single classrooms, and will have more empty classrooms. We do not need schools fighting over students. We need to invest in the schools we have already built—with taxpayer dollars. We need the city to look at the big picture, because this charter school is not.

2. Traffic is already gridlocked during school drop off/pick up hours. Valor Academy will be half a block away from Sepulveda Middle School and Carlos Santana Arts Academy -- creating a traffic nightmare. Santana parents will be tempted to avoid Plummer Street and instead approach Santana from the South— dropping their children on the wrong side Columbus Ave or making a U-turn where there is a blind curve. There will be car accidents and someone may hit a pedestrian.

3. Building a new school on the Plummer Street property is not the best use of the oldest house in North Hills. The house built in 1914 has been identified as a historic resource and is being considered to become LA's newest Historic Cultural Monument. A community group, the North Hills Preservation Consortium, want to restore the house and create a museum featuring the agricultural legacy of the San Fernando Valley. The want to create a new open space for the entire community. The Valor Academy plan will not restore the house and it will not be open to the public. They will build upon some of the last open space available in North Hills.

4. The neighborhood is in need of open space. A Needs Assessment was conducted by LA County. Mission Hills/Panorama City/North Hills have an average of 0.5 park acres per 1,000, while LA County has an average of 3.3 park acres per 1,000 people. They described the need for a park on this particular stretch of Plummer Street as "Very High." The community is in dire need of open space that can be used by everyone.

I hope you appreciate that North Hills is not a good location for this charter school.

Thank you,

Min Dane

Esther Ahn <esther.ahn@lacity.org>

CPC-2022-5865-CU-SPR

1 message

Patricia Bloomfield <tbloomfield@verizon.net> Tue, Dec 6, 2022 at 9:50 AM
To: "Esther.ahn@lacity.org" <esther.ahn@lacity.org>

RE: CPC-2022-5865-CU-SPR
I have read through the Initial Documents and the Environmental Review that have been submitted by Brightstar for their plan to build a new publicly-funded charter elementary school in North Hills and the root issue is being overlooked. We do not need another elementary school in North Hills. We already have 12 elementary schools in a town of 5.5 square miles. We have an elementary school every 2.18 miles in our small town. We do not need another elementary school.

Long before Brightstar came into the picture, our community has been working on a better plan that we call The Plummer Street Project. Since April 2021, we have been working on designating the historic house that is situated on the property and built in 1914, as a Los Angeles Historic Cultural Monument. Our grass-roots organization called The North Hills Preservation Consortium, presented our plan to restore the house, create a small museum and new park for the community, to to the owner, to our councilwoman CD7 Monica Rodriguez, and to our North Hills East Neighborhood Council in August 2021. Councilwoman Monica Rodriguez reached out to the owner with an initial offering of $1.2 million to purchase the properties. We have offered to create a 501c3 non-profit organization to manage the historic house and museum, if that would please the city.

North Hills is in the Very High Need for park space. The Los Angeles County Park Needs Assessment Survey https://lacountyparkneeds.org/wp-content/root/FinalReportAppendixA/StudyArea_130.pdf identified North Hills in the Very High need for park space. We have only one park in North Hills. North Hills has .5 park acres per 1,000 people compared to the rest of LA County which averages 3.3 park acres per 1,000. As North Hills becomes more dense with multi-unit dwellings, it is imperative that we have more pocket parks. Parks are a crucial part of any community, not only for the well-being of our residents, but also to mitigate climate change. Unpaved ground absorbs water and parks reduce the urban heat island effect due to the abundance of asphalt and concrete in urban areas.

So my question to Los Angeles City Planning is why is this root issue not being addressed? We have 12 elementary schools and 1 park. Brightstar has checked all the correct boxes, dotted their I's and crossed their T's, but after all is said and done, it is just plain wrong to approve the construction of a new elementary school in North Hills.

Thank you for your consideration,

Patricia A. Bloomfield

Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

2 messages

Patty <phollers33@gmail.com> Sun, Oct 30, 2022 at 9:04 PM
To: esther.ahn@lacity.org

Dear Ms Ahn,

I am a resident of Langdon Ave & Plummer St. close to where the Brightstar Valor School is trying to build the school. I beg you to consider the ramifications to our neighborhood if this school is built. Currently the traffic to get out of our street is horrendous. The traffic is so bad cars choose to come barreling down our street at dangerous speeds so they don't need to sit at the light which takes anywhere up to 5 - 7 minutes to get through. We have Sepulveda Middle-school on the corner with parents double parking on Plummer to pick up there children. This creates traffic jams and occasionally accidents. Many of these children use the cross walks on Sepulveda/Plummer. I have sat at the light watching these children trying to cross while frustrated drivers are are zooming through the lights with no concern for these children. The Brightstar Valor school will only cause more congestion.
The residents love our neighborhood. We do not need another school so close together that would only create more traffic.

We definitely need a park in our neighborhood! We have one in North Hills that is so small I wouldn't even go there, plus it is in a very dangerous area.
Below are some of our thoughts on this terrible situation.

- Building a new school on the property will destroy the setting where the oldest house in North Hills is located. The house built in 1914 has been identified as a historic resource and is being considered to become LA's newest Historic Cultural Monument.
- Traffic is already gridlocked during school drop off/pick up hours. Brightstar's Valor Academy will be 1/2 block away from Sepulveda MS and Carlos Santana ES in the middle of the block on Plummer between Sepulveda Blvd. and Orion Ave. creating a traffic nightmare.
- We want to restore the 1914 house, create a museum and new open space for the entire community. BrightStar Valor Academy's plan will not restore the house and it will not be open to the public. They will build upon some of the last open space available in North Hills.
- We need open space. Mission Hills-Panorama City-North Hills have an average of 0.5 park acres per 1,000. LA County has an average of 3.3 park acres per 1,000 people. We are in dire need of open space preserved for the entire community.

Thank you for your time.
Patty Hollers
9615 Langdon Ave
North Hills 91343

Sent from my iPad

Esther Ahn <esther.ahn@lacity.org> Tue, Nov 1, 2022 at 9:59 AM
To: Patty <phollers33@gmail.com>

Good morning,

Thank you for your comments.

I am confirming receipt of them for inclusion in the case file and public record.

Many thanks,
Esther
[Quoted text hidden]
--

Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
T: (213) 978-1486 | Planning4LA.org
E-NEWS

Name	City	State	Postal Code	Country	Commented Date	Comment
Ervin E. Arevalo	Panorama City	CA	91402	US	2022-07-02	"We have enough schools in north hills and a school wil exacerbate traffic patterns."
Linda Kelsch	North Hills	CA	91343-2102	US	2022-07-02	"We already have too many schools in our little neighborhood and way too much traffic. This would create an even bigger traffic gridlock in the area. This is a residential area, not a commercial/business area."
Esther Calderon	Simi Valley	CA	93065	US	2022-07-02	"I work at one of the elementary schools in this neighborhood. This historic house should be restored and turned into a museum with a park and green space that the whole community could enjoy. This neighborhood does n
Sara Drost	Oakhurst	CA	93644	US	2022-07-02	"I would love to see history preserved by the Plummer Street project, not another school.The SF valley needs to maintain its craftsman style home and the history of the Plummer family while creating an open space park for t
Linda Schwartz	Los Angeles	CA	91436	US	2022-07-02	"Another school is absolutely not needed!!"
Linda Kelsch	North Hills	CA	91343-2102	US	2022-07-02	"We already have too many schools in our little neighborhood and way too much traffic. This would create an even bigger traffic gridlock in the area. This is a residential area, not a commercial/business area. Please preser
Carl Petersen	Porter Ranch	CA	91326	US	2022-07-05	"Bright Star's Valor Academy contributes to a charter school building boom financed by taxpayers in the midst of declining student enrollment.Read my article at: <a href="https://changethelausd.medium.com/as-students-d
Pernelle Hayes	Granada Hills	CA	91344	US	2022-07-08	"Resources need to go to existing public schools and historical buildings need guaranteed preservation."
Louis Bruder III	North Hills	CA	91343	US	2022-07-08	"It's absurd that building another school is even an idea. LA schools are under staffed as it is. They are bringing substitute teachers on full time or are trying to. We need to focus on our already understaffed schools and the ir
Bonnie Cockerell	Los Angeles	CA	91343	US	2022-07-08	"I strongly agree with what my community needs and will benefit from."
Maya DeBus	Lake Balboa	CA	91406	US	2022-07-09	"We have enough schools We need parks and a sense of history."
Elizabeth hodges	Whittier	CA	90606	US	2022-07-15	"We don't want it"
Susan Lum				US	2022-07-15	"Building a new school would reduce the amount of open space in North Hills, would increase traffic on this residential street, would be a waste of resources, considering there are already many schools in the city, and would
Ana Cotton	Temecula	CA	92592	US	2022-07-16	"I believe we have to preserve older structures and not tear them down. The charter school can open elsewhere."
Hilda Rubio	North Hills	CA	91801	US	2022-07-17	"An area such as North Hills is in dire need of a green space for all the families to enjoy. We don't need another school. Enrollment is low and people are leaving Cali. This is a waste of a perfectly good and historic place that
Julia Seguin	Calgary		T3r 0p8	Canada	2022-07-17	"We have enough schools in this area."
Cris Bennett	Canoga Park	CA	91304	US	2022-09-20	"Charter schools are a SCAM. They waste taxpayer money and have no accountability compared to public schools. They are run for profit and are notorious for poor quality education. PLUS, enrollment in LA is so low that
M Welsh	North Hills	CA	91343	US	2022-11-20	"Traffic is bad enough already. We don't need anymore in this area."
michael murphy	north hills	CA	91343	US	2022-11-20	"No more traffic. No more noise."
Rosenda Vicuna	Los Angeles	CA	90011	US	2022-11-21	"The location is not logical and there are already many schools with low enrollment."
Donald wleklinski	Terre Haute	IN	47803	US	2022-11-23	"Needs looking into."
Elio Spinello	Santa Clarita	CA	91354	US	2022-11-23	"Condominiums are being build behind the location, which will further compound the traffic and noise problems for residents."
Patricia Bloomfield	Mission Hills	CA	91345	US	2022-12-02	"An historical landmark and a park are essential for community"
Esther Calderon	North Hills	CA	91343	US	2022-12-03	"North Hills does not need another school in a time of declining enrollment as families move out to more affordable housing. We need a park! The historic home has potential to be a great resource to the community as a histo
Thelma Mericle	Sherman Oaks	CA	91411	US	2022-12-06	"I oppose the Bright Star Valor Academy who want to turn this lovely building in offices, so they say, it could lead to demolition. This historic home belonging to the Plummer Family is the only house left. We need to keep thi
Nicolle Fefferman	Van Nuys	CA	91401	US	2022-12-06	"All neighborhoods deserve green spaces for play and rest. No more charter schools taking up valuable land!"
Rocio Velazquez	Reseda	CA	91335	US	2022-12-06	"Don't need another charter school we need park's"
Rose Reiss	Santa Monica	CA	90402	US	2022-12-06	"No need for more charter schools as there are already too many schools close by!"
Amy Fleiss	Valley Village	CA	91607	US	2022-12-06	"We need more parks and safe areas for our children. We do not need more Charter schools."
tracy cook	Los Angeles	CA	90036	US	2022-12-07	"There is no reason for this school to be built in a declining enrollment. Using public dollars is downright criminal at this point to build it. Terrible."
Elizabeth Gay Lannon	Sherman Oaks	CA	91411	US	2022-12-09	"We have enough charter schools and not enough history/parks!!"

petition_signatures_jobs_33817212_20221210041941

Name	City	State	Postal Code	Country	Signed On
Debora Masterson				US	2022-07-02
Patty Hollers	North Hills	CA	91343	US	2022-07-02
Cody Fuhrman	Sherman Oaks	CA	91423	US	2022-07-02
Ervin E. Arevalo	Panorama City	CA	91402	US	2022-07-02
Jose Colon	Chicago		60631	US	2022-07-02
Plasma YT	New London		54961	US	2022-07-02
Linda Kelsch	North Hills	CA	91343-2102	US	2022-07-02
Esther Calderon	Simi Valley	CA	93065	US	2022-07-02
Tamiko Fuote	Calabasas	CA	91302	US	2022-07-02
Anita G				US	2022-07-02
David Hyman	Sepulveda	CA	91343	US	2022-07-02
Sara Drost	Oakhurst	CA	93644	US	2022-07-02
Kai o'sullivan	Andover		1810	US	2022-07-02
Maggie Elliott	Northridge	CA	91325	US	2022-07-02
Mari Mills	North Hills	CA	91331	US	2022-07-02
David Jacoby	North Hills	CA	91343	US	2022-07-02
Linda Schwartz	Los Angeles	CA	91436	US	2022-07-02
Holland Mills	North Hills	CA	91343	US	2022-07-02
Adam Kaluba	Burleson		76028	US	2022-07-02
Phyllis Frieze	North Hills	CA	91343	US	2022-07-02
Holly Havlik	Tujunga	CA	91042	US	2022-07-02
Jeanne Ramage	Winnetka	CA	91306	US	2022-07-03
kookie Smith	Garnett		66032	US	2022-07-03
Clarissa Mason	North Hills	CA	91343	US	2022-07-03
Joanni Hays	Denver		80230	US	2022-07-03
Triforce Gaming64				US	2022-07-03
Humzah Kashif	Richmond		77469	US	2022-07-03
Brody Lowery	Athens		45701	US	2022-07-03
edward anderson				US	2022-07-04

Gracie Faith	Portland		37148	US	2022-07-04
Jea Gracia	Whittier		90604	US	2022-07-04
Nicole Thiroux Petersen	Porter Ranch	CA	91326	US	2022-07-05
Maria Melnyk	Нью-Брітейн		6053	US	2022-07-05
Carl Petersen	Porter Ranch	CA	91326	US	2022-07-05
Kristina Wallace	Granada Hills	CA	91344	US	2022-07-05
Maya DeBus	Van Nuys	CA	91405	US	2022-07-05
teresa garcia	North Hills	CA	91343	US	2022-07-05
Phyllis Schneider	Chatsworth	CA	91311	US	2022-07-05
Craig Baker	Los Angeles	CA	91342	US	2022-07-05
Kayla Deines	Glasgow		42141	US	2022-07-05
Carolyn Pakes	West Hills	CA	91304	US	2022-07-05
Johnathon Hazemann	Moorhead		56560	US	2022-07-05
Tony Liu	Lake Forest	CA	92630	US	2022-07-06
Lucero moreno	Los Angeles	CA	91331	US	2022-07-06
Omar Vazquez	North hills	CA	91343	US	2022-07-06
Jo Rubio	Panorama City	CA	91402	US	2022-07-06
Olga Verdin	Los Angeles	CA	91345	US	2022-07-06
michael murphy	north hills	CA	91343	US	2022-07-06
Austin Ward	Corvallis	OR	97330	US	2022-07-07
Michele Wantink	Tustin	CA	92780	US	2022-07-07
Glenn Hackenberg	Granada Hills	CA	91344	US	2022-07-07
Kathy Schirle	North Hills	CA	91343	US	2022-07-07
Wilbert Andrews	Bronx		10461	US	2022-07-07
Jeimy Noriega	Dallas		75217	US	2022-07-07
Kevin Lara	Fort Myers		33908	US	2022-07-07
E F	lafeyette		437083	US	2022-07-07
Nancy Arriaga	Panorama City	CA	91402	US	2022-07-08
Vivian Lupo	Philadelphia		19148	US	2022-07-08
Pernelle Hayes	Granada Hills	CA	91344	US	2022-07-08
emilio martinez	Panorama City	CA	91402	US	2022-07-08
Louis Bruder III	North Hills	CA	91343	US	2022-07-08

Peggy Jackson	North Hills	CA	91343	US	2022-07-08
Nethaniel Mills				US	2022-07-08
Carlton Ferguson	Grovetown		30813	US	2022-07-08
Whitney Dean	Newton		39337	US	2022-07-08
RAQUEL STEVENSON	Pacoima	CA	91331	US	2022-07-08
Matthew Cormier	Mission Hills	CA	91311	US	2022-07-08
Patricia Bloomfield	Mission Hills	CA	91345	US	2022-07-08
Linda Edgington	Concord	MA	1773	US	2022-07-08
maria b	St Louis		63106	US	2022-07-08
Jim Cockerell	North Hills	CA	91343	US	2022-07-08
Bonnie Cockerell	Los Angeles	CA	91343	US	2022-07-08
Natalia Alonso	El Paso		79938	US	2022-07-09
Isabella Braziel	Fort Worth		76102	US	2022-07-09
Genesis Amaya	Stockton		95201	US	2022-07-09
Ronald Van Deest	Granada Hills	CA	91344	US	2022-07-09
James Moorcroft	Granada Hills	CA	91343-1433	US	2022-07-09
Jesus Colina Alba Jesus	Miami		33135	US	2022-07-09
Mindy Olazaba	Panorama City	CA	91402	US	2022-07-09
Adriana Robles	Northridge	CA	91324	US	2022-07-09
Lissette Gonzalez	Sylmar	CA	91342	US	2022-07-09
genave salas	Anaheim	CA	92802	US	2022-07-09
Amber Phan	Baldwin Park		91706	US	2022-07-10
Alexandrea Mares	Los Angeles	CA	91343	US	2022-07-10
Elsa Soto	Chatsworth	CA	91311	US	2022-07-10
Ingrid Moya	North Hills	CA	91343	US	2022-07-10
Melva Barrios	Lancaster	CA	93534	US	2022-07-10
Andrea King	north hills	CA	91343	US	2022-07-10
Lara Welty	Ramona		92065	US	2022-07-10
Barbara Garcia	Simi Valley	CA	93065	US	2022-07-10
Tania Martinez	Northridge	CA	91325	US	2022-07-10
Maria López Rojas	Lancaster	CA	93535	US	2022-07-10
Gema Lopez	San Diego	CA	92122	US	2022-07-10

Antonio Garcia	Los Angeles	CA	90033	US	2022-07-10
Keren Jimenez	Palmdale	CA	93550	US	2022-07-10
Brianna Salas	Anaheim	CA	92805	US	2022-07-10
Elda Lopez	Long Beach	CA	90805	US	2022-07-11
Niki B	Phoenix		85027	US	2022-07-11
Georgette Montes de Oca	93021	CA	93021	US	2022-07-11
Nicole Bell	Edwinstowe	ENG	NG21	UK	2022-07-11
Caprice Copeland	Chesapeake		23320	US	2022-07-11
Ada Reyes	Porter Ranch	CA	91326	US	2022-07-11
Eva Perlman	Reseda	CA	91335	US	2022-07-11
Maria Figueroa	Van Nuys	CA	91405	US	2022-07-11
Allison Weigand	El Paso		79924	US	2022-07-11
Christel Altschüler			69115	Germany	2022-07-11
Flip 3L5K	Philadelphia		19125	US	2022-07-11
Emma Berreth	Burbank	CA	91506	US	2022-07-11
Christian Escobar	Los Angeles	CA	90011	US	2022-07-11
Alejandra Orozco	Atlanta	GA	30319	US	2022-07-11
Ana G	Panorama City	CA	91402	US	2022-07-12
Haley Opiopio	kaila kona		96740	US	2022-07-12
Maria Ines	Northridge	CA	91324	US	2022-07-12
Cinthia Maurice	Nancy		54000	France	2022-07-12
Ron Raz	Ferndale		18921	US	2022-07-12
Shakira Dowtin	Atlanta		30303	US	2022-07-12
butthole wiener	Indianapolis		46217	US	2022-07-12
KaiLyn HoFFman	Newark		19711	US	2022-07-13
Davis Sherman	San Jose		95126	US	2022-07-13
Tina Berney	Rockford		61101	US	2022-07-13
Stephanie Alfonso				US	2022-07-13
Valentina Ovalles	Houston		77077	US	2022-07-13
Bryan Tavares	Chicago		60602	US	2022-07-13
Renate Heistermann	Winnetka		91306	US	2022-07-13
D R	Westminster	CA	92683	US	2022-07-13

lyda pinto	Spring Lake		28390	US	2022-07-14
Jorge Chavez	Oklahoma City		73132	US	2022-07-14
Alfonso Bravo	Westminster	CA	92683	US	2022-07-14
Zoey Beeson	Rock Springs		82901	US	2022-07-15
Maribel Marulanda	New York		11106	US	2022-07-15
Brady Shaw	Elmhurst		60126	US	2022-07-15
James Mason	Carmichael		95608	US	2022-07-15
Frank Pisano	Huntington Bea	CA	92649	US	2022-07-15
alasis gigoriy	Dacula		30019	US	2022-07-15
Monica Kim	Lakewood	CA	90713	US	2022-07-15
Peggy Fung	Walnut	CA	91789	US	2022-07-15
Sarah Hernandez	Agoura Hills	CA	91301	US	2022-07-15
Rosa Arcadia-Murillo	Los Angeles	CA	90006	US	2022-07-15
Elizabeth hodges	Whittier	CA	90606	US	2022-07-15
Irene Mena-Acevedo	Porter Ranch	CA	91326	US	2022-07-15
Hiromi Seki	Los Angeles	CA	90043	US	2022-07-15
m h	austin		76813	US	2022-07-15
Christen Jevtic (east valle	Los Angeles	CA	90022	US	2022-07-15
Tanya Ramirez	Pacoima	CA	91331	US	2022-07-15
Mary Backos	Los Angeles	CA	90022	US	2022-07-15
Susan Lum				US	2022-07-15
Vanessa Ordaz	Norwalk	CA	90650	US	2022-07-15
Jim Warren	Costa Mesa	CA	92627	US	2022-07-15
Rosa Navar	Bell	CA	90201	US	2022-07-15
Patricia Naylor	Banning	CA	92220	US	2022-07-15
Marlina ogaz Ogaz	Ontario	CA	91764	US	2022-07-15
Winisha Mendes	Los Angeles		90018	US	2022-07-15
Aileen Colon	Brooklyn	NY	11209	US	2022-07-15
Jennifer Harmon	Roslindale		2131	US	2022-07-16
Ana Cotton	Temecula	CA	92592	US	2022-07-16
Janet Murillo	North Hollywoo	CA	91601	US	2022-07-16
Avery Kim	Mamaroneck		10543	US	2022-07-16

jennifer soto	Forest Park		30297	US	2022-07-16
princess jahdori baez	Honolulu		96826	US	2022-07-16
Patricia Charcas	Los Angeles	CA	90037	US	2022-07-16
Edimar Leon	Kansas wichita		67203	US	2022-07-17
Luca M	Grand Ledge		48837	US	2022-07-17
Winter Herman	Bethel Park		15102	US	2022-07-17
Eva Herzig	Shelburne Falls		1370	US	2022-07-17
Dorothy OConnor	Glendale	CA	90039	US	2022-07-17
Hilda Rubio	North Hills	CA	91801	US	2022-07-17
Nichole Christner	Smithton	PA	15479	US	2022-07-17
Stephanie Pickering	Crossett		71635	US	2022-07-17
Amy Chau	New York	NY	10044	US	2022-07-17
J Seguin	Calgary		T3R	Canada	2022-07-17
Yuko Minagoe	Hawthorne	CA	90250	US	2022-07-17
Janiaya Williams	Hopkinsville		42240	US	2022-07-17
Rachelle Shipstad	Glendale	CA	91201	US	2022-07-17
Michelle O'Leary	Long Beach	CA	90803	US	2022-07-17
Erica Blackbourn	Howell	MI	48843	US	2022-07-17
Leah Muhammad	Kennesaw		30144	US	2022-07-17
Haydee Cannon	Houston	TX	77055	US	2022-07-17
Tanya Benitez	Apple Valley	CA	92307	US	2022-07-17
Su Bradly	Port Saint Lucie	FL	34986	US	2022-07-17
Amy Torres	Ventura	CA	93004	US	2022-07-17
Michele Vydrzal	New Ulm	TX	78950	US	2022-07-17
Andrew Vy6	New Ulm	TX	78950	US	2022-07-17
Longi Schladenhauffen	Portsmouth	NH	3801	US	2022-07-18
Olha Sarzhynska	Sacramento		95841	US	2022-07-18
Danielle Kongeal	Detroit	MI	48227	US	2022-07-18
Kandace Kuwahara	Gardena	CA	90247	US	2022-07-18
Debbie Hamner	St Louis	MO	63114	US	2022-07-18
Tanya Shirland	Bellevue	WA	98007	US	2022-07-18
Carolina Dullavin	Phoenix	AZ	85033	US	2022-07-18

Jennifer Watanabe	Union City	CA	94587	US	2022-07-18
Kim George	Kirkland	WA	98033	US	2022-07-18
Fiona Anna	Palm Coast		32137	US	2022-07-18
Ann Therie	Vilvoorde			Belgium	2022-07-18
Elise Hernandez	Rahway	NJ	7065	US	2022-07-18
Laura Calogero	Morlenbach		69509	Germany	2022-07-18
Seamus Alban	East Longmeadow		1028	US	2022-07-18
brandem Anderson	Fort Wayne		46819	US	2022-07-18
Valerie Gutierrez	Dallas		75243	US	2022-07-18
James Rice	Acworth		30102	US	2022-07-18
Marcela Rico	Taos	NM	87571	US	2022-07-18
Nakiche Carter	Detroit	MI	48217	US	2022-07-18
Arcie Baba	Anaheim	CA	92804	US	2022-07-19
Amanda Cook	Vergennes		5491	US	2022-07-19
Alexia Pryor	Temple		76502	US	2022-07-19
Alexander Campling	Bellevue		98004	US	2022-07-19
Falcon Knight	Brooklyn	NY	11226	US	2022-07-20
Uni Wolf	Raleigh		27604	US	2022-07-21
Stephanie Beam	Liberty		29657	US	2022-07-21
Norma Clark	Davenport		52802	US	2022-07-22
Krista Samsel	Long Beach		90802	US	2022-07-22
bob jones	Chester Springs		19425	US	2022-07-22
Kendra Sanders	Seattle		98111	US	2022-07-22
Vsmp repspit	New Brighton		15066	US	2022-07-22
Sarieli Sribhashyam	San Jose		95135	US	2022-07-22
Leigh Energi	Spring		90006	US	2022-07-23
Richard McConnell	Olympia Fields		60461	US	2022-07-23
Toni Hamilton	Detroit		48	US	2022-07-24
Beverly Rose	Cypress		90630	US	2022-07-24
Cynthia Lozano	Carson	CA	90745	US	2022-07-24
liliana gonzalez	Carson	CA	90745	US	2022-07-24
Laura Correa	Carson	CA	90745	US	2022-07-24

Gabriela Godinez	Los Angeles	CA	90016	US	2022-07-24
Saul Gonzalez	Los Angeles	CA	90006	US	2022-07-24
Mindy Ware	Kerens		75144	US	2022-07-24
Cyrilla Clampet	Princeton		75407	US	2022-07-25
Tim Maurer	Anaheim		92808	US	2022-07-25
Mia Rivers	Crofton		21114	US	2022-07-25
Sandra Y	Reseda	CA	91335	US	2022-07-25
Aleshia Wall	Louisa		23093	US	2022-07-26
Kuu Tech				US	2022-07-26
Jara Longmire	Cincinnati		45231	US	2022-07-26
Haylee Thomas	Heber Springs		72543	US	2022-07-26
daniel guccicoochie				US	2022-07-26
aidan smoot	Newport News		23606	US	2022-07-26
gabii de leonn	Miami		33180	US	2022-07-27
Odalys Solis	Los Angeles		90047	US	2022-07-27
Chip Chapley	Sherwood		72120	US	2022-07-27
Annecy Lopez	Los Angeles	CA	90041	US	2022-07-28
Rey Herrera	Las Vegas		89110	US	2022-07-28
Molly Stanton	Bremerton		98337	US	2022-07-28
Elizabeth Coker	White Plains		10605	US	2022-07-28
Esperanza Rodriguez	Converse		78109	US	2022-07-28
Corey Meyers	Lakeland		33809	US	2022-07-29
Emma Witham	Belfast		4915	US	2022-07-29
Noemi Espinoza	Arlington		76002	US	2022-07-29
Luke Carter	Concord		3303	US	2022-07-29
Darius Mckency				US	2022-07-29
Sherry Lee	Dallas		75214	US	2022-07-29
Joseph Francisco	Orlando		32810	US	2022-07-29
john smith	Seattle		98109	US	2022-07-29
Martin Kent	Morrilton		72110	US	2022-07-29
Dante Medori	Jenkintown		19046	US	2022-07-29
Dylan Ryder	Waxhaw		28173	US	2022-07-29

Ashlyn Hunt	West Jordan		84088	US	2022-07-30
Joshua Rosario Rivera	Philadelphia		19130	US	2022-07-30
S'Aliyah Brown	Cleveland		44128	US	2022-07-30
Abigail Doll	Redlands		92374	US	2022-07-31
Keshav Lincoln	Annapolis		21401	US	2022-07-31
Panise Riveea	Lawrence		1843	US	2022-08-01
Natalie Leon	El Paso		79924	US	2022-08-01
Chelsea Jackson	Washington		20020	US	2022-08-01
Lucas Cole	Durant		74701	US	2022-08-01
Josh McQuillis	Belle Vernon		15012	US	2022-08-01
Albert Brown	Indianapolis		46214	US	2022-08-02
Kevin Sanguinetti				US	2022-08-02
Rindu Berat	North Bergen		7047	US	2022-08-02
william blachowski	Cheektowaga		14225	US	2022-08-02
Derrick Hill	Hollywood		20636	US	2022-08-02
Nailea Dinh	Buford		30518	US	2022-08-02
Fire Scythe	Los Angeles	CA		US	2022-08-02
deona abraham	Lawrenceville		30043	US	2022-08-03
Zed Trick	Brooklyn	NY		US	2022-08-03
Kenyatta Day	Houston		77095	US	2022-08-03
Himanshu Pallath	Greenville		29607	US	2022-08-03
Aamari Davis	Columbus		31909	US	2022-08-04
Elizabeth Gonzalez	Panorama City	CA	91402	US	2022-08-06
Barbara Stiles	Porter Ranch	CA	91326	US	2022-08-06
Alaiyah Myrick	Fort Lauderdale		33313	US	2022-08-07
Carolie Warden	Elk River		55330	US	2022-08-08
Clara Reyes	Panorama City	CA	91402	US	2022-08-22
Narges Hosseini	Porter Ranch	CA	91326	US	2022-08-22
Izack Salinas	Mesquite		75150	US	2022-08-22
Luis Duran	Mesquite		75180	US	2022-08-22
Jay Boy	Tulsa		74136	US	2022-08-22
Vulture Bones	Brooklyn	NY	11226	US	2022-08-23

Carlos Rabanales	Los Angeles		90032	US	2022-08-23
Your Mom				US	2022-08-23
Kristina Wallace	Granada Hills	CA	91344	US	2022-08-23
Cindy Negrete	North Hills	CA	9`1343	US	2022-08-23
Alison Ohr	Bingley		BD16 1EQ	UK	2022-08-23
Robert Satz	Lake Hughes	CA	93532	US	2022-08-24
Maria Rodriguez	Arleta	CA	91331	US	2022-08-26
Nida Pholananta	North Hills	CA	91343	US	2022-08-26
Melissa Abrahams	Symar	CA	91342	US	2022-08-26
Tamiko Fuote	Calabasas	CA	91302	US	2022-08-27
ALBERT ALFASSO	Canoga Park	CA	91304	US	2022-08-29
Cris Bennett	Canoga Park	CA	91304	US	2022-09-20
Elisa Harris	Burbank	CA	91505	US	2022-09-20
Jay Falconer	Long Beach	CA	90813	US	2022-10-08
Susana Nieva	Fontana	CA	92336	US	2022-10-09
Claudia Mejia	Los Angeles	CA	90011	US	2022-10-10
Carlos Vildozola	Pacoima	CA	91331	US	2022-10-26
Rosa Cabrerizo	Hospitalet de Llobregat		8906	Spain	2022-11-03
Roxana Moya	Santiago			Chile	2022-11-05
Nelly PRESTAT	Mouroux		77120	France	2022-11-07
Ljay Abella	Pampanga			Philippine	2022-11-14
Renata Cheferrino	Rio de Janeiro			Brazil	2022-11-15
Maria Welsh	North Hills	CA	91343	US	2022-11-20
Sergio Mendoza	Los Angeles	CA	90011	US	2022-11-20
Rebecca Miller	Oxford		48371	US	2022-11-20
Jesus Nieves	Detroit		48221	US	2022-11-20
Mahnoor Hashmi	Bronx		10467	US	2022-11-20
Andre Terry	Lanham		20706	US	2022-11-20
Tamara Ruiz	North Hills	CA	91343	US	2022-11-20
Carol Crawford	Panorama City	CA	91402	US	2022-11-20
Jimmy Castillo	Panorama City	CA	91402	US	2022-11-20
Maria Gonzalez	North Hills	CA	91343	US	2022-11-20

Maria Ancona	Los Angeles	CA	90006	US	2022-11-20
Barbara Holland	N. Hills	CA	91343	US	2022-11-20
Mayra Molina	North hills	CA	91343	US	2022-11-20
Mary Dentice	Panorama City	CA	91402	US	2022-11-21
Patricia Alvarez	Los Angeles	CA	90022	US	2022-11-21
Lori Goldstein	North Hills	CA	91343	US	2022-11-21
Yanna Cole Mariano				Philippine	2022-11-21
Gloria Dominguez	North Hills	CA	91331	US	2022-11-21
Rosenda Vicuna	Los Angeles	CA	90011	US	2022-11-21
Ardis Oliver	Northridge	CA	91325	US	2022-11-21
Darren Young	North Hills	CA	91343	US	2022-11-22
kathy schirle	Panorama City	CA	91402	US	2022-11-22
Diana Sanchez	Pacoima	CA	91331	US	2022-11-22
Laura Laurant	Los Angeles	CA	90014	US	2022-11-23
Leland Wigington	North Hills	CA	91343	US	2022-11-23
Anonymous 1738	Havertown		19083	US	2022-11-23
Robert Yaros	Whitehall		18052	US	2022-11-23
Autum Bland	Tulsa		74129	US	2022-11-23
Rachel Kim	Irvine		92617	US	2022-11-23
Shadi fdk	Los Angeles		90060	US	2022-11-23
Amin Tehrani	Dallas		75270	US	2022-11-23
Donald wleklinski	Terre Haute	IN	47803	US	2022-11-23
Joshua Curphey	Peterborough		PE7	US	2022-11-23
pamela hamilton	Palo Cedro	CA	96073	US	2022-11-23
george bourlotos	belleville	NJ	7109	US	2022-11-23
Donna Mcleary	Pacoima	CA	91331	US	2022-11-23
Elio Spinello	Santa Clarita	CA	91354	US	2022-11-23
Agnes McBroom	Pacoima	CA	91331	US	2022-11-26
Tina Purwin	North Hills	CA	91343	US	2022-11-26
Claire Joseph	Sylmar	CA	91342	US	2022-11-26
Bari Lomberto	Northridge	CA	91325	US	2022-11-26
Khloe Bertram	St.croix falls		54024	US	2022-11-28

Bana Habte	Indian Trail	NC	28079	US	2022-11-28
Aixa Fielder	Los Angeles		90028	US	2022-11-28
Joseph Wendt	Olean		15760	US	2022-11-28
Kimberly Times	St Louis		63108	US	2022-11-28
Lale Zolfaghari	Las Vegas		89119	US	2022-11-28
Khloe Mason	Waldorf		20603	US	2022-11-28
Fatuma Mohamed	Minneapolis		55415	US	2022-11-28
Elisha Callis	Harker Heights		76548	US	2022-11-28
Marie S Minofils	Fort Lauderdale	FL	33319	US	2022-11-28
Angelina Gomez	Fullerton		92831	US	2022-11-28
Felora Arya	Sacramento		95821	US	2022-11-28
Megan Carson	Houston		77024	US	2022-11-28
Alexis Washington	Shreveport		71107	US	2022-11-28
Serene Caldwell	Greenfield		46140	US	2022-11-28
Elizabeth Neff	Key Largo		33037	US	2022-11-28
Jack Urian	Clarksville		21029	US	2022-11-28
Anna Nell	Green Bay		54303	US	2022-11-28
Mia Wang	San Jose		95125	US	2022-11-28
Karly Shows	Foley		36535	US	2022-11-28
Mitra rezaei	Tacoma	WA	98409	US	2022-11-28
Anonymous 1829	Havertown		19083	US	2022-11-28
Liya Fu	Katy		77494	US	2022-11-28
Fatemeh Helali	Mersin			Turkey	2022-11-28
Yarieliz Ramos Hernande	Colorado Springs		80923	US	2022-11-29
Reyna De jesus	unknown		78076	US	2022-11-29
S. Kinnamon	Greenville	SC		US	2022-11-29
Big Balls	McKinney		75071	US	2022-11-29
Van Nguyen	North Hills	CA	91343	US	2022-11-29
Jessie Petersen	Newhall	CA	91326	US	2022-11-29
Sue Gramacy	Los Angeles	CA	90012	US	2022-12-02
Sarah Megan Heller	Los Angeles	CA	90006	US	2022-12-02
Peggy Burgess	North Hills	CA	91343	US	2022-12-02

Rose Reiss	Los Angeles	CA	90049	US	2022-12-02
Esther Calderon	North Hills	CA	91343	US	2022-12-03
Barbara Mark	Ojai	CA	93023	US	2022-12-03
Maria Zia	North Hills	CA	91343	US	2022-12-03
Kimberly Montsinger	Los Angeles	CA	91335	US	2022-12-04
Ashwin Mills	North Hills	CA	91343	US	2022-12-05
Valerie Miranda	Northridge	CA	91325	US	2022-12-05
Gregory Catton	Bellevue	NE	68147	US	2022-12-05
Stacy Stetz	Los Angeles	CA	90006	US	2022-12-06
Thelma Mericle	Sherman Oaks	CA	91411	US	2022-12-06
Peter Brunner	Sherman Oaks	CA	91423	US	2022-12-06
Rachel Caceres	Canyon Country	CA	91387	US	2022-12-06
yesica galvan	Pacoima	CA	91331	US	2022-12-06
Lauren Reed	Canyon Country	CA	91387	US	2022-12-06
Kristen Mindock	North Hills	CA	91343	US	2022-12-06
Erik Mulet	Encino	CA	91316	US	2022-12-06
Maria Santana	Riverside	CA	92503	US	2022-12-06
Jane Creighton	Los Angeles	CA	90006	US	2022-12-06
Laura Tarver	Friendswood	TX	77546	US	2022-12-06
Sharon Ungersma	Woodland Hills		91364	US	2022-12-06
Max Waller	Pacoima	CA	91331-1551	US	2022-12-06
Nicolle Fefferman	Van Nuys	CA	91401	US	2022-12-06
Amy Bogartz	North Hollywoo	CA	91605	US	2022-12-06
Kyoko Bristow	Los Angeles	CA	90033	US	2022-12-06
Janette Gonzalez	San Fernando	CA	91340	US	2022-12-06
Rocio Velazquez	Reseda	CA	91335	US	2022-12-06
Denise Emerson	North Hollywood		91606	US	2022-12-06
Leonila Villegas	Northridge	CA	91325	US	2022-12-06
alison mayersohn	Los Angeles	CA	90025	US	2022-12-06
Emily Skehan	Sherman Oaks	CA	91423	US	2022-12-06
Maria Calvillo	South Gate	CA	90280	US	2022-12-06
Amy Fleiss	Valley Village	CA	91607	US	2022-12-06

Cathy Millan	Los Angeles	CA	90026	US	2022-12-06
Monique Avila	Pacoima	CA	91331	US	2022-12-06
Jackie Cullum	Woodland Hills	CA	91364	US	2022-12-06
Michele Millan	Los Angeles	CA	90023	US	2022-12-06
Amanda Carnevali	Northridge	CA	91324	US	2022-12-06
Kelly Lortie	Los Angeles	CA	90006	US	2022-12-06
Lourdes Quevedo	Granada Hills	CA	91344	US	2022-12-07
Prathibha Madigapola	Granada Hills	CA	91344	US	2022-12-07
Cathy Cole	Cathedral City	CA	92234	US	2022-12-07
Sarah DeRemer	Los Angeles	CA		US	2022-12-07
Amber Schwinmann	Canoga Park	CA	91304	US	2022-12-07
Elizabeth Garcia	Salt Lake City	UT	84129	US	2022-12-07
Andrew Hilleary	Irvine	CA	92612	US	2022-12-07
Rhoda Ekmekji	Granada Hills	CA	91344	US	2022-12-07
Wendy Ron	South Gate	CA	90280	US	2022-12-07
Heather Cisneros	Panorama City	CA	91402	US	2022-12-07
Tanya Vreeken	Burbank	CA	91504	US	2022-12-07
tracy cook	Los Angeles	CA	90036	US	2022-12-07
Ying Yang	Granada Hills	CA	91344	US	2022-12-07
Natalie Calderon	Ontario	CA	91764	US	2022-12-07
Herman Vargas	North Hills	CA	91343	US	2022-12-07
David Russell	Northridge	CA	91325	US	2022-12-08
Kevin Baker-Cross	Los Angeles	CA	90034	US	2022-12-09
Elizabeth Gay Lannon	Sherman Oaks	CA	91411	US	2022-12-09
Mimi Guzmán-Duncanso	Los Angeles	CA	90022	US	2022-12-09

Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

1 message

Phyllis Schneider <phyllis.schneider66@gmail.com> Thu, Dec 1, 2022 at 6:39 PM
To: esther.ahn@lacity.org

Dear Ms. Ahn,

I have great concern about the potential construction of the Valor Academy Elementary School in North Hills. Aside from the obvious **lack of need** for another school in that neighborhood, the construction of more buildings in a currently open space is obviously foolish.

From a climate change perspective, let's plant trees! Let's not increase the carbon footprint of the City of Los Angeles by the use of **more** concrete, steel and aluminum. Children will benefit more from green space than another schoolhouse !

Regards,

Phyllis Schneider, M.A.
Retired Director
Child Development Center, Los Angeles Pierce College

Esther Ahn <esther.ahn@lacity.org>

Case CPC

1 message

Sara Drost <sara.drost@gmail.com> Tue, Nov 1, 2022 at 5:47 PM
To: esther.ahn@lacity.org

Dear Esther Ahn,

I'm a former educator in the public school system. I'm a resident in the San Fernando Valley, shaping the future for my 6 grandchildren in the area. We need a green space desperately. Please help protect Nature.

Valor School may rent out empty classrooms for their private school needs, as they have done in the past in Granada Hills. If they are given the Plummer Street address, there will be 3 negative results. The green space for the neighborhood will be gone. The historic home will be unavailable for the neighborhood, and the additional congestion would cause gridlock.

Is there any way I could help to make the green space a reality? Please save my name for reference. I sincerely appreciate your time and careful consideration of the impact on our crowded valley.

Sincerely,

--
Be well,
Sara

Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

1 message

Sarah Megan Heller <s_megan@yahoo.com> Tue, Nov 8, 2022 at 3:24 PM
To: "esther.ahn@lacity.org" <esther.ahn@lacity.org>

Dear Esther Ahn and the LA City Planning Department

I am writing as a parent of two children in LAUSD schools, in opposition to the plan to build an elementary school at 15526 Plummer Street. Bright Star Schools, a charter school company with nine schools in LA, is planning to purchase a historic home on Plummer Street and move one of their schools, Valor Academy, to North Hills, where there are already three Bright Star Schools. However, a 60-member community group named the North Hills Preservation Consortium has a competing plan for the property on Plummer Street. They want to transform the property into a museum dedicated to San Fernando's agricultural history and build a much-needed park.

1. There are 12 existing elementary schools in North Hills, a town of 5.5 square miles. The neighborhood does not need to build another school. My son attends Carlos Santana Arts Academy where he is in a Dual Language program, learning to read and write in both English and Spanish. It is a regular public school that was built only 9 years ago, when more classrooms were needed. If Valor Academy moves closer and grows bigger, Santana's enrollment will shrink as a result. Consequently, Santana will have to lay off teachers, combine multiple grades into single classrooms, and will have more empty classrooms. We do not need schools fighting over students. We need to invest in the schools we have already built—with taxpayer dollars. We need the city to look at the big picture, because this charter school is not.

2. Traffic is already gridlocked during school drop off/pick up hours. Valor Academy will be half a block away from Sepulveda Middle School and Carlos Santana Arts Academy -- creating a traffic nightmare. Santana parents will be tempted to avoid Plummer Street and instead approach Santana from the South—dropping their children on the wrong side Columbus Ave or making a U-turn where there is a blind curve. There will be car accidents and someone may hit a pedestrian.

3. Building a new school on the Plummer Street property is not the best use of the oldest house in North Hills. The house built in 1914 has been identified as a historic resource and is being considered to become LA's newest Historic Cultural Monument. A community group, the North Hills Preservation Consortium, want to restore the house and create a museum featuring the agricultural legacy of the San Fernando Valley. The want to create a new open space for the entire community. The Valor Academy plan will not restore the house and it will not be open to the public. They will build upon some of the last open space available in North Hills.

4. The neighborhood is in need of open space. A Needs Assessment was conducted by LA County. Mission Hills/Panorama City/North Hills have an average of 0.5 park acres per 1,000, while LA County has an average of 3.3 park acres per 1,000 people. They described the need for a park on this particular stretch of Plummer Street as "Very High." The community is in dire need of open space that can be used by everyone.

I hope you appreciate that North Hills is not a good location for this charter school.

Thank you,

Sarah Megan Heller

Esther Ahn <esther.ahn@lacity.org>

Plummer street project

1 message

Sue Gramacy <srgramacy@aol.com> Fri, Dec 2, 2022 at 10:51 AM
To: Esther.ahn@lacity.org

Hello
I am writing to save this property as an open space rather than a school - which would cause too much traffic and is not needed.
There are already 12 elementary schools in North Hills, a twin of 5.5 sq miles. We do not need another school.
Thank you
Sue Gramacy

-

Sent from the all new AOL app for iOS

Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR - 15526 Plummer Street

2 messages

tamiko fuote <tfuote@gmail.com> Wed, Nov 30, 2022 at 1:59 PM
To: esther.ahn@lacity.org

I am writing to oppose the building of another school in this area and especially on this site.

Please see below some of my reasons for the opposition to building another school on this site.

- There are 12 existing elementary schools in North Hills, a town of 5.5 square miles. We do not need to build another school.
- Building a new school on the property will destroy the setting where the oldest house in North Hills is located. The house built in 1914 has been identified as a historic resource and is being considered to become LA's newest Historic Cultural Monument.
- Traffic is already gridlocked during school drop off/pick up hours. Brightstar's Valor Academy will be 1/2 block away from Sepulveda MS and Carlos Santana ES in the middle of the block on Plummer between Sepulveda Blvd. and Orion Ave. creating a traffic nightmare.
- We want to restore the 1914 house, create a museum and new open space for the entire community. BrightStar Valor Academy's plan will not restore the house and it will not be open to the public. They will build upon some of the last open space available in North Hills.
- We need open space. Mission Hills-Panorama City-North Hills have an average of 0.5 park acres per 1,000. LA County has an average of 3.3 park acres per 1,000 people. We are in dire need of open space preserved for the entire community.

Sincerely,

Tamiko Fuote
tfuote@gmail.com

Esther Ahn <esther.ahn@lacity.org> Thu, Dec 1, 2022 at 12:09 PM
To: tamiko fuote <tfuote@gmail.com>

Good afternoon,

I am confirming receipt of your comments for inclusion in the case file and public record.

Many thanks,
Esther
[Quoted text hidden]
--

Esther Ahn
City Planner
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
T: (213) 978-1486 | Planning4LA.org
E-NEWS

Esther Ahn <esther.ahn@lacity.org>

CPC-20225865-CU-SPR

1 message

Thelma Mericle <thelma.mericle.sonc@gmail.com> Mon, Dec 19, 2022 at 4:52 PM
To: esther.ahn@lacity.org
Cc: Councilmember.Rodriguez@lacity.org, councilmemberlee@lacity.org, Deborawkart@gmail.com

Dear Esther Ahn,

This e-mail is regarding the historic house at 15524 and 15526 Plummer St. in North Hills. This historic home and grounds has been designated as a cultural heritage location. It must be preserved for future generations as an important part of the foundational history of the San Fernando Valley. It is especially important for the residents of this location. There are already 12 schools in the close vicinity. Another one is NOT needed in this location. The importance of the home and the surrounding grounds, which could be turned into a community park far outweigh the destruction of history and an unnecessary additional school. The Valley is in dire need of more green park space.

This home is all that is left of the Plummer Family history, other than the name of the street. This is a wonderful opportunity for City Planning to do the right thing for the community! I am opposed to the building of the Bright Star Valor Academy! Do not allow them to build on Plummer Street.

Thank you for your consideration,

Thelma Mericle
Sherman Oaks Neighborhood Council
Residential Representative

Esther Ahn <esther.ahn@lacity.org>

We Oppose BrightStar Valor Academy.

1 message

Valerie Miranda <valeriebmiranda@gmail.com> Mon, Dec 5, 2022 at 10:13 AM
To: Esther Ahn <Esther.ahn@lacity.org>

Ms Ahn,
My entire family (3 households) opposes the BrightStar Valor Academy as we all live in the neighborhood. To us, it will cause a huge traffic issue on top of the already bad traffic in the mornings and afternoons. There are enough schools in our area to support the amount of children needing to attend school. We all would love to see this location hold a historical site and a community park in our neighborhood as there aren't any open spaces for us to take our family too other than driving a good distance to one. PLEASE hear our plea!

Sincerely,
Valerie Miranda



Valerie B. Miranda
REALTOR® DRE# 01889510
RODEO REALTY, INC.
Cell 818-335-7679

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Esther Ahn <esther.ahn@lacity.org>

Case Number CPC-2022-5865-CU-SPR-15526 Plummer Street

1 message

cacwow@verizon.net <cacwow@verizon.net> Wed, Dec 7, 2022 at 7:49 PM
To: esther.ahn@lacity.org

LA City Planning Hearing Officer - Esther Ahn;

This letter is concerning property development on 15526 Plummer street into a publicly funded charter school in North Hills, Ca.

School enrollment in the San Fernando valley is rapidly declining. LAUSD has empty classrooms not being utilized. This city has 23 schools in the 5.5 square miles, 12 of which are elementary schools. Sepulveda MS and Carlos Santana ES are ½ block away across Sepulveda Blvd. Another school is not needed in North Hills.

This is some of the last open space in North Hills and is greatly needed for the residents to utilize for a pocket park/open space. L.A county has an average of 3.3 park acres per 1,000 people. North Hills currently has .5 acres per 1,000 people. More density usually equals more crime plus adding more traffic into a residential neighborhood.

A house built in 1914 by Mr. & Mrs. Plummer sits on the property which is being considered to become L.A's newest Historic Cultural Monument. Turning this historic house and surrounding acreage into a museum open to the public, with surrounding trees and landscaping, would allow everyone a place to go on field trips for educational learning. Perhaps a small community center to be utilized by the public, and to learn how the early settlers farmed and lived in the San Fernando Valley.

North Hills already has an abundance of schools.

North Hills needs open park space.

Respectfully,

Wanda Weickert

Esther Ahn <esther.ahn@lacity.org>

RE:CPC-2022-5865-CU-SPR

1 message

Wil Negrete <wilnegrete@gmail.com> Mon, Dec 12, 2022 at 2:45 PM
To: Esther.ahn@lacity.org

My name is Wilfred Negrete and I have lived in my community for 35 yrs. I was here when we were called Sepulveda and then it was changed to North Hills.
There are many reasons for not putting this school on Plummer Street. There are four elementary schools, one high school and one middle school all within one mile of each other. And these are the LAUSD schools, and there are two parochial schools nearby. These schools were established many years ago, Carlos Santana is the newest. As a resident here in North Hills, traffic has become worse over the years, and it has put residents having to choose new ways to get home. Traffic just from the existing schools at 3:30 is backed up from Sepulveda Blvd. to Haskell Ave. Now if this school is built, the main artery from the west side of the valley will be congested, and our small streets will have parents racing to and from this school to pick up and drop off their children.
Now I saw the hearing notice this weekend and want to ask, how many students actually live within the 500ft radius that this school will bring a benefit to. Maybe one if you're lucky two, so after all has been said, most of the children coming to this school will have to travel by car to attend this school. This leaves current residents with total kaos during the school year. I know, as a grandfather I have taken four grandkids to school in the mornings and parents and grandparents are not very kind especially when they are late.
I ask you to reconsider other properties that can have the extra parking and streets widen for entering and exiting.

Thank you
Wilfred Negrete

Esther Ahn <esther.ahn@lacity.org>

(no subject)

1 message

Yesenia Ostorga <yesebiaostorga25@gmail.com> Tue, Dec 13, 2022 at 4:46 PM
To: esther.ahn@lacity.org

My name is Yesenia ostorga. I am a parent of a student who attends Valor Academy elementary school I am writing in support of the Bright star school project to build a permanent campus for valor elementary at 15526 Plummer street. This location is important to me because both of my daughters attend Valor elementary and I believe that it is important for my daughters academic future to have a permanent location for their academic success. Valor elementary has been a wonderful place for my daughters to learn and grow. Specifically, the school has benefited our family by giving us lot of support on my daughter learning disability and my other daughter psychological. The stuff at valor is very welcoming and helpful in giving back to the community. I full support the school building a permanent campus at 15526 Plummer so that more children from the community can benefit from receiving an education here.

sincerely

yesenia

ostorga