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DOWLING AARON

Christopher A. Brown
Director
[redacted]

July 24, 2024

VIA EMAIL / clerk@fresno.gov

President of City Council Annalisa Perea
City of Fresno
City Council
2600 Fresno Street
Fresno, CA 93721

Re: Fresno City Council July 25, 2024 Agenda Item ID 24-899: Public Comment on Appeal of Project at 7056 North Prospect Avenue, Development Permit Application No. P21-00989, and CEQA determination under Class 32 Categorical Exemption

Dear President Annalisa Perea and Councilmembers:

On behalf of the Northwest Neighbors for Safe Development, we submit this comment letter in opposition to the City Council's appeal of the Planning Commission's Approval of the Appeal of the Director of Planning's approval of the 7056 North Prospect Avenue Project, located on the northeast corner of West Herndon and North Prospect Avenues in Fresno (**"Project"**), and which includes approval of Development Permit Application No. P21-00989 pursuant to FMC Section 15-5206, adoption of Findings and Conditions of Approval, and determination that the Project is exempt from the California Environmental Quality Act (**"CEQA"**) pursuant to a Class 32 categorical exemption.[1]

On March 25, 2024, the City of Fresno (**"City"**) Director of Planning (**"Director"**) issued a Notice of Action (**"NOA"**) approving the Project. The NOA approved a Development Permit Application, adopted Findings and Conditions of Approval, and determined that the Project is exempt from the CEQA pursuant to a Class 32 categorical exemption.[2] The NOA indicates that the appeal period for the determination ended on April 9, 2022. This NOA was appealed and heard at the Fresno Planning Commission meeting on May 15, 2024, where the Planning

[1] CEQA Guidelines, Section 15332.
[2] Project NOA, March 25, 2024, available at https://appdev.fresno.gov/kiosk_clerk/admin/upload/1711407994_cityclerk.pdf

Commission upheld the appeal, resulting in the denial of the Project.[3] The City Council appealed this Planning Commission decision on May 29, 2024.[4]

The Planning Commission upheld the appeal on the basis of Finding B (the General Plan and any operative plan or policies the City has adopted) that it does not meet the General Plan in regards to Urban Neighborhood Residential Planned Land Use because it does not meet the General Plan due to it being completed in 2015 and does not take into account the significant growth within the City of Fresno, especially the traffic that will be detrimental to the public if this Project was approved.[5]

Northwest Neighbors for Safe Development hereby opposes the City Council's appeal of the Planning Commission's approval of an appeal where the Planning Commission overturned the Director's approval of the Development Permit Application, Findings and Conditions of Approval, and where the Director determined that the Project is exempt from the CEQA pursuant to a Class 32 categorical exemption NOA dated March 25, 2024.

The reasons for the opposition to this appeal are set forth herein. Our opposition is supported by technical comments provided by air quality and hazards expert James Clark, Ph.D,[6] and noise expert Derek Watry.[7]

As explained herein and in the attached expert comments, the Planning Commission's decision was correct because the Director abused its discretion and failed to proceed in the manner required by law by approving the Project in reliance on a categorical exemption and without substantial evidence to support the approval findings.[8]

To qualify for a categorical exemption, a lead agency must provide substantial evidence that the Project will not have a significant effect.[9] However, as explained below, the Project may have potentially significant impacts on public health and noise. Specifically, the Project's construction may result in emissions of toxic air contaminants ("**TACs**") that would increase health risks to significant levels. The Project's construction includes noise-generating activities that may result in significant noise impacts on nearby receptors. These impacts are especially

[3] City of Fresno Planning Commission Meeting May 15, 2024 Meeting Minutes, available at City of Fresno - Meeting of Planning Commission on 5/15/2024 at 6:00 PM (legistar.com).
[4] City of Fresno Letter from Fresno Mayor and Councilmember of District 2 Appeal the Planning Commission decision, dated May 29, 2024. Attached here as **Exhibit A**.
[5] City of Fresno Planning Commission Meeting May 15, 2024 Meeting Minutes, available at City of Fresno - File #: ID 24-651 (legistar.com).
[6] Dr. Clark's technical comments and curriculum vitae are attached hereto as **Exhibit B** ("Clark Comments").
[7] Mr. Watry's technical comments and curriculum vitae are attached hereto as **Exhibit C** ("Watry Comments").
[8] Code Civ. Proc. § 1094.5(b); *Topanga Assn. for a Scenic Community v. County of Los* Angeles (1974) 11 Cal.3d 506, 515.
[9] *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego* (2006) 139 Cal.App.4th 249, 269.

severe due to the proximity of residential receptors – residential buildings are located within 25 feet of the Project site.

As a result, an EIR is the correct form of environmental review for the Project, not a categorical exemption. Due to these significant environmental and public health impacts, and the related failure to prepare the correct form environmental review, the Director also abused its discretion in approving the Project under the Housing Accountability Act because there are specific adverse impacts from the Project which are not mitigated in the Project's current form.

Because the Director abused its discretion and failed to proceed in the manner required by law, including, but not limited to, a failure to comply with CEQA, Northwest Neighbors for Safe Development respectfully requests that the City Council uphold the Planning Commission's appeal decision of the Project, on the basis the Planning Commission approved the appeal due to inconsistencies with the General Plan and traffic impacts. Additionally, the City Council has the independent authority to deny the Project because there is substantial evidence in the record via this letter that the Project will cause specific adverse impacts on public health and safety that justify the continued vacation of the Director's approval of the Project, and would require the City Council to direct staff to prepare an EIR for the Project should the City Council not wish to deny the Project altogether.

I. STANDING AND STATEMENT OF INTEREST

Northwest Neighbors for Safe Development is an unincorporated association of individuals that may be adversely affected by the potential public health and safety hazards, and the environmental and public service impacts of the Project. The coalition includes City of Fresno residents Matt Nutting, Brandon Smittcamp, Kirk Cernigli, J.T. Contrestano, Pat Cornaggia, Rodney J. De Luca, Gary H. Rushing, Peter Nunez, David Scott, Mike Shirinian, Vicki Allen-Westburg, Debbie Nard, Dennis Nard, Rick Martin, along with their families, and other individuals who live and work in the City of Fresno.

Individual members of Northwest Neighbors for Safe Development live, work, recreate, and raise their families in the City of Fresno and surrounding communities. Accordingly, they would be directly affected by the Project's environmental, health, and safety impacts.

Northwest Neighbors for Safe Development and its members are aggrieved by the City Council's appeal of the Planning Commission's decision overturning the Director's decision to approve the Project and adopt unsupported approval findings in reliance on a CEQA exemption, without analyzing and mitigating the Project's potentially significant impacts in an EIR.

II. THE PROJECT DOES NOT QUALIFY FOR A CLASS 32 CATEGORICAL EXEMPTION FOR INFILL DEVELOPMENT PROJECTS

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an EIR, except in certain limited circumstances.[10] The EIR is the very heart of CEQA.[11] "The foremost principle in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language."[12]

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project.[13] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'"[14] The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return."[15]

Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all feasible mitigation measures.[16] The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced."[17] If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns."[18]

Under CEQA, mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments.[19] A CEQA lead agency is precluded from making the required CEQA findings to approve a project unless the record shows that all uncertainties regarding the mitigation of impacts have been resolved. For this reason, an agency

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[10] *See, e.g.*, PRC § 21100.
[11] *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.
[12] *Communities for a Better Env. v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 109 ("*CBE v. CRA*").
[13] 14 Cal. Code Regs. § 15002(a)(1).
[14] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.
[15] *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1354 ("*Berkeley Jets*"); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.
[16] 14 CCR § 15002(a)(2) and (3); *see also Berkeley Jets*, 91 Cal.App.4th at 1354; *Citizens of Goleta Valley*, 52 Cal.3d at p. 564.
[17] 14 Cal. Code Regs. §15002(a)(2).
[18] PRC § 21081; 14 CCR § 15092(b)(2)(A) & (B).
[19] CEQA Guidelines, § 15126.4, subd. (a)(2).

may not rely on mitigation measures of uncertain efficacy or feasibility.[20] This approach helps "ensure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug."[21]

CEQA identifies certain classes of projects which are exempt from the provisions of CEQA, called categorical exemptions.[22] Categorical exemptions apply to certain narrow classes of activities that generally do not have a significant effect on the environment.[23] "Thus an agency's finding that a particular proposed project comes within one of the exempt classes necessarily includes an implied finding that the project has no significant effect on the environment."[24] "It follows that where there is any reasonable possibility that a project or activity may have a significant effect on the environment, an exemption would be improper."[25]

CEQA exemptions must be narrowly construed and are not to be expanded beyond the scope of their plain language.[26] They should not be construed so broadly as to include classes of projects that do not normally satisfy the requirements for a categorical exemption.[27] Erroneous reliance by a lead agency on a categorical exemption constitutes a prejudicial abuse of discretion and a violation of CEQA.[28] "[I]f the court perceives there was substantial evidence that the project might have an adverse impact, but the agency failed to secure preparation of an EIR, the agency's action must be set aside because the agency abused its discretion by failing to follow the law."[29]

To qualify for a categorical exemption, a lead agency must provide "substantial evidence to support [its] finding that the Project will not have a significant effect."[30] "Substantial evidence" means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the Project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency.[31] If a court locates substantial evidence in the record to support the agency's conclusion, the agency's

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[20] *Kings County Farm Bureau v. County of Hanford* (1990) 221 Cal.App.3d 692, 727-28 (a groundwater purchase agreement found to be inadequate mitigation because there was no record evidence that replacement water was available).
[21] *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935.
[22] PRC § 21084(a); 14 CCR §§ 15300, 15354.
[23] PRC § 21084(a); 14 CCR §§ 15300, 15354; *Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal.4th 372, 380.
[24] *Davidon Homes v. City of San Jose* (1997) 54 Cal.App.4th 106, 115.
[25] *Azusa Land Reclamation Co. v. Main San Gabriel Basin* Watermaster (1997) 52 Cal.App.4th 1165, 1191 ("*Azusa Land Reclamation*"), *quoting Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 205– 206.
[26] *Castaic Lake Water Agency v. City of Santa Clarita* (1995) 41 Cal.App.4th 1257.
[27] *Azusa Land Reclamation* (1997) 52 Cal.App.4th 1165, 1192.
[28] *Azusa*, 52 Cal.App.4th at 1192.
[29] *Dunn-Edwards Corp. v. Bay Area Air Quality Mgmt. Dist.* (1992) 9 Cal.App.4th 644, 656).
[30] *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego* (2006) 139 Cal.App.4th 249, 269.
[31] CEQA Guidelines § 15384.

decision will be upheld.[32] If, however, the record lacks substantial evidence, as here, a reviewing court will not uphold an exemption determination.

Section 15332 of the CEQA Guidelines provides an exemption from CEQA for projects characterized as in-fill development meeting the conditions:

> (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
>
> (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
>
> (c) The project site has no value as habitat for endangered, rare or threatened species.
>
> (d) **Approval of the project would not result in any significant effects relating to traffic, noise, air quality**, or water quality. (emphasis added)
>
> (e) The site can be adequately served by all required utilities and public services.

CEQA also contains several exceptions to categorical exemptions. In particular, a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to "unusual circumstances,"[33] or where there is a reasonable possibility that the activity will have a significant effect on the environment, including (1) when "the cumulative impact of successive projects of the same type in the same place, over time is significant."[34] An agency may not rely on a categorical exemption if to do so would require the imposition of mitigation measures to reduce potentially significant effects.[35]

Here, the Class 32 Exemption and any other CEQA exemption are inapplicable to the Project due to its significant effects on air quality, health risk, noise, and transportation.[36]

[32] *Bankers Hill Hillcrest*, 139 Cal.App.4th at 269.
[33] 14 CCR § 15300.2(c).
[34] 14 CCR § 15300.2(b).
[35] *Salmon Pro. & Watershed Network v. County of Marin* ("SPAWN") (2004) 125 Cal.App.4th 1098, 1198-1201.
[36] The Project's significant effects also create exceptions to an exemption under 14 CCR § 15300.2(b), (c).

A. A CEQA Exemption is Inapplicable Because the Project may Result in Significant Effects Related to Air Quality and Health Risk

1. The City Lacks Substantial Evidence to Conclude That the Project's Health Risk Impacts From air Emissions are Less Than Significant

The City lacks substantial evidence to support its reliance on an exemption because the City failed to analyze the health risk impacts of Project construction and operation on nearby sensitive receptors. To qualify for a categorical exemption, a lead agency must provide "substantial evidence to support [its] finding that the Project will not have a significant effect."[37] Here Dr. Clark has presented substantial evidence there will be significant effects on public health.

The Project would increase health risks in the surrounding community by contributing TACs such as Diesel Particulate Matter ("**DPM**") during construction.[38] During the Project's construction, heavy equipment and diesel trucks would emit DPM. DPM has been linked to a range of serious health problems including an increase in respiratory disease, lung damage, cancer, and premature death.[39] The Project's emissions of DPM would impact numerous sensitive receptors, including residents in residential buildings located within 25 feet of the Project site.[40]

CEQA requires an analysis of human health impacts. CEQA Guidelines Section 15065(a)(4) provides that the City is required to find a project will have a significant impact on the environment and require an EIR if the environmental effects of a project will cause a substantial adverse effect on human beings.[41] The Supreme Court has also explained that CEQA requires the lead agency to disclose the health consequences that result from exposure to a project's air emissions.[42]

For development projects like this one, the Office of Environmental Health Hazard Assessment's ("**OEHHA**") risk assessment guidelines recommend a formal health risk analysis ("**HRA**") for short-term construction exposures to TACs lasting longer than 2 months and exposures from projects lasting more than 6 months should be evaluated for the duration of the project.[43] In an HRA, lead agencies must first quantify the concentration released into the environment at each of the sensitive receptor locations through air dispersion modeling, calculate

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[37] *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San* Diego (2006) 139 Cal.App.4th 249, 269
[38] Clark Comments, pg. 5.
[39] Clark Comments, pg. 6.
[40] Clark Comments, pg. 9.
[41] 14 CCR § 15065(a)(4); PRC § 21083(b)(3), (d).
[42] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, 523.
[43] Office of Environmental Health Hazard Assessment (OEHHA), Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, February 2015 (OEHHA 2015), Section 8.2.10: Cancer Risk Evaluation of Short Term Projects, pp. 8-17/18; https://oehha.ca.gov/air/crnr/notice adoption air toxics hot spots program guidance manual preparation-health-risk-0

the dose of each TAC at that location, and quantify the cancer risk and hazard index for each of the chemicals of concern.[44] Following that analysis, then the City can make a determination of the relative significance of the emissions.

The City did not conduct this analysis. Here, the City concludes that the Project would not result in significant health risk impacts without conducting any of the above analytical steps. The City fails to disclose or analyze that the Project's construction and operation would result in emissions of TACs. Next, the City fails to disclose or analyze the health impacts of exposure to certain concentrations of TACs. Then the City fails to quantify the magnitude of TACs emitted by the Project. Lastly, the City fails to model the concentration of TACs at sensitive receptors.[45] In sum, there is no evidence in the Environmental Assessment performed by the City on February 9, 2024 ("**Environmental Assessment**")[46] that the City considered health risks from TACs when determining that the Project qualifies for a categorical exemption.

The City reasons that because of the scale and scope of the Project done under the Small Project Analysis Level ("**SPAL**"), there would be no contributions to air quality impacts. The City relied on the Guidance for Assessing and Mitigating Air Quality Impacts ("**GAMAQI**") put forth by the San Joaquin Valley Air Pollution Control District ("**SJVAPCD**").[47] This guidance though notes that:

> When a project falls under the SPAL, the Lead Agency should use the information in the initial study checklist, or whatever format used, to justify a finding of less than significant air quality impacts. **The initial study should also verify that no sensitive receptors would be exposed to substantial pollutant concentrations as a result of the project**. Project size, as identified in the SPAL, is not a threshold of significance. SPAL is a screening tool. **The Lead Agency has the responsibility to identify and avoid potential land use conflicts, such as potential exposure of sensitive receptors to sources of toxic air contaminants**, sources of hazardous materials, and potential odors. (emphasis added).[48]

The City clearly ignored the guidance's recommendations on TACs and therefore its conclusions are not supported by substantial evidence and do not mitigate the specific adverse

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[44] *Id.*
[45] The City's failure to analyze the magnitude and concentration of the Project's TACs also conflicts with the OEHHA recommendations for HRAs. The OEHHA guidelines recommend an HRA be prepared for this Project's construction and operation because its 24-month construction schedule exceeds 2 months, and its operations would last over 6 months.
[46] City of Fresno Planning Department, Categorical Exemption Environmental Assessment for the Project (February 9, 2024), p.6, available at ID 24-651 - Exhibit J - Environmental Assessment P21-00989 [2-9-2024] (legistar.com).
[47] *Id* at p. 6.
[48] Guidance for Assessing and Mitigating Air Quality Impacts, San Joaquin Valley Air Pollution Control District, p. 86, available at https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF#page=86

impacts identified below. As SJVAPCD notes, just because a Project qualifies as a SPAL, does not mean the Project will have no environmental impacts. GAMAQI notes that the Lead Agency is responsible for identifying and avoiding potential exposure of TACs to sensitive receptors. Therefore, the City failed to analyze health risk impacts from exposure to TACs during the Project's construction and thus failed to support its finding of a less-than-significant health risk impact.

2. The Project has Potentially Significant Health Risk Impacts

Dr. Clark calculates that the Project's emissions of DPM would exceed applicable significance thresholds for health risk set by the SJVAPCD.

Using OEHHA's HARP 2 Standalone Risk software, Dr. Clark calculated the cancer risk to the most sensitive population – infants less than 3 years old.[49] The maximum risk for exposure during construction is 21.5 in 1,000,000, which is greater than the 20 in 1,000,000 threshold set forth by the SJVAPCD for the maximally exposed individual. Dr. Clark's modeling even shows which receptors will be subject to these potentially significant impacts.[50]

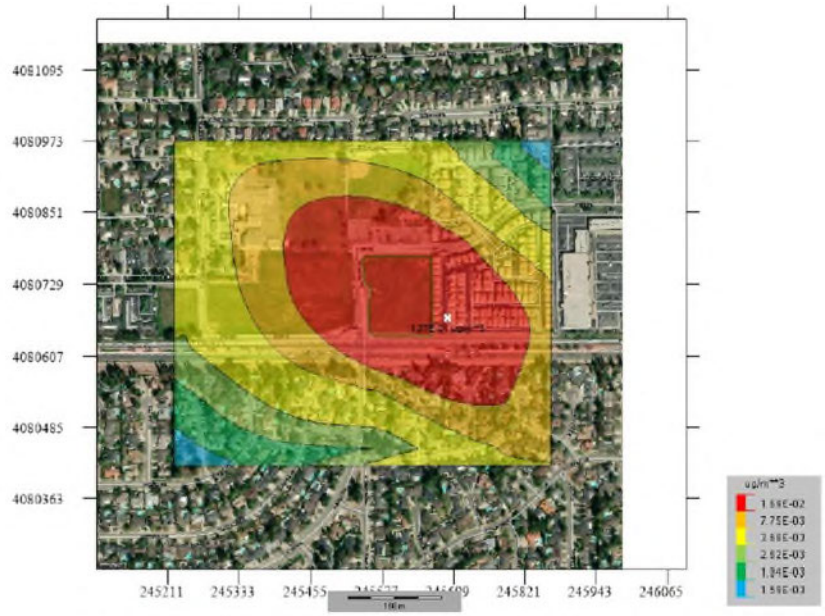

Figure 6: Model output showing DPM concentrations from 2024 through 2025

As a result of these significant effects, the Project does not qualify for any CEQA exemption, including a Class 32 exemption. The Project's significant impacts must be disclosed and mitigated in an EIR. Additionally, these significant effects constitute a "specific adverse

[49] Clark Comments, pg. 10.
[50] *Id*.

impact" based on written public health or safety standards in existence at the time the Project's application was filed as defined by the Housing Accountability Act.[51] Thus, the City Council may uphold the Planning Commission's appeal on an independent basis different from that which the Planning Commission ruled on because the Project may properly be denied under the Housing Accountability Act, or at least directed to prepare an EIR.

B. An Exemption is Inapplicable Because the Project may Result in Significant Construction Noise Impacts Which Require Mitigation

1. The City Lacks Substantial Evidence to Conclude That the Project's Noise Impacts From Construction are Less Than Significant

To qualify for a categorical exemption, a lead agency must provide "substantial evidence to support [its] finding that the Project will not have a significant effect."[52] The City's Environmental Assessment states that the Project would result in less-than-significant construction noise impacts, but according to the Environmental Assessment, the Project's construction noise impacts are exempt under FMC section 10-109(a) and thus were never even analyzed.[53]

Courts have held that compliance with noise regulations alone is not substantial evidence of a less-than-significant impact.[54] In *Oro Fino Gold Mining Corp. v. County of El Dorado* ("*Oro Fino*"),[55] a mining company applied for a special use permit for drilling holes to explore for minerals.[56] The mining company argued the proposed mitigated negative declaration prohibited noise levels above the applicable county general plan noise standard maximum of 50 dBA and, therefore, there could be no significant noise impact. The court rejected this argument: "we note that conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects."[57] Thus, the court concluded an EIR was required.

In *Citizens for Responsible & Open Government v. City of Grand Terrace* ("*Grand Terrace*"),[58] the city approved a 120-unit senior housing facility based on a mitigated negative

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[51] Gov. Code section 65589.5(j)(1)(A)-(B).
[52] *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San* Diego (2006) 139 Cal.App.4th 249, 269.
[53] *See* FMC Section 10-109(a).
[54] *King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal.App.5th 814, 865.
[55] (1990) 225 Cal.App.3d 872.
[56] *Id.* at pg. 876; *see also Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714; *Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project's effects can be significant even if "they are not greater than those deemed acceptable in a general plan"); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, ("CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan").
[57] *Id.* at pp. 881–882.
[58] (2008) 160 Cal.App.4th 1323.

declaration.[59] The noise element of the city's general plan stated exterior noise levels in residential areas should be limited to 65 dB CNEL.[60] The initial study concluded the facility's air conditioner units would cause noise impacts, but with mitigating measures the project would operate within the general plan's noise standard. But the court cited *Oro Fino* for the principle that "'conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects.'"[61] A citizen's group provided substantial evidence supporting such a fair argument. This evidence included testimony from an individual in the HVAC industry that the type of air conditioning units proposed by the project "sound like airplanes."[62] And at a city council public hearing, community and city council members expressed concern that the air conditioners would be noisy.[63] The court considered the testimony about the noise generated by the proposed air conditioners, took into account the mitigation measures, and concluded "there is substantial evidence that it can be fairly argued that the Project may have a significant environmental noise impact."[64]

Here the City's conclusions regarding impacts from Construction Noise are not supported by substantial evidence because the City did not perform any analysis to reach said conclusions. Mr. Watry notes that it is possible for a project to cause significant environmental noise impacts regardless of whether the Fresno Municipal Code makes this type of noise a violation.[65] The City merely assumed that compliance with the City's noise ordinance means it is impossible for there to also be construction noise impacts. This conflation is wrong and violates CEQA.

2. The Project has Potentially Significant Construction Noise Impacts

To further demonstrate this, Mr. Watry performed a construction noise analysis and found that construction noise would exceed the residential noise thresholds of 55 dB from 7:00 p.m. to 10:00 p.m. and 60 dB from 7 a.m. to 7 p.m.[66] Mr. Watry recites the City's noise ordinance which describes what noise levels are usually prima facie noise violations:

> Any noise or sound exceeding the ambient noise level at the property line of any person offended thereby, or, if a condominium or apartment house, within any adjoining living unit, by more than five decibels shall be deemed to be prima facie evidence of a violation of Section 8-305.[67]

[59] Id. at 1327.
[60] *Grand Terrace*, 160 Cal.App.4th at 1338.
[61] *Grand Terrace*, *supra*, at pg. 1338.
[62] *Id.* at 1338-1339.
[63] *Id.* at 1338.
[64] *Id.* at p. 1341.
[65] Watry Comments, p. 2.
[66] Watry Comments, p. 5.
[67] FMC sec. 10-106.

Mr. Watry uses this value combined with a significant buffer of an additional 5 dBA to determine what level of noise impacts could constitute potentially significant noise impacts.[68] Using the Environmental Protection Agency's values for Residential Construction Noise, Mr. Watry concluded that every phase of construction would exceed the residential thresholds by at least 10 dBA significance threshold for residential. While every phase of construction will exceed 70 dBA, some will significantly exceed this based on the average EPA Noise Levels for each phase of construction:[69]

TABLE I EPA NOISE LEVELS FOR RESIDENTIAL CONSTRUCTION

Phase	Average	Range‡
Ground clearing	83 dBA	75 to 91 dBA
Excavation	88	80 to 96
Foundations	81	71 to 91
Erection	81	71 to 91
Finishing	88	81 to 95

As such the City's conclusions regarding impacts from Construction Noise are not supported by substantial evidence because the City failed to analyze construction noise impacts or present substantial evidence that there will not be potentially significant construction noise impacts.

As a result of these significant effects, the Project does not qualify for any CEQA exemption, including a Class 32 exemption. The Project's significant impacts must be disclosed and mitigated in an EIR. Additionally, these significant effects constitute a "specific adverse impact" based on written public health or safety standards in existence at the time the Project's application was filed as defined by the Housing Accountability Act.[70] Thus, the City Council may uphold the Planning Commission's appeal on an independent basis different from that which the Planning Commission ruled on because the Project may properly be denied under the Housing Accountability Act, or at least directed to prepare an EIR.

C. An Exemption is Inapplicable Because the Project may Result in Significant Transportation Impacts

To qualify for a categorical exemption, a lead agency must provide "substantial evidence to support [its] finding that the Project will not have a significant effect." The City's

[68] Watry Comments, p. 4.
[69] Watry Comments, p. 3.
[70] Gov. Code section 65589.5(j)(1)(A)-(B).

Environmental Assessment states that the Project would result in less-than-significant transportation impacts, but the City failed to perform an actual transportation analysis.

Here the City did not perform a transportation analysis based on screening out the Project based on a projected 461 trip-per-day vehicle metric. Additionally, the City also failed to review the Project's pedestrian and bicycle safety impacts, given the Project's density and proximity to the Tatarian Elementary School and Orchard Park. Many existing neighbors, with eye-witness experience, and the Fresno Unified School District President Susan Wittrup have commented regarding the present traffic and pedestrian safety issues that would be exacerbated by the Project and must be analyzed.[71] As such the City's conclusions regarding Transportation impacts are not supported by substantial evidence and do not support the use of an exemption.

III. THE CITY COUNCIL MAY DENY THE PROJECT UNDER THE HOUSING ACCOUNTABILITY ACT BECAUSE "SPECIFIC ADVERSE IMPACT ON THE PUBLIC HEALTH" ARE FOUND BASED ON OBJECTIVE CRITERIA

The City Council may deny a housing development project, or impose a condition that the project be developed at a lower density, after making written findings, based on a preponderance of the evidence in the administrative record, that the Project would have a specific, adverse impact on the public health or safety, and there is no other feasible method to satisfactorily mitigate or avoid the adverse impact.[72] A "specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.[73] Objective standards are defined as those that involve no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official.[74]

As discussed above the Air Quality and Noise impacts were measured against external and uniform benchmarks or criteria available and knowable by both the development applicant or proponent and the public official, had the Project merely performed an EIR. This means under Gov. Code section 65589.5(j)(1)(A) the Project could be denied or at least required to perform an EIR before the City Council ultimately looks to approve the Project.

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[71] Fresno City Council Agenda for July 25, 2024 Meeting Agenda Item ID 24-899, Exhibit O, pg. 8-9, available at ID 24-899 - Exhibit O - Correspondence Received (legistar.com).
[72] Gov. Code section 65589.5(j)(1)(A)-(B).
[73] *Id.*
[74] Department of Housing and Community Development, Division of Housing Policy Development, Housing Accountability Act Technical Assistance Advisory (Government Code Section 65589.5) (September 15, 2020), https://www.hcd.ca.gov/community-development/housing-element/housingelement-memos/docs/hcd-memo-on-haa-final-sept2020.pdf ("HCD Advisory").

As to Gov. Code section 65589.5(j)(1)(B) because the Project failed to perform an EIR, there is currently no feasible way to mitigate these impacts other than the disapproval of the Project or approve the Project at a lower density once it has been determined mitigation is feasible. It is impossible at this moment and time to determine if there are feasible methods to satisfactorily mitigate or avoid the adverse impacts identified above. The Housing Accountability Act does not relieve the City of its obligation to require the proper CEQA process and until such analysis is done it is impossible to determine how to mitigate these impacts.[75]

IV. CONCLUSION

Northwest Neighbors for Safe Development respectfully requests that the City Council uphold the Planning Commission's decision because there is substantial evidence in the record that the Project does not qualify for a Categorical Exemption under CEQA and that there will be specific adverse impacts on public health. Until the City performs an EIR for the Project it is impossible to determine if the Project's specific adverse impacts can be mitigated sufficiently to require approval under the HAA.

Sincerely,

FENNEMORE DOWLING AARON

[redacted]

Christopher A. Brown

CBRO/mrh
Attachments
cc/enc: Robert Holt (Via Email [redacted]
David Schneider (Via Email [redacted]

[75] Gov. Code section 65589.5(e).

EXHIBIT A

CITY OF FRESNO

May 29, 2024

Jennifer Clark, Director
Planning and Development Department
2600 Fresno Street
Fresno, CA 93721

Re: 7056 North Prospect Avenue – Development Permit Application #P21-00989

We understand that as Planning and Development Department Director, you approved Development Permit Application #P21-00989 on March 25, 2024, which proposed an 82-unit market-rate apartment complex at 7056 North Prospect Avenue. The City of Fresno (City) received eight appeals of that decision, which was then heard by the Planning Commission on May 15, 2024. The Planning Commission overturned the Director's approval of the permit.

Decisions of the Planning Commission may be appealed by the district Councilmember and/or the Mayor. On May 22, 2024, we received a request from the applicant seeking an appeal of the Planning Commission's determination, which would allow the matter to be reviewed by the City Council. Further, the applicant suggested the action taken by the Planning Commission may have violated the California Housing Accountability Act. Subsequently, on May 23, 2024, a second request for appeal was provided by several members of the Greenfield Coalition, also suggesting the Planning Commission's action may have violated state law, and the City would be in a "vulnerable position to defending such an action."

Additionally, we received countless phone calls, e-mails and letters from concerned residents and households in the Prospect Avenue neighborhood. Many of the residents expressing concern were not in opposition to housing in this area and recognized that Fresno is in the midst of a housing crisis. They were, however, concerned with understandable items such as traffic congestion, parking, and the four-story height of one section of the proposed complex. It was reported that some of the neighborhood concerns were addressed, such as removal of windows facing adjacent housing, but many remain unsatisfied with the applicant's unwillingness to meet and further discuss the community concerns.

When considering the pleas to both appeal and not appeal this decision, as elected officials we must take into account both the responsibility to protect the City's financial interests, as well as act in the best interest of our residents, and not lose the trust of our community.

It is with this in mind; we have heavily considered the following items:

1. The City Attorney's Office has advised that the findings made by the Planning Commission fall short of the required criteria to deny the project. As a result, the City has been placed at substantial risk of litigation that will likely result in substantial fines and the courts approving the project as it stands proposed today by the developer.
2. It is logical to presume that if the Planning Commission's decision is not appealed, the applicant could litigate, and has a strong likelihood of winning, resulting in the proposed development being approved as is.

3. In addition to the time and resources involved in litigation, there are also fines for violating the Housing Accountability Act. These fees range from a minimum of $10,000 to $50,000 per unit. This could equate to a City fine between $820,000 - $4.1 million.
4. Nearby residents continue to express opposition to elements of the proposed multi-family housing development, concerns ranging from traffic congestion, parking, and the four-story height of one section of the proposed complex.
5. Insufficient community dialogue has been reported by residents, indicating the applicant refused to meet with the community to discuss concerns. It is clear the community desires an opportunity to meet with the applicant.
6. Last, and certainly not least, it is our understanding that should the applicant apply for a new housing development, the 3.7 acre lot allows density for up to 111 units. Should a new application include a percentage of units reserved for affordable housing, the City would have no other option but to approve within a 90-day time period. Depending on income levels and unit counts proposed under this potential scenario, density bonuses can also be applied which range from 20-40 additional units. As part of the density bonus program, which could allow up to 151 units, additional parking reductions plus other concessions like height, setbacks and landscaping can also be made.

Therefore, it is with considerable thought and deliberation that we have come to a decision we hope will honor the concerns raised by residents, that will provide quality housing for Fresno residents, and that will not put the City at unnecessary financial risk.

In this instance, we are confident a "do nothing" posture would be an even greater disservice to all involved. We are advised by the City Attorney that doing nothing by foregoing our appeal rights will result in great risk to the City. Doing nothing would create delays in housing production and potential litigation, all with a high likelihood the courts would eventually uphold the development as proposed in the long run, costing the City millions, and ultimately putting this decision in the hands of the court system versus the City Council.

Of even greater concern is the risk of losing the trust of the community. We are sympathetic to those who live in close proximity, and understand the residents desire an opportunity to discuss the proposed project with the applicant. By doing nothing, we believe the residents would ultimately be unsatisfied with the final outcome, and the needs of the community outweigh all other considerations.

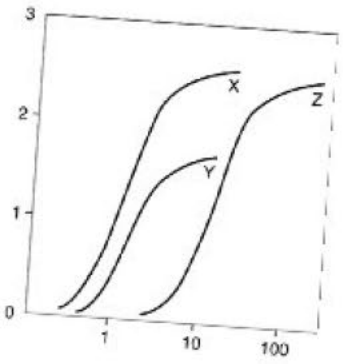
Therefore, we are exercising our authority to appeal the Planning Commission's determination related to Development Permit Application #P21-00989. The appeal will protect our right to bring this item to Council for further review in a reasonable period of time. During this time, we encourage the applicant to come to the table with neighboring residents in productive dialogue around the concerns raised, including but not limited to parking, the height of the proposed building, and traffic congestion.

Sincerely,

Jerry P. Dyer
Mayor

Mike Karbassi
Council Vice President, District 2

EXHIBIT B



Clark & Associates
Environmental Consulting, Inc.

OFFICE
[redacted]

PHONE
[redacted]

FAX
[redacted]

EMAIL
[redacted]

July 19, 2024

Fennemore Law
[redacted]

Attn: Mr. Chris Brown

Subject: Comment Letter on Categorical Exemption For The 7056 North Prospect Avenue Project Categorical Exemption (CE) From The City Of Fresno, California

Dear Mr. Brown:

At the request of Fennemore Law (FL), Clark and Associates (Clark) has reviewed materials related to the February 9, 204 Categorical Exemption (CE) from the City of Fresno (the City) of the above referenced project. The Class 32 CE is proposed for the Project without consideration of the substantial air quality impacts that will be placed on the surrounding neighborhood. The project involves the construction of an 82-unit private gated multi-family development immediately adjacent to existing single-family residential neighborhood located east of the Project Site.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the CE. If we do not comment on a specific item, this does not constitute acceptance of the item.

The project proposes on-site and off-site improvements including, but not limited to, three (3) three-story multifamily residential buildings and one (1) four-story building multifamily residential building consisting of 74 two-bedroom/two bathroom dwelling units and eight (8) two-bedroom/one bathroom dwelling units, one (1) approximately 1,907 square-foot one-story community center building, one (1) swimming pool area, one (1) dog park area, 154 parking spaces (27 single-car garages, 72 covered carport parking spaces, and 55 uncovered parking

spaces), and 6 long-term bicycle parking spaces. Direct access to the development will only be provided from North Prospect Avenue via a private gated entrance. One (1) emergency vehicle access approach is proposed along West Fir Avenue. Three (3) private pedestrian gates will be provided along West Fir Avenue and two (2) private pedestrian gates will be provided along North Prospect Avenue.

Existing Conditions

The Project Site is currently vacant and undeveloped. The proposed project is located within City limits, occurs on a vacant site of approximately 3.7 acres, which is less than the five-acre maximum, and is surrounded by other urban uses. An existing single-family residential neighborhood is located east of the project site. The property to the west is currently vacant and planned and zoned for Employment – Offices uses. The property to the north has been developed with a neighborhood park (Orchid Park). Properties further to the northwest and northeast have been developed with an elementary school (H. Roger Tatarian Elementary School) and single-family residential neighborhoods.

Figure 1: Project Site Location

General Comments:

No attempt has been made to quantify the emissions from the construction and operational phases of the Project. The City argues that using the project type, size, and number of vehicle trips, the San Joaquin Valley Air Pollution Control District (SJV-APCD) has prequantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants. The goes on to state that according to the Small Project Analysis Level (SPAL) Table 1 Residential, Apartment, Mid- Rise with a size of 225 dwelling units and 800 or less average daily one-way trips for all fleet types of 800 or less are deemed to be less than significant. Using the ITE Trip Generation Rates 11th Edition, the subject project (82-unit apartments) would generate 461 average daily trips (two-way trips). Thus, it is less than the SPAL 800 average daily one-way trip threshold. The project as described will not occur at a scale or scope with potential to contribute substantially or cumulatively to existing or projected air quality violations or impacts. This analysis fails to consider the impacts from construction activities at the Project Site and the release of toxic air contaminants (TACs), primarily in the form of diesel particulate matter (DPM) from the construction equipment, onto the adjacent homes. The City's failure to analyze for the health risks associated with the Project ignores the potentially significant impacts which must be analyzed in an environmental impact report (EIR).

Specific Comments:

1. **The City Failed To Perform An Air Quality Analysis Of The Project's Construction And Operational Phases.**

Using the current version of the CalEEMOD (Version 2020.4.0) software I have calculated the unmitigated emissions from the construction phase and operational of the Project. The results are attached as Exhibit A to this letter. Using the data contained in the project description and attached drawings (available from the City's website). The modeled Project is outlined in the figure below.

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	82.0	Dwelling Unit	3.70	54,293	64,835	—	262	—
Parking Lot	40.6	1000sqft	0.93	0.00	—	—	—	—

Figure 2: Project Description For CalEEMOD Analysis

Using the default settings from CalEEMOD, a Project construction schedule was derived. The schedule included 5 distinct phases of work including site preparation, grading, building construction, paving of parking, and application of architectural coatings. Each phase was assumed to be distinct and no overlapping of emissions was assumed.

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	8/30/2024	9/6/2024	5.00	5.00	—
Grading	Grading	9/7/2024	9/18/2024	5.00	8.00	—
Building Construction	Building Construction	9/19/2024	8/7/2025	5.00	230	—
Paving	Paving	8/8/2025	9/2/2025	5.00	18.0	—
Architectural Coating	Architectural Coating	9/3/2025	9/28/2025	5.00	18.0	—

Figure 3: Default Construction Schedule

The CalEEMOD model allows users to select the types of construction equipment available for each phase, hours of operation, along with the emission controls that may be in place. The modeled construction equipment was assumed to be the averaged value of the fleet available currently.

The CalEEMOD analysis generates daily and annual emission values of total organic gases (TOGs), reactive organic gases (ROGs), oxides of nitrogen (NO_x), carbon dioxide (CO), sulfur dioxide (SO2), particulate matter less than ten microns as exhaust (PM_{10E}), particulate matter less than ten microns as dust (PM_{10D}), total PM_{10}, particulate matter less than 2.5 microns as exhaust ($PM_{2.5E}$), particulate matter less than 2.5 microns as dust ($PM2_{2.5D}$), total $PM_{2.5}$, and greenhouse gases. Based on the CalEEMOD analysis, the Project would not exceed the regulatory thresholds for the criteria pollutants listed by SJV-APCD.

Pollutant/Precursor	Construction Emissions	Operational Emissions	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities
	Emissions (tpy)	Emissions (tpy)	Emissions (tpy)
CO	100	100	100
NOx	10	10	10
ROG	10	10	10
SOx	27	27	27
PM_{10}	15	15	15
PM2.5	15	15	15

Figure 4: SJV-APCD Significance Thresholds For Pollutants

The results of the model's output of PM_{10E} though was used in the next part of my analysis to determine if the emissions would exceed the SJV-APCD's risk threshold (a cancer risk of 20 in 1,000,000).

2. Diesel Exhaust From Construction Equipment Is Toxic And Must Be Evaluated Quantitatively To Determine The Health Impacts On The Nearest Sensitive Receptor(s)

Diesel exhaust, in particular DPM, is classified by the State of California as a TAC. TACs, including DPM[1], contribute to a host of respiratory impacts and may lead to the development of various cancers. Failing to quantify the carcinogenic and other health risk impacts places the community at risk for unwanted adverse health impacts. *Even brief exposures to the TACs could lead to the development of adverse health impacts over the life of an individual.*

Diesel exhaust contains nearly 40 toxic substances, including TACs, and may pose a serious public health risk for residents in the vicinity of the Project. TACs are airborne 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

[1] Because DPM is a TAC, it is a different air pollutant than criteria particulate matter (PM) emissions such as PM10, PM2.5, and fugitive dust. DPM exposure causes acute health effects that are different from the effects of exposure to PM alone.

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.[2,3,4] 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.[5] 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.[6] 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}.[7]

Nearby sensitive receptors would be exposed to TACs released during Project construction and operation, including DPM. The nearest sensitive receptors to the Project include the single-family residential neighborhood is located east of the Project Site, the elementary school to the west of the Project Site, and the remaining residences to the southwest and southeast of the Project Site.

The City must assess the air quality impacts for all TACs that will be released during the construction and operational phases of the project. CARB[8] defines diesel exhaust as a complex mixture

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[2] 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.

[3] U.S. EPA, Health Assessment Document for Diesel Engine Exhaust, Report EPA/600/8-90/057F, May 2002.

[4] 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.

[5] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998.

[6] Findings of the Scientific Review Panel on The Report on Diesel Exhaust as adopted at the Panel's April 22, 1998 Meeting.

[7] 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.")

[8] CARB. 1998. Report to the Air Resources Board on the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Part A, Public Exposure To, Sources and Emissions of Diesel Exhaust In California. April 22, 1998. Pg A-1.

of inorganic and organic compounds that exists in gaseous, liquid, and solid phases. CARB and U.S. EPA identify 40 components of the exhaust as suspected human carcinogens, including formaldehyde, 1,3-butadiene, and benzo[a]pyrene. The inhalation unit risk factor identified by OEHHA for use in risk assessments is for the particulate matter (DPM) fraction of diesel exhaust and not the vapor phase components identified by CARB and U.S. EPA.

There is notable precedent requiring a quantitative analysis of TACs from diesel exhaust in CEQA documents. Moreover, the absence of this analysis renders the CE's Air Quality Analysis incomplete. For example, in a 2017 Notice of Preparation of a CEQA Document For the Los Robles Apartments Project, from the SCAQMD[9] noted that:

"In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included." This is a common and feasible analysis that is routinely performed for development projects like the 7056 North Prospect Project.

No effort is made in the CE to quantify the potential health impacts from DPM generated by construction activities or operational activities from the Project on nearby receptors. The City's failure to perform such an analysis is clearly a major flaw in the CE and may be placing the nearby residents at risk from the construction and operational phases of the Project.

3. Using The Results Of The CalEEMOD Analysis I Have Constructed An Air Dispersion Model Of The Emissions And Calculated That The Health Risk From DPM Emissions Will Exceed The SJC-APCD's Risk Significance Threshold Of 20 In One Million.

Using the model described above, a total of 123.6 pounds of DPM were calculated to be emitted from the construction phase of the Project. The Project construction phase will last approximately 279

[9] SCAQMD. 2017. Comment Letter To David Sanchez, Senior Planner City of Pasadena from Jillian Wong, Planning and Rules Manager, SCAQMD.

work days and would last a total of 1.03 years (workdays plus holidays, plus weekends).

Phase	Year	Emissions	Duration	Total Emissions For Phase
		lbs/day	days	lbs
Site Preparation	2024	1.6	5	8
Grading	2024	0.84	8	6.72
Building Construction	2024	0.5	68	34
Building Construction	2025	0.43	162	69.66
Paving	2025	0.29	18	5.22
Architectural Coating	2025	0.03	18	0.54
Total			279	123.6

The construction site is assumed to be approximately 3.7 acres or approximately 1.61 E+05 square feet. Limiting the emissions to an 8-hour period during weekdays, the time weight averaged emission rate for 2024 through 2025 was calculated to be 3.46×10^{-7} lbs per hour of operation per square feet.

AERMOD is an acronym for the American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee's Dispersion Model. AERMOD contains the necessary algorithms to model air concentrations from a wide range of emission source types, including stack-based point sources, fugitive area sources, and volume sources. The modeling domain with the Project Site are indicated in the figure below. The green area is the source area of DPM from construction of the Project.

Figure 5: Model Domain And Receptors

Using the 5-year meteorological data from SJV-APCD for the Fresno Airport monitoring station (closest met station to the Project site), limiting the emissions to an 8-hour period on weekdays, the concentrations at the nearest receptors were calculated and are summarized below. The results are presented in Exhibit B to this letter.

Table 2: Annual Average DPM Concentrations Modeled For Construction Phase

2018	2019	2020	2021	2022
ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3
1.27E-01	1.09E-01	1.06E-01	1.21E-01	1.26E-01

Assuming that emissions will be limited to an eight-hour period during weekdays, it is possible to calculate an averaged emissions over the whole construction site. Using AERMOD, the US EPA's

preferred air dispersion model, it is possible to calculate the concentrations of DPM from the construction area at the closest receptors near the construction site.

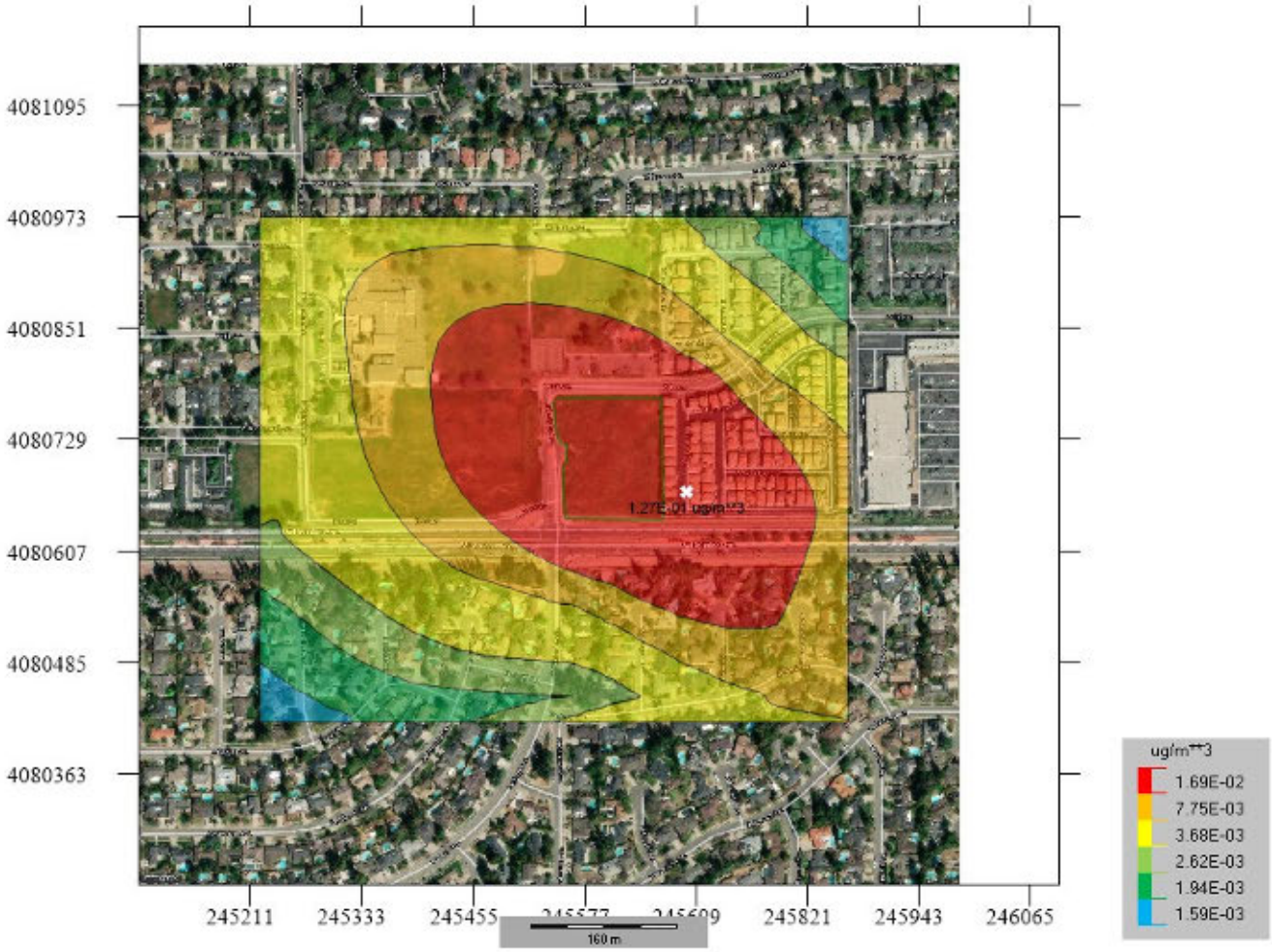

Figure 6: Model output showing DPM concentrations from 2024 through 2025

Based on the assumptions detailed above, the maximum averaged concentration of DPM from the construction phase of the project is 0.127 ug/m^3. The median value of the concentrations modeled at the same location is 0.121 ug/m^3.

Using the algorithms from OEHHA's HARP 2 Standalone Risk software, the cancer risk to the most sensitive population, infants less than 3 years old was calculated. The risk for exposure of infants during the 1 years of construction is 21.5 in 1,000,000 using the maximum concentration modeled, much greater than the 20 in 1,000,000 significance threshold outlined by SJV-APCD, resulting in a significant impact. The risk for exposure of infants during the 1 years of construction is

20.5 in 1,000,000 using the median concentration modeled, much greater than the 20 in 1,000,000 significance threshold outlined by SJV-APCD, resulting in a significant impact.

It is clear from the results above that the unmitigated emissions from the construction phase of the Project represent a significant risk if the CE were signed. The City must quantify and disclose these significant impacts in an EIR for the Project.

Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. The City must prepare an EIR to address these substantial concerns and to address the errors presented in the CE.

Sincerely,

Exhibit A

CalEEMOD Analysis

7056 North Prospect Ave Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	7056 North Prospect Ave
Construction Start Date	8/1/2024
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	22.6
Location	36.83816901498409, -119.85291402629232
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2425
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.26

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	82.0	Dwelling Unit	3.70	54,293	64,835	—	262	—

Parking Lot	40.6	1000sqft	0.93	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	19.7	19.7	36.0	33.6	0.05	1.60	19.8	21.4	1.47	10.1	11.6	—	5,404	5,404	0.22	0.05	1.76	5,424
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.70	1.44	11.6	15.1	0.02	0.50	0.35	0.85	0.46	0.08	0.54	—	2,840	2,840	0.12	0.05	0.05	2,858
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.71	1.60	4.99	6.94	0.01	0.20	0.50	0.64	0.19	0.23	0.36	—	1,300	1,300	0.05	0.02	0.32	1,308
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.31	0.29	0.91	1.27	< 0.005	0.04	0.09	0.12	0.03	0.04	0.07	—	215	215	0.01	< 0.005	0.05	217
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	10.0	10.0	100	27.0	—	—	15.0	—	—	15.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.42	3.73	36.0	33.6	0.05	1.60	19.8	21.4	1.47	10.1	11.6	—	5,404	5,404	0.22	0.05	1.76	5,424
2025	19.7	19.7	10.8	15.3	0.02	0.43	0.35	0.78	0.40	0.08	0.48	—	2,871	2,871	0.11	0.05	1.64	2,891
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.70	1.44	11.6	15.1	0.02	0.50	0.35	0.85	0.46	0.08	0.54	—	2,840	2,840	0.12	0.05	0.05	2,858
2025	1.60	1.35	10.8	14.9	0.02	0.43	0.35	0.78	0.40	0.08	0.48	—	2,831	2,831	0.11	0.05	0.04	2,849
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.46	0.39	3.25	3.97	0.01	0.14	0.50	0.64	0.13	0.23	0.36	—	721	721	0.03	0.01	0.16	725
2025	1.71	1.60	4.99	6.94	0.01	0.20	0.16	0.36	0.19	0.04	0.22	—	1,300	1,300	0.05	0.02	0.32	1,308
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.08	0.07	0.59	0.72	< 0.005	0.03	0.09	0.12	0.02	0.04	0.07	—	119	119	0.01	< 0.005	0.03	120
2025	0.31	0.29	0.91	1.27	< 0.005	0.04	0.03	0.07	0.03	0.01	0.04	—	215	215	0.01	< 0.005	0.05	217

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.81	5.53	2.88	34.8	0.09	2.76	1.91	4.67	2.66	0.48	3.14	485	4,249	4,733	6.23	0.15	9.40	4,943
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	7.16	4.89	3.03	29.0	0.09	2.76	1.91	4.67	2.66	0.48	3.14	485	4,033	4,518	6.25	0.16	0.62	4,722
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.06	3.44	2.13	16.1	0.04	0.67	1.79	2.46	0.64	0.45	1.10	139	3,313	3,452	4.60	0.15	4.09	3,615
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.74	0.63	0.39	2.93	0.01	0.12	0.33	0.45	0.12	0.08	0.20	23.0	549	572	0.76	0.02	0.68	598
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	10.0	10.0	100	27.0	—	—	15.0	—	—	15.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.84	1.74	1.34	11.1	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,458	2,458	0.12	0.13	9.01	2,507
Area	5.90	3.76	1.03	23.4	0.06	2.70	—	2.70	2.60	—	2.60	446	876	1,321	2.10	< 0.005	—	1,374
Energy	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	906	906	0.10	0.01	—	911
Water	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Waste	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	7.81	5.53	2.88	34.8	0.09	2.76	1.91	4.67	2.66	0.48	3.14	485	4,249	4,733	6.23	0.15	9.40	4,943
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.64	1.52	1.53	9.95	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,255	2,255	0.14	0.14	0.23	2,299

Area	5.46	3.34	0.98	18.8	0.06	2.70	—	2.70	2.60	—	2.60	446	863	1,309	2.10	< 0.005	—	1,362
Energy	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	906	906	0.10	0.01	—	911
Water	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Waste	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	7.16	4.89	3.03	29.0	0.09	2.76	1.91	4.67	2.66	0.48	3.14	485	4,033	4,518	6.25	0.16	0.62	4,722
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.58	1.48	1.36	9.32	0.02	0.02	1.79	1.81	0.02	0.45	0.47	—	2,198	2,198	0.12	0.12	3.70	2,241
Area	2.42	1.93	0.24	6.51	0.01	0.61	—	0.61	0.58	—	0.58	100	200	300	0.47	< 0.005	—	312
Energy	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	906	906	0.10	0.01	—	911
Water	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Waste	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	4.06	3.44	2.13	16.1	0.04	0.67	1.79	2.46	0.64	0.45	1.10	139	3,313	3,452	4.60	0.15	4.09	3,615
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.29	0.27	0.25	1.70	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	364	364	0.02	0.02	0.61	371
Area	0.44	0.35	0.04	1.19	< 0.005	0.11	—	0.11	0.11	—	0.11	16.6	33.1	49.7	0.08	< 0.005	—	51.7
Energy	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	150	150	0.02	< 0.005	—	151
Water	—	—	—	—	—	—	—	—	—	—	—	1.05	1.45	2.50	0.11	< 0.005	—	5.96
Waste	—	—	—	—	—	—	—	—	—	—	—	5.40	0.00	5.40	0.54	0.00	—	18.9
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	0.74	0.63	0.39	2.93	0.01	0.12	0.33	0.45	0.12	0.08	0.20	23.0	549	572	0.76	0.02	0.68	598

3. Construction Emissions Details

3.1. Site Preparation (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.49	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	—	0.27	0.27	—	0.14	0.14	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1

Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.04	0.71	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	108	108	0.01	< 0.005	0.43	110
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.36	1.36	< 0.005	< 0.005	< 0.005	1.39
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.23	0.23	< 0.005	< 0.005	< 0.005	0.23
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	64.8	64.8	< 0.005	< 0.005	—	65.1
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.61	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	92.9	92.9	0.01	< 0.005	0.37	94.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.87	1.87	< 0.005	< 0.005	< 0.005	1.90
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.32
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2024) - Unmitigated

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

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

Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.24	2.28	2.67	< 0.005	0.10	—	0.10	0.09	—	0.09	—	488	488	0.02	< 0.005	—	490
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.42	0.49	< 0.005	0.02	—	0.02	0.02	—	0.02	—	80.8	80.8	< 0.005	< 0.005	—	81.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.27	0.15	2.40	0.00	0.00	0.32	0.32	0.00	0.08	0.08	—	366	366	0.02	0.02	1.46	372
Vendor	0.01	0.01	0.19	0.09	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	117	117	< 0.005	0.02	0.30	123

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.23	0.19	1.94	0.00	0.00	0.32	0.32	0.00	0.08	0.08	—	324	324	0.02	0.02	0.04	329
Vendor	0.01	0.01	0.20	0.09	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	118	118	< 0.005	0.02	0.01	123
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.40	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	68.4	68.4	< 0.005	< 0.005	0.13	69.6
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.9	23.9	< 0.005	< 0.005	0.03	25.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.3	11.3	< 0.005	< 0.005	0.02	11.5
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.96	3.96	< 0.005	< 0.005	< 0.005	4.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.58	0.48	4.48	5.59	0.01	0.19	—	0.19	0.17	—	0.17	—	1,028	1,028	0.04	0.01	—	1,031
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.82	1.02	< 0.005	0.03	—	0.03	0.03	—	0.03	—	170	170	0.01	< 0.005	—	171
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.25	0.13	2.20	0.00	0.00	0.32	0.32	0.00	0.08	0.08	—	358	358	0.01	0.02	1.34	364
Vendor	0.01	0.01	0.19	0.08	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	115	115	< 0.005	0.02	0.30	121
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.16	1.78	0.00	0.00	0.32	0.32	0.00	0.08	0.08	—	318	318	0.01	0.02	0.03	323

Vendor	0.01	0.01	0.20	0.09	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	116	116	< 0.005	0.02	0.01	121
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.10	0.06	0.78	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	141	141	0.01	0.01	0.25	143
Vendor	< 0.005	< 0.005	0.08	0.04	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	49.5	49.5	< 0.005	0.01	0.06	51.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.14	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.3	23.3	< 0.005	< 0.005	0.04	23.7
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.19	8.19	< 0.005	< 0.005	0.01	8.56
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.52	8.84	0.01	0.29	—	0.29	0.26	—	0.26	—	1,351	1,351	0.05	0.01	—	1,355
Paving	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.04	0.04	0.32	0.44	< 0.005	0.01	—	0.01	0.01	—	0.01	—	66.6	66.6	< 0.005	< 0.005	—	66.8
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.1
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	0.05	0.74	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	121	121	< 0.005	0.01	0.45	123
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.50	5.50	< 0.005	< 0.005	0.01	5.59
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.91	0.91	< 0.005	< 0.005	< 0.005	0.93
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	19.5	19.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.58	6.58	< 0.005	< 0.005	—	6.61
Architectural Coatings	0.96	0.96	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.09	1.09	< 0.005	< 0.005	—	1.09
Architectural Coatings	0.18	0.18	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.44	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	71.6	71.6	< 0.005	< 0.005	0.27	72.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.25	3.25	< 0.005	< 0.005	0.01	3.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.54	0.54	< 0.005	< 0.005	< 0.005	0.55
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	1.84	1.74	1.34	11.1	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,458	2,458	0.12	0.13	9.01	2,507
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.84	1.74	1.34	11.1	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,458	2,458	0.12	0.13	9.01	2,507
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	1.64	1.52	1.53	9.95	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,255	2,255	0.14	0.14	0.23	2,299
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.64	1.52	1.53	9.95	0.02	0.02	1.91	1.93	0.02	0.48	0.50	—	2,255	2,255	0.14	0.14	0.23	2,299
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.29	0.27	0.25	1.70	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	364	364	0.02	0.02	0.61	371
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.29	0.27	0.25	1.70	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	364	364	0.02	0.02	0.61	371

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	225	225	0.04	< 0.005	—	228
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	19.9	19.9	< 0.005	< 0.005	—	20.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	245	245	0.04	< 0.005	—	248
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	225	225	0.04	< 0.005	—	228
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	19.9	19.9	< 0.005	< 0.005	—	20.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	245	245	0.04	< 0.005	—	248
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	37.3	37.3	0.01	< 0.005	—	37.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	3.29	3.29	< 0.005	< 0.005	—	3.32
Total	—	—	—	—	—	—	—	—	—	—	—	—	40.6	40.6	0.01	< 0.005	—	41.0

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	661	661	0.06	< 0.005	—	663
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	661	661	0.06	< 0.005	—	663
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	661	661	0.06	< 0.005	—	663
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.06	0.03	0.52	0.22	< 0.005	0.04	—	0.04	0.04	—	0.04	—	661	661	0.06	< 0.005	—	663
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	109	109	0.01	< 0.005	—	110
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	109	109	0.01	< 0.005	—	110

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.20	2.08	0.98	18.8	0.06	2.70	—	2.70	2.60	—	2.60	446	863	1,309	2.10	< 0.005	—	1,362
Consumer Products	1.17	1.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.44	0.42	0.05	4.64	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.4	12.4	< 0.005	< 0.005	—	12.5
Total	5.90	3.76	1.03	23.4	0.06	2.70	—	2.70	2.60	—	2.60	446	876	1,321	2.10	< 0.005	—	1,374
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.20	2.08	0.98	18.8	0.06	2.70	—	2.70	2.60	—	2.60	446	863	1,309	2.10	< 0.005	—	1,362
Consumer Products	1.17	1.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.46	3.34	0.98	18.8	0.06	2.70	—	2.70	2.60	—	2.60	446	863	1,309	2.10	< 0.005	—	1,362
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.17	0.09	0.04	0.77	< 0.005	0.11	—	0.11	0.11	—	0.11	16.6	32.1	48.7	0.08	< 0.005	—	50.7
Consumer Products	0.21	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.04	0.04	< 0.005	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.02	1.02	< 0.005	< 0.005	—	1.02
Total	0.44	0.35	0.04	1.19	< 0.005	0.11	—	0.11	0.11	—	0.11	16.6	33.1	49.7	0.08	< 0.005	—	51.7

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	6.33	8.74	15.1	0.65	0.02	—	36.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments	—	—	—	—	—	—	—	—	—	—	—	1.05	1.45	2.50	0.11	< 0.005	—	5.96
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	1.05	1.45	2.50	0.11	< 0.005	—	5.96

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	32.6	0.00	32.6	3.26	0.00	—	114
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	5.40	0.00	5.40	0.54	0.00	—	18.9

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	5.40	0.00	5.40	0.54	0.00	—	18.9

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.39	0.39
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	8/30/2024	9/6/2024	5.00	5.00	—

Grading	Grading	9/7/2024	9/18/2024	5.00	8.00	—
Building Construction	Building Construction	9/19/2024	8/7/2025	5.00	230	—
Paving	Paving	8/8/2025	9/2/2025	5.00	18.0	—
Architectural Coating	Architectural Coating	9/3/2025	9/28/2025	5.00	18.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	2.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	6.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	6.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37

Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	7.70	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	7.70	LDA,LDT1,LDT2
Grading	Vendor	—	4.00	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	59.0	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	8.77	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	7.70	LDA,LDT1,LDT2
Paving	Vendor	—	4.00	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	11.8	7.70	LDA,LDT1,LDT2

Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	109,943	36,648	0.00	0.00	2,436

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	7.50	0.00	—
Grading	—	—	8.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.93

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%
Parking Lot	0.93	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	204	0.03	< 0.005
2025	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	446	403	335	154,781	2,699	2,436	2,029	936,388
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	41
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	41
Conventional Wood Stoves	0
Catalytic Wood Stoves	4

Non-Catalytic Wood Stoves	4
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
109943.325	36,648	0.00	0.00	2,436

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	403,341	204	0.0330	0.0040	2,062,851
Parking Lot	35,572	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	3,304,272	1,087,782
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	60.5	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

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

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit

Temperature and Extreme Heat	30.9	annual days of extreme heat
Extreme Precipitation	1.35	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	82.5
AQ-PM	94.6
AQ-DPM	19.6
Drinking Water	96.0
Lead Risk Housing	12.2
Pesticides	75.3
Toxic Releases	71.9

Traffic	53.3
Effect Indicators	—
CleanUp Sites	19.9
Groundwater	2.11
Haz Waste Facilities/Generators	35.6
Impaired Water Bodies	23.9
Solid Waste	0.00
Sensitive Population	—
Asthma	55.9
Cardio-vascular	23.1
Low Birth Weights	25.4
Socioeconomic Factor Indicators	—
Education	7.40
Housing	23.4
Linguistic	14.3
Poverty	6.08
Unemployment	7.14

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	85.05068651
Employed	83.80597973
Median HI	87.12947517
Education	—
Bachelor's or higher	84.97369434
High school enrollment	17.31040678

Preschool enrollment	41.72975747
Transportation	—
Auto Access	48.06877967
Active commuting	7.596561016
Social	—
2-parent households	29.20569742
Voting	90.79943539
Neighborhood	—
Alcohol availability	76.44039523
Park access	18.23431284
Retail density	29.44950597
Supermarket access	61.94020275
Tree canopy	85.16617477
Housing	—
Homeownership	89.86269729
Housing habitability	81.05992557
Low-inc homeowner severe housing cost burden	72.02617734
Low-inc renter severe housing cost burden	31.52829462
Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	93.81496215
Arthritis	2.7
Asthma ER Admissions	53.8
High Blood Pressure	3.1
Cancer (excluding skin)	1.8
Asthma	76.7
Coronary Heart Disease	6.2
Chronic Obstructive Pulmonary Disease	37.6

Diagnosed Diabetes	44.3
Life Expectancy at Birth	20.4
Cognitively Disabled	25.4
Physically Disabled	17.3
Heart Attack ER Admissions	69.8
Mental Health Not Good	91.8
Chronic Kidney Disease	20.1
Obesity	77.3
Pedestrian Injuries	19.6
Physical Health Not Good	71.4
Stroke	26.0
Health Risk Behaviors	—
Binge Drinking	83.4
Current Smoker	96.7
No Leisure Time for Physical Activity	76.1
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	92.2
Elderly	3.1
English Speaking	68.5
Foreign-born	6.6
Outdoor Workers	80.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	75.3
Traffic Density	36.4
Traffic Access	0.0
Other Indices	—

Hardship	7.5
Other Decision Support	—
2016 Voting	84.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	23.0
Healthy Places Index Score for Project Location (b)	75.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	From Design Exhibit H
Construction: Construction Phases	no demolition required. open field

Exhibit B

Air Dispersion Model and HRA Spreadsheets

Emissions of DPM During Construction

Phase	Year	Emissions*	Duration	Total Emissions For Phase	Total Hours	Emissions Per Day Averaged Over Project Duration	Emission Rate Per Hour	Site Wide Hourly Emission Rate	Weighted Site Wide Annual Emission Rate
		lbs/day	days	lbs		lbs/day	lbs-hour	lbs-hr/ft2	
Site Preparation	2024	1.6	5	8	40	2.87E-02	2.00E-01	1.24E-06	2.23E-08
Grading	2024	0.84	8	6.72	64	2.41E-02	1.05E-01	6.53E-07	1.87E-08
Building Construction	2024	0.5	68	34	544	1.22E-01	6.25E-02	3.89E-07	9.48E-08
Building Construction	2025	0.43	162	69.66	1296	2.50E-01	5.38E-02	3.35E-07	1.94E-07
Paving	2025	0.29	18	5.22	144	1.87E-02	3.63E-02	2.26E-07	1.46E-08
Architectural Coating	2025	0.03	18	0.54	144	1.94E-03	3.75E-03	2.33E-08	1.51E-09
Total			279	123.6	2232	0.443010753		2.87E-06	3.46E-07

```
** BREEZE AERMOD
** Trinity Consultants
** VERSION  11.0

CO STARTING
CO TITLEONE  Construction Phase Of 7056 North Prospect Ave Project
CO TITLETWO  DPM Emissions From Off-Road Construction Equipment - Only Weekday Work
CO MODELOPT  DFAULT  CONC  NODRYDPLT  NOWETDPLT
CO RUNORNOT  RUN
CO AVERTIME  ANNUAL
CO POLLUTID  DPM
CO FINISHED

SO STARTING
SO ELEVUNIT  METERS
SO LOCATION  JOO6O1AS  AREAPOLY  245661.2  4080774.5  99.19
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SO AREAVERT  JOO6O1AS  245549.4 4080725.7  245557.7 4080723.1  245557.7 4080705.7  245554.5 4080701.3
SO AREAVERT  JOO6O1AS  245552.6 4080690  245555.9 4080643  245662.6 4080641.2  245661.2 4080774.5
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SO SRCGROUP  ALL
SO FINISHED

RE STARTING
RE ELEVUNIT  METERS
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RE DISCCART  245835.3  4080897.7  99.44  99.44
** RCPDESCR  Homes to NE
RE DISCCART  245860.3  4080897.7  99.67  99.67
** RCPDESCR  Homes to NE
RE DISCCART  245685.3  4080922.7  99.12  99.12
** RCPDESCR  Homes to NE
RE DISCCART  245710.3  4080922.7  99.33  99.33
** RCPDESCR  Homes to NE
RE DISCCART  245735.3  4080922.7  99.33  99.33
** RCPDESCR  Homes to NE
RE DISCCART  245760.3  4080922.7  99.36  99.36
** RCPDESCR  Homes to NE
RE DISCCART  245785.3  4080922.7  99.36  99.36
** RCPDESCR  Homes to NE
RE DISCCART  245810.3  4080922.7  99.36  99.36
** RCPDESCR  Homes to NE
RE DISCCART  245835.3  4080922.7  99.44  99.44
** RCPDESCR  Homes to NE
RE DISCCART  245860.3  4080922.7  99.67  99.67
** RCPDESCR  Homes to NE
RE DISCCART  245685.3  4080947.7  99.06  99.06
** RCPDESCR  Homes to NE
RE DISCCART  245710.3  4080947.7  99.08  99.08
** RCPDESCR  Homes to NE
RE DISCCART  245735.3  4080947.7  99.08  99.08
** RCPDESCR  Homes to NE
RE DISCCART  245760.3  4080947.7  99.29  99.29
** RCPDESCR  Homes to NE
RE DISCCART  245785.3  4080947.7  99.36  99.36
** RCPDESCR  Homes to NE
RE DISCCART  245810.3  4080947.7  99.36  99.36
** RCPDESCR  Homes to NE
```

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RE DISCCART  245835.3  4080947.7  99.44  99.44
** RCPDESCR  Homes to NE
RE DISCCART  245860.3  4080947.7  99.67  99.67
** RCPDESCR  Homes to NE
RE DISCCART  245835.3  4080972.7  99.38  99.38
** RCPDESCR  Homes to NE
RE DISCCART  245860.3  4080972.7  99.45  99.45
** RCPDESCR  Homes to NE
RE DISCCART  245299.3  4080786.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245324.3  4080786.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080786.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080786.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080786.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245424.3  4080786.2  98.61  98.61
** RCPDESCR  elementary school
RE DISCCART  245449.3  4080786.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245474.3  4080786.2  98.78  98.78
** RCPDESCR  elementary school
RE DISCCART  245499.3  4080786.2  98.9  98.9
** RCPDESCR  elementary school
RE DISCCART  245299.3  4080811.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245324.3  4080811.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080811.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080811.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080811.2  98.53  98.53
** RCPDESCR  elementary school
RE DISCCART  245424.3  4080811.2  98.67  98.67
** RCPDESCR  elementary school
RE DISCCART  245449.3  4080811.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245474.3  4080811.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245499.3  4080811.2  98.77  98.77
** RCPDESCR  elementary school
RE DISCCART  245299.3  4080836.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245324.3  4080836.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080836.2  98.45  98.45
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080836.2  98.51  98.51
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080836.2  98.68  98.68
** RCPDESCR  elementary school
RE DISCCART  245424.3  4080836.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245449.3  4080836.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245474.3  4080836.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245499.3  4080836.2  98.77  98.77
** RCPDESCR  elementary school
RE DISCCART  245324.3  4080861.2  98.47  98.47
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080861.2  98.48  98.48
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080861.2  98.72  98.72
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080861.2  98.76  98.76
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** RCPDESCR  elementary school
RE DISCCART  245424.3  4080861.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245449.3  4080861.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245474.3  4080861.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245499.3  4080861.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245299.3  4080886.2  98.72  98.72
** RCPDESCR  elementary school
RE DISCCART  245324.3  4080886.2  98.72  98.72
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080886.2  98.72  98.72
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080886.2  98.75  98.75
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080886.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245424.3  4080886.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245449.3  4080886.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245474.3  4080886.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245499.3  4080886.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245299.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245324.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245424.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245449.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245474.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245499.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245299.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245324.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245424.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245449.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245474.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245499.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245499.3  4080961.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245564.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
RE DISCCART  245589.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
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RE DISCCART  245614.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
RE DISCCART  245639.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
RE DISCCART  245664.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
RE DISCCART  245689.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
RE DISCCART  245714.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
RE DISCCART  245739.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
RE DISCCART  245589.6  4080472.7  97.54  97.54
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RE DISCCART  245614.6  4080472.7  97.54  97.54
** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
RE DISCCART  245689.6  4080472.7  97.57  97.57
** RCPDESCR  Homes to SE
RE DISCCART  245714.6  4080472.7  97.57  97.57
** RCPDESCR  Homes to SE
RE DISCCART  245739.6  4080472.7  97.57  97.57
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** RCPDESCR  Homes to SE
RE DISCCART  245789.6  4080472.7  97.57  97.57
** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
RE DISCCART  245589.6  4080497.7  97.54  97.54
** RCPDESCR  Homes to SE
RE DISCCART  245614.6  4080497.7  97.54  97.54
** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
RE DISCCART  245714.6  4080497.7  97.82  97.82
** RCPDESCR  Homes to SE
RE DISCCART  245739.6  4080497.7  97.82  97.82
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** RCPDESCR  Homes to SE
RE DISCCART  245789.6  4080497.7  97.82  97.82
** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
RE DISCCART  245689.6  4080522.7  98.07  98.07
** RCPDESCR  Homes to SE
RE DISCCART  245714.6  4080522.7  98.07  98.07
** RCPDESCR  Homes to SE
RE DISCCART  245739.6  4080522.7  98.07  98.07
** RCPDESCR  Homes to SE
RE DISCCART  245764.6  4080522.7  98.07  98.07
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
RE DISCCART  245589.6  4080547.7  98.02  98.02
** RCPDESCR  Homes to SE
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RE DISCCART  245664.6  4080547.7  98.33  98.33
** RCPDESCR  Homes to SE
RE DISCCART  245689.6  4080547.7  98.33  98.33
** RCPDESCR  Homes to SE
RE DISCCART  245714.6  4080547.7  98.33  98.33
** RCPDESCR  Homes to SE
RE DISCCART  245739.6  4080547.7  98.33  98.33
** RCPDESCR  Homes to SE
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RE DISCCART  245789.6  4080547.7  98.46  98.46
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
RE DISCCART  245664.6  4080572.7  98.58  98.58
** RCPDESCR  Homes to SE
RE DISCCART  245689.6  4080572.7  98.58  98.58
** RCPDESCR  Homes to SE
RE DISCCART  245714.6  4080572.7  98.58  98.58
** RCPDESCR  Homes to SE
RE DISCCART  245739.6  4080572.7  98.58  98.58
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RE DISCCART  245246.9  4080419.4  97.23  97.23
** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080419.4  97.23  97.23
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** RCPDESCR  homes to SW
RE DISCCART  245246.9  4080444.4  97.23  97.23
** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080444.4  97.23  97.23
** RCPDESCR  homes to SW
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RE DISCCART  245321.9  4080444.4  97.31  97.31
** RCPDESCR  homes to SW
RE DISCCART  245221.9  4080469.4  97.23  97.23
** RCPDESCR  homes to SW
RE DISCCART  245246.9  4080469.4  97.23  97.23
** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080469.4  97.23  97.23
** RCPDESCR  homes to SW
RE DISCCART  245296.9  4080469.4  97.32  97.32
** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080469.4  97.53  97.53
** RCPDESCR  homes to SW
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RE DISCCART  245346.9  4080469.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245371.9  4080469.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245396.9  4080469.4  97.54  97.54
** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
RE DISCCART  245246.9  4080494.4  97.48  97.48
** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080494.4  97.48  97.48
** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
RE DISCCART  245496.9  4080494.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245521.9  4080494.4  97.54  97.54
** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245296.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245346.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245371.9  4080519.4  97.78  97.78
** RCPDESCR  homes to SW
RE DISCCART  245396.9  4080519.4  97.84  97.84
** RCPDESCR  homes to SW
RE DISCCART  245421.9  4080519.4  97.79  97.79
** RCPDESCR  homes to SW
RE DISCCART  245446.9  4080519.4  97.68  97.68
** RCPDESCR  homes to SW
RE DISCCART  245471.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245496.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245521.9  4080519.4  97.69  97.69
** RCPDESCR  homes to SW
RE DISCCART  245221.9  4080544.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245246.9  4080544.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080544.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245296.9  4080544.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080544.4  97.55  97.55
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RE DISCCART  245371.9  4080544.4  97.81  97.81
** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
RE DISCCART  245471.9  4080544.4  97.69  97.69
** RCPDESCR  homes to SW
RE DISCCART  245496.9  4080544.4  97.69  97.69
** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080569.4  97.63  97.63
** RCPDESCR  homes to SW
RE DISCCART  245296.9  4080569.4  97.63  97.63
** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080569.4  97.66  97.66
** RCPDESCR  homes to SW
RE DISCCART  245346.9  4080569.4  97.83  97.83
** RCPDESCR  homes to SW
RE DISCCART  245371.9  4080569.4  97.84  97.84
** RCPDESCR  homes to SW
RE DISCCART  245396.9  4080569.4  97.9  97.9
** RCPDESCR  homes to SW
RE DISCCART  245421.9  4080569.4  97.94  97.94
** RCPDESCR  homes to SW
RE DISCCART  245446.9  4080569.4  97.94  97.94
** RCPDESCR  homes to SW
RE DISCCART  245471.9  4080569.4  97.95  97.95
** RCPDESCR  homes to SW
RE DISCCART  245496.9  4080569.4  98.03  98.03
** RCPDESCR  homes to SW
RE DISCCART  245521.9  4080569.4  98.28  98.28
** RCPDESCR  homes to SW
RE FINISHED

ME STARTING
ME SURFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC"
** SURFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC"
ME PROFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL"
** PROFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL"
ME SURFDATA  93193 2018
ME UAIRDATA  23230 2018
ME PROFBASE  10  METERS
ME FINISHED

OU STARTING
OU FILEFORM  FIX
OU PLOTFILE  ANNUAL  ALL  ALL`ANNUAL.plt  10000
OU POSTFILE  ANNUAL  ALL  UNFORM  ALL`ANNUAL.bin  10001
OU FINISHED


  *** Message Summary For AERMOD Model Setup ***

  --------- Summary of Total Messages --------

 A Total of            0 Fatal Error Message(s)
 A Total of            4 Warning Message(s)
 A Total of            0 Informational Message(s)
```

```
   ******** FATAL ERROR MESSAGES ********
             ***  NONE  ***


   ********   WARNING MESSAGES   ********
 ME W186     606       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used           0.50
 ME W187     606       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
 OU W565     610       PERPLT: Possible Conflict With Dynamically Allocated FUNIT     PLOTFILE
 OU W565     611       PERPST: Possible Conflict With Dynamically Allocated FUNIT     POSTFILE

 ************************************
 *** SETUP Finishes Successfully ***
 ************************************

♠ *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
     07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE   1
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                          ***     MODEL SETUP OPTIONS SUMMARY       ***
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - -

 ** Model Options Selected:
      * Model Uses Regulatory DEFAULT Options
      * Model Is Setup For Calculation of Average CONCentration Values.
      * NO GAS DEPOSITION Data Provided.
      * NO PARTICLE DEPOSITION Data Provided.
      * Model Uses NO DRY DEPLETION. DDPLETE  =  F
      * Model Uses NO WET DEPLETION. WETDPLT  =  F
      * Stack-tip Downwash.
      * Model Accounts for ELEVated Terrain Effects.
      * Use Calms Processing Routine.
      * Use Missing Data Processing Routine.
      * No Exponential Decay.
      * Model Uses RURAL Dispersion Only.
      * ADJ_U*   - Use ADJ_U* option for SBL in AERMET
      * CCVR_Sub - Meteorological data includes CCVR substitutions
      * TEMP_Sub - Meteorological data includes TEMP substitutions
      * Model Assumes No FLAGPOLE Receptor Heights.
      * The User Specified a Pollutant Type of: DPM

 **Model Calculates ANNUAL Averages Only

 **This Run Includes:      1 Source(s);       1 Source Group(s); and     283 Receptor(s)

                with:      0 POINT(s), including
                           0 POINTCAP(s) and      0 POINTHOR(s)
                 and:      0 VOLUME source(s)
                 and:      1 AREA type source(s)
                 and:      0 LINE source(s)
                 and:      0 RLINE/RLINEXT source(s)
                 and:      0 OPENPIT source(s)
                 and:      0 BUOYANT LINE source(s) with a total of     0 line(s)
                 and:      0 SWPOINT source(s)


 **Model Set To Continue RUNning After the Setup Testing.

 **The AERMET Input Meteorological Data Version Date:  21112

 **Output Options Selected:
          Model Outputs Tables of ANNUAL Averages by Receptor
          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) =   10.00 ; 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 =   3.5 MB of RAM.

 **Input Runstream File: aermod.inp

 **Output Print File: aermod.out

 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

                                          *** AREAPOLY SOURCE DATA ***

              NUMBER EMISSION RATE   LOCATION OF AREA BASE   RELEASE NUMBER   INIT.   URBAN EMISSION RATE
   SOURCE   PART. (GRAMS/SEC   X   Y   ELEV.   HEIGHT OF VERTS.   SZ   SOURCE SCALAR VARY
     ID   CATS.   /METER**2)   (METERS) (METERS) (METERS) (METERS)   (METERS)   BY
 -
- - - - - -

 JOO6O1AS   0   0.34600E-06 245661.2 4080774.5   99.2   4.30   12   2.15   NO   HRDOW

 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

                                       *** SOURCE IDs DEFINING SOURCE GROUPS ***

 SRCGROUP ID   SOURCE IDs
 -----------   ----------

  ALL   JOO6O1AS   ,

 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

                  * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

 SOURCE ID = JOO6O1AS   ; SOURCE TYPE = AREAPOLY :
  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  .1000E+01
    9  .1000E+01   10  .1000E+01   11  .1000E+01   12  .0000E+00   13  .1000E+01   14  .1000E+01   15  .1000E+01
16  .1000E+01
   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
    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
*** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
    07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
  16:49:31

  PAGE   5
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                   *** DISCRETE CARTESIAN RECEPTORS ***
                                  (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                              (METERS)

    ( 245689.9, 4080671.2,      99.1,      99.1,       0.0);        ( 245714.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245739.9, 4080671.2,      99.1,      99.1,       0.0);        ( 245764.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245789.9, 4080671.2,      99.1,      99.1,       0.0);        ( 245814.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245839.9, 4080671.2,      99.1,      99.1,       0.0);        ( 245864.9, 4080671.2,      99.3,      99.3,
    0.0);
    ( 245689.9, 4080696.2,      99.1,      99.1,       0.0);        ( 245714.9, 4080696.2,      99.1,      99.1,
    0.0);
    ( 245739.9, 4080696.2,      99.2,      99.2,       0.0);        ( 245764.9, 4080696.2,      99.2,      99.2,
    0.0);
    ( 245789.9, 4080696.2,      99.2,      99.2,       0.0);        ( 245814.9, 4080696.2,      99.2,      99.2,
    0.0);
    ( 245839.9, 4080696.2,      99.3,      99.3,       0.0);        ( 245864.9, 4080696.2,      99.4,      99.4,
    0.0);
    ( 245689.9, 4080721.2,      99.1,      99.1,       0.0);        ( 245714.9, 4080721.2,      99.2,      99.2,
    0.0);
    ( 245739.9, 4080721.2,      99.4,      99.4,       0.0);        ( 245764.9, 4080721.2,      99.4,      99.4,
    0.0);
    ( 245789.9, 4080721.2,      99.4,      99.4,       0.0);        ( 245814.9, 4080721.2,      99.4,      99.4,
    0.0);
    ( 245839.9, 4080721.2,      99.4,      99.4,       0.0);        ( 245864.9, 4080721.2,      99.4,      99.4,
    0.0);
    ( 245689.9, 4080746.2,      99.2,      99.2,       0.0);        ( 245714.9, 4080746.2,      99.4,      99.4,
    0.0);
    ( 245739.9, 4080746.2,      99.4,      99.4,       0.0);        ( 245764.9, 4080746.2,      99.4,      99.4,
    0.0);
    ( 245789.9, 4080746.2,      99.4,      99.4,       0.0);        ( 245814.9, 4080746.2,      99.4,      99.4,
    0.0);
    ( 245839.9, 4080746.2,      99.4,      99.4,       0.0);        ( 245864.9, 4080746.2,      99.4,      99.4,
    0.0);
    ( 245689.9, 4080771.2,      99.4,      99.4,       0.0);        ( 245714.9, 4080771.2,      99.4,      99.4,
    0.0);
    ( 245739.9, 4080771.2,      99.4,      99.4,       0.0);        ( 245764.9, 4080771.2,      99.4,      99.4,
    0.0);
    ( 245789.9, 4080771.2,      99.4,      99.4,       0.0);        ( 245814.9, 4080771.2,      99.4,      99.4,
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(245735.3, 4080822.7, 99.4, 99.4, 0.0); (245685.3, 4080847.7, 99.2, 99.2,
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(245710.3, 4080847.7, 99.4, 99.4, 0.0); (245735.3, 4080847.7, 99.4, 99.4,
0.0);
(245760.3, 4080847.7, 99.4, 99.4, 0.0); (245685.3, 4080872.7, 99.1, 99.1,
0.0);
(245710.3, 4080872.7, 99.4, 99.4, 0.0); (245735.3, 4080872.7, 99.4, 99.4,
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(245760.3, 4080872.7, 99.4, 99.4, 0.0); (245785.3, 4080872.7, 99.4, 99.4,
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(245810.3, 4080872.7, 99.4, 99.4, 0.0); (245835.3, 4080872.7, 99.4, 99.4,
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(245860.3, 4080872.7, 99.7, 99.7, 0.0); (245685.3, 4080897.7, 99.1, 99.1,
0.0);
(245710.3, 4080897.7, 99.4, 99.4, 0.0); (245735.3, 4080897.7, 99.4, 99.4,
0.0);
(245760.3, 4080897.7, 99.4, 99.4, 0.0); (245785.3, 4080897.7, 99.4, 99.4,
0.0);
(245810.3, 4080897.7, 99.4, 99.4, 0.0); (245835.3, 4080897.7, 99.4, 99.4,
0.0);
(245860.3, 4080897.7, 99.7, 99.7, 0.0); (245685.3, 4080922.7, 99.1, 99.1,
0.0);
(245710.3, 4080922.7, 99.3, 99.3, 0.0); (245735.3, 4080922.7, 99.3, 99.3,
0.0);
(245760.3, 4080922.7, 99.4, 99.4, 0.0); (245785.3, 4080922.7, 99.4, 99.4,
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(245810.3, 4080922.7, 99.4, 99.4, 0.0); (245835.3, 4080922.7, 99.4, 99.4,
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(245860.3, 4080922.7, 99.7, 99.7, 0.0); (245685.3, 4080947.7, 99.1, 99.1,
0.0);
(245710.3, 4080947.7, 99.1, 99.1, 0.0); (245735.3, 4080947.7, 99.1, 99.1,
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(245760.3, 4080947.7, 99.3, 99.3, 0.0); (245785.3, 4080947.7, 99.4, 99.4,
0.0);
(245810.3, 4080947.7, 99.4, 99.4, 0.0); (245835.3, 4080947.7, 99.4, 99.4,
0.0);

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(245860.3, 4080947.7, 99.7, 99.7, 0.0); (245835.3, 4080972.7, 99.4, 99.4,
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(245860.3, 4080972.7, 99.5, 99.5, 0.0); (245299.3, 4080786.2, 98.5, 98.5,
0.0);

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( 245324.3, 4080786.2,      98.5,      98.5,      0.0);        ( 245349.3, 4080786.2,      98.5,      98.5,
0.0);
( 245374.3, 4080786.2,      98.5,      98.5,      0.0);        ( 245399.3, 4080786.2,      98.5,      98.5,
0.0);
( 245424.3, 4080786.2,      98.6,      98.6,      0.0);        ( 245449.3, 4080786.2,      98.8,      98.8,
0.0);
( 245474.3, 4080786.2,      98.8,      98.8,      0.0);        ( 245499.3, 4080786.2,      98.9,      98.9,
0.0);
( 245299.3, 4080811.2,      98.5,      98.5,      0.0);        ( 245324.3, 4080811.2,      98.5,      98.5,
0.0);
( 245349.3, 4080811.2,      98.5,      98.5,      0.0);        ( 245374.3, 4080811.2,      98.5,      98.5,
0.0);
( 245399.3, 4080811.2,      98.5,      98.5,      0.0);        ( 245424.3, 4080811.2,      98.7,      98.7,
0.0);
( 245449.3, 4080811.2,      98.8,      98.8,      0.0);        ( 245474.3, 4080811.2,      98.8,      98.8,
0.0);
( 245499.3, 4080811.2,      98.8,      98.8,      0.0);        ( 245299.3, 4080836.2,      98.5,      98.5,
0.0);
( 245324.3, 4080836.2,      98.5,      98.5,      0.0);        ( 245349.3, 4080836.2,      98.5,      98.5,
0.0);
( 245374.3, 4080836.2,      98.5,      98.5,      0.0);        ( 245399.3, 4080836.2,      98.7,      98.7,
0.0);
( 245424.3, 4080836.2,      98.8,      98.8,      0.0);        ( 245449.3, 4080836.2,      98.8,      98.8,
0.0);
( 245474.3, 4080836.2,      98.8,      98.8,      0.0);        ( 245499.3, 4080836.2,      98.8,      98.8,
0.0);
( 245324.3, 4080861.2,      98.5,      98.5,      0.0);        ( 245349.3, 4080861.2,      98.5,      98.5,
0.0);
( 245374.3, 4080861.2,      98.7,      98.7,      0.0);        ( 245399.3, 4080861.2,      98.8,      98.8,
0.0);
( 245424.3, 4080861.2,      98.8,      98.8,      0.0);        ( 245449.3, 4080861.2,      98.8,      98.8,
0.0);
( 245474.3, 4080861.2,      98.8,      98.8,      0.0);        ( 245499.3, 4080861.2,      98.8,      98.8,
0.0);
( 245299.3, 4080886.2,      98.7,      98.7,      0.0);        ( 245324.3, 4080886.2,      98.7,      98.7,
0.0);
( 245349.3, 4080886.2,      98.7,      98.7,      0.0);        ( 245374.3, 4080886.2,      98.8,      98.8,
0.0);
( 245399.3, 4080886.2,      98.8,      98.8,      0.0);        ( 245424.3, 4080886.2,      98.8,      98.8,
0.0);
( 245449.3, 4080886.2,      98.8,      98.8,      0.0);        ( 245474.3, 4080886.2,      98.8,      98.8,
0.0);
( 245499.3, 4080886.2,      98.8,      98.8,      0.0);        ( 245299.3, 4080911.2,      98.8,      98.8,
0.0);
( 245324.3, 4080911.2,      98.8,      98.8,      0.0);        ( 245349.3, 4080911.2,      98.8,      98.8,
0.0);
( 245374.3, 4080911.2,      98.8,      98.8,      0.0);        ( 245399.3, 4080911.2,      98.8,      98.8,
0.0);
( 245424.3, 4080911.2,      98.8,      98.8,      0.0);        ( 245449.3, 4080911.2,      98.8,      98.8,
0.0);
( 245474.3, 4080911.2,      98.8,      98.8,      0.0);        ( 245499.3, 4080911.2,      98.8,      98.8,
0.0);
( 245299.3, 4080936.2,      98.8,      98.8,      0.0);        ( 245324.3, 4080936.2,      98.8,      98.8,
0.0);
( 245349.3, 4080936.2,      98.8,      98.8,      0.0);        ( 245374.3, 4080936.2,      98.8,      98.8,
0.0);
( 245399.3, 4080936.2,      98.8,      98.8,      0.0);        ( 245424.3, 4080936.2,      98.8,      98.8,
0.0);
( 245449.3, 4080936.2,      98.8,      98.8,      0.0);        ( 245474.3, 4080936.2,      98.8,      98.8,
0.0);
( 245499.3, 4080936.2,      98.8,      98.8,      0.0);        ( 245499.3, 4080961.2,      98.8,      98.8,
0.0);
( 245564.6, 4080447.7,      97.5,      97.5,      0.0);        ( 245589.6, 4080447.7,      97.5,      97.5,
0.0);
( 245614.6, 4080447.7,      97.5,      97.5,      0.0);        ( 245639.6, 4080447.7,      97.5,      97.5,
0.0);
( 245664.6, 4080447.7,      97.5,      97.5,      0.0);        ( 245689.6, 4080447.7,      97.5,      97.5,
0.0);
( 245714.6, 4080447.7,      97.5,      97.5,      0.0);        ( 245739.6, 4080447.7,      97.5,      97.5,
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0.0);
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(245614.6, 4080472.7, 97.5, 97.5, 0.0); (245639.6, 4080472.7, 97.5, 97.5, 0.0);
(245664.6, 4080472.7, 97.5, 97.5, 0.0); (245689.6, 4080472.7, 97.6, 97.6, 0.0);
(245714.6, 4080472.7, 97.6, 97.6, 0.0); (245739.6, 4080472.7, 97.6, 97.6, 0.0);
(245764.6, 4080472.7, 97.6, 97.6, 0.0); (245789.6, 4080472.7, 97.6, 97.6, 0.0);
(245564.6, 4080497.7, 97.5, 97.5, 0.0); (245589.6, 4080497.7, 97.5, 97.5, 0.0);
(245614.6, 4080497.7, 97.5, 97.5, 0.0); (245639.6, 4080497.7, 97.5, 97.5, 0.0);
(245664.6, 4080497.7, 97.7, 97.7, 0.0); (245689.6, 4080497.7, 97.8, 97.8, 0.0);

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(245714.6, 4080497.7, 97.8, 97.8, 0.0); (245739.6, 4080497.7, 97.8, 97.8, 0.0);
(245764.6, 4080497.7, 97.8, 97.8, 0.0); (245789.6, 4080497.7, 97.8, 97.8, 0.0);
(245564.6, 4080522.7, 97.8, 97.8, 0.0); (245589.6, 4080522.7, 97.8, 97.8, 0.0);
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(245664.6, 4080522.7, 98.0, 98.0, 0.0); (245689.6, 4080522.7, 98.1, 98.1, 0.0);
(245714.6, 4080522.7, 98.1, 98.1, 0.0); (245739.6, 4080522.7, 98.1, 98.1, 0.0);
(245764.6, 4080522.7, 98.1, 98.1, 0.0); (245789.6, 4080522.7, 98.1, 98.1, 0.0);
(245564.6, 4080547.7, 98.0, 98.0, 0.0); (245589.6, 4080547.7, 98.0, 98.0, 0.0);
(245614.6, 4080547.7, 98.0, 98.0, 0.0); (245639.6, 4080547.7, 98.2, 98.2, 0.0);
(245664.6, 4080547.7, 98.3, 98.3, 0.0); (245689.6, 4080547.7, 98.3, 98.3, 0.0);
(245714.6, 4080547.7, 98.3, 98.3, 0.0); (245739.6, 4080547.7, 98.3, 98.3, 0.0);
(245764.6, 4080547.7, 98.3, 98.3, 0.0); (245789.6, 4080547.7, 98.5, 98.5, 0.0);
(245564.6, 4080572.7, 98.4, 98.4, 0.0); (245589.6, 4080572.7, 98.4, 98.4, 0.0);
(245614.6, 4080572.7, 98.4, 98.4, 0.0); (245639.6, 4080572.7, 98.5, 98.5, 0.0);
(245664.6, 4080572.7, 98.6, 98.6, 0.0); (245689.6, 4080572.7, 98.6, 98.6, 0.0);
(245714.6, 4080572.7, 98.6, 98.6, 0.0); (245739.6, 4080572.7, 98.6, 98.6, 0.0);
(245764.6, 4080572.7, 98.6, 98.6, 0.0); (245789.6, 4080572.7, 98.7, 98.7, 0.0);
(245221.9, 4080419.4, 97.2, 97.2, 0.0); (245246.9, 4080419.4, 97.2, 97.2, 0.0);
(245271.9, 4080419.4, 97.2, 97.2, 0.0); (245221.9, 4080444.4, 97.2, 97.2, 0.0);
(245246.9, 4080444.4, 97.2, 97.2, 0.0); (245271.9, 4080444.4, 97.2, 97.2, 0.0);

(245296.9, 4080444.4, 97.2, 97.2, 0.0); (245321.9, 4080444.4, 97.3, 97.3, 0.0);
(245221.9, 4080469.4, 97.2, 97.2, 0.0); (245246.9, 4080469.4, 97.2, 97.2, 0.0);
(245271.9, 4080469.4, 97.2, 97.2, 0.0); (245296.9, 4080469.4, 97.3, 97.3, 0.0);
(245321.9, 4080469.4, 97.5, 97.5, 0.0); (245346.9, 4080469.4, 97.5, 97.5, 0.0);
(245371.9, 4080469.4, 97.5, 97.5, 0.0); (245396.9, 4080469.4, 97.5, 97.5, 0.0);
(245421.9, 4080469.4, 97.5, 97.5, 0.0); (245221.9, 4080494.4, 97.5, 97.5, 0.0);
(245246.9, 4080494.4, 97.5, 97.5, 0.0); (245271.9, 4080494.4, 97.5, 97.5, 0.0);
(245296.9, 4080494.4, 97.5, 97.5, 0.0); (245321.9, 4080494.4, 97.5, 97.5, 0.0);
(245346.9, 4080494.4, 97.5, 97.5, 0.0); (245371.9, 4080494.4, 97.7, 97.7, 0.0);
(245396.9, 4080494.4, 97.8, 97.8, 0.0); (245421.9, 4080494.4, 97.7, 97.7, 0.0);
(245446.9, 4080494.4, 97.5, 97.5, 0.0); (245471.9, 4080494.4, 97.5, 97.5, 0.0);
(245496.9, 4080494.4, 97.5, 97.5, 0.0); (245521.9, 4080494.4, 97.5, 97.5, 0.0);
(245221.9, 4080519.4, 97.5, 97.5, 0.0); (245246.9, 4080519.4, 97.5, 97.5, 0.0);
(245271.9, 4080519.4, 97.5, 97.5, 0.0); (245296.9, 4080519.4, 97.5, 97.5, 0.0);
(245321.9, 4080519.4, 97.5, 97.5, 0.0); (245346.9, 4080519.4, 97.5, 97.5, 0.0);
(245371.9, 4080519.4, 97.8, 97.8, 0.0); (245396.9, 4080519.4, 97.8, 97.8, 0.0);
(245421.9, 4080519.4, 97.8, 97.8, 0.0); (245446.9, 4080519.4, 97.7, 97.7, 0.0);
(245471.9, 4080519.4, 97.5, 97.5, 0.0); (245496.9, 4080519.4, 97.5, 97.5, 0.0);
(245521.9, 4080519.4, 97.7, 97.7, 0.0); (245221.9, 4080544.4, 97.5, 97.5, 0.0);
(245246.9, 4080544.4, 97.5, 97.5, 0.0); (245271.9, 4080544.4, 97.5, 97.5, 0.0);
(245296.9, 4080544.4, 97.5, 97.5, 0.0); (245321.9, 4080544.4, 97.5, 97.5, 0.0);
(245346.9, 4080544.4, 97.7, 97.7, 0.0); (245371.9, 4080544.4, 97.8, 97.8, 0.0);
(245396.9, 4080544.4, 97.8, 97.8, 0.0); (245421.9, 4080544.4, 97.8, 97.8, 0.0);
(245446.9, 4080544.4, 97.8, 97.8, 0.0); (245471.9, 4080544.4, 97.7, 97.7, 0.0);
(245496.9, 4080544.4, 97.7, 97.7, 0.0); (245521.9, 4080544.4, 97.9, 97.9, 0.0);

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(245221.9, 4080569.4, 97.6, 97.6, 0.0); (245246.9, 4080569.4, 97.6, 97.6, 0.0);
(245271.9, 4080569.4, 97.6, 97.6, 0.0); (245296.9, 4080569.4, 97.6, 97.6, 0.0);
(245321.9, 4080569.4, 97.7, 97.7, 0.0); (245346.9, 4080569.4, 97.8, 97.8, 0.0);
(245371.9, 4080569.4, 97.8, 97.8, 0.0); (245396.9, 4080569.4, 97.9, 97.9,

```
     0.0);
     ( 245421.9, 4080569.4,      97.9,      97.9,       0.0);        ( 245446.9, 4080569.4,      97.9,      97.9,
     0.0);
     ( 245471.9, 4080569.4,      98.0,      98.0,       0.0);        ( 245496.9, 4080569.4,      98.0,      98.0,
     0.0);
     ( 245521.9, 4080569.4,      98.3,      98.3,       0.0);
```



```
                                            *** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
                                                              (1=YES; 0=NO)

            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
            1 1 1 1 1 1 1 1 1 1  1 1 1 1 1

                NOTE:  METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA
FILE.


                                  *** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***
                                                           (METERS/SEC)

                                                 1.54,   3.09,   5.14,   8.23,  10.80,
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                                    *** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

   Surface file:   C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC                       Met Version:
21112
   Profile file:   C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL
   Surface format: FREE

   Profile format: FREE

   Surface station no.:    93193                  Upper air station no.:    23230
                  Name: UNKNOWN                                    Name: UNKNOWN
                  Year:   2018                                     Year:   2018

 First 24 hours of scalar data
 YR MO DY JDY HR     H0     U*     W*  DT/DZ ZICNV ZIMCH  M-O LEN    Z0  BOWEN ALBEDO  REF WS   WD     HT  REF TA
  HT
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - -
```

```
18 01 01   1 01   -6.0  0.108 -9.000 -9.000 -999.   85.     18.7  0.17   1.06   1.00    1.20  347.   10.0  280.9
2.0
18 01 01   1 02   -2.0  0.062 -9.000 -9.000 -999.   38.     10.9  0.02   1.06   1.00    0.91  174.   10.0  279.2
2.0
18 01 01   1 03   -3.4  0.076 -9.000 -9.000 -999.   50.     11.8  0.03   1.06   1.00    1.20  265.   10.0  279.2
2.0
18 01 01   1 04   -5.1  0.095 -9.000 -9.000 -999.   71.     15.2  0.06   1.06   1.00    1.35  316.   10.0  278.1
2.0
18 01 01   1 05   -8.8  0.123 -9.000 -9.000 -999.  104.     19.1  0.04   1.06   1.00    1.87   96.   10.0  277.0
2.0
18 01 01   1 06   -2.6  0.067 -9.000 -9.000 -999.   43.     10.7  0.02   1.06   1.00    1.08  177.   10.0  277.5
2.0
18 01 01   1 07   -3.7  0.078 -9.000 -9.000 -999.   52.     11.5  0.02   1.06   1.00    1.33  181.   10.0  277.5
2.0
18 01 01   1 08  -15.2  0.167 -9.000 -9.000 -999.  164.     30.7  0.06   1.06   0.65    2.32   76.   10.0  276.4
2.0
18 01 01   1 09   -3.5  0.149 -9.000 -9.000 -999.  139.     86.8  0.04   1.06   0.36    2.15  109.   10.0  278.1
2.0
18 01 01   1 10   56.2  0.204  0.651  0.006  177.  221.    -13.6  0.04   1.06   0.26    2.37  134.   10.0  281.4
2.0
18 01 01   1 11   92.0  0.233  1.067  0.016  477.  270.    -12.4  0.04   1.06   0.22    2.62  105.   10.0  283.1
2.0
18 01 01   1 12  116.8  0.202  1.234  0.018  581.  219.     -6.4  0.04   1.06   0.21    2.11  102.   10.0  285.9
2.0
18 01 01   1 13  112.5  0.144  1.280  0.019  673.  132.     -2.4  0.02   1.06   0.21    1.55  183.   10.0  287.5
2.0
18 01 01   1 14   84.0  0.122  1.190  0.019  723.  103.     -2.0  0.02   1.06   0.22    1.28  200.   10.0  289.2
2.0
18 01 01   1 15   57.9  0.161  1.059  0.019  738.  155.     -6.5  0.03   1.06   0.26    1.81  262.   10.0  290.4
2.0
18 01 01   1 16   16.8  0.124  0.702  0.019  742.  105.    -10.3  0.03   1.06   0.35    1.47  259.   10.0  289.9
2.0
18 01 01   1 17   -2.5  0.068 -9.000 -9.000 -999.   44.     11.3  0.02   1.06   0.62    1.14  297.   10.0  287.5
2.0
18 01 01   1 18   -7.4  0.111 -9.000 -9.000 -999.   89.     16.9  0.03   1.06   1.00    1.84  239.   10.0  286.4
2.0
18 01 01   1 19   -4.0  0.085 -9.000 -9.000 -999.   60.     13.8  0.06   1.06   1.00    1.21   83.   10.0  284.9
2.0
18 01 01   1 20  -10.4  0.137 -9.000 -9.000 -999.  122.     22.3  0.06   1.06   1.00    1.93   76.   10.0  283.8
2.0
18 01 01   1 21   -4.7  0.090 -9.000 -9.000 -999.   65.     14.0  0.04   1.06   1.00    1.38  109.   10.0  283.1
2.0
18 01 01   1 22   -4.1  0.084 -9.000 -9.000 -999.   58.     13.0  0.04   1.06   1.00    1.30  127.   10.0  281.4
2.0
18 01 01   1 23  -11.7  0.145 -9.000 -9.000 -999.  133.     23.6  0.06   1.06   1.00    2.04   70.   10.0  280.9
2.0
18 01 01   1 24   -3.4  0.079 -9.000 -9.000 -999.   54.     13.0  0.06   1.06   1.00    1.09   80.   10.0  281.4
2.0


First hour of profile data
YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
18 01 01 01   10.0 1  347.    1.20   281.0   99.0  -99.00  -99.00

F indicates top of profile (=1) or below (=0)
 *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
    07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
  16:49:31

  PAGE  11
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                  *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5 YEARS FOR SOURCE GROUP: ALL
***
                                INCLUDING SOURCE(S):     JOO6O1AS    ,

                                          *** DISCRETE CARTESIAN RECEPTOR POINTS ***
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** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
245689.90	4080671.20	0.11757	245714.90	4080671.20	0.07252
245739.90	4080671.20	0.04710	245764.90	4080671.20	0.03210
245789.90	4080671.20	0.02278	245814.90	4080671.20	0.01672
245839.90	4080671.20	0.01264	245864.90	4080671.20	0.00980
245689.90	4080696.20	0.11503	245714.90	4080696.20	0.06783
245739.90	4080696.20	0.04241	245764.90	4080696.20	0.02819
245789.90	4080696.20	0.01974	245814.90	4080696.20	0.01443
245839.90	4080696.20	0.01092	245864.90	4080696.20	0.00851
245689.90	4080721.20	0.10227	245714.90	4080721.20	0.05707
245739.90	4080721.20	0.03465	245764.90	4080721.20	0.02286
245789.90	4080721.20	0.01609	245814.90	4080721.20	0.01190
245839.90	4080721.20	0.00914	245864.90	4080721.20	0.00723
245689.90	4080746.20	0.07687	245714.90	4080746.20	0.04157
245739.90	4080746.20	0.02564	245764.90	4080746.20	0.01740
245789.90	4080746.20	0.01261	245814.90	4080746.20	0.00958
245839.90	4080746.20	0.00753	245864.90	4080746.20	0.00608
245689.90	4080771.20	0.04405	245714.90	4080771.20	0.02676
245739.90	4080771.20	0.01796	245764.90	4080771.20	0.01294
245789.90	4080771.20	0.00979	245814.90	4080771.20	0.00768
245839.90	4080771.20	0.00619	245864.90	4080771.20	0.00510
245764.90	4080796.20	0.00971	245789.90	4080796.20	0.00765
245814.90	4080796.20	0.00619	245839.90	4080796.20	0.00510
245864.90	4080796.20	0.00428	245789.90	4080821.20	0.00606
245814.90	4080821.20	0.00502	245839.90	4080821.20	0.00422
245864.90	4080821.20	0.00360	245814.90	4080846.20	0.00415
245839.90	4080846.20	0.00354	245864.90	4080846.20	0.00305
245685.30	4080822.70	0.01741	245710.30	4080822.70	0.01269
245735.30	4080822.70	0.00968	245685.30	4080847.70	0.01232
245710.30	4080847.70	0.00943	245735.30	4080847.70	0.00746
245760.30	4080847.70	0.00607	245685.30	4080872.70	0.00921
245710.30	4080872.70	0.00731	245735.30	4080872.70	0.00594
245760.30	4080872.70	0.00494	245785.30	4080872.70	0.00417

245810.30	4080872.70	0.00357	245835.30	4080872.70	0.00308
245860.30	4080872.70	0.00268	245685.30	4080897.70	0.00717
245710.30	4080897.70	0.00583	245735.30	4080897.70	0.00484
245760.30	4080897.70	0.00409	245785.30	4080897.70	0.00351
245810.30	4080897.70	0.00305	245835.30	4080897.70	0.00267
245860.30	4080897.70	0.00235	245685.30	4080922.70	0.00576
245710.30	4080922.70	0.00477	245735.30	4080922.70	0.00402
245760.30	4080922.70	0.00344	245785.30	4080922.70	0.00299

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO6O1AS ,

*** 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
245810.30	4080922.70	0.00263	245835.30	4080922.70	0.00233
245860.30	4080922.70	0.00208	245685.30	4080947.70	0.00474
245710.30	4080947.70	0.00398	245735.30	4080947.70	0.00339
245760.30	4080947.70	0.00293	245785.30	4080947.70	0.00257
245810.30	4080947.70	0.00228	245835.30	4080947.70	0.00204
245860.30	4080947.70	0.00184	245835.30	4080972.70	0.00179
245860.30	4080972.70	0.00163	245299.30	4080786.20	0.00772
245324.30	4080786.20	0.00922	245349.30	4080786.20	0.01120
245374.30	4080786.20	0.01386	245399.30	4080786.20	0.01749
245424.30	4080786.20	0.02261	245449.30	4080786.20	0.02998
245474.30	4080786.20	0.04103	245499.30	4080786.20	0.05904
245299.30	4080811.20	0.00811	245324.30	4080811.20	0.00967
245349.30	4080811.20	0.01168	245374.30	4080811.20	0.01431
245399.30	4080811.20	0.01778	245424.30	4080811.20	0.02242
245449.30	4080811.20	0.02867	245474.30	4080811.20	0.03715
245499.30	4080811.20	0.04842	245299.30	4080836.20	0.00838
245324.30	4080836.20	0.00991	245349.30	4080836.20	0.01183

245374.30	4080836.20	0.01424	245399.30	4080836.20	0.01725
245424.30	4080836.20	0.02095	245449.30	4080836.20	0.02541
245474.30	4080836.20	0.03056	245499.30	4080836.20	0.03603
245324.30	4080861.20	0.00990	245349.30	4080861.20	0.01159
245374.30	4080861.20	0.01361	245399.30	4080861.20	0.01590
245424.30	4080861.20	0.01845	245449.30	4080861.20	0.02114
245474.30	4080861.20	0.02382	245499.30	4080861.20	0.02621
245299.30	4080886.20	0.00839	245324.30	4080886.20	0.00960
245349.30	4080886.20	0.01097	245374.30	4080886.20	0.01245
245399.30	4080886.20	0.01399	245424.30	4080886.20	0.01552
245449.30	4080886.20	0.01698	245474.30	4080886.20	0.01828
245499.30	4080886.20	0.01926	245299.30	4080911.20	0.00805
245324.30	4080911.20	0.00901	245349.30	4080911.20	0.00999
245374.30	4080911.20	0.01097	245399.30	4080911.20	0.01189
245424.30	4080911.20	0.01274	245449.30	4080911.20	0.01350
245474.30	4080911.20	0.01412	245499.30	4080911.20	0.01449
245299.30	4080936.20	0.00751	245324.30	4080936.20	0.00819
245349.30	4080936.20	0.00883	245374.30	4080936.20	0.00941
245399.30	4080936.20	0.00993	245424.30	4080936.20	0.01038
245449.30	4080936.20	0.01078	245474.30	4080936.20	0.01108
245499.30	4080936.20	0.01120	245499.30	4080961.20	0.00888
245564.60	4080447.70	0.00232	245589.60	4080447.70	0.00261
245614.60	4080447.70	0.00296	245639.60	4080447.70	0.00340

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO6O1AS ,

*** 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
245664.60	4080447.70	0.00397	245689.60	4080447.70	0.00466
245714.60	4080447.70	0.00543	245739.60	4080447.70	0.00619

245564.60	4080472.70	0.00283	245589.60	4080472.70	0.00324
245614.60	4080472.70	0.00377	245639.60	4080472.70	0.00445
245664.60	4080472.70	0.00531	245689.60	4080472.70	0.00632
245714.60	4080472.70	0.00737	245739.60	4080472.70	0.00830
245764.60	4080472.70	0.00897	245789.60	4080472.70	0.00928
245564.60	4080497.70	0.00355	245589.60	4080497.70	0.00416
245614.60	4080497.70	0.00498	245639.60	4080497.70	0.00607
245664.60	4080497.70	0.00742	245689.60	4080497.70	0.00890
245714.60	4080497.70	0.01027	245739.60	4080497.70	0.01130
245764.60	4080497.70	0.01180	245789.60	4080497.70	0.01175
245564.60	4080522.70	0.00461	245589.60	4080522.70	0.00556
245614.60	4080522.70	0.00694	245639.60	4080522.70	0.00877
245664.60	4080522.70	0.01091	245689.60	4080522.70	0.01302
245714.60	4080522.70	0.01467	245739.60	4080522.70	0.01551
245764.60	4080522.70	0.01546	245789.60	4080522.70	0.01470
245564.60	4080547.70	0.00629	245589.60	4080547.70	0.00789
245614.60	4080547.70	0.01038	245639.60	4080547.70	0.01362
245664.60	4080547.70	0.01701	245689.60	4080547.70	0.01981
245714.60	4080547.70	0.02133	245739.60	4080547.70	0.02129
245764.60	4080547.70	0.01998	245789.60	4080547.70	0.01799
245564.60	4080572.70	0.00922	245589.60	4080572.70	0.01231
245614.60	4080572.70	0.01726	245639.60	4080572.70	0.02311
245664.60	4080572.70	0.02822	245689.60	4080572.70	0.03127
245714.60	4080572.70	0.03128	245739.60	4080572.70	0.02876
245764.60	4080572.70	0.02507	245789.60	4080572.70	0.02124
245221.90	4080419.40	0.00129	245246.90	4080419.40	0.00131
245271.90	4080419.40	0.00132	245221.90	4080444.40	0.00147
245246.90	4080444.40	0.00150	245271.90	4080444.40	0.00153
245296.90	4080444.40	0.00156	245321.90	4080444.40	0.00157
245221.90	4080469.40	0.00167	245246.90	4080469.40	0.00173
245271.90	4080469.40	0.00178	245296.90	4080469.40	0.00182
245321.90	4080469.40	0.00187	245346.90	4080469.40	0.00190
245371.90	4080469.40	0.00191	245396.90	4080469.40	0.00192
245421.90	4080469.40	0.00193	245221.90	4080494.40	0.00190
245246.90	4080494.40	0.00198	245271.90	4080494.40	0.00206

245296.90	4080494.40	0.00214	245321.90	4080494.40	0.00221
245346.90	4080494.40	0.00228	245371.90	4080494.40	0.00233
245396.90	4080494.40	0.00237	245421.90	4080494.40	0.00240

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO6O1AS ,

*** 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
245446.90	4080494.40	0.00242	245471.90	4080494.40	0.00247
245496.90	4080494.40	0.00258	245521.90	4080494.40	0.00279
245221.90	4080519.40	0.00213	245246.90	4080519.40	0.00225
245271.90	4080519.40	0.00237	245296.90	4080519.40	0.00250
245321.90	4080519.40	0.00262	245346.90	4080519.40	0.00274
245371.90	4080519.40	0.00285	245396.90	4080519.40	0.00295
245421.90	4080519.40	0.00302	245446.90	4080519.40	0.00308
245471.90	4080519.40	0.00315	245496.90	4080519.40	0.00328
245521.90	4080519.40	0.00355	245221.90	4080544.40	0.00237
245246.90	4080544.40	0.00253	245271.90	4080544.40	0.00271
245296.90	4080544.40	0.00289	245321.90	4080544.40	0.00308
245346.90	4080544.40	0.00328	245371.90	4080544.40	0.00349
245396.90	4080544.40	0.00368	245421.90	4080544.40	0.00385
245446.90	4080544.40	0.00401	245471.90	4080544.40	0.00415
245496.90	4080544.40	0.00434	245521.90	4080544.40	0.00470
245221.90	4080569.40	0.00261	245246.90	4080569.40	0.00283
245271.90	4080569.40	0.00306	245296.90	4080569.40	0.00332
245321.90	4080569.40	0.00360	245346.90	4080569.40	0.00391
245371.90	4080569.40	0.00424	245396.90	4080569.40	0.00458
245421.90	4080569.40	0.00493	245446.90	4080569.40	0.00528
245471.90	4080569.40	0.00563	245496.90	4080569.40	0.00601
245521.90	4080569.40	0.00657			

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 5 YEARS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

NETWORK GROUP ID / GRID-ID		AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)				OF TYPE
ALL	1ST HIGHEST VALUE IS	0.11757 AT	245689.90,	4080671.20,	99.06,	99.06,	0.00) DC
	2ND HIGHEST VALUE IS	0.11503 AT	245689.90,	4080696.20,	99.06,	99.06,	0.00) DC
	3RD HIGHEST VALUE IS	0.10227 AT	245689.90,	4080721.20,	99.11,	99.11,	0.00) DC
	4TH HIGHEST VALUE IS	0.07687 AT	245689.90,	4080746.20,	99.22,	99.22,	0.00) DC
	5TH HIGHEST VALUE IS	0.07252 AT	245714.90,	4080671.20,	99.06,	99.06,	0.00) DC
	6TH HIGHEST VALUE IS	0.06783 AT	245714.90,	4080696.20,	99.10,	99.10,	0.00) DC
	7TH HIGHEST VALUE IS	0.05904 AT	245499.30,	4080786.20,	98.90,	98.90,	0.00) DC
	8TH HIGHEST VALUE IS	0.05707 AT	245714.90,	4080721.20,	99.22,	99.22,	0.00) DC
	9TH HIGHEST VALUE IS	0.04842 AT	245499.30,	4080811.20,	98.77,	98.77,	0.00) DC
	10TH HIGHEST VALUE IS	0.04710 AT	245739.90,	4080671.20,	99.06,	99.06,	0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** Message Summary : AERMOD Model Execution ***

--------- Summary of Total Messages --------

A Total of 0 Fatal Error Message(s)
A Total of 6 Warning Message(s)
A Total of 1361 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 750 Calm Hours Identified

A Total of 611 Missing Hours Identified (1.39 Percent)

```
   ******** FATAL ERROR MESSAGES ********
             ***  NONE  ***


   ********   WARNING MESSAGES   ********
ME W186     606       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used          0.50
ME W187     606       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
OU W565     610       PERPLT: Possible Conflict With Dynamically Allocated FUNIT     PLOTFILE
OU W565     611       PERPST: Possible Conflict With Dynamically Allocated FUNIT     POSTFILE
MX W420    7582        METQA: Wind Speed Out-of-Range.   KURDAT =                   18111222
MX W420    7588        METQA: Wind Speed Out-of-Range.   KURDAT =                   18111304

   ***********************************
   *** AERMOD Finishes Successfully ***
   ***********************************
```

Risk Calculations For Diesel Exhaust

$Risk_{inh\text{-}res} = Dose_{air} * CPF * ASF * ED/AT$

$Dose_{air} = C_{air} * \{BR/BW\} * A * EF * 10^{-6}$

Variable	Description	Units	Value
$Risk_{inh\text{-}air}$	Residential inhalation cancer risk	Unitless	Calculated
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated
CPF	Inhalation cancer potency factor	$(mg/kg\text{-}day)^{-1}$	Chemical Specific
ASF	Age sensitivity factor for a specified age group	Unitless	Calculated
ED	Exposure duration (in years) for a specified age group	years	Calculated
AT	Averaging time for lifetime caner risk	years	70
FAH	Fraction of time spent at home	Unitless	Calculated

Variable	Description	Units	Value	
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated	
C_{air}	Concentration in air	ug/m^3	**0.121**	1.21E-01
{BR/BW}	Daily Breathing rate normalized to body weight	L/kg body weight-day	Calculated	
A	Inhalation absorption fraction	Unitless	1	
EF	Exposure frequency (days/365 days)	Unitless	Calculated	
10^{-6}	migrograms to milligrams conversion, liters to cubic meters conversion	Unitless	Calculated	

0.00E+00

Residential Exposures

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	0.00E+00	10	1	0	1.1	4.19E-05	0.121	361	1	0.958904
0-1	2.05E-05	10	1	1.03	1.1	1.26E-04	0.121	1090	1	0.958904
1-2	0.00E+00	10	1	0	1.1	1.26E-04	0.121	1090	1	0.958904
2-3	0.00E+00	3	1	0	1.1	6.64E-05	0.121	572	1	0.958904
3-4	0.00E+00	3	1	0	1.1	6.64E-05	0.121	572	1	0.958904
2<9	0.00E+00	3	0.72	0	1.1	9.99E-05	0.121	861	1	0.958904
2<16	0.00E+00	3	0.72	0	1.1	8.64E-05	0.121	745	1	0.958904
16<30	4.59E-07	1	0.73	1.03	1.1	3.89E-05	0.121	335	1	0.958904
16-70	0.00E+00	1	0.73	0	1.1	3.36E-05	0.121	290	1	0.958904

3rd trimeseter to 4.	2.05E-05
3rd trimester to 30	0.00E+00
3rd trimester to 70	**2.09E-05**

Risk Calculations For Diesel Exhaust

$Risk_{inh\text{-}res} = Dose_{air} * CPF * ASF * ED/AT$

$Dose_{air} = C_{air} * \{BR/BW\} * A * EF * 10^{-6}$

Variable	Description	Units	Value
$Risk_{inh\text{-}air}$	Residential inhalation cancer risk	Unitless	Calculated
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated
CPF	Inhalation cancer potency factor	$(mg/kg\text{-}day)^{-1}$	Chemical Specific
ASF	Age sensitivity factor for a specified age group	Unitless	Calculated
ED	Exposure duration (in years) for a specified age group	years	Calculated
AT	Averaging time for lifetime caner risk	years	70
FAH	Fraction of time spent at home	Unitless	Calculated

Variable	Description	Units	Value	
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated	
C_{air}	Concentration in air	ug/m^3	**0.127**	1.27E-01
{BR/BW}	Daily Breathing rate normalized to body weight	L/kg body weight-day	Calculated	
A	Inhalation absorption fraction	Unitless	1	
EF	Exposure frequency (days/365 days)	Unitless	Calculated	
10^{-6}	migrograms to milligrams conversion, liters to cubic meters conversion	Unitless	Calculated	

0.00E+00

Residential Exposures

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	0.00E+00	10	1	0	1.1	4.40E-05	0.127	361	1	0.958904
0-1	2.15E-05	10	1	1.03	1.1	1.33E-04	0.127	1090	1	0.958904
1-2	0.00E+00	10	1	0	1.1	1.33E-04	0.127	1090	1	0.958904
2-3	0.00E+00	3	1	0	1.1	6.97E-05	0.127	572	1	0.958904
3-4	0.00E+00	3	1	0	1.1	6.97E-05	0.127	572	1	0.958904
2<9	0.00E+00	3	0.72	0	1.1	1.05E-04	0.127	861	1	0.958904
2<16	0.00E+00	3	0.72	0	1.1	9.07E-05	0.127	745	1	0.958904
16<30	4.82E-07	1	0.73	1.03	1.1	4.08E-05	0.127	335	1	0.958904
16-70	0.00E+00	1	0.73	0	1.1	3.53E-05	0.127	290	1	0.958904

3rd trimeseter to 4.	2.15E-05
3rd trimester to 30	0.00E+00
3rd trimester to 70	**2.20E-05**

EXHIBIT C

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

23 July 2024

Christopher A. Brown, Director
Fennemore Law
[redacted]

Subject: *Lincoln Park Apartments, 7056 North Prospect Avenue, Fresno, California*
City of Fresno Permit Application P21-00989
Review of Categorical Exemption Environmental Assessment – Noise

Dear Mr. Brown:

I have reviewed documents pertaining to the Categorical Exemption of the subject project, in particular the document identified as Exhibit J on the City of Fresno's Legislation website page that pertains to this project:[1]

> *City of Fresno Categorical Exemption*
> *Environmental Assessment for Development Permit Application No. P21-00989*
> *("Environmental Assessment")*

This letter presents our comments on Noise section of this document.

Wilson Ihrig, Acoustical Consultants, has practiced exclusively in the field of acoustics since 1966. During our 58 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also regularly utilize industry-standard acoustical programs such as Environmental Noise Model (ENM), Traffic Noise Model (TNM), SoundPLAN, and CADNA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

Comments Regarding Construction Noise

The Environmental Assessment takes the position that because the Fresno municipal code exempts construction noise during specified time periods from the quantitative noise standards that otherwise apply, construction noise from the project will technically comply with the local

[1] City of Fresno - File #: ID 24-651 (legistar.com)

standards and, therefore, is incapable of causing any sort of environmental impact. The fallacy of this argument is plain when one considers that it would allow noise levels that could cause hearing loss and still lead to the conclusion that those levels do not cause a significant environmental noise impact. CEQA is not focused on the application of local regulations. Rather, it is focused on the determination of actual environmental degradation and disclosure of any degradation that is reasonably found to cause a significant impact on the environment. While the CEQA Appendix G guidelines for noise assessment do call for comparison of project noise levels to local standards, they also call for comparison to the existing ambient, specifically stating:

> Would the project result in . . . [g]eneration of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project . . .

This aspect of a thorough CEQA noise assessment is completely disregarded in the Environmental Assessment document.

An assessment based on the existing ambient is all the more important in this situation because the Fresno noise ordinance's *prima facia* noise limit is itself based on the ambient noise level:

> Any noise or sound exceeding the ambient noise level at the property line of any person offended thereby, or, if a condominium or apartment house, within any adjoining living unit, by more than five decibels shall be deemed to be prima facie evidence of a violation of Section 8-305. [F.M.C. Sec. 10-106. PRIMA FACIE VIOLATION]

In this situation, comparison with the existing ambient must necessarily be the basis for a CEQA assessment.

There is nothing in the record for this project that suggests that ambient measurements have been made in the surrounding neighborhoods. However, the Fresno Noise Ordinance contains statutory minimum ambient noise levels for various zoning districts, and given a lack of any other information, it is reasonable to assume these for the areas surrounding the project site. For residential districts, these statutory ambient levels are:

7:00 am to 7:00 pm	60 dBA
7:00 pm to 10:00 pm	55 dBA

Construction is a noisy endeavor. The Environmental Protection Agency (EPA) has published typical ranges of noise levels at construction sites for a variety of building types.[2] For domestic housing, the EPA noise levels for each major phase of construction with all pertinent equipment present at site are reproduced in Table I.

[2] *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*, U. S. Environmental Protection Agency, NTID300.1, 31 December 1971.

TABLE I EPA NOISE LEVELS FOR RESIDENTIAL CONSTRUCTION

Phase	Average	Range‡
Ground clearing	83 dBA	75 to 91 dBA
Excavation	88	80 to 96
Foundations	81	71 to 91
Erection	81	71 to 91
Finishing	88	81 to 95

‡ The range is the average plus/minus one standard deviation. For a "normal" (bell-shaped) distribution, the noise level will be within the range 68% of the time and higher than the low end of the range 84% of the time.

The values given in Table I are based on the loudest piece of equipment being located at a distance of 50 feet. Construction equipment noise spreads as a point source (as opposed to roadway noise which is a line source), and point source noise attenuates at a rate of 6 decibels per every doubling of distance (which means it also increases 6 dB for every halving of distance). So, for example, if the noise is 88 dBA at 50 feet, it will be 82 dBA at 100 feet and 76 dBA at 200 feet. The noise level does not attenuate linearly with distance because the decibel scale is logarithmic (like the Richter scale for earthquakes).

According to F.M.C. Sec. 10-106, the *prima facia* noise limit for most noises is 5 dB over the ambient. Using the statutory daytime (7:00 am – 7:00 pm) ambient of 60 dBA, the *prima facia* limit is 65 dBA. However, as noted above, construction noise levels are exempted by the F.M.C. from the normal *prima facia* noise limit, so what is a reasonable threshold of significance? I believe a reasonable limit is the *prima facia* limit plus another 5 dB., i.e., the ambient plus 10 dB. Given the statutory ambient, this is 70 dBA between 7:00 am and 7:00 pm.

Returning to Table I, one can see that not only is the average noise level for every construction phase well over 70 dBA, the lower end of the expected range is also over 70 dBA for every phase. This is direct evidence that unmitigated construction noise will cause a significant impact on residents immediately adjacent to the project site (namely, residents of the 11 homes between 7003 and 7063 Harmony Drive, inclusive).

Another way to look at this is to consider how far away the construction will have to be for the noise level to drop to 70 dBA. If the noise level at 50 feet is 88 dBA, the construction would have to be 400 feet away for the level to attenuate to 70 dBA. However, the width of the site from east to west is only 350 feet. So, if the average construction noise level is 88 dBA at 50 feet, it will be greater than 70 dBA for the entire period of the phase.[3] Focusing on the first four phases of construction, Table II shows the percentage of the 350-foot wide site for which the noise level will be greater than 70 dBA.

[3] This is strictly true for the Ground Clearing, Excavation, and Foundation phases. Potentially less so for the Erection phase if some built portions block noise from other portions being built. For the Finishing phase the noise levels would only match the levels shown in Table I for areas that have a direct line of sight to the off-site receptor.

TABLE II PERCENT OF SITE ON WHICH NOISE WILL EXCEED 70 dBA

Phase	Average	Range
Ground clearing	64%	25% to 100%
Excavation	100%	45% to 100%
Foundations	51%	16% to 100%
Erection	51%	16% to 100%

For each of the first four phases of construction, the noise level is expected to exceed 70 dBA for more than 50% of the site. This indicates the longevity of time that residences of Harmony Drive will be subjected to construction noise levels at least 10 dB higher than the statutory ambient and 5 dB higher than the *prima facia* noise limit established by the F.M.C.

Concluding Comments

The Environmental Assessment upon which the Categorical Exemption for this project is based concludes that there will not be a temporary noise impact based on a legal technicality, disregarding the intent and spirit of CEQA. Using construction noise level estimates published by the EPA, an ambient noise level based on the Fresno municipal code, and a reasonable threshold of significance also founded upon the municipal code, I have demonstrated by simple analysis that, in fact, the residents of Harmony Drive will be likely be subjected to a temporary, significant noise impact by the construction of the Lincoln Park Apartments project.

* * * * *

Please let me know if you have any questions about these comments on Lincoln Park Apartments environmental noise assessment that was produced to support a Categorical Exemption for the project.

Very truly yours,

WILSON IHRIG

[redacted]

Derek L. Watry
Principal

Susan Mac

From: Clerk
Sent: Wednesday, July 24, 2024 8:06 AM
To: Clerk Agendas
Cc: Clerk
Subject: FW: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

From: James Westgate [redacted]
Sent: Tuesday, July 23, 2024 5:51 PM
To: Jennifer Clark [redacted] Clerk <Clerk@fresno.gov>
Cc: District2 [redacted] Jerry Dyer [redacted] Keith Bergthold [redacted]
Subject: RE: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

RECEIVED
2024 JUL 24 A 8:47
CITY OF FRESNO
CITY CLERK'S OFFICE

External Email: Use caution with links and attachments

To: Jennifer Clark

Subject: RE: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

Dear Planning Director, Jennifer Clark, and City Clerk, Todd Stermer (Please distribute to appropriate City Officials and Fresno City Council Members):

We strongly encourage action by the Fresno City Council on July 25, 2024 to Approve Development Permit Application No. P21-00989 and related Environmental Assessment for property located at 7056 North Prospect Avenue on the northeast corner of West Herndon and North Prospect Avenues (Council District 2).

The California Housing Accountability Act prohibits a local agency from disapproving a housing development project that complies with applicable, objective general plan and zoning standards and criteria, unless a local agency makes specified written findings.

This project, as evidenced by thorough professional City Staff written analyses, assessments and conclusions, complies with all City of Fresno objective general plan and zoning standards and criteria.

The developer has acted in good faith over the past 4 years, working within the rules and standards established by the City of Fresno for the planning and development of the subject parcel, and closely conferring with City Staff to meet all City requirements.

Fresno desperately needs more high-quality multiple-family housing as proposed by this project in an appropriate location adjacent a major street and a public park and in convenient walking distance to the local elementary school and shopping opportunities to meet daily needs nearby at Marks and Herndon.

Opposition to the project at the Planning Commission appeal hearing (and in letters submitted) raised many non-factual issues and issues unrelated to the attributes and impacts of the proposed project, as well as several surrounding existing street and pedestrian safety issues that the City of Fresno and the Council District Office should take responsibility for proactively resolving whether or not this project takes place.

This project factually meets all City requirements, is needed to meet a serious housing deficit within the city limits of Fresno in infill areas already efficiently served by public infrastructure and services, and should be expeditiously approved.

Regards, Jim Westgate, On-Behalf of Members of the Fresno Region Taskforce for Affordable Housing and the Greenfield Coalition

Jim Westgagte

--
Jim Westgate
[redacted]

Susan Mac

From: Clerk
Sent: Wednesday, July 24, 2024 8:06 AM
To: Clerk Agendas
Cc: Clerk
Subject: FW: Housing Project on Herndon and Prospect

From: Stephen Sacks [redacted]
Sent: Tuesday, July 23, 2024 5:50 PM
To: Clerk <Clerk@fresno.gov>; Jerry Dyer <[redacted]; Jennifer Clark <[redacted]
District2[redacted]
Subject: Housing Project on Herndon and Prospect

External Email: Use caution with links and attachments

Hi,

One of the big needs in the City of Fresno is more infill housing as sprawl like proposed in the SEDA Project brings a whole list of negatives.

Therefore, I want to express my support for the Housing Project on Herndon and Prospect that will be coming up before the Fresno City Council on Thursday.

I'm sure you are aware that the California Housing Accountability Act prohibits a local agency from disapproving a housing development project like this one that complies with all City of Fresno objective general plan and zoning standards and criteria.

Fresno desperately needs more high-quality multiple-family housing as proposed by this project in an appropriate location adjacent a major street and a public park and in convenient walking distance to the local elementary school and shopping opportunities.

Please support this project!

Stephen Sacks

Susan Mac

From: Clerk
Sent: Wednesday, July 24, 2024 8:00 AM
To: Clerk Agendas
Cc: Clerk
Subject: FW: Housing Issue in Fresno

From: Cheyenne J. <[redacted]
Sent: Tuesday, July 23, 2024 6:21 PM
To: Clerk <Clerk@fresno.gov>
Cc: Cheyenne J. <[redacted]
Subject: Housing Issue in Fresno

External Email: Use caution with links and attachments

Dear Council Members,

1) Strongly encourage action by the Fresno City Council on July 25, 2024 to Approve Development Permit Application No. P21-00989 located at 7056 North Prospect Avenue (Council District 2).

2) The California Housing Accountability Act prohibits a local agency from disapproving a housing development project like this one that complies with all City of Fresno objective general plan and zoning standards and criteria.

3) Fresno desperately needs more high-quality multiple-family housing as proposed by this project in an appropriate location adjacent a major street and a public park and in convenient walking distance to the local elementary school and shopping opportunities.

~Live Vertically~
Cheyenne Jenvey

Susan Mac

From: Clerk
Sent: Wednesday, July 24, 2024 7:34 AM
To: Clerk Agendas
Cc: Clerk
Subject: FW: Housing Project

From: Francine Farber [redacted]
Sent: Tuesday, July 23, 2024 6:30 PM
To: Jennifer Clark [redacted]; Clerk <Clerk@fresno.gov>; Jerry Dyer [redacted]
Subject: Housing Project

External Email: Use caution with links and attachments

Dear Planning Director, Jennifer Clark, and City Clerk, Todd Stermer (Please distribute to appropriate City Officials and Fresno City Council Members):

I am writing to support the permit application for the property at 7056 North Prospect Avenue in Fresno. Since this project complies with the general plan and zoning standards, there is no reason to turn it down. Even the developer has complied with Fresno's rules and standards. The project is strategically located for the people it will serve, providing easy access to needed services. The people who are opposing it are forgetting that we are all in this world together and we have to support our neighbors, rather than exclude them. Their opposition is not based on factual concerns.

Let's stand up for what is right and approve this application.

Sincerely,

[redacted]

Susan Mac

From: Clerk
Sent: Wednesday, July 24, 2024 11:21 AM
To: Clerk Agendas
Cc: Clerk
Subject: FW: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

Follow Up Flag: Follow up
Flag Status: Completed

From: Christian Gonzalez [redacted]
Sent: Wednesday, July 24, 2024 10:10 AM
To: Jennifer Clark [redacted] Clerk <Clerk@fresno.gov>
Cc: District2 [redacted] Jerry Dyer [redacted]
Subject: RE: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

Dear Planning Director, Jennifer Clark, and City Clerk, Todd Stermer (Please distribute to appropriate City Officials and Fresno City Council Members):

We strongly encourage action by the Fresno City Council on July 25, 2024 to Approve Development Permit Application No. P21-00989 and related Environmental Assessment for property located at 7056 North Prospect Avenue on the northeast corner of West Herndon and North Prospect Avenues (Council District 2).

The California Housing Accountability Act prohibits a local agency from disapproving a housing development project that complies with applicable, objective general plan and zoning standards and criteria, unless a local agency makes specified written findings.

This project, as evidenced by thorough professional City Staff written analyses, assessments and conclusions, complies with all City of Fresno objective general plan and zoning standards and criteria.

The developer has acted in good faith over the past 4 years, working within the rules and standards established by the City of Fresno for the planning and development of the subject parcel, and closely conferring with City Staff to meet all City requirements.

Fresno desperately needs more high-quality multiple-family housing as proposed by this project in an appropriate location adjacent a major street and a public park and in convenient walking distance to the local elementary school and shopping opportunities to meet daily needs nearby at Marks and Herndon.

Opposition to the project at the Planning Commission appeal hearing (and in letters submitted) raised

many non-factual issues and issues unrelated to the attributes and impacts of the proposed project, as well as several surrounding existing street and pedestrian safety issues that the City of Fresno and the Council District Office should take responsibility for proactively resolving whether or not this project takes place.

This project factually meets all City requirements, is needed to meet a serious housing deficit within the city limits of Fresno in infill areas already efficiently served by public infrastructure and services, and should be expeditiously approved.

Regards, Christian Gonzalez, Fresno City Resident, Greenfield Coalition Member.

Link to agenda:
https://fresno.legistar.com/DepartmentDetail.aspx?ID=24367&GUID=3F2858EB-369B-4203-B7B5-EF33E643E2AD&Mode=MainBody

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Christian Gonzalez
Neighborhood Development Manager
she/her/ella

Every Neighborhood Partnership 15 YEAR ANNIVERSARY

[redacted]

Join Our Newsletter!

Susan Mac

From: Clerk
Sent: Wednesday, July 24, 2024 11:42 AM
To: Clerk Agendas
Cc: Clerk
Subject: FW: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

From: Keith Bergthold [redacted]
Sent: Tuesday, July 23, 2024 4:14 PM
To: Jennifer Clark [redacted] Clerk <Clerk@fresno.gov>
Cc: District2 [redacted] Jerry Dyer [redacted]; Keith Bergthold [redacted]
Subject: RE: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

Dear Planning Director, Jennifer Clark, and City Clerk, Todd Stermer (Please distribute to appropriate City Officials and Fresno City Council Members):

We strongly encourage action by the Fresno City Council on July 25, 2024 to Approve Development Permit Application No. P21-00989 and related Environmental Assessment for property located at 7056 North Prospect Avenue on the northeast corner of West Herndon and North Prospect Avenues (Council District 2).

The California Housing Accountability Act prohibits a local agency from disapproving a housing development project that complies with applicable, objective general plan and zoning standards and criteria, unless a local agency makes specified written findings.

This project, as evidenced by thorough professional City Staff written analyses, assessments and conclusions, complies with all City of Fresno objective general plan and zoning standards and criteria.

The developer has acted in good faith over the past 4 years, working within the rules and standards established by the City of Fresno for the planning and development of the subject parcel, and closely conferring with City Staff to meet all City requirements.

Fresno desperately needs more high-quality multiple-family housing as proposed by this project in an appropriate location adjacent a major street and a public park and in convenient walking distance to the local elementary school and shopping opportunities to meet daily needs nearby at Marks and Herndon.

Opposition to the project at the Planning Commission appeal hearing (and in letters submitted) raised many non-factual issues and issues unrelated to the attributes and impacts of the proposed project, as well as several surrounding existing street and pedestrian safety issues that the City of Fresno and the Council District Office should take responsibility for proactively resolving whether or not this project takes place.

This project factually meets all City requirements, is needed to meet a serious housing deficit within the city limits of Fresno in infill areas already efficiently served by public infrastructure and services, and should be expeditiously approved.

Regards, Keith Bergthold, On-Behalf of Members of the Fresno Region Taskforce for Affordable Housing and the Greenfield Coalition

Link to agenda:

https://fresno.legistar.com/DepartmentDetail.aspx?ID=24367&GUID=3F2858EB-369B-4203-B7B5-EF33E643E2AD&Mode=MainBody

Keith Bergthold
RCI, CEO
[redacted]

Regenerate California Innovation Inc. (RCI)
[redacted]

Susan Mac

From: Clerk
Sent: Wednesday, July 24, 2024 1:11 PM
To: Clerk Agendas
Cc: Clerk
Subject: FW: Letter of Support for permit app for housing project on Herndon and Prospect

From: Loren Dubberke [redacted]
Sent: Wednesday, July 24, 2024 11:39 AM
To: Garry Bredefeld [redacted] District6 [redacted] Miguel Arias [redacted] District1 [redacted] Annalisa Perea [redacted] Mike Karbassi [redacted] District3 [redacted] District2 [redacted] Tyler Maxwell [redacted]; District4 [redacted]; Luis Chavez [redacted] District5 [redacted] Nelson Esparza [redacted] District7 [redacted] Clerk <Clerk@fresno.gov>
Subject: Letter of Support for permit app for housing project on Herndon and Prospect

External Email: Use caution with links and attachments

Dear Fresno City Council Members,

I am writing to express my strong support for the Fresno City Council to approve the permit process for the housing project on Herndon and Prospect. (P121-00989)

As the Executive Director of a local non profit that works in the Robinson/Hoover neighborhood, I work daily with families needing jobs, housing and other vital resources to thrive. I see first-hand the challenges facing those that have limited options for housing at all income levels.

Please help us prevent urban sprawl and beautify vacant lots through housing projects like this one that make it easier for families to live and work in the city of Fresno.

Gratefully,

Loren

Loren Dubberke
FACE Executive Director
[redacted]

RECEIVED
2024 JUL 24 P 2:58
CITY OF FRESNO
CITY CLERK'S OFFICE

Susan Mac

From:	Clerk
Sent:	Wednesday, July 24, 2024 2:21 PM
To:	Clerk Agendas
Cc:	Clerk
Subject:	FW: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

From: Jared Davis [redacted]
Sent: Wednesday, July 24, 2024 2:00 PM
To: Jennifer Clark <[redacted]
Cc: District2 <[redacted]; Jerry Dyer <[redacted]; [redacted] Clerk <Clerk@fresno.gov>
Subject: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

External Email: Use caution with links and attachments

Dear Planning Director Jennifer Clark and City Clerk Todd Stermer (Please distribute to appropriate City Officials and Fresno City Council Members):

I strongly encourage action by the Fresno City Council on July 25, 2024, to Approve Development Permit Application No. P21-00989 and related Environmental Assessment for property located at 7056 North Prospect Avenue on the northeast corner of West Herndon and North Prospect Avenues (Council District 2) for the following reasons:

1. The California Housing Accountability Act prohibits a local agency from disapproving a housing development project that complies with applicable, objective general plan and zoning standards and criteria unless the agency makes specified written findings.

2. This project, as evidenced by thorough professional City Staff written analyses, assessments, and conclusions, complies with all City of Fresno objective general plan and zoning standards and criteria.

3. The developer has acted in good faith over the past 4 years, working within the rules and standards established by the City of Fresno to plan and develop the subject parcel and closely conferring with City Staff to meet all City requirements.

4. Fresno desperately needs more high-quality multiple-family housing, as proposed by this project, in an appropriate location adjacent to a major street and a public park and in convenient walking distance to the local elementary school and shopping opportunities to meet daily needs nearby at Marks and Herndon.

Opposition to the project at the Planning Commission appeal hearing (and in letters submitted) raised many non-factual issues and street and pedestrian safety issues unrelated to the proposed project. Regardless of the outcome of this matter, the City of Fresno and the Council District Office should also take responsibility for proactively resolving existing street and pedestrian safety issues impacting this area.

This project is urgently needed to address the severe housing deficit within the city limits of Fresno in infill areas already efficiently served by public infrastructure and services. The Plan Commission should have recommended approval of the project based on the objective standards as delineated in the Citywide Development Code, Chapter 15 of the Fresno Code of Ordinances. Unfortunately, they did not.

City planning staff has determined that the project factually meets all city requirements, and as such, it should be expeditiously approved.

Finally, I would appreciate it if City Clerk Todd Stermer could distribute this email to City Officials as appropriate and to all Fresno City Council Members.

Regards,

Jared A. Davis
Member
Fresno Region Taskforce for Affordable Housing

Susan Mac

From: Clerk
Sent: Wednesday, July 24, 2024 4:03 PM
To: Clerk Agendas
Subject: FW: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

From: Ivan Paz [redacted]
Sent: Wednesday, July 24, 2024 2:50 PM
To: Jennifer Clark [redacted]; Clerk <Clerk@fresno.gov>; District2 [redacted] Jerry Dyer [redacted]
Subject: Development Permit Application No. P21-00989 - Comment for Fresno City Council Herndon-Prospect Appeal Hearing - 5 pm - July 25th - Fresno City Hall

External Email: Use caution with links and attachments

Dear Planning Director, Jennifer Clark, and City Clerk, Todd Stermer (Please distribute to appropriate City Officials and Fresno City Council Members):
We strongly encourage action by the Fresno City Council on July 25, 2024 to Approve Development Permit Application No. P21-00989 and related Environmental Assessment for property located at 7056 North Prospect Avenue on the northeast corner of West Herndon and North Prospect Avenues (Council District 2).

The California Housing Accountability Act prohibits a local agency from disapproving a housing development project that complies with applicable, objective general plan and zoning standards and criteria, unless a local agency makes specified written findings.

This project, as evidenced by thorough professional City Staff written analyses, assessments and conclusions, complies with all City of Fresno objective general plan and zoning standards and criteria.

The developer has acted in good faith over the past 4 years, working within the rules and standards established by the City of Fresno for the planning and development of the subject parcel, and closely conferring with City Staff to meet all City requirements.

Fresno desperately needs more high-quality multiple-family housing as proposed by this project in an appropriate location adjacent a major street and a public park and in convenient walking distance to the local elementary school and shopping opportunities to meet daily needs nearby at Marks and Herndon.

Opposition to the project at the Planning Commission appeal hearing (and in letters submitted) raised many non-factual issues and issues unrelated to the attributes and impacts of the proposed project, as well as several surrounding existing street and pedestrian safety issues that the City of Fresno and the Council District Office should take responsibility for proactively resolving whether or not this project takes place.

This project factually meets all City requirements, is needed to meet a serious housing deficit within the city limits of Fresno in infill areas already efficiently served by public infrastructure and services, and should be expeditiously approved.

Ivan Paz

On-Behalf of Members of the Fresno Region Taskforce for Affordable Housing and the Greenfield Coalition

--

Ivan Paz

Community Land Use Academy

Project Manager

Every Neighborhood Partnership

☐ [redacted]

☐

☐

"No fancy quote except that LOVE will always win!"