FINAL ENVIRONMENTAL IMPACT REPORT

Parkway Village Specific Plan

Prepared for

City of Lancaster
Planning Department

Prepared by

Aspen environmental group

January 2026

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1. INTRODUCTION

Due to its length, the text of the Parkway Village Specific Plan (Specific Plan or Plan) Draft Environmental Impact Report (EIR) is incorporated by reference and is not reproduced in this Final EIR. Any changes between the DEIR and the FEIR are noted in Section 2. Responses to Comments. None of the corrections or clarifications to the Draft EIR identified in this FEIR constitutes "significant new information" pursuant to CEQA Guidelines Section 15088.5. Therefore, recirculation of the Draft EIR is not required.

In accordance with the *California Environmental Quality Act Guidelines* (CEQA Guidelines) Section 15088, the City of Lancaster, as the lead agency under CEQA, has evaluated the comments received on the Parkway Village Specific Plan Draft EIR (State Clearinghouse No. 2024020979) and responded to them.

The Draft EIR for the proposed Parkway Village Specific Plan was distributed to responsible and trustee agencies, interested groups, and organizations. The Draft EIR was made available for public review and comment for an initial period of 45 days. The public review period for the Draft EIR established by the CEQA Guidelines commenced on September 19, 2025, and ended November 3, 2025. However, the public review period was extended an additional week to November 10, 2025, to provide the public with additional time to review the complete Draft EIR. The Final EIR consists of the following components:

- Section 1 - Introduction
- Section 2 - Draft Environmental Impact Report Comments, Responses to Comments, and Errata
- Appendix A: Updated Water Supply Assessment

2. RESPONSES TO COMMENTS

2.1. Introduction

The Draft Environmental Impact Report (EIR) for the Parkway Village Specific Plan project was available for review and comment from September 19, 2025, through November 10, 2025, (56-day public review period). During this period, seven letters commenting on the Draft EIR were submitted to the City of Lancaster Community Development Department, Planning Division. An additional comment letter was submitted after the comment period, on November 17th, by the County of Los Angeles Fire Department, for a total of eight comment letters.

As the lead agency under the California Environmental Quality Act (CEQA), and consistent with Section 15088 of the CEQA Guidelines, the City has reviewed the comments received on the Draft EIR and has prepared responses to these comments in this document. The commenters are listed in Table 2-1, below. In Section 2.2 (Responses to Comments Received on the Draft EIR) comment letters are provided in full followed by responses. Where appropriate, some responses result in revisions to the DEIR text. These revisions are included in individual responses. In addition, Section 2.3 includes minor corrections to the Draft EIR that are not in response to individual comment letters.

Consistent with Section 15088(b) of the CEQA Guidelines, the focus of the City's responses to comments received on the Draft EIR is the disposition of environmental issues that are raised in the comments. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204(a)).

2.2. Responses to Comments Received on the Draft EIR

This section provides a copy of individual comment letters and the City's responses to the comments regarding the Draft EIR provided in those letters. Individual letters are followed by responses to comments. Table 2-1 lists commenter submitting letters to the City regarding the DEIR.

Table 2-1. List of Commenters on the Draft EIR

Comment Letter	Date	From
Local and State Agencies		
A01	10/08/2025	Antelope Valley Air Quality Management District
A02	11/06/2025	California Department of Fish and Wildlife
A03	11/07/2025	California Department of Transportation
A04	11/17/2025	County of Los Angeles Fire Department
Organizations		
B01	10/31/2025	Gibbs Giden representing 3Gen Net Lease, LP (Bowlero)
B02	11/03/2025	Kaiser Foundation Hospitals
B03	11/10/2025	Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles
Individuals		
C01	10/03/2025	Charles Fricke

To facilitate review of specific comments and responses, each comment letter has been given a specific letter and number designation (A01, A02, etc.), as shown in Table 2-1, and individual comments within each letter have been assigned a number (e.g., first comment in letter A01 is A01-1, the second comment is A01-2, etc.). Changes between the Draft and Final EIR are shown with underline and strikethrough, with a vertical line in the left margin.

Comment Letter A01: Antelope Valley Air Quality Management District

Antelope Valley Air Quality Management District
2551 West Avenue H Lancaster, CA 93536
661-723-8070
www.avaqmd.ca.gov
Barbara Lods, Executive Director

In reply, please refer to AV1025/128

October 8, 2025

Jocelyn Swain
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

Project: Notice of Availability of a Draft Environmental Impact Report for the Parkway Village Specific Plan

To Whom It May Concern:

The Antelope Valley Air Quality Management District (District) has received the request to review **Notice of Availability of a Draft Environmental Impact Report for the Parkway Village Specific Plan,** requesting to adopt the Parkway Village Specific Plan, to provide a mixed-use, walkable community with a variety of commercial, residential, medical, and open space/public uses. The residential uses would include traditional single-family residences, single-family residences on smaller lots, townhomes, condominiums, and apartment complexes. This project site consists of approximately 435 acres in the central portion of the City. The project is generally bound by Avenue K, Sierra Hwy, 10th Street West, Avenue K-8, and the eastern side of the apartment complexes at 6th Street West in the city of Lancaster, CA (APNs: 3128-001-005, -008, -009, -015 thru -019, -021, -022; 3128-002-001 thru -005, -014, -017 thru -020, -900, -901; 3128-004-011, -013, -017, -024, -025, -900, -902, -903; 3128-005-001 thru -038; 3128-006-001 thru -007, -009, -010, -010, -017 thru -025, -027 thru -029, -031, -032, -046, -049 thru -052, -054 thru -060, -062 and -900 thru -906).

Prior to the start of any grading/construction activity, the District requires the proposed project to comply with the following: **A01-1**

- Project Information Form
- Other: No Comment

Thank you for the opportunity to review this planning document. If you have any questions/concerns regarding the information presented in this letter, please contact me at (661) 723-8070 ext. 23 or blods@avaqmd.ca.gov.

Sincerely,

Barbara Lods

Barbara Lods
BJL/SS
Sent via Email

Responses to Comment Letter A01: Antelope Valley Air Quality Management District

A01-1 The Antelope Valley Air District (AVAQMD) noted that prior to starting any grading or construction activity a project must complete a Project Information Form.

The Draft EIR identifies several regulatory requirements for air quality, specifically AVAQMD rules and regulations in addition to specific mitigation measures. Individual projects within the Parkway Village Specific Plan area will be required to obtain any necessary permits from the AVAQMD and complete relevant forms such as the Project Information Form prior to construction. As such, no further response is necessary.

Comment Letter A02: California Department of Fish and Wildlife

Docusign Envelope ID: 0593191B-AE26-459B-8175-456C036F42F7

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

November 6, 2025

Jocelyn Swain
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534
jswain@cityoflancasterca.gov

Subject: Draft Environmental Impact Report for the Parkway Village Specific Plan Project, SCH No. 2024020979, Los Angeles County, CA

Dear Jocelyn Swain:

A02-1

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from City of Lancaster for the Parkway Village Specific Plan (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Comment Letter A02: California Department of Fish and Wildlife (continued)

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A02-1 (cont'd)

example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law[2] of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Lancaster

Objective: The objective of the Project is to develop and implement the Parkway Village Specific Plan (Plan). The Plan would provide direction for development within the Project area over a 20-year period. The Plan would provide a variety of commercial, residential, medical, and public use areas. Residential uses would vary from single-family residences, townhomes, condominiums, to apartment complexes. Additionally, land use and circulation plans for the Project area would be incorporated into the Plan. The Project area would be divided into multiple planning areas dedicated to different types of uses. Main features of the Plan include future development of the following:

- 3,462 residential units. Planning Areas 7 and 8 may include a transit hub;
- 130 hotel rooms in one or more hotels;
- 150,000 square feet of commercial uses in areas designated Town Center;
- 415,000 square feet of office, medical office, assisted/supportive living, and uses supportive of office including restaurants, financial institutions, professional services, etc., in areas designated Business;
- 185,000 square feet of commercial uses including indoor technical schools, fitness centers and gymnasiums in areas designated Workshop;
- 8.7 acres for school uses;
- 27.8 acres for parks of varying sizes;
- A 200-bed hospital and up to 500,000 square feet of medical-related uses including skilled nursing and assisted living; and
- 10.2-acre aquatic center.

Location: The Project area consists of approximately 435 acres in the central portion of the City of Lancaster (City), Los Angeles County. The Project area is bound by West Avenue L to the south, 10th Street West to the west, Avenue K to the north, and Sierra Highway to the east. The Montecito Apartment Complex located on the northeast corner of Avenue L and 10th Street West and the gas station on the southeast corner of Avenue K-8 and 10th Street West are not part of the Project area.

[2] "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

Comment Letter A02: California Department of Fish and Wildlife (continued)

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A02-1 (cont'd)

Biological Setting: The Project area lies within the Antelope Valley, which is part of the Antelope Valley Regional Conservation Investment Strategy. The Project area is primarily vacant with some developed parcels along the borders of the area. The developed areas have existing buildings that serve varying uses (e.g., commercial, medical, church, etc.). The Project area is bisected by West Avenue K-8 that runs east to west and 5th Street West that runs north to south. Beyond the immediate borders of the Project area lies Sergeant Steve Owen Memorial Park to the west, railroad tracks to the east, residential communities to the north, and vacant land to the south. Based on aerial imagery, off-road vehicular tracks, trash, encampments, and unpaved/paved roads are present throughout the Project area.

General habitat assessments and biological surveys for special-status species were performed in April 2020 and April 2024. Focused botanical surveys were conducted in April 2020, 2024, May 2024, and July 2024. An evaluation of water features and jurisdictional delineation within the Project area was conducted on July 1, 2024. Additionally, a western Joshua tree (*Yucca brevifolia*; CESA candidate species) census was conducted in 2024 within the Project area. All survey and census findings were compiled in a Biological Resources Technical Report (BRTR), dated October 2024. According to the BRTR, the Project area contains mostly non-native grassland/upland mustard and partially developed open space. The remaining areas contain approximately 11 acres of scrub habitat and about 3 acres of western Joshua tree woodland. A total of 103 western Joshua trees were observed on site. Aside from a western Joshua tree woodland, no additional sensitive natural communities were observed, and no rare plants were identified during focused botanical surveys. Additionally, there is an earthen drainage in the southern portion of the Project area.

During surveys, Swainson's hawk (*Buteo swainsoni*; CESA threatened species) and Cooper's hawk were observed flying over the Project area. Special-status wildlife species with moderate or high potential to be present during future individual project activities include, but is not limited to, western burrowing owl (*Athene cunicularia hypugaea*; CESA candidate species), Crotch's bumble bee (*Bombus crotchii*; CESA candidate species), northern California legless lizard (*Anniella pulchra;* California Species of Special Concern (SSC)), and loggerhead shrike (*Lanius ludovicianus;* SSC). The City has incorporated mitigation measures in the DEIR specific to western burrowing owl, Crotch's bumble bee, general pre-construction surveys and monitoring, best management practices, wildlife entrapment, invasive weed introduction, and trash.

Project Timeline: The Plan does not propose or approve individual project construction schedules. The Plan is a planning document that provides guidance for future development over a 20-year time period.

Project History: CDFW previously reviewed the Notice of Preparation (NOP) and provided a comment letter to the City on March 27, 2024. Comments in the NOP addressed cumulative impacts, local wildlife movement, CESA protected species,

Comment Letter A02: California Department of Fish and Wildlife (continued)

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western Joshua tree, an earthen drainage feature, rare plants, SSC, and nesting birds and raptors.

A02-1 (cont'd)

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

COMMENT # 1: Cumulative Impact

Issue: The DEIR does not analyze the impact of future and current developments in addition to impacts of the Project, which may lead to significant cumulative impacts to biological resources.

Specific Impact: The DEIR does not sufficiently analyze the cumulative impacts on biological resources as it relates to loss of undeveloped land from this Project and surrounding projects within the immediate vicinity surrounding the area. Individual project activities such as vegetation clearing and grading of the Project area over time would contribute to the cumulative loss of nesting and foraging habitat for burrowing owl, Loggerhead shrike, Swainson's hawk, western Joshua tree, Crotch's bumble bee, and additional flora and fauna.

Why impact would occur: The DEIR provided a Cumulative Projects Map (map) on page 3.1-6 that depicts 28 projects surrounding the proposed Project that are currently under review, approved, or under construction. The Cumulative Impact Analysis in the Biological Resources Section of the DEIR notes special-status species that have potential to be present in the Project area; however further states, "[t]hese species occur elsewhere in the Antelope Valley and in the vicinity of the Plan area, but extensive habitat is still present in the region" (3.4-25). Contrary to this statement, there has been a rapid increase in development (i.e., industrial, commercial, and residential), especially solar installation, within the City and throughout Antelope Valley, which has led to ongoing loss of suitable habitat. With conversion of a large area of undeveloped land in an urban setting, there may be no additional habitat easily available for small wildlife such as northern California legless lizard to find nesting or foraging opportunities, resulting in a reduced population of special-status species in a localized area within the City. Thus, buildout of the Plan will contribute to the permanent loss of suitable habitat for special status species, and mitigation should be implemented to offset those impacts.

From the map, it is clearly evident that building out these smaller projects in addition to this larger Project area would have a significant cumulative loss to the remaining open space in an area that is highly fragmented due to development and urbanization. While the limited open space may not support large mammals, it does support special-status

Comment Letter A02: California Department of Fish and Wildlife (continued)

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small and medium sized wildlife (e.g., squirrels, coyotes, burrowing owl) as well as several plant species and should be mitigated to offset the permanent loss.

A02-1 (cont'd)

Additionally, the analysis does not provide scientific evidence that demonstrates that habitat within the region is sufficient to offset the loss of roughly 435 acres of suitable nesting and foraging habitat for special status wildlife. The DEIR does not provide scientific literature, maps, or discussion to denote areas of open space within the City that would support these species and how wildlife that occupy the 435 acres would be able to move to those areas for nesting and foraging opportunities. Without any scientific evidence or discussion in the DEIR to support the claim that extensive habitat is still present in the region, CDFW remains concerned that the Project would contribute to the considerable loss of large areas of open space within the City, reduce availability for nesting opportunities during breeding season, decrease foraging areas, and reduce population range of certain special-status species.

Evidence impact may be significant: CDFW believes that cumulative impacts of the Project on biological resources could be cumulatively considerable (CEQA Guidelines §15065(a)(3)). "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (Pub. Resources Code, § 21083(b)).

Cumulative impacts can also result from individually minor but collectively significant projects inclusive of prior, concurrent, and future projects [CEQA Guidelines, §§ 15065(a)(3), 15355]. Given the anticipated buildout of the Project site and adjacent areas, potential exists for cumulative impacts to open space (CEQA Guidelines, §15064(d)).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation #1: Cumulative Impact Analysis Revision - CDFW recommends the City re-evaluate the cumulative impacts analysis of the Project and amend the cumulative impact analysis in the Biological Resources section of the DEIR to demonstrate what open space areas are adjacent to the Project site for wildlife to utilize and how the Project, relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities does not contribute to the considerable loss of undeveloped land in the City. If the City continues to remain certain in their position that the Project would not have a cumulative impact, the DEIR should indicate why the cumulative impact is not significant, supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].

Recommendation #2: Compensatory Mitigation - If the City revises their position that the Project would have a cumulative impact, the City should provide compensatory

Comment Letter A02: California Department of Fish and Wildlife (continued)

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mitigation in the form of land acquisition and permanent preservation to offset the cumulative loss of habitat.

A02-1 (cont'd)

COMMENT # 2: Impacts on Western Burrowing Owl

A02-2

Issue: Future projects facilitated by the Plan may adversely impact western burrowing owl.

Specific impact: Individual project ground-disturbing activities, such as grading, will result in habitat loss and may lead to death or injury of individuals. Future project construction activities may also disrupt foraging behavior for any western burrowing owl present on site.

Why impact would occur: The DEIR states that the Project area provides suitable habitat for western burrowing owl. While western burrowing owl were not detected during the 2020 or 2024 surveys, it was noted in the BRTR that whitewash was observed and the Project area contains suitable burrows.

According to Antelope Valley Regional Conservation Investment Strategy, suitable habitat for burrowing owl encompasses a variety of landscapes throughout the region, but it is imperative that burrows, typically from small mammals (e.g., California ground squirrel), already exist to allow burrowing owl to occupy them. If suitable burrows are adjacent to or within the Project area, it is possible that western burrowing owl may utilize the Project area as foraging habitat or that California ground squirrel may start to create suitable burrows on site. Since the individual project activities by individual projects under the Plan will occur at an undisclosed time, additional suitable burrows and western burrowing owl presence may continue to occur.

The DEIR states that the impacts will be mitigated if western burrowing presence is confirmed. However, since the Project area contains suitable habitat, burrows, and prior evidence of whitewash, CDFW believes that future individual projects facilitated by the Plan have a high likelihood of adversely impacting this CESA candidate species. If individual project activities overlap with the breeding season for western burrowing owl there is potential for individual project activities to result in abandonment of burrows, burrow collapse, or injury/mortality of owlets. Furthermore, attempts to flush western burrowing owl from the site may disturb, distress, or lead to potential take of individual western burrowing owl. CDFW appreciates the incorporation of MM BIO-2 to have pre-construction surveys for western burrowing owl. However, a single pre-construction clearance survey will not adequately assess how western burrowing owl use a site. Inadequate assessment of western burrowing owl presence may result in unauthorized take. To avoid unauthorized take, every project facilitated by the Plan should be conducting multiple focused western burrowing owl surveys prior to project activities and should coordinate with CDFW to obtain appropriate take authorization if western burrowing owl is identified on site.

Comment Letter A02: California Department of Fish and Wildlife (continued)

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A02-2 (cont'd)

Evidence impact may be significant: Western burrowing owl is a species designated as candidate for listing as threatened or endangered pursuant to CESA (Fish & G. Code, § 2050 *et seq*.). Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Additionally, take of individual western burrowing owl and their nests is defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation #3: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to western burrowing owl and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

Mitigation Measure #1: Mitigation Measure BIO-2 – CDFW recommends the City revise Mitigation Measure BIO – 2 to incorporate the underlined language and remove the language in strikethrough:

Every individual project applicant shall retain a qualified biologist to conduct focused surveys for western burrowing owl prior to Project activities. Focused surveys shall be conducted pursuant to CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation or CDFW's most recent guidance. In California, the burrowing owl breeding season extends from February 1 to August 31 with some variances by geographic location and climatic conditions. Survey protocol for breeding season owl surveys states to conduct four survey visits: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15.

Additionally, pre-construction burrowing owl clearance survey shall be conducted no more than 14 days prior to any vegetation removal or ground disturbing activities to

Comment Letter A02: California Department of Fish and Wildlife (continued)

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A02-2 (cont'd)

avoid impacts to burrowing owls and/or occupied burrows. The pre-construction clearance survey shall be conducted by a qualified biologist and in accordance with the methods outlined in the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game 2012). Documentation of surveys and findings shall be submitted to the City of Lancaster for review and file. If no burrowing owls or occupied burrows are detected, project activities may begin, and no additional avoidance and minimization measures shall be required.

If an occupied burrow is found outside, but within 500 feet, of the development footprint, the qualified biologist shall establish a "no-disturbance" buffer around the burrow location(s). The size of the "no-disturbance" buffer shall be determined in consultation with CDFW and be based on the species status (i.e., breeding, non-breeding) and proposed level of disturbance. If an occupied burrow is found within the development footprint, the qualified biologist shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. The project applicant shall contact CDFW to develop appropriate mitigation and management procedures and a final Burrowing Owl Mitigation Plan shall be submitted to the City and CDFW for review and approval prior to project activities.

If burrowing owl presence is confirmed, the project applicant shall offset impacts by acquiring CDFW-approved mitigation lands for the species. The potential mitigation land shall have the following: 1) have presence of burrowing owl; 2) replace the impacted burrowing owl habitat at a minimum of 2:1 ratio to ensure no net loss of habitat; and 3) be of equivalent or greater habitat value than that of the project site. Prior to acquisition of potential mitigation land, the project applicant shall provide CDFW with the appropriate documentation for property eligibility. Requested documentation may include, but is not limited to, a biological report, preliminary title report, mineral risk assessment report, and Phase I Environmental Assessment report. Following CDFW written approval of potential mitigation land, the project applicant shall protect the land in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094. Recordation of the conservation easement shall occur prior to commencement of project activities. An appropriate endowment, to be determined by CDFW, shall also be provided for the long-term monitoring and management of mitigation lands.

Each applicant or developer ~~that has a~~ is responsible for analyzing potential impacts to ~~impact~~ western burrowing owl. If there are potential impacts to western burrowing owl, the applicant would need to obtain an Incidental Take Permit from CDFW to ensure compliance with the California Endangered Species Act.

Mitigation Measure #2: Incidental Take Permit – If an occupied burrow or western burrowing owl is identified within the Project site or adjacent areas, the individual project applicant shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish and Game code, § 2080 *et seq.*). Parks shall comply with the

Comment Letter A02: California Department of Fish and Wildlife (continued)

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mitigation measures detailed in the take authorization issued by CDFW. Parks shall obtain a fully executed take authorization prior to implementing Project activities with potential to impact western burrowing owl. **A02-2 (cont'd)**

Recommendation #4: Western Burrowing Owl Discussion – The FEIR should acknowledge that western burrowing owl is designated as a CESA candidate species and afforded full protection under CESA. The FEIR should also provide a thorough discussion of the Project's potential direct and indirect impacts to western burrowing owl. If the Project has the potential to impact western burrowing owl, the FEIR should propose measures to mitigate for potential impacts to the species as well as for habitat that supports the species. The discussion should be of depth and scope that a CESA ITP could be issued based on the analysis provided in the FEIR.

COMMENT # 3: Impacts on Swainson Hawk **A02-3**

Issue: The DEIR does not incorporate mitigation measures specific to Swainson's hawk addressing potential impacts by individual projects.

Specific impact: Individual project activities may result in loss of foraging habitat for Swainson's hawk.

Why impact would occur: Swainson's Hawk are generally found foraging in Palmdale and Lancaster areas. This raptor species prefers open spaces, open grasslands, pastures, and agricultural land. The DEIR acknowledges that the Project area contains suitable foraging habitat. The DEIR also states that Swainson's hawk has been detected several times in the vicinity of the Project area and was observed during 2020 surveys flying overhead. CDFW appreciates the incorporation of MM BIO-1 to mitigate impacts to any nesting birds, but this does not adequately address potential impacts to Swainson's Hawk. A single nesting bird survey will not adequately analyze how Swainson's Hawk may be using the Project area. CDFW considers a Swainson's hawk nest site to be active if it was used at least once within the past five years and impacts to suitable habitat or individual birds within a five-mile radius of an active nest as significant. It also does not address the permanent loss of foraging areas for this CESA threatened species due to development of the Project area. The estimated historical population of Swainson's hawk was nearly 17,000 pairs; however, in the late 20th century, Bloom (1980) estimated a population of only 375 pairs. The decline was primarily a result of habitat loss from development. A survey conducted in 2009 estimated the population at 941 breeding pairs. The species is currently threatened by loss of nesting and foraging habitat (e.g., from agricultural shifts to less crops that provide less suitable habitat), urban development, environmental contaminants (e.g., pesticides), and climate change.

Evidence impact would be significant: Consistent with CEQA Guidelines section 15380, the status of the Swainson's hawk as a threatened species under CESA qualifies it as an endangered, rare, or threatened species under CEQA. Project impacts would potentially reduce the number and/or restrict the range of Swainson's hawk or

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contribute to the abandonment of an active nest and/or the loss of significant foraging habitat for a given nest territory and thus result in take as defined under CESA.

A02-3 (cont'd)

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #3: Swainson's Hawk Surveys - Every individual project applicant that has suitable habitat to support Swainson's hawk on their project site shall retain a qualified biologist to conduct focused surveys adhering to survey protocol outlined in CDFW's *Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California*. Findings from the focused surveys shall be submitted to the City prior to individual project activities.

Mitigation Measure #4: **Take Authorization -** If an individual project will impact Swainson's hawk during Project construction or operation, the individual project applicant shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 *et seq.*). The project applicant shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The project applicant shall also provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.

COMMENT # 4: Impacts on Crotch's Bumble Bee

A02-4

Issue: Mitigation Measure BIO-3 does not address all of CDFW concerns pertaining to impacts on Crotch's bumble bee and its associated habitat.

Specific impact: Individual projects facilitated by the Plan may result in temporal or permanent loss of suitable nesting and foraging habitat. Project ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impact would occur: The DEIR states the Project area provides suitable nesting and foraging habitat for the Crotch's bumble bee and supports numerous food plants. Crotch's bumble bee primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014).

CDFW appreciates the incorporation of MM BIO-3 to address impacts to Crotch's bumble bee. As currently written, the measure only recommends obtaining an ITP if a

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A02-4 (cont'd)

nest is unavoidable. This does not address impacts to floral resources. Crotch's bumble bee can be adversely impacted when their floral resources are removed. Additionally, ground disturbance and vegetation removal associated with individual project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. Without sufficient avoidance, minimization, or mitigation measures, the development may result in undisclosed and unmitigated temporal or permanent loss of colonies, and suitable nesting and foraging habitat.

Evidence impact would be significant: The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Crotch's bumble bee. The Project may also reduce the number and range of the species without taking into account the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project site. Crotch's bumble bee is listed as an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation #5: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

Mitigation Measure #5: Mitigation Measure BIO-3 Crotch's Bumble Bee - CDFW recommends the City revise Mitigation Measure BIO – 3 to incorporate the underlined language and remove the language in strikethrough:

The project applicant shall retain a qualified biologist with appropriate handling permits to conduct protocol-level surveys following CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. If any individual Crotch's bumble bee or a Crotch's bumble bee nest is found on a project site, the applicant will obtain an Incidental Take Permit from CDFW for impacts to this species ~~Protocol-level surveys in the appropriate season (CDFW, 2023c) shall be conducted for Crotch's bumble bee prior to the commencement of any ground-disturbing activities.~~ If

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~~foraging individuals are found on a project site, a biologist will monitor construction activities to ensure that bees are not impacted by construction activities, vehicles, or any other potential activities. If a nesting colony is identified on the project site, a buffer encompassing the nest and adequate foraging resources will be established by a qualified biologist. The no-activity buffer shall be maintained until the end of flight season or once the nest is deemed inactive and unoccupied by a qualified biologist. If the nest is unavoidable, the Applicant will obtain an Incidental Take Permit from CDFW for impacts to this species~~. If the California Fish and Game Commission decides not to list Crotch's bumble bee under CESA, this measure will no longer be required. **A02-4 (cont'd)**

Mitigation Measure #6: **No Net Loss -** If California Fish and Game Commission does not list Crotch's bumble bee under CESA, it will still remain an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority. Thus, there shall be no net loss of suitable habitat for Crotch's bumble bee. The City shall offset impacts on habitat for Crotch's bumble bee at no less than 2:1, so there is no net loss of suitable habitat.

ADDITIONAL COMMENTS

MM BIO-1 Nest Avoidance. CDFW recommends the City revise MM BIO – 1 to incorporate the underlined language and remove the language in strikethrough: **A02-5**

A nesting bird and raptor survey shall be conducted by a qualified biologist within 7 days prior to the start of construction/ground disturbing activities. The qualified biologist shall survey the entire project site and areas within a biologically defensible buffer zone surrounding the project site. If project activities delay or suspended for more than 7 days during the nesting season, the nesting bird and raptor survey shall be repeated. If active bird nests are identified during the survey, the species shall be identified, and a no-disturbance buffer shall be established around the active nest. At a minimum, a buffer of 500 feet around active raptor nests and ~~100~~ 300 feet around other migratory bird species nests shall be established. Personnel working on the project, including all contractors working onsite, shall be instructed on the presence of nesting birds, restricted areas, and adherence to no-disturbance buffers. A qualified biologist shall periodically monitor any active bird nests to determine if project-related activities occurring outside the "no-disturbance" buffer disturbs the birds and if the buffer shall be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the "no-disturbance" buffer may occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.

Injured or Dead Wildlife. For every individual project facilitated by the Plan, if any special status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and City of Lancaster within 3 calendar days of **A02-6**

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the incident or finding. The report should include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

A02-6 (cont'd)

CEQA Document Tiering. The Project is a specific plan that is intended to provide guidance for individual developments that will occur at a future time within the Project area. While CDFW appreciates that biological surveys and impact analysis in the Biological Resources section of the DEIR, more updated surveys and impact analysis may need to occur once individual projects are approved. Without disclosing any design or individual project specifics, CDFW recommends that, for individual projects nested under the proposed Project, findings of significance should be set aside when certifying the DEIR until those aspects can be fully studied in a subsequent or supplemental CEQA document (see CEQA Guidelines §§ 15162 and 15163). The DEIR should explicitly discuss what further CEQA actions are anticipated for these individual projects, whether further analysis will be provided, and whether it will be available for public review. In addition to this recommendation, CDFW would appreciate the opportunity to review and comment on subsequent CEQA actions (e.g., subsequent, supplemental, addendum, etc.) associated with this DEIR.

A02-7

Landscaping. For individual projects that will incorporate landscaping, CDFW recommends that the project applicant should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species, particularly 'moderate' or 'high' listed by the California Invasive Plant Council. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

A02-8

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

A02-9

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ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[3] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms. **A02-10**

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[4].

City of Lancaster should ensure data collected for the preparation of the DEIR is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) **A02-11**

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

[3] https://wildlife.ca.gov/Data/CNDDB
[4] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

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Questions regarding this letter or further coordination should be directed to Andrew Aitken[5], Environmental Scientist.

Sincerely,

DocuSigned by:
5991E19EF8094C3...

Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Steve Gibson
Andrew Aitken
Julisa Portugal
Jennifer Ludovissy

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

Goulson, D. 2010. Bumblebees: behavior, ecology, and conservation. Oxford University Press, New York. 317pp.

Hatfield, R., Jepsen, S., Foltz Jordan, S., Blackburn, M., Code, Aimee. 2018. A Petition to the State of California Fish and Game Commission to List Four Species of Bumblebees as Endangered Species.

Williams, P.H., R.W. Thorp, L.L. Richardson, and S.R. Colla. 2014. Bumble bees of North America: An Identification guide. Princeton University Press, Princeton, New Jersey. 208pp.

[5] Phone: 562-525-9688; Email: Andrew.Aitken@wildlife.ca.gov

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #1: Mitigation Measure BIO-2 – CDFW recommends the City revise Mitigation Measure BIO – 2 to incorporate the underlined language and remove the language in strikethrough: Every individual project applicant shall retain a qualified biologist to conduct focused surveys for western burrowing owl prior to Project activities. Focused surveys shall be conducted pursuant to CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation or CDFW's most recent guidance. In California, the burrowing owl breeding season extends from February 1 to August 31 with some variances by geographic location and climatic conditions. Survey protocol for breeding season owl surveys states to conduct four survey visits: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Additionally, pre-construction burrowing owl clearance survey shall be conducted no more than 14 days prior to any vegetation removal or ground disturbing activities to avoid impacts to burrowing owls and/or occupied burrows. The pre-construction clearance survey shall be conducted by a qualified biologist and in accordance with the methods outlined in the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game 2012). Documentation of surveys and findings shall be submitted to the City of Lancaster for review and file. If no burrowing owls or occupied burrows are detected, project activities may begin, and no additional avoidance and minimization measures shall be required.	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
If an occupied burrow is found outside, but within 500 feet, of the development footprint, the qualified biologist shall establish a “no-disturbance” buffer around the burrow location(s). The size of the “no-disturbance” buffer shall be determined in consultation with CDFW and be based on the species status (i.e., breeding, non-breeding) and proposed level of disturbance. If an occupied burrow is found within the development footprint, the qualified biologist shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. The project applicant shall contact CDFW to develop appropriate mitigation and management procedures and a final Burrowing Owl Mitigation Plan shall be submitted to the City and CDFW for review and approval prior to project activities. If burrowing owl presence is confirmed, the project applicant shall offset impacts by acquiring CDFW-approved mitigation lands for the species. The potential mitigation land shall have the following: 1) have presence of burrowing owl; 2) replace the impacted burrowing owl habitat at a minimum of 2:1 ratio to ensure no net loss of habitat; and 3) be of equivalent or greater habitat value than that of the project site. Prior to acquisition of potential mitigation land, the project applicant shall provide CDFW with the appropriate documentation for property eligibility. Requested documentation may include, but is not limited to, a biological report, preliminary title report, mineral risk assessment report, and Phase I Environmental Assessment report. Following CDFW written approval of potential mitigation land, the project applicant shall protect the land in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094. Recordation of the conservation easement shall occur prior to commencement of		

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Mitigation Measure	Timing	Responsible Party
project activities. An appropriate endowment, to be determined by CDFW, shall also be provided for the long-term monitoring and management of mitigation lands. Each applicant or developer ~~that has a~~ is responsible for analyzing potential impacts to ~~impact~~ western burrowing owl. If there are potential impacts to western burrowing owl, the applicant would need to obtain an Incidental Take Permit from CDFW to ensure compliance with the California Endangered Species Act.		
Mitigation Measure #2: Incidental Take Permit – If an occupied burrow or western burrowing owl is identified within the Project site or adjacent areas, the individual project applicant shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish and Game code, § 2080 *et seq.*). Parks shall comply with the mitigation measures detailed in the take authorization issued by CDFW. Parks shall obtain a fully executed take authorization prior to implementing Project activities with potential to impact western burrowing owl.	Prior to Project Activities	Project Proponent
Mitigation Measure #3: Swainson's Hawk Surveys - Every individual project applicant that has suitable habitat to support Swainson's hawk on their project site shall retain a qualified biologist to conduct focused surveys adhering to survey protocol outlined in CDFW's *Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California*. Findings from the focused surveys shall be submitted to the City prior to individual project activities.	Prior to Project Activities	Project Proponent
Mitigation Measure #4: **Take Authorization -** If an individual project will impact Swainson's hawk during Project construction or operation, the individual project applicant shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 *et seq.*). The project applicant shall comply with the mitigation measures detailed in the take authorization issued by	Prior to Project Activities	Project Proponent

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Mitigation Measure	Timing	Responsible Party
CDFW. The project applicant shall also provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.		
Mitigation Measure #5: Mitigation Measure BIO-3 Crotch's Bumble Bee - CDFW recommends the City revise Mitigation Measure BIO – 3 to incorporate the underlined language and remove the language in strikethrough: The project applicant shall retain a qualified biologist with appropriate handling permits to conduct protocol-level surveys following CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. If any individual Crotch's bumble bee or a Crotch's bumble bee nest is found on a project site, the applicant will obtain an Incidental Take Permit from CDFW for impacts to this species ~~Protocol-level surveys in the appropriate season (CDFW, 2023c) shall be conducted for Crotch's bumble bee prior to the commencement of any ground disturbing activities. If foraging individuals are found on a project site, a biologist will monitor construction activities to ensure that bees are not impacted by construction activities, vehicles, or any other potential activities. If a nesting colony is identified on the project site, a buffer encompassing the nest and adequate foraging resources will be established by a qualified biologist. The no-activity buffer shall be maintained until the end of flight season or once the nest is deemed inactive and unoccupied by a qualified biologist. If the nest is unavoidable, the Applicant will obtain an Incidental Take Permit from CDFW for impacts to this species~~. If the California Fish and Game Commission decides not to list Crotch's bumble bee under CESA, this measure will no longer be required.	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
Mitigation Measure #6: **No Net Loss -** If California Fish and Game Commission does not list Crotch's bumble bee under CESA, it will still remain an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority. Thus, there shall be no net loss of suitable habitat for Crotch's bumble bee. The City shall offset impacts on habitat for Crotch's bumble bee at no less than 2:1, so there is no net loss of suitable habitat.	Prior to adoption of the DEIR	Lead Agency
Mitigation Measure #7: MM BIO-1 Nest Avoidance. CDFW recommends the City revise MM BIO – 1 to incorporate the underlined language and remove the language in strikethrough: A nesting bird and raptor survey shall be conducted by a qualified biologist within 7 days prior to the start of construction/ground disturbing activities. The qualified biologist shall survey the entire project site and areas within a biologically defensible buffer zone surrounding the project site. If project activities delay or suspended for more than 7 days during the nesting season, the nesting bird and raptor survey shall be repeated. If active bird nests are identified during the survey, the species shall be identified, and a no-disturbance buffer shall be established around the active nest. At a minimum, a buffer of 500 feet around active raptor nests and ~~100~~ 300 feet around other migratory bird species nests shall be established. Personnel working on the project, including all contractors working onsite, shall be instructed on the presence of nesting birds, restricted areas, and adherence to no-disturbance buffers. A qualified biologist shall periodically monitor any active bird nests to determine if project-related activities occurring outside the "no-disturbance" buffer disturbs the birds and if the buffer shall be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the "no-	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
disturbance" buffer may occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.		
Mitigation Measure #8: Injured or Dead Wildlife. For every individual project facilitated by the Plan, if any special status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist shall be notified, and dead or injured wildlife documented immediately. A formal report shall be sent to CDFW and City of Lancaster within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.	During Project Implementation	Project Proponent
Mitigation Measure #9: Landscaping. For individual projects that will incorporate landscaping, CDFW recommends that the project applicant should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species, particularly 'moderate' or 'high' listed by the California Invasive Plant Council. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.	During Project Implementation	Project Proponent

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Mitigation Measure	Timing	Responsible Party
Recommendation #1: Cumulative Impact Analysis Revision - CDFW recommends the City re-evaluate the cumulative impacts analysis of the Project and amend the cumulative impact analysis in the Biological Resources section of the DEIR to demonstrate what open space areas are adjacent to the Project site for wildlife to utilize and how the Project, relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities does not contribute to the considerable loss of undeveloped land in the City. If the City continues to remain certain in their position that the Project would not have a cumulative impact, the DEIR should indicate why the cumulative impact is not significant supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].	Prior to adoption of the DEIR	Lead Agency
Recommendation #2: Compensatory Mitigation - If the City revises their position that the Project would have a cumulative impact, the City should provide compensatory mitigation in the form of land acquisition and permanent preservation to offset the cumulative loss of habitat.	Prior to adoption of the DEIR	Lead Agency
Recommendation #3: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to western burrowing owl and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
Recommendation #4: Western Burrowing Owl Discussion – The FEIR should acknowledge that western burrowing owl is designated as a CESA candidate species and afforded full protection under CESA. The FEIR should also provide a thorough discussion of the Project's potential direct and indirect impacts to western burrowing owl. If the Project has the potential to impact western burrowing owl, the FEIR should propose measures to mitigate for potential impacts to the species as well as for habitat that supports the species. The discussion should be of depth and scope that a CESA ITP could be issued based on the analysis provided in the FEIR.	Prior to adoption of the DEIR	Lead Agency
Recommendation #5: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	Prior to adoption of the DEIR	Lead Agency
Recommendation #6: CEQA Document Tiering. The Project is a specific plan that is intended to provide guidance for individual developments that will occur at a future time within the Project area. While CDFW appreciates that biological surveys and impact analysis in the Biological Resources section of the DEIR, more updated surveys and impact analysis may need to occur once individual projects are approved. Without disclosing any design or individual project specifics, CDFW recommends that, for individual projects nested under the proposed Project, findings of significance should be set aside when certifying the DEIR until those aspects can	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
be fully studied in a subsequent or supplemental CEQA document (see CEQA Guidelines §§ 15162 and 15163). The DEIR should explicitly discuss what further CEQA actions are anticipated for these individual projects, whether further analysis will be provided, and whether it will be available for public review. In addition to this recommendation, CDFW would appreciate the opportunity to review and comment on subsequent CEQA actions (e.g., subsequent, supplemental, addendum, etc.) associated with this DEIR.		

Responses to Comment Letter A02: California Department of Fish and Wildlife

A02-1 The California Department of Fish and Wildlife (CDFW) provides a summary of their role as a Trustee and Responsible Agency, a summary of the project description and a summary of the biological setting of the Plan area.

The comment is acknowledged and no further response is necessary.

A02-2 The CDFW states that the Draft EIR did not adequately analyze cumulative impacts to biological resources as a result of future and current developments in addition to impacts of the Specific Plan. CDFW indicates that impacts on biological resources could be cumulatively considerable and recommends re-evaluation of the cumulative impacts and, if determined to be significant, application of compensatory mitigation.

The comment is acknowledged. The Plan area is in south-central Lancaster and is surrounded by existing development on three sides, with mixed development and open land to the south. The cumulative impact analysis in the Draft EIR considered foreseeable development within the Plan area and its immediate vicinity. Specifically, 28 projects located within approximately one mile of the Plan area were evaluated for potential impacts on sensitive habitats and species. This approach is consistent with CEQA Guidelines §15130, which allows for a reasonable geographic scope based on the nature of the resources affected.

The Draft EIR evaluated cumulative impacts consistent with CEQA Guidelines §15130, which requires consideration of past, present, and reasonably foreseeable future projects in the region. The analysis used the Plan area and the immediate vicinity as the regional context and considered the Plan area in relation to surrounding habitats and species occurrences.

The Draft EIR identified special-status species and sensitive natural communities within the Plan area and evaluated whether the Plan's incremental contribution, combined with other projects, would result in cumulatively considerable impacts. The analysis concluded that cumulative impacts would not be significant for the following reasons:

- Future and current developments in the region are subject to existing federal, state, and local regulations, including CDFW permitting requirements, which provide substantial protection for biological resources.
- The DEIR includes project-specific mitigation measures that reduce direct impacts to less than significant. These measures also minimize the Plan's incremental contribution to cumulative impacts.
- Individual related projects are also subject to CEQA and if necessary, project-specific mitigation measures.

Additionally, the City requires all development to pay a biological impact fee that is utilized to acquire habitat and place under conservation easements. This is required regardless of the resources on the project site and does not constitute project-specific or cumulative mitigation.

The Draft EIR determined that the Plan's contribution to cumulative impacts on biological resources would not be cumulatively considerable. Therefore, no further response is necessary.

A02-3 The CDFW states that future projects under the Specific Plan may result in habitat loss, disturbance, or direct harm to western burrowing owls, a candidate species for state protection. CDFW recommends multiple focused surveys prior to ground-disturbing activities, coordination with the agency for take authorization if owls are present, and robust mitigation measures to avoid unauthorized take. The agency emphasizes that a single pre-construction survey is insufficient and ongoing monitoring is needed.

The comment is acknowledged. Mitigation Measure (MM) BIO-2 requires a clearance survey within 14 days (2 weeks) prior to ground disturbance. In addition, all projects are required to submit a biological report with their application to the City to determine types of habitat and identify if protected species are present. MM BIO-2 also requires applicants to obtain an Incidental Take Permit from CDFW if impacts to western burrowing owl cannot be avoided and offset impacts by acquiring CDFW-approved mitigation lands at a minimum 2:1 ratio to ensure no net loss of habitat. No further revisions are necessary.

A02-4 The CDFW states the Draft EIR lacks specific mitigation measures for Swainson's hawk. CDFW recommends that each project applicant conduct focused surveys following agency protocols and obtain take authorization if project activities may impact the species. The agency highlights the importance of protecting foraging habitat and notes that loss of such habitat could contribute to population decline.

The comment is acknowledged. The comment identifies the need to address Swainson's hawk, a state-listed species, and recommends mitigation measures to adequately analyze and mitigate potential impacts. MM-BIO-1 has been revised to include specific surveys for Swainson's hawk. To minimize impacts, project applicants will conduct surveys prior to ground-disturbing activities. If active nests are detected, biologically appropriate no-disturbance buffers will be established, typically 0.5 miles for nesting pairs, and construction within these areas will not resume until the nests are inactive.

MM BIO-1 Nest Avoidance. A nesting bird and raptor survey shall be conducted by a qualified biologist within 7 days prior to the start of construction/ground disturbing activities. The qualified biologist shall survey the entire project site and areas within a biologically defensible buffer zone surrounding the project site. <u>The surveys shall include a minimum 0.5-mile buffer for Swainsons Hawks where suitable nesting habitat is present.</u> If project activities are delay<u>ed</u> or suspended for more than 7 days during the nesting season, the nesting bird and raptor survey shall be repeated. If active bird nests are identified during the survey, the species shall be identified, and a no-disturbance buffer shall be established around the active nest. At a minimum, a buffer of <u>0.5 miles shall be established around any active Swainsons Hawk nests,</u> 500 feet around active raptor nests and 100 feet around other migratory bird species nests shall be established. Personnel working on the project, including all contractors working onsite, shall be instructed on the presence of nesting birds, restricted areas, and adherence to no-disturbance buffers. A qualified biologist shall periodically monitor any active bird nests to determine if project-related activities occurring outside the "no-disturbance" buffer disturbs the birds and if the buffer shall be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the "no-disturbance" buffer may occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.

A02-5 The CDFW finds mitigation for Crotch's bumble bee to be insufficient. CDFW recommends protocol-level surveys, take authorization if nests are found, and ensuring no net loss of suitable habitat, even if the species is not listed under CESA.

The comment is acknowledged. MM BIO-3 requires protocol-level surveys for Crotch's bumblebee, a candidate for listing under CESA, prior to ground-disturbing activities and obtaining an Incidental Take Permit if an active nest is observed. In addition, the City's municipal code and approved plant list require the use of native and/or drought tolerant plant species in landscaped areas throughout the City, including the Plan area. MM BIO-3 has been revised as follows:

MM BIO-3 Crotch's Bumble Bee. Protocol-level surveys in the appropriate season (CDFW, 2023c) shall be conducted for Crotch's bumble bee prior to the commencement of any ground-disturbing activities. If foraging individuals are found on a project site, a biologist will monitor construction activities to ensure that bees are not impacted by construction activities, vehicles, or any other potential activities. If a nesting colony is identified on the project site, a buffer encompassing the nest and adequate foraging resources will be established by a qualified biologist. The no-activity buffer shall be maintained until the end of flight season or once the nest is deemed inactive and unoccupied by a qualified biologist. If the nest is unavoidable, the Applicant will obtain an Incidental Take Permit from CDFW for impacts to this species. ~~If the California Fish and Game Commission decides not to list Crotch's bumble bee under CESA, this measure will no longer be required.~~

A02-6 The CDFW recommends revising MM BIO-1 to require surveys for nesting birds and raptors before construction, establishing appropriate no-disturbance buffers, and monitoring nests to prevent disturbance.

The comment is acknowledged. MM BIO-1 currently requires surveys for nesting birds and raptors within 7 days prior to vegetation removal and ground disturbance, establishment of 500-foot no-disturbance buffers for active raptor nests and 100-foot buffers for other nesting birds, and periodic monitoring of active nests. MM BIO-1 has been revised to incorporate biologically appropriate no-disturbance buffers for common and special-status species and clearly identifying nest monitoring protocols, including the frequency and duration of monitoring, to ensure that project activities do not disturb nesting birds. These revisions ensure compliance with CDFW guidance and provide clear, enforceable procedures for protecting nesting birds during construction.

MM BIO-1 Nest Avoidance. A nesting bird and raptor survey shall be conducted by a qualified biologist within 7 days prior to the start of construction/ground disturbing activities. The qualified biologist shall survey the entire project site and areas within a biologically defensible buffer zone surrounding the project site. If project activities are delay or suspended for more than 7 days during the nesting season, the nesting bird and raptor survey shall be repeated. If active bird nests are identified during the survey, the species shall be identified, and a no-disturbance buffer shall be established around the active nest. At a minimum, a buffer of 500 feet around active raptor nests and 100 feet around other migratory bird species nests shall be established. Additionally, special-status bird nests will be initially protected with a buffer of 500 feet. Personnel working on the project, including all contractors working onsite, shall be instructed on the presence of nesting birds, restricted areas, and adherence to no-disturbance buffers. A qualified biologist shall ~~periodically~~ monitor any active bird nests on a weekly basis to determine if project-related activities occurring outside the "no-disturbance" buffer disturbs the birds and if the buffer shall be modified~~increased~~. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the "no-disturbance" buffer may occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.

A02-7 CDFW suggests that if special status wildlife is found injured or dead, work should stop, the incident should be documented and reported, and additional mitigation measures implemented before resuming work.

The comment is acknowledged. Mitigation Measure BIO-4 has been modified to include notification of City staff and CDFW if any special status wildlife species are found, harmed during relocation, or discovered dead or injured during construction and the stoppage of all work in the immediate area. A qualified biologist will be notified, and the incident will be documented.

A formal report will be submitted to CDFW and the City of Lancaster within three (3) calendar days of the incident or finding. Work in the immediate area may only resume once proper notifications have been made, and additional mitigation measures have been identified and implemented to prevent further injury or mortality if deemed necessary.

MM BIO-4 Pre-construction Surveys and Construction Monitoring. To avoid or minimize impacts to Northern California legless lizard, loggerhead shrike, monarch, golden eagle, Swainson's hawk, Cooper's hawks, ferruginous hawk, merlin, ~~and~~ Costa's hummingbird, and other special status species, Applicants will assign one or more qualified biological monitors to conduct a pre-construction biolo**-**gical survey and monitor all initial ground-disturbing activities and vegetation removal within each specific portion of the Plan area. The pre-construction survey shall be conducted within 72 hours prior to the start of construction activities in any given portion of the Plan area. The qualified biologist shall survey the proposed impacts areas and a 50-foot buffer. The pre-construction surveys shall incorporate appropriate methods and timing to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, or in loose soil. If a special-status species is found, the qualified biologist shall contact CDFW, and the species shall be passively ushered out of harm's way to an area that is unaffected by the project. If the project requires any of the above-listed species to be removed, disturbed, or otherwise handled, the qualified biologist shall obtain all appropriate permits and prepare a list or plan of proper handling and passive relocation protocols. The list or plan of protocols shall be implemented during project construction activities and biological construction monitoring. The qualified biologist shall coordinate with CDFW to prepare a relocation plan which shall be submitted to CDFW for review and comment prior to implementing project ground-disturbing activities.

Monitors will be responsible for ensuring that impacts to special-status wildlife species are avoided to the extent possible. Monitors will also inform on-site construction person-nel of applicable mitigation measures, environmental commitments, permit conditions, and any potential for infraction. Once vegetation removal and initial ground disturbance are completed, and no nesting birds or special-status wildlife species are present on site, a qualified biological monitor will no longer be required to oversee construction activities.

If special status species are observed during pre-construction surveys or while monitoring, these observations will be reported to the California Natural Diversity Database (CNDDB). If any special status wildlife species are found, harmed during relocation, or discovered dead or injured during construction, all work in the immediate area will stop immediately. A qualified biologist will be notified, and the incident will be documented. For CESA listed species, a formal report will be submitted to CDFW and the City of Lancaster within three (3) calendar days of the incident or finding. For non-listed special status species, a formal report will be submitted to the City of Lancaster within three (3) calendar days of the incident or finding. Work in the immediate area may only resume once proper notifications have been made, and additional mitigation measures have been identified and implemented to prevent further injury or mortality.

A02-8 CDFW recommends that findings of significance for individual projects be deferred until further study in subsequent or supplemental CEQA documents, with opportunities for CDFW review and comment.

The comment is acknowledged. All individual projects within the Specific Plan area will undergo review to determine whether additional CEQA analysis is required. If subsequent or supplemental CEQA documentation is necessary, findings of significance will be evaluated at that

time, and CDFW will be provided opportunities for review and comment in accordance with CEQA requirements.

A02-9 CDFW suggests that landscaping for individual projects should use only native species and avoid introducing nonnative, invasive plants, especially those listed as moderate or high risk by the California Invasive Plant Council.

The comment is acknowledged. The City's municipal code and approved plant list require the use of native and/or drought tolerant plant species in landscaped areas throughout the City, including the Plan area. No further revisions are needed.

A02-10 CDFW recommends the EIR include suggested mitigation measures included in Attachment A of the comment letter.

The comment is acknowledged. Modifications to the biological mitigation measures have been made when considered appropriate. No further revisions are necessary.

A02-11 CDFW states that all special status species and natural communities detected during surveys should be reported to the California Natural Diversity Database and CDFW's Vegetation Classification and Mapping Program.

The comment is acknowledged. MM BIO-4 has been modified to require that any special-status species observed on-site be submitted to California Natural Diversity Database. No changes have been made to MM BIO-4 with respect to new sensitive natural communities as they are not expected to become established within the project site and will therefore not require notification to CDFW's Vegetation Classification and Mapping Program (VegCAMP).

A02-12 CDFW states the project will require payment of environmental document filing fees to CDFW upon filing the Notice of Determination, as required by law.

The comment is acknowledged. The required filing fee will be paid as part of the filing of the Notice of Determination with the Los Angeles County Clerk.

Comment Letter A03: California Department of Transportation

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
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Making Conservation a California Way of Life

November 7, 2025

Jocelyn Swain, Senior Planner
Community Development Department
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

RE: Parkway Village Specific Plan
SCH # 2024020979
Vic. LA-14/PM R65.676 to R66.743
GTS # LA-2024-04910-DEIR

Dear Jocelyn Swain:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The City of Lancaster is proposing the Parkway Village Specific Plan, a 20-year mixed-use development that would establish land use designations, development standards, and infrastructure strategies for approximately 43 planning areas. The project envisions a walkable community with a mix of residential, commercial, medical, recreational, and public uses, including 4,246 housing units, 130 hotel rooms, up to 750,000 square feet of commercial and office/medical space, a 200-bed hospital with related facilities, 27.8 acres of parks, an 8.7-acre school site, and a 10.2-acre aquatic center.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. As a reminder, all environmental document should include Vehicle Miles Traveled. You may reference the Governor's Office of Planning and Research (OPR) for more information: **A03-1**

https://opr.ca.gov/ceqa/#guidelines-updates

Comment Letter A03: California Department of Transportation (continued)

Jocelyn Swain, Senior Planner
November 7, 2025
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A03-1 (cont'd)

We understand that the Specific Plan may be processed under the City's adopted SB 743 VMT Policy and that transportation analysis may be limited or omitted if CEQA exemptions or screening criteria are applied. Given the scale and regional significance of the proposed development, we submit the following comments for your consideration and for inclusion in the administrative record.

1. Project Overview and Scale of Potential Impact
Based on the Specific Plan documentation, the project proposes:

- 4,246 residential units
- 130 hotel rooms
- 750,000 square feet of commercial/office space
- A 200-bed hospital and 500,000 square feet of medical-related uses
- 8.7 acres of schools and 27.8 acres of parks
- A potential transit hub serving the site and broader area

This development, by size and intensity, is anticipated to generate significant daily trips and Vehicle Miles Traveled (VMT) and may directly or indirectly impact the State Highway System, particularly via State Route 14 and nearby interchanges.

2. VMT Comments on the DEIR
State Route 14, located approximately one-half mile from the Specific Plan site, is a Class 2 (Other Freeway or Expressway) facility. Avenue L, which extends from the Specific Plan boundary to State Route 14, is a Class 3 facility (Other Principal Arterial). Any modifications or improvements to State Route 14 or to Avenue L in the vicinity of the interchange would require an evaluation of potential VMT-inducing impacts, according to the Caltrans guidance documents for evaluating transportation impacts of projects on the State Highway System.

These guidance documents include the Transportation Analysis Framework (TAF) and the Transportation Analysis Under CEQA (TAC). The 2nd edition TAF and TAC are available on the Caltrans SB 743 Implementation Resources page (https://dot.ca.gov/programs/sustainability/sb-743/resources).

The TAC notes that, during the screening review, practitioners should examine the specific project circumstances to ensure that there are no unusual circumstances that could otherwise lead to an increase in VMT. When concluding that a particular project may be screened out from further analysis, the practitioner should review and fully document the rationale supporting the conclusion that the particular project would not likely lead to a measurable and substantial increase in VMT.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Comment Letter A03: California Department of Transportation (continued)

3. Concerns with Application of CEQA Screening **A03-2**

While we recognize the City's efforts to align with SB 743 and streamline CEQA review, we caution against applying broad CEQA exemptions or VMT screening criteria that would bypass detailed transportation analysis for a development of this magnitude.

Key considerations include:

- The proposed land uses — including a hospital, regional commercial, and a transit hub — are likely to attract trips from a beyond-local service area, exceeding typical local-serving thresholds.
- Regional draw increases the potential for substantial VMT generation and cumulative transportation impacts.
- The City's VMT policy should not be applied in a way that precludes full disclosure of transportation impacts merely due to CEQA exemptions or TPA screening without project-specific justification.

Additional VMT Screening Recommendations:

We recommend that the project proponent submit a completed screening criteria checklist for Caltrans review. The screening criteria will help determine whether the project is likely to have a less-than-significant impact on regional VMT, potentially exempting it from a detailed VMT analysis.

Although the proposed project is located within an area that may be characterized as low VMT-generating, there could still be potential changes in travel patterns due to the scale and diversity of land uses proposed. Therefore, even if the project site is within a low VMT area, a project-specific VMT analysis may still be warranted to evaluate potential impacts.

We also recommend consulting with the local planning agency to understand specific thresholds. For reference, residential development that would generate vehicle travel that is 15 percent or more below the existing residential VMT per capita—measured against the region or city—may indicate a less-than-significant transportation impact. It is critical, however, that the agency maintain consistency in its VMT measurement approach throughout the analysis to ensure an "apples-to-apples" comparison. For example, if the agency uses home-based VMT for the threshold, it should also use home-based VMT for calculating project VMT and for evaluating the effectiveness of mitigation measures.

Comment Letter A03: California Department of Transportation (continued)

Jocelyn Swain, Senior Planner
November 7, 2025
Page 4 of 6

4. Impacts to the State Highway System (SHS) **A03-3**

The Parkway Village site is located within proximity to State Route 14, and access to/from the project may affect the following:

- On/off-ramps and interchanges serving regional trips
- Mainline congestion and queuing potential
- Emergency access routes, particularly to the proposed hospital
- Regional traffic circulation, especially during peak periods or special events

In Caltrans' comment letter dated March 26, 2024, "Caltrans recommends the Lead Agency include queuing analysis with actual signal timing for existing traffic conditions plus project trips at the impacted off-ramps such as at I-14 and Avenue K and I-14 and W Ave L". Due to the project's size and proximity to SR-14, there is potential for rear-end collision risk at the off-ramps during the peak conditions.

We request the City coordinate closely with Caltrans 07 to assess any encroachment, operational, or access-related issues, and to ensure that necessary mitigations or improvements are identified and addressed through the project review process.

5. Safety and Non-CEQA Mobility Considerations **A03-4**

Even where CEQA transportation impacts may not be significant or analyzed, the City retains local responsibility for ensuring that transportation infrastructure and planning address:

- Bicycle and pedestrian safety within and around the project site
- Site access and circulation, especially for schools, parks, and transit
- Queue spillback at off-ramps to mainline, intersections and driveways
- Emergency vehicle routing and access, particularly to the hospital

Cities such as San Diego have implemented Local Mobility Analyses (LMA) outside of CEQA to address these concerns. We encourage the City to consider a similar approach, especially for complex, multimodal projects like Parkway Village.

6. Complete Street and Non-Motorized Access **A03-5**

In addition to the comments above, Caltrans District 7's Planning Office has prepared detailed Complete Streets recommendations (see Attachment A) addressing pedestrian and bicycle connectivity between the Parkway Village site and State Route 14 interchanges, Avenue K–L corridors, and the Future Sierra Highway.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Comment Letter A03: California Department of Transportation (continued)

These recommendations identify specific locations where new crosswalks, ADA-compliant curb ramps, separate bikeways, and other safety enhancements are warranted to accommodate increased multimodal travel generated by the Specific Plan. We request the City incorporate these measures, or equivalent features meeting Caltrans standards, into the Final Specific Plan and its Mitigation Monitoring and Reporting Program (MMRP). Any work within or affecting the State right-of-way shall require Caltrans design review and approval through the Encroachment Permit process. **A03-5**

7. Adopt Robust Monitoring and An Enforceable VMT Compliance Mechanism **A03-6**

The Final EIR should require a monitoring program with thresholds and remedial measures regardless if a VMT analysis is required: e.g., within X years after occupancy of the first 1,000 units, the City or project owner must report observed travel behavior (counts, transit boardings, modal split, and VMT estimates). If VMT exceeds the projected level by a defined margin, the project must pay into the City VMT Mitigation Fund or implement specific on-site/off-site TDM or transit service improvements. This condition should be legally enforceable and tied to building permits/occupancy. (This is consistent with City practice and OPR guidance on defensible assumptions.)

8. Legal Defensibility and Enforcement **A03-7**

Due to the regional nature and long-term implications of this project, the City should be prepared to demonstrate that:

- Any CEQA exemptions or screening determinations are fully supported by substantial evidence,
- Any mitigation measures or conditions are enforceable and tied to measurable outcomes, and
- Monitoring provisions are established, particularly for VMT reduction strategies or transportation demand management (TDM) measures.
- Caltrans supports the inclusion of Transportation Demand Management (TDM) strategies to reduce project-generated VMT.

This will support the City in maintaining legal defensibility of its actions and ensuring long-term transportation system performance.

9. Other Comments **A03-8**

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

Comment Letter A03: California Department of Transportation (continued)

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover.

A03-8 (cont'd)

Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

In addition, a truck/traffic construction management plan may be needed for this project when mitigation/improvement is proposed at SR-14 interchanges. Traffic Management Plans involving lane closures or street detours which will impact the circulation system affecting traffic to and from freeway on/off-ramps should be coordinated with Caltrans.

10. Request for Ongoing Coordination

We request the opportunity to:

- Discuss the substantial evidence for the VMT screening.
- Discuss Project features including TDM reducing project-generated VMT.
- Evaluate potential operational and safety impact to SR-14 Interchanges.
- Participate in interagency review of transportation-related materials,
- Review any future traffic operations studies or mitigation proposals, and
- Be informed of public hearings, CEQA findings, and final approvals.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2024-04910-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse

Comment Letter A03: California Department of Transportation (continued)

Attachment

Parkway Village Specific Plan – Draft EIR

SCH #2024020979

(LDR GTS #07-LA-2024-04910)

A03-9

1. These pedestrian and bicycle mitigations are warranted to reduce specific plan-generated VMT and ensure safe multimodal access to and from Parkway Village. The extent of improvements shall be proportionate to the project's contribution to pedestrian and bicycle demand, as documented in the Final EIR.
2. The Final EIR's MMRP shall include each complete streets improvement listed herein as enforceable conditions, with identified implementing party (City or developer), timing (before occupancy or first building permit), and performance standards (e.g., ADA compliance, Class IV bikeway separation).
3. Prior to installation of any pedestrian or bicycle facilities at SR-14 interchanges, the applicant and City shall obtain Caltrans approval through the Encroachment Permit process.

Draft EIR Comments

Page	Section/Topic	Mitigation/Improvement	Justification
3.14-6	Pedestrian Facilities	Mitigation: Install or upgrade existing crosswalks and upgrade curb ramps to current ADA standards at all on- and off-ramps at the Avenue K/ Route 14 interchange. Include new sidewalk, new curb ramps, and a Rectangular Rapid Flashing Beacon at the free-right crossing point from eastbound Avenue K to the southbound SR-14 on-ramp.	Expected increase in pedestrian volumes to and from the Parkway Village development
3.14-6	Pedestrian Facilities	Mitigation: Construct a sidewalk on the north side of Avenue K8 between 15th	Expected increase in pedestrian volumes due to the Parkway Village development

Comment Letter A03: California Department of Transportation (continued)

Page	Section/Topic	Mitigation/Improvement	Justification
		Street and Star Lane/ Drivers Way to close the existing	
3.14-6	Pedestrian Facilities	Sidewalk Mitigation: gap. Install a crosswalk on the south side of Avenue K8 where it crosses Star Lane.	Expected increase in pedestrian volumes due to the Parkway Village development
3.14-6	Pedestrian Facilities	Mitigation: Install or upgrade existing crosswalks and upgrade curb ramps to current ADA standards at all on- and off-ramps at the Avenue L/ Route 14 interchange (7 total crossings). Include Rectangular Rapid Flashing Beacons at the free-right crossing points.	Expected increase in pedestrian volumes to and from the Parkway Village development
3.14-6	Pedestrian Facilities	Mitigation: Add crosswalks and ADA-compliant curb ramps at the Avenue L/Sierra Hwy connector roads on both eastbound and westbound Avenue L. https://maps.app.goo.gl/vz 7vrWK1bPE9uKmw9	Expected increase in pedestrian volumes due to the Parkway Village development
3.14-6	Bicycle Network	Mitigation: Upgrade existing Class II bike lanes on 10th Street and Avenue K-8 to Class V separated bikeways, including on the bridge over State Route 14.	Expected increase in bicycle rider volumes due to the Parkway Village development. Existing traffic speeds and volumes justify a Class IV bikeway according to national best practice and FHWA guidance (see page 23: https://highways.dot.gov/sites/fhwa.dot.gov/files/2022-07/fhwasa18077.pdf)

A03-9 (cont'd)

Comment Letter A03: California Department of Transportation (continued)

Specific Plan (Public Draft, September 2025) Comments

Page	Section/Topic	Mitigation/Improvement	Justification
28	Exhibit 4-2, District Framework Plan	Mitigation: Include Class I Shared-Use Paths along Avenue K-8 within the Specific Plan area (to continue the current condition) and the future north-south SHTC arterial street.	Expected increase in bicycle rider volumes due to the Parkway Village development
28	Exhibit 4-2, District Framework Plan	Mitigation: Construct a signalized mid-block crossing where "Plaza A" meets 10th Street for people to access the park west of 10th Street, since the Green Tendril will lead people to this point. Otherwise, people will be likely to cross regardless.	Expected increase in pedestrian volumes due to the Parkway Village development and proximity to large park and transit hub
37	Future Sierra Highway	Improvement: Rather than a meandering path, we recommend a straight path of travel for bicycle riders in this future corridor, to reduce travel time and physical effort and to reduce potential crashes due to frequent curves.	Expected increase in bicycle rider volumes due to the Parkway Village development
39	Future Sierra Highway	Improvement: The California Highway Design Manual states, "Where heavy bicycle volumes are anticipated and/or significant pedestrian traffic is expected, the paved width of a two-way bike path should be greater than 10 feet, preferably 12 feet or more."	Expected increase in bicycle rider volumes due to the Parkway Village development

A03-9 (cont'd)

Comment Letter A03: California Department of Transportation (continued)

Page	Section/Topic	Mitigation/Improvement	Justification
		https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp1000.pdf	
42	Urban Collector – Variation B	Improvement: Provide a buffer and vertical delineator/separation between bike lane and vehicle travel lanes.	Expected increase in bicycle rider volumes due to the Parkway Village development, and best practice complete streets design
46	Exhibit 4-9, Minor Collectors	Improvement: Rather than a meandering sidewalk, we recommend a straight path of travel to reduce travel time and distance and physical effort.	Expected increase in pedestrian volumes due to the Parkway Village development
47	Exhibit 4-10, Local Streets	Improvement: Consider striping the parking lane to reduce the visual width of the travel lane. When parked vehicles are not present, the wide 18' roadway will likely encourage higher-than-desired vehicular speeds. Also, include traffic calming elements such as speed humps, curb extensions, chicanes, etc.	Expected increase in pedestrian and bicycle volumes due to the Parkway Village development
49	Exhibit 4-11, Plaza	Improvement: Consider back-in angled parking to provide safer conditions for bicycle riders and drivers.	Expected increase in bicycle rider volumes due to the Parkway Village development, and best practice complete streets design
51	4.4.3 Non-Vehicular Circulation	Improvement: Shared Roadway Markings are no longer allowed on streets that have a posted speed limit greater than 30 mph, but they can be used on streets with lower speed limits. (CA MUTCD)	Change in state law (Senate Bill 960)

A03-9 (cont'd)

Comment Letter A03: California Department of Transportation (continued)

Page	Section/Topic	Mitigation/Improvement	Justification
87	Table 5-1 Community Park Amenities	Mitigation: Include Bike Parking/Storage guidelines for all uses in the specific plan area, for both visitors and residents.	Expected increase in bicycle rider volumes due to the Parkway Village development
100	6.4 Sign Standards	Mitigation: Include bicycle-friendly wayfinding signs along the bikeway corridors.	Expected increase in bicycle rider volumes due to the Parkway Village development

A03-9 (cont'd)

Responses to Comment Letter A03: California Department of Transportation

A03-1 The California Department of Transportation (Caltrans) emphasizes the significant scale of the Parkway Village project and reminds the City that CEQA requires a thorough Vehicle Miles Traveled (VMT) analysis. The agency notes that VMT is now the primary metric for assessing transportation impacts and should be included in all environmental documents.

Caltrans is correct in their summary of the project in that it is a specific plan that would establish zoning and development standards and allow for a maximum of up to 4,246 residential units, 130 hotel rooms, 750,000 square feet of commercial uses/office space, 200-bed hospital with up to 500,000 square feet of medical related uses, school, parks (including aquatic center) and a potential transit station (relocation of the existing transit station). However, no specific development projects have been proposed at this time, and the buildout year of the Specific Plan is estimated to be 2050. All projects that are proposed within the Specific Plan area would be evaluated against the Parkway Village Specific Plan EIR and additional, project-specific CEQA analysis would be prepared if warranted.

The proposed Specific Plan was evaluated for VMT impacts in accordance with the City's adopted thresholds and guidelines for VMT along with the City's certified Final Program Environmental Impact Report for Vehicle Miles Traveled Mitigation Program, dated December 2022 (SCH#2021090175). Based on this information, the Specific Plan area is located in a low VMT area (more than 15% below the established thresholds) and as such, screens out from a detailed VMT analysis.

A03-2 Caltrans cautions against broadly applying CEQA exemptions or VMT screening criteria to bypass detailed transportation analysis for a project of this size. The agency recommends submitting a completed screening criteria checklist and conducting a project-specific VMT analysis, as the mix of uses may attract regional trips and increase cumulative impacts.

The City evaluated the proposed Specific Plan's potential VMT impacts utilizing the City's adopted VMT Guidelines and Thresholds. Based on the adopted thresholds, the entire Plan area is located in a low VMT area and screens out from a detailed VMT analysis. Additionally, no specific development projects have been submitted within this Plan area. When specific development projects are submitted to the City, they will be evaluated against both the Specific Plan and associated EIR and any additional analysis will be prepared.

The mix of uses may attract trips from outside of the Plan area, but is not likely to attract trips from outside of the Antelope Valley. The commercial uses and the medical office uses/hospital have been allowed since the adoption of the Amargosa Creek Specific Plan in 2007 with the residential and other commercial uses allowed under the City's existing zoning of Mixed Use – Employment (MU-E) and Mixed Use – Neighborhood (MU-N) since 2009.

The EIR included a list of cumulative (related) projects, and a cumulative analysis was prepared for each topical area. As the Plan area is developed (with a buildout estimated at 2050), appropriate improvements will be conditioned on the projects as determined by the City's Traffic Engineer. If needed, Local Transportation Assessments will be prepared for individual development projects which would analyze the operational impacts of the project with an updated cumulative projects list. As such, no further analysis is necessary at this time.

A03-3 Caltrans suggests project access and egress may impact on/off-ramps, congestion, emergency access, and regional traffic circulation. Caltrans requests queuing analysis for affected off-ramps and coordination with the agency to address operational and access-related issues. The agency emphasizes the need for mitigation measures to address traffic impacts.

The proposed Parkway Village Specific Plan establishes the zoning and development standards for the Plan area and allows for a maximum amount of development as described above, with a buildout year of 2050. There are no specific developments proposed within the Plan area at this time. Additionally, the types of uses proposed within the Plan area are already allowed under the City's SP (Amargosa Creek Specific Plan), Mixed Use – Employment (MU-E), and Mixed Use – Neighborhood (MU-N) zonings. These zonings have been in place since 2007 for the SP and 2009 for the MU-E and MU-N zonings.

The standard of review for traffic impacts under Senate Bill (SB) 743 is no longer level of service but is now Vehicle Miles Traveled (VMT). Since the Plan area screens out of a detailed VMT due to its location in a low VMT area, no traffic mitigation measures are required or necessary. As individual development projects are submitted, additional project-specific traffic studies may be required (LTA, VMT, queuing, etc.) as the discretion of the City's Traffic Engineer to determine any roadway improvements that may be required. These would be project specific and any improvements necessary would become conditions of approval, not mitigation measures.

A03-4 Due to the project's proximity to State Route 14, Caltrans is concerned about impacts to ramps, congestion, and emergency access. The agency requests queuing analysis for affected off-ramps and close coordination to address operational and safety issues, including mitigation for potential collision risks.

The proposed Specific Plan establishes zoning and development for an area in the central portion of the City. While it allows for a maximum amount of development, there are no projects that have been proposed at this time. As development projects are submitted, the Traffic Engineering Division has the ability to request any studies needed to analyze and address operational and safety issues with respect to traffic. These can include, but are not limited to, Local Transportation Assessments, Vehicle Miles Traveled Studies, queueing analyses, etc., in order to determine any improvements necessary to ensure operational safety and efficiency. The need for these studies will be determined on a case-by-case basis as individual development project applications are submitted. Additionally, all development projects are routed to and reviewed by the Los Angeles County Fire Department for access and fire hydrants during the entitlement process to ensure adequate access for life safety.

A03-5 The agency recommends incorporating Complete Streets measures, such as new crosswalks, ADA-compliant curb ramps, and bikeways, to improve pedestrian and bicycle connectivity. Caltrans requests these features be included in the Final Specific Plan and reviewed by Caltrans if they affect the State right-of-way.

The City appreciates the time and effort Caltrans took to generate a list of recommendations for Complete Streets. The City has an adopted Master Plan of Complete Streets along with Complete Street policies within the City's General Plan. The Parkway Village Specific Plan also establishes the design standards for all streets within the Plan area to ensure the smooth flow of traffic while accommodating the needs of all users. These standards are contained on Pages 37 through 52 and require that all streets have pedestrian facilities and most streets will have bike lanes. Additionally, the Specific Plan establishes a non-vehicular circulation plan as shown on Page 52. As specific projects are submitted to the City for entitlement within the Plan area, they will be evaluated against the standards in the Specific Plan and conditioned to construct the appropriate improvements.

Attachment A to the comment letter also includes several off-site improvements. Many of these improvements are either part of an existing project (improvements associated with the Avenue L and Avenue K interchange projects), have no nexus to development within the

Specific Plan area, and/or are entirely within the purview of another agency (widening of the bridge on Avenue K-8 to install a sidewalk on the north side).

All conditions of approval/mitigation measures are required to have a nexus between the requested condition/measure and the impact of an individual project. At this time, there are no specific development projects proposed within the Plan area and no way of knowing when development applications may be submitted to the City. The requested improvements are not located adjacent to the Plan area and would not have a nexus to a specific, individual development project. Instead, these improvements are much likely to be City policy issues and improvements done as part of capital projects if deemed necessary.

A03-6 Caltrans recommends a robust monitoring program to track VMT after project occupancy, with enforceable measures if VMT exceeds projections. This could include contributions to a VMT Mitigation Fund or implementation of additional transit or transportation demand management improvements.

As currently envisioned, development within the Parkway Village Specific Plan screens out from a VMT analysis as the project site is located within a low VMT area as documented in the City's existing, adopted VMT and traffic analysis guidelines and thresholds. However, at this time no specific projects with the Plan area have been submitted to the City. As individual projects are submitted, they will be evaluated against the Parkway Village Specific Plan and EIR and any additional analysis will be prepared. Any project that is found to have a VMT impact will be subject to the City's Vehicle Miles Traveled Mitigation Program.

The Vehicles Miles Traveled Mitigation Program was adopted by the Lancaster City Council on January 24, 2023, the second reading was held on February 14, 2023, and the program went into effect on March 14, 2023. As part of the development of the program, a nexus study was prepared, and a Final Environmental Impact Report (SCH#202109017) was certified along with a Statement of Overriding Considerations. The program is codified in Chapter 15.67 of the Lancaster Municipal Code.

The VMT Mitigation Program was developed utilizing a list of unfunded, planned infrastructure projects identified within many existing planning documents. The identified infrastructure projects which could directly contribute toward reducing Citywide VMT and could be funded by the program include, but are not limited to, new and widened sidewalks, medians, multi-purpose paths, crosswalks, pedestrian refuge islands, curb pop-outs, flashing beacons, a variety of traffic calming measures (speed humps), and traffic circles. These potential improvements were quantified, and an overall construction cost was estimated. Based on this information, the nexus study determined that a fee of up to $400 per VMT could be charged.

The adopted fee of $150 per VMT was based on the nexus study and feedback from the development community. The fee does not apply to all development within the City. The fee only applies to development projects that do not screen out of a VMT analysis and have a VMT impact. Developers are not obliged to utilize the program if they choose to mitigate the VMT impacts through other means (e.g., choosing to install additional improvements beyond the requirements of the project, etc.); however, all projects with VMT impacts are required to reduce impacts to 15 percent below the City's threshold. Payment of the fee is required prior to the issuance of any constructed-related permits. As such, a separate VMT mitigation program for Parkway Village is not being proposed or implemented.

A03-7 Caltrans advises that any CEQA exemptions or screening determinations must be supported by substantial evidence, and all mitigation measures should be enforceable and tied to measurable outcomes. The agency supports the inclusion of TDM strategies to reduce project-

generated VMT and recommends establishing clear monitoring provisions to ensure long-term transportation system performance and legal defensibility.

The City of Lancaster appreciates Caltrans input on the use screening determinations and the requirements of CEQA. However, the City of Lancaster evaluated the impacts of the Specific Plan, including VMT impacts, based on the City's adopted VMT guidelines and thresholds. Per the City's adopted guidelines, the Plan area screens out from a detailed VMT analysis as it is located in a low-VMT area for both residential and commercial uses. As discussed above in A03-6, future projects submitted to the City within the Plan area would be evaluated for consistency with the specific plan and EIR, and if needed, additional studies prepared. Additionally, the City has an adopted mitigation program for VMT that would be utilized in the event that a submitted project is not consistent with VMT analysis in the EIR.

A03-8 Caltrans reminds the City that any work within the State right-of-way requires appropriate permits and compliance with Caltrans standards. The agency also recommends managing construction truck trips, controlling stormwater runoff, and preparing a traffic management plan for activities affecting freeway ramps and circulation. Caltrans also requests ongoing coordination with the City.

The City of Lancaster acknowledges that work within the Caltrans right-of-way requires an encroachment permit from Caltrans and must meet Caltrans' design standards and specifications. At this time, there are no projects proposed within the Parkway Village Specific Plan area and no improvements to State facilities are required or necessary. As projects are submitted to the City for entitlement, they will be routed for review to appropriate agencies, including Caltrans, in accordance with City procedures.

A03-9 Caltrans recommends implementation of pedestrian and bicycle mitigation measures, inclusion of complete streets improvement requirements in the Final EIR's Mitigation Monitoring and Reporting Program and obtaining Caltrans approval of any pedestrian or bicycle facilities at SR-14 interchanges prior to installation.

This comment is similar in nature and scope to comments A03-05 and A03-8. Please see RTC A03-05 and A03-8.

Comment Letter A04: County of Los Angeles Fire Department

COUNTY OF LOS ANGELES FIRE DEPARTMENT

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(323) 881-2401
www.fire.lacounty.gov

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FIRE CHIEF
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KATHRYN BARGER, FIFTH DISTRICT

November 17, 2025

Kendal Brekke
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Brekke:

THE NOTICE OF AVAILABILITY, VILLAGE SPECIFIC PLAN, PROVIDES DIRECTION FOR DEVELOPMENT WITHIN A PLAN AREA OVER A 20-YEAR PERIOD. THE PLAN PROVIDES FOR A MIXED-USE COMMUNITY WITH A VARIETY OF COMMERCIAL, RESIDENTIAL, MEDICAL AND OPEN SPACE PUBLIC USE, CITY OF LANCASTER, FFER2025004390

The Notice of Availability was reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

Fire Protection serving the area appears to be adequate for the existing development/land use; however, each additional development creates greater demands on existing resources.

For any questions regarding this response, please contact Shui Kam, at (213) 466-5596 or Shuiking.kam@fire.lacounty.gov.

A04-1

LAND DEVELOPMENT UNIT:

The Land Development Unit has no additional comments regarding this project at this time. The comments that were addressed in FFER2024001367 (April 10, 2024), have not changed and are still applicable to this project.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS, ARTESIA, AZUSA, BALDWIN PARK, BELL, BELL GARDENS, BELLFLOWER, BRADBURY, CALABASAS, CARSON, CERRITOS, CLAREMONT, COMMERCE, COVINA, CUDAHY, DIAMOND BAR, DUARTE, EL MONTE, GARDENA, GLENDORA, HAWAIIAN GARDENS, HAWTHORNE, HERMOSA BEACH, HIDDEN HILLS, HUNTINGTON PARK, INDUSTRY, INGLEWOOD, IRWINDALE, LA CANADA-FLINTRIDGE, LA HABRA, LA MIRADA, LA PUENTE, LAKEWOOD, LANCASTER, LAWNDALE, LOMITA, LYNWOOD, MALIBU, MAYWOOD, NORWALK, PALMDALE, PALOS VERDES ESTATES, PARAMOUNT, PICO RIVERA, POMONA, RANCHO PALOS VERDES, ROLLING HILLS, ROLLING HILLS ESTATES, ROSEMEAD, SAN DIMAS, SANTA CLARITA, SIGNAL HILL, SOUTH EL MONTE, SOUTH GATE, TEMPLE CITY, VERNON, WALNUT, WEST HOLLYWOOD, WESTLAKE VILLAGE, WHITTIER

Comment Letter A04: County of Los Angeles Fire Department (continued)

The Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, please contact Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov. **A04-1 (cont'd)**

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS: **A04-2**

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

For any questions regarding this response, please contact Forestry Assistant, Matthew Ermino at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION: **A04-3**

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has reviewed the Notice of Availability of a Draft Environmental Impact Report for the Parkway Village Specific Plan prepared by the City of Lancaster, dated September 19, 2025, and the draft EIR and associated environmental reports, dated September 2025, prepared by Aspen Environmental Group. In addition to the proposed mitigation measures included in the draft EIR, HHMD also recommends that a soil management plan (SMP) be implemented at the project site before site grading. The SMP should also address potential discoveries of underground storage tanks (USTs) and the associated role of the Los Angeles Regional Water Quality Control Board if contaminated soil and/or groundwater are related to past UST releases. HHMD has no additional requirements or comments at this time.

Please contact HHMD Hazardous Materials Specialist III, Sharon Dela Rea at (323) 890-4061 or Sharon.delarea@fire.lacounty.gov if you have any questions.

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:pg

Responses to Comment Letter A04: County of Los Angeles Fire Department

A03-1 The comment states that the fire protection serving the area appears to be adequate for existing development but that each additional development puts additional demand on existing resources. There are no additional comments from the Land Development Unit.

This comment is noted. Any project that is proposed within the Plan area would be routed for the Fire Department's review and any necessary revisions incorporated prior to Planning approval. No further response is necessary.

A03-2 The comment identifies multiple statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division and states that potential impacts in these areas should be addressed.

The Draft EIR addresses potential impacts in the topical areas listed by the Fire Department. Sections 3.4 Biological Resources, 3.5 Cultural Resources, 3.7 Geology, Soils, and Paleontology, and 3.9 Hydrology and Water Quality address the potential impacts to rare and endangered species, archaeological and cultural resources, erosion control, and watershed management, respectively. The Plan area is mapped as a Non-Very High Fire Hazard Severity Zone by CAL FIRE. The City of Lancaster General Plan Safety Element identifies the Plan area as having moderate wildfire risk. The few areas of sparse desert vegetation that would remain in the Plan area would be less prone to wildfires than other heavily vegetated areas of Southern California (City of Lancaster, 2022). The urbanized areas near the Plan area are unlikely to be exposed to wildland fires due to the lack of wildlands in the vicinity, and thus impacts were evaluated not to be significant with regard to wildfire. The project is located in the City of Lancaster. The County Oak Tree Ordinance only applies to unincorporated areas of Los Angeles County, and as such does not apply to the project.

A03-3 The comment recommends that a soil management plan be implemented at the project site before site grading which would address potential discoveries of underground storage tanks (USTs) and the role of the Los Angeles Regional Water Quality Control Board.

Existing MM HAZ-1 requires completion of a site characterization study prior to issuance of a grading permit for developments within Plan area. The characterization study shall include determination of whether USTs are present within the development site and protocols for if an UST is identified as remaining onsite. In addition, MM HAZ-2 establishes a protocol if unknown wastes or suspect materials (including USTs) are discovered during construction.

The project site is not located within the boundaries of the Los Angeles Regional Water Quality Control Board. The Antelope Valley, including Lancaster, is within the Lahontan Regional Water Quality Control Board. Any discoveries of underground storage tanks and/or contamination will be coordinated with the applicable regional board. No revisions are necessary.

Comment Letter B01: Gibbs Giden representing 3Gen Net Lease, LP (Bowlero)

Peter G. Haber, Esq.
phaber@gibbsgiden.com

File No. 5157.003
Reply to Westlake Village office
www.gibbsgiden.com

October 31, 2025

VIA E-MAIL AND US MAIL

City of Lancaster
ATTN: Jocelyn Swain, Senior Planner
44933 Fern Avenue
Lancaster, CA 93534
jswain@cityoflancasterca.org

Re: **WRITTEN COMMENT TO DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PARKWAY VILLAGE SPECIFIC PLAN**
Our Client: **3Gen Net Lease, LP**
Property: **43233 Sierra Highway, Lancaster, CA**

Dear Ms. Swain:

B01-1

This office represents 3Gen Net Lease, LP, the owner of the parcel located at 43233 Sierra Highway, currently operated as Bowlero Lancaster (the "Bowling Alley"). Please accept this correspondence as our written comment to the draft Environmental Impact Report ("EIR") for the Parkway Village Specific Plan. This letter shall also supplement our comments shared with the Planning Department on March 14, 2024 and our subsequent correspondence dated March 28, 2024, incorporated herein.

The draft EIR invites comments on the various topics addressed therein, including matters pertaining to "Public Service and Recreation" which this correspondence intends to address with respect to the Bowling Alley.

Currently the draft EIR indicates that, "Existing development within the [Sierra Highway Transit Corridor] is expected to remain and is not proposed to be demolished or removed due to the implementation of the [Parkway Village Specific Plan]. Existing development will be considered legal nonconforming uses, and any modification is subject to Article VII (Nonconforming Uses and Structures) of the Lancaster Municipal Code." We are respectfully requesting that the draft EIR commit the city of Lancaster to a non-disturbance covenant for the Bowling Alley.

The Bowling Alley has been serving the Lancaster community continuously since 1969 and today is only one of two such bowling alleys in Lancaster. The Bowling Alley maintains leagues for seniors, is open to families and children, and offers the community recreation and

GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP

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3443417.1

Comment Letter B01: Gibbs Giden representing 3Gen Net Lease, LP (Bowlero) (continued)

GIBBS GIDEN

respite from summer heat. The ownership hopes that it can continue to serve as that essential community space for generations to come.

B01-1 (cont'd)

We appreciate that the draft EIR clarifies that the existing use will be permitted to continue in a legal but non-conforming capacity, however, the ownership seeks a higher level of certainty with respect to the future viability of this important local community gathering location. We are requesting that the draft EIR explicitly 1) carve the Bowling Alley out of the Parkway Village Specific Plan in its entirety; or 2) commit the city of Lancaster to enter into a recorded non-disturbance covenant and restriction whereby the city of Lancaster agrees that it will not disturb the operation of the Bowling Alley as a commercial use open to the public.

Including this language will provide the ownership and operator the certainty they need to ensure that the Bowling Alley will be permitted to remain at this location. It would be consistent with the vision of creating increased housing, along with set asides for commercial and recreational space to serve the local community. The ownership would like to express its sincere commitment to collaborating with the City to ensure the continued operation of the Bowling Alley in its current location.

We look forward to your next draft EIR and remain optimistic that it will address our concerns. In the meantime, please do not hesitate to contact the undersigned with any questions or concerns.

Sincerely,

Peter G. Haber
for GIBBS GIDEN LOCHER TURNER
SENET & WITTBRODT LLP

3443417.1

Responses to Comment Letter B01: Gibbs Giden representing 3Gen Net Lease, LP (Bowlero)

B01-1 The commenter represents the owner of an existing bowling alley located within boundaries of the Specific Plan area. The commenter requests that the City of Lancaster commit to a "non-disturbance covenant" for the bowling alley or that the bowling alley be carved out of the Specific Plan in its entirety.

An agreement between the bowling alley and the City regarding operations is not a CEQA-related issue. There are no environmental issues identified in the letter. The EIR and the Specific Plan clearly state that existing uses within the Specific Plan area, including the bowling alley, would be permitted to continue as a legal, non-conforming use in accordance with the City of Lancaster Municipal Code.

Comment Letter B02: Kaiser Foundation Hospitals

KAISER PERMANENTE®

Kaiser Foundation Hospitals – Legal Department

Sent via email to *jswain@cityoflancasterca.org*

November 3, 2025

City of Lancaster
Community Development Department
44933 Fern Avenue
Lancaster, CA 93534
Attn: Ms. Jocelyn Swain, Senior Planner

RE: Kaiser Foundation Hospitals' comments on the proposed Parkway Village Specific Plan and associated Draft EIR

Dear Ms. Swain:

Kaiser Foundation Hospitals ("Kaiser") is the owner and operator of the Kaiser Permanente Antelope Valley Medical Offices, located at 615 W Ave. L, Lancaster, California. Kaiser also owns a significant amount of vacant land surrounding the medical offices (collectively with the medical offices, the "Kaiser Property"). The Kaiser Property would be directly affected by the proposed Parkway Village Specific Plan (the "PVSP"), and therefore Kaiser offers the following comments.

In 2007, the City of Lancaster (the "City") approved the Amargosa Creek Specific Plan (the "ACSP") for an approximately 152-acre site within the City that also included the Kaiser Property. Under the ACSP, the entirety of the Kaiser Property was designated as "Health Care (Medical Facility)" with a wide road at the north and west property lines to provide a buffer between the medical uses on the Kaiser Property and the non-medical uses on the balance of the ACSP area. Kaiser and the City also entered into a development agreement in 2007 pursuant to Government Code section 65864 et seq. (the "Development Agreement"), under which Kaiser has a vested right to develop the Kaiser Property as a multi-phased medical center (the "Project") under the "Project Approvals" (which includes the ACSP). The Development Agreement vested the Project Approvals for 25 years (i.e., until 2032.

B02-1

Kaiser continues to have serious concerns regarding the contents of the PVSP, which, in several respects, would seriously impair Kaiser's vested rights to complete development under its Project Approvals, the existing ACSP, and the Development Agreement. Specifically:

- Height Limits. The ACSP permits structures up to six stores or 80 feet. (ACSP § 6.02.C.1.) This standard is specifically tailored to the operational needs of a regional medical center. PVSP Table 6-9, however, reduces the by-right height allowed on the Kaiser Property to 50 feet. Because a modern hospital building cannot be plausibly built with that height limit, the PVSP would frustrate the purpose behind Kaiser's Project Approvals. The only relief

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Pasadena, CA 91188
(626) 405-6726 - fax

Comment Letter B02: Kaiser Foundation Hospitals (continued)

offered by the PVSP would be via a CUP to exceed this height limit; however, this additional discretionary approval process offers no assurance that Kaiser could build up to 80 feet or six stories, as it now has a vested right to do, and would thus impose a development risk that Kaiser does not currently have.

B02-1 (cont'd)

- Setbacks. Under the ACSP, required setbacks are 25 feet from buildings,15 feet for service facilities and parking along Avenue L and 5th Street West, and 10 feet along interior lot lines. (ACSP § 6.02.C.2, Exhibit 49.) PVSP Table 6-9 expands these requirements to a minimum of 20-foot front and 50-foot side and rear setbacks. These enlarged buffers reduce the buildable area within the Kaiser Property contrary to the existing vested setback standards and would therefore greatly complicate Kaiser's ability to master plan the undeveloped portion of the site as envisioned by the ACSP and the Development Agreement.

- Parking Standards. The ACSP provides clear, objective parking ratios: three spaces per hospital bed, five per 1,000 square feet of medical office, and two per 1,000 square feet of administrative facilities. (ACSP § 6.02.C.3.) Kaiser secured these parking ratios from the City when it entitled the Project in 2007 because they conform to the parking requirements of the Project's medical office buildings and hospital and vested its rights to retain these ratios under the Development Agreement. The PVSP eliminates these ratios and instead requires developers to demonstrate that parking would be "sufficient" to the satisfaction of the Community Development Director or Planning Commission, which, depending on this official's determinations, could potentially prove more restrictive or burdensome than the ACSP's parking standards. This open-ended standard would violate Kaiser's vested rights to the existing parking ratios for its Project and would purport to replace these vested parking ratios with unfettered discretionary judgment.

Collectively, these changes increase City discretion, impose new, more restrictive development standards, and reduce the predictability of future approvals, all in violation of Kaiser's vested development rights and creating greater burdens than those analyzed and vested under the ACSP. Kaiser asks the City to honor and comply with Kaiser's vested rights under the Development Agreement and the ACSP by removing all the development restrictions described above from the proposed PVSP. We would like to meet with you and all other appropriate City staff and leadership at the earliest opportunity, and well before the City takes action on the PVSP and its Draft EIR, to resolve these matters. Please let us know times when this meeting can occur and who from the City will attend.

Comment Letter B02: Kaiser Foundation Hospitals (continued)

City of Lancaster
Attn: Ms. Jocelyn Swain
Page 3

Kaiser has been an active member of the Lancaster community for decades and looks forward to further growing its campus. The City will enable us to do so by resolving these matters to our mutual satisfaction in a good faith, collaborative and timely manner.

Thank you in advance for your consideration of these comments.

Thank for your attention to this matter.

Sincerely,

KAISER FOUNDATION HOSPITALS

_/s/ Fernando Avila_____
Fernando Avila, Senior Counsel
(626) 240-8708
fernando.avila@kp.org

cc: Allison E. Burns, City Attorney (*ABurns@stradlinglaw.com*)

Responses to Comment Letter B02: Kaiser Foundation Hospitals

B02-1 This commenter states that in 2007 under the then approved Amargosa Creek Specific Plan, Kaiser and the City entered into a development agreement under which Kaiser had a vested interest in the development of a multi-phased medical center and that the development agreement vested the project for 25 years. The commenter feels the Parkway Village Specific Plan impairs Kaiser's vested rights. The commenter makes specific note of three subject areas: Height Limits; Setbacks; and Parking Standards and feels Amargosa Creek Specific Plan standards should apply and the City should remove the Parkway Village Specific Plan standards with regard to the Kaiser properties. The commenter requests a meeting with the City prior to any decision on the Parkway Village Specific Plan.

The commenter raises concerns with respect to building height, setbacks, and parking for the future hospital and medical facilities located on Kaiser owned property within the Parkway Village Specific Plan. The Draft EIR does not need to be revised to address these issues. The City and Kaiser have had several meetings to address Kaiser's concerns. As a result, the Parkway Village Specific Plan has been modified by adding the following language as a footnote to Table 6-9 with respect to development standards:

"* For the duration of the Development Agreement (DA) between Kaiser Foundation Hospitals and the City of Lancaster, dated December 3, 2007, the following development standards shall apply to Planning Area O:

1. A maximum building height of 80 feet and six stories shall apply. Following expiration, nullification or termination of the DA, the development standards listed in Table 6-9 shall apply.
2. The minimum setback to all buildings shall be 25 feet. The minimum setback on the north and west borders of Planning Area O shall be 15 feet to service and parking. The minimum setback on the south and east borders of Planning Area O shall be 10 feet to service and parking. Following expiration, nullification, or termination of the DA, the development standards listed in Table 6-9 shall apply.
3. All uses and developments on Planning Area O shall not be subject to any minimum automobile parking requirement. Following expiration, nullification, or termination of the DA, parking for all uses and developments shall comply with Section 6.3. No further response is necessary."

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles

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Of Counsel
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November 10, 2025

VIA EMAIL AND OVERNIGHT MAIL
City of Lancaster
Attn: Jocelyn Swain, Senior Planner
44933 Fern Avenue
Lancaster, CA 93534
Email: jswain@cityoflancasterca.gov; planning@cityoflancasterca.gov.

Re: Preliminary Comments on the Draft Environmental Impact Report for the Parkway Village Specific Plan (SCH No. 2024020979)

Dear Ms. Swain:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") to provide comments on the Draft Environmental Impact Report ("DEIR") prepared for the Parkway Village Specific Plan (SCH No. 2024020979) ("Project") by the City of Lancaster ("City").

The Project proposes to guide the future development of 434.7 acres located between 10th Street West and Sierra Highway and Avenue K and Avenue L in the City of Lancaster. The Project proposes land use and circulation plans and development standards. The Project includes 3,462 residential units, 130 hotel rooms in one or more hotels, 150,000 square feet (sf) of commercial uses, 415,000 sf of office, medical office, assisted/supportive living, and uses supportive of office including restaurants, financial institutions, professional services, etc., 185,000 sf of commercial uses, 8.7 acres for school uses, 27.8 acres for parks, a 200-bed hospital, and up to 500,000 sf of medical-related uses, and a 10.2-acre aquatic center.[1] The Project approvals include adoption of the Specific Plan (or "PVSP"), General Plan Amendment, and Zone Change.

We reviewed the DEIR with the assistance of air quality expert Dr. James Clark[2] and noise expert Silas Bensing.[3] The City must separately respond to these

[1] DEIR, pg. ES-1.
[2] Dr. Clark's technical comments and curricula vitae are attached hereto as **Exhibit A.**
[3] Mr. Bensing's technical comments and curricula vitae are attached hereto as **Exhibit B.**

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technical comments. CREED LA's review of the DEIR demonstrates that the DEIR fails to comply with the requirements of the California Environmental Quality Act ("CEQA").[4]

In summary, the DEIR finds that the Project's operations would result in significant air quality impacts, but fails to require all feasible mitigation measures to reduce this impact, as required by CEQA.[5] Dr. Clark identifies feasible measures that have been required by other programmatic EIRs. The Project's construction activities would generate significant amounts of Toxic Air Contaminants, but the DEIR fails to analyze and mitigate nearby residents' exposure to these pollutants. These comments demonstrate that CEQA requires analysis of the Project's health risk impacts, and Dr. Clark demonstrates that quantitative analysis of these impacts is feasible. Dr. Clark prepared a health risk analysis showing that construction activities would result in an incremental cancer risk of 12.3 in one million, which exceeds the City's 10 in one million significance threshold.[6] **B03-1**

The DEIR fails to disclose an additional source of potentially significant health risk from exposure to Valley Fever spores that may be disturbed by the Project's ground-disturbing construction activities. Dr. Clark demonstrates that the DEIR's mitigation is not adequate to protect residents near the Project site. **B03-2**

The Project would have potentially significant greenhouse gas ("GHG") impacts resulting from the Project's inconsistencies with key policies in the 2022 California Air Resources Board ("CARB") Scoping Plan and the City's Climate Action Plan.[7] However, the DEIR incorrectly concludes that GHG impacts are less than significant or non-existent.[8] **B03-3**

The DEIR fails to analyze the Project's energy consumption during construction and operation. This is a plain violation of CEQA given the size of the Project.[9] The DEIR also fails to include sufficient investigation into energy conservation measures that might be available or appropriate for the Project, as required by CEQA Guidelines Appendix F. **B03-4**

The DEIR fails to adequately analyze and mitigate significant noise impacts from the Project's construction and operation. Mr. Bensing demonstrates that the **B03-5**

[4] PRC § 21100 et seq.
[5] PRC § 21081(a)(3), (b); CEQA Guidelines §§ 15090, 15091; *Covington v. Great Basin Unified Air Pollution Control Dist*. (2019) 43 Cal.App.5th 867, 883.
[6] Clark Comments, pg. 12.
[7] DEIR, pg. 3.3-14.
[8] DEIR, p. ES-6.
[9] *See California Clean Energy Commission v. City of Woodland* (2014) 225 CA4th 173, 210.

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DEIR's analysis fails to adequately measure existing conditions, fails to consider the combined impacts from total development proposed by the Project, and fails to adopt effective mitigation.

B03-5 (cont'd)

As a result of these shortcomings, the DEIR fails to comply with CEQA. The DEIR lacks substantial evidence to support its conclusions, violates CEQA's analytical requirements, and fails to properly mitigate the Project's significant environmental impacts. CREED LA urges the City to remedy the deficiencies in the DEIR by preparing a legally adequate revised DEIR and recirculating it for public review and comment.[10]

These comments are timely submitted in accordance with a limited extension of the comment period by the City.[11] As will be explained in greater detail herein, the City provided an extension for CREED LA to submit its DEIR comments due to the City's failure to make environmental studies other reference documents available throughout the entire comment period.[12] CREED LA reserves the right to provide supplemental comments at any and all later proceedings related to this Project.[13]

I. STATEMENT OF INTEREST

CREED LA is a non-profit organization formed to ensure that the construction of major urban projects in the Los Angeles region proceeds in a manner that minimizes public and worker health and safety risks, avoids or mitigates environmental and public service impacts, and fosters long-term sustainable construction and development opportunities. The organization's members include Lancaster residents Francisco Alvarez, Jose Amezquita, and Douglas Wilson, the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, and their members, their families, and

[10] We reserve the right to supplement these comments at later hearings on this Project. Gov. Code § 65009(b); Public Resources Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199–1203; *see Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.
[11] On October 30, 2025, the City provided CREED LA with an extension to September 10, 2025 to submit comments on the DEIR due to the City's failure to provide timely access to the DEIR reference documents. *See* **Exhibit C**.
[12] Cal. Code Regs. Tit. 14, § 15105 (the minimum public review period for this document is 45 days).
[13] Gov. Code § 65009(b); PRC § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; *see Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

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other individuals who live and work in and around the City of Lancaster and the Los Angeles region.

Individual members of CREED LA live, work, recreate, and raise their families in the City of Lancaster and surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite. CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

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

I. FAILURE TO PROVIDE ACCESS TO REFERENCE DOCUMENTS

B03-6

1. The City Failed to Make DEIR Appendices and References Available During the Public Review Period

The City failed to provide timely access to documents referenced, relied upon and incorporated by reference in the DEIR during the public review and comment period, which originally ran from July 21, 2025, to November 3, 2025,[14] in violation of CEQA's requirement that the DEIR and all reference documents be made available during the comment period.[15] These reference documents included

[14] City of Lancaster, Notice of Availability of the Draft Environmental Impact Report For the Parkway Village Specific Plan Project
[15] Pub. Resources Code § 21092(b)(1); 14 C.C.R. § 15087(c)(5).

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environmental studies such as the DEIR's transportation study.[16] As a result, CREED LA had to request access to missing reference documents and an extension of the DEIR comment period, which was only partially granted.

B03-6 (cont'd)

On October 27, 2025, 9:50 A.M., CREED LA submitted a letter to the City ("DEIR References Request"), pursuant to CEQA section 21092(b)(1) and CEQA Guidelines section 15087(c)(5), requesting "immediate access to any and all documents referenced, incorporated by reference, and relied upon" in the DEIR.[17] On October 28, 2024, CREED LA emailed the City to follow up on the DEIR References Request and request immediate access to the transportation study.[18] On October 29, 2025, CREED LA reiterated its request for access to reference documents, and submitted a request for extension of the comment period.[19] At 4:30 P.M. on October 30, 2025, the City provided CREED LA with access to the transportation study and stated that CREED LA could submit comments until September 10, 2025.[20]

While CREED LA utilized the minimal extension provided by the City, the extension provided insufficient time for public review of the missing DEIR reference documents, as required by CEQA. To comply with CEQA's requirement that the *entire* DEIR be circulated for 30 days[21] and be "readily accessible,"[22] the comment period should have been extended 30 days after all missing DEIR references documents were made available.

Courts have held that the failure to provide even a few pages of CEQA documents for a portion of the review period invalidates the entire process, and that such a failure must be remedied by permitting additional public comment.[23] It is well settled that a CEQA document may not rely on hidden studies or documents

[16] Referenced in the DEIR as "*Garland and Associates. 2024 (October). Traffic/Transportation Impact Analysis for the Proposed Parkway Village Specific Plan. City of Lancaster. [Available from the Lancaster City Community Development Department]*."
[17] Letter from Adams, Broadwell, Joseph & Cardozo ("ABJC") to City re Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (SCH No. 2024020979) (October 27, 2025).
[18] Email from ABJC to City re Request for Immediate Access to Documents Referenced in the Draft Environmental Impact (October 28, 2025, 11:30 A.M.).
[19] **Exhibit D**: Letter from ABJC to City re Request to Extend the Public Review and Comment Period for the Draft Environmental Impact Report - Parkway Village Specific Plan (SCH No. 2024020979) (October 29, 2025).
[20] Exhibit C.
[21] Cal. Code Regs. Tit. 14, § 15105 (The public review period for a draft EIR shall not be less than 30 days).
[22] Cal. Code Regs. Tit. 14, § 15087(c).
[23] *Ultramar v. South Coast Air Quality Man. Dist*. (1993) 17 Cal.App.4th 689, 699.

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that are not provided to the public.[24] Here, public review of the City's analysis of the Project's transportation impacts, air quality, and traffic noise was substantially impaired without access to the transportation study. Moreover, review of other analyses in the DEIR remains impaired without access to documents listed in the DEIR's References sections. The DEIR's review and comment period was thus improperly shortened. **B03-6 (cont'd)**

I. THE PROJECT DESCRIPTION IS INADEQUATE **B03-7**

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

CEQA Guidelines section 15378 defines "project" to mean "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."[29] "The term "project" refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term project does not mean each separate governmental approval."[30] Courts have explained that a complete description of a project must "address not only the immediate environmental consequences of going forward with the project, but also all "*reasonably foreseeable* consequence[s] of the initial project."[31] "If

[24] *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 831 ("Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.").
[25] *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* ("*CBE v. Richmond*") (2010) 184 Cal.App.4th 70, 85–89; *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185, 193.
[26] 14 CCR § 15124; *see Laurel Heights Improvement Assn. v. Regents of Univ. of Cal ("Laurel Heights I")* (1988) 47 Cal.3d 376.
[27] *Id.*
[28] *Sundstrom v. County of Mendocino* ("*Sundstrom*") (1988) 202 Cal.App.3d 296, 311.
[29] CEQA Guidelines § 15378.
[30] *Id.*, § 15378(c).
[31] *Laurel Heights I,* 47 Cal. 3d 376, 398 (emphasis added); *see also Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.

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a[n]…EIR…does not adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project, informed decisionmaking cannot occur under CEQA and the final EIR is inadequate as a matter of law."[32]

B03-7 (cont'd)

A. Use of Back-Up Generators is a Reasonably Foreseeable Component of the Project

B03-8

The DEIR's discussion of the Project's air quality and health risk impacts fails to describe the reasonably foreseeable use of back-up generators. The DEIR's CalEEMod analysis of criteria air pollutants fails to include emissions from backup generators.[33] The DEIR's analysis indicates that use of back-up generators is reasonably foreseeable for the land uses proposed by the Project.[34] Also, the use of backup generators is a reasonably foreseeable activity during Project operation due to the prevalence of power safety shutoffs, extreme heat events, and other emergencies which lead to temporary losses of power.

In *East Oakland Stadium Alliance v. City of Oakland*,[35] the Court of Appeal upheld an EIR's analysis of emissions from backup generators. The EIR's analysis assumed that generators would operate for 50 hours of testing and maintenance annually, while allocating no time for actual emergency use. In discussing the lead agency's duty to analyze backup generator emissions, the Court stated that "if the annual need for emergency generator use is reasonably foreseeable, the EIR was not entitled to disregard such use merely because it would occur at unpredictable times."[36] The Court explained that use of a generator was reasonably foreseeable because, "[a]s noted in the EIR, some parts of the Bay Area are subject to predictable, sustained power outages undertaken to reduce the risk of fire."[37] Thus, "[t]he EIR was required to make neither a generally applicable nor a worst-case assumption; rather it was required to make a reasonable estimate of likely annual use of the generators at the project site."[38]

[32] *Riverwatch v. Olivenhain Municipal Water Dist*. (2009) 170 Cal. App. 4th 1186, 1201.
[33] DEIR, Appendix A, pg. 214.
[34] DEIR, pg. 3.11-19 ("Noise sources commonly associated with these land uses include commercial air conditioning units/chillers, mechanical equipment (e.g., trash compactors, generators)"); DEIR, Appendix A, PDF pg. 9 ("Stationary sources that are constructed as part of the project, which could include boilers and large water heaters, emergency power generators…").
[35] (2023) 889 Cal. App. 5th 1226.
[36] *Id.* at 1252.
[37] *Id.* at 1253.
[38] *Id.*

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Here, as in *East Oakland Stadium Alliance*, backup generator emissions are a reasonably foreseeable consequence of the Project due to increasingly common Public Safety Power Shutoff ("PSPS") events and extreme heat events ("EHE"). EHEs are defined as periods where the temperatures throughout California exceed 100 degrees Fahrenheit.[39] From January 2019 through December 2019, Southern California Edison, which the DEIR states may supply the Project's electricity,[40] reported 158 of their circuits underwent a PSP event.[41] In Los Angeles County, two circuits had 4 PSPS events during that period, lasting an average of 35 to 38 hours. The total duration of the PSPS events lasted between 141 hours to 154 hours in 2019. According to the California Public Utilities Commission ("CPUC") de-energization report[42] in October 2019, there were almost 806 PSPS events that impacted almost 973,000 customers (~7.5% of households in California). The California Air Resources Board estimates that with 973,000 customers impacted by PSPS events in October 2019, approximately 125,000 back-up generators were used by customers to provide electricity during power outages.[43] The widespread use of back-up generators to adapt to PSPS and EHE events suggests that back-up generators are a reasonably foreseeable consequence of the Project. In addition to emergency use, any generators included in the Project would be operated for routine testing.

B03-8 (cont'd)

Generators commonly rely on fuels such as natural gas or diesel,[44] and therefore emit criteria air pollutants, greenhouse gases, and toxic air contaminants. Generator emissions can significantly impact public health through diesel particulate matter ("DPM") emissions, which is a TAC.[45] Generators can also

[39] Governor of California. 2021. Proclamation of a state of emergency. June 17, 2021.
[40] DEIR, Appendix A, PDF pg. 45.
[41] SCAQMD. 2020. Proposed Amendment To Rules (PARS) 1110.2, 1470, and 1472. Dated December 10, 2020. http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1110.2/1110-2_1470_1472/par1110-2_1470_wgm_121020.pdf?sfvrsn=6.
[42] https://www.cpuc.ca.gov/deenergization/ as cited in CARB, 2020. Potential Emission Impact of Public Safety Power Shutoff (PSPS), Emission Impact: Additional Generator Usage associated With Power Outage.
[43] California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps.
[44] SCAQMD, Fact Sheet on Emergency Backup Generators, http://www.aqmd.gov/home/permits/emergency-generators ("Most of the existing emergency backup generators use diesel as fuel").
[45] California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps (showing that generators commonly rely on gasoline or diesel, and that use of generators during power outages results in excess emissions); California Air Resources Board, Use of Back-up Engines for Electricity Generation During Public Safety Power Shutoff Events (October 25, 2019), available at

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emit significant amounts of nitrogen oxides ("NOx"), sulfur dioxides ("SO2"), particulate matter ("PM10"), carbon dioxide ("CO2"), carbon monoxide ("CO"), volatile organic compounds ("VOC"), particulate matter less than 10 microns ("PM_{10}"), PM less than 2.5 microns ("$PM_{2.5}$").[46] The DEIR failed to measure emissions from onsite generator emissions. This omission resulted in an underestimation of the Project's air quality, greenhouse gas, and health risk impacts. **B03-8 (cont'd)**

II. THE DEIR FAILS TO DISCLOSE, ANALYZE AND MITIGATE POTENTIALLY SIGNIFICANT IMPACTS **B03-9**

An EIR must fully disclose all potentially significant impacts of a Project and implement all feasible mitigation to reduce those impacts to less than significant levels. The lead agency's significance determination with regard to each impact must be supported by accurate scientific and factual data.[47] An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.[48]

Even when the substantial evidence standard is applicable to agency decisions to certify an EIR and approve a project, reviewing courts will not 'uncritically rely on every study or analysis presented by a project proponent in

https://ww2.arb.ca.gov/resources/documents/use-back-engines-electricity-generation-during-public-safety-power-shutoff ("When electric utilities de-energize their electric lines, the demand for back-up power increases. This demand for reliable back-up power has health impacts of its own. Of particular concern are health effects related to emissions from diesel back-up engines. Diesel particulate matter (DPM) has been identified as a toxic air contaminant, composed of carbon particles and numerous organic compounds, including over forty known cancer-causing organic substances. The majority of DPM is small enough to be inhaled deep into the lungs and make them more susceptible to injury. Much of the back-up power produced during PSPS events is expected to come from engines regulated by CARB and California's 35 air pollution control and air quality management districts (air districts)").

[46] University of California, Riverside Bourns College of Engineering—Center for Environmental Research and Technology, Air Quality Implications Of Backup Generators In California, (March 2005), pg. 8, available at https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=84c8463118e4813a117db3d768151a8622c4bf6b; South Coast AQMD, Fact Sheet on Emergency Backup Generators ("Emissions of Nitrogen Oxides (NOx) from diesel-fired emergency engines are 200 to 600 times greater, per unit of electricity produced, than new or controlled existing central power plants fired on natural gas. Diesel-fired engines also produce significantly greater amounts of fine particulates and toxics emissions compared to natural gas fired equipment."), available at http://www.aqmd.gov/home/permits/emergency-generators#Fact2.

[47] CEQA Guidelines § 15064(b).

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

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support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference.'"[49] **B03-9 (cont'd)**

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by CEQA.[50] Challenges to an agency's failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project's environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual conclusions.[51] In reviewing challenges to an agency's approval of an EIR based on a lack of substantial evidence, the court will "determine de novo whether the agency has employed the correct procedures, scrupulously enforcing all legislatively mandated CEQA requirements."[52]

Additionally, CEQA requires agencies to commit to all feasible mitigation measures to reduce significant environmental impacts.[53] In particular, the lead agency may not make required CEQA findings, including finding that a project impact is significant and unavoidable, unless the administrative record demonstrates that it has adopted all feasible mitigation to reduce significant environmental impacts to the greatest extent feasible.[54]

A. The DEIR Fails to Disclose and Mitigate Significant Air Quality Impacts **B03-10**

1. The DEIR Fails to Identify All Feasible Mitigation for the Project's Admittedly Significant Air Quality Impacts

The DEIR finds that the Project would result in a significant and unavoidable operational air quality impact.[55] The DEIR acknowledges that unmitigated emissions from Project operations would exceed significance thresholds for VOCs, CO, and PM10.[56] The DEIR explains that the VOC exceedance would be primarily caused by transportation and area sources (which include architectural coatings,

[49] *Berkeley Jets*, 91 Cal.App.4th at 1355.
[50] *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236.
[51] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.
[52] *Id., Madera Oversight Coal., Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102.
[53] CEQA Guidelines § 15002(a)(2).
[54] PRC § 21081(a)(3), (b); CEQA Guidelines §§ 15090, 15091; *Covington v. Great Basin Unified Air Pollution Control Dist*. (2019) 43 Cal.App.5th 867, 883.
[55] DEIR, pg. 3.3-10.
[56] *Id.*

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B03-10 (cont'd)

consumer products, landscaping equipment, and hearths),[57] and the CO and PM10 exceedances would be caused by the large increase in vehicular traffic attributed to population growth in the Plan area.[58] The DEIR proposes to mitigate these emissions with MM AQ-1, which provides:

> Operational Area Source Emission Reduction Plan. The PVSP may implement energy-efficient heating and cooling systems to decrease reliance on natural gas. This may include using electric alternatives in residences, including installing electric hearths and stoves instead of natural gas or wood stoves and hearths. Additionally, the project owner may utilize low VOC paints and cleaning supplies where applicable.[59]

The DEIR claims that this measure would fully mitigate PM10 emissions, but CO and VOC emissions would remain significant and unavoidable. The conclusion that remaining significant emissions are unavoidable is unsupported because the DEIR fails to evaluate other feasible and effective measures that would further reduce emissions.

CEQA requires agencies to commit to all feasible mitigation measures to reduce significant environmental impacts.[60] In particular, a lead agency may not make required CEQA findings, including finding that a project impact is significant and unavoidable, unless the administrative record demonstrates that it has adopted all feasible mitigation to reduce significant environmental impacts to the greatest extent feasible.[61] Further, Policy 3.3.3 of the General Plan provides: "[m]inimize air pollutant emissions generated by new and existing development."

Here, the DEIR does not propose all feasible mitigation to minimize significant emissions. Dr. Clark identified additional feasible mitigation measures that must be considered before finding emissions to be significant and unavoidable.[62]

In summary, the DEIR must be revised to analyze the measures discussed above and in Dr. Clark's comments in order to comply with CEQA.

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[57] DEIR, Appendix A, pg. 14.
[58] DEIR, pg. 3.3-10.
[59] DEIR, pg. 3.3-10.
[60] CEQA Guidelines § 15002(a)(3) ("The basic purposes of CEQA are to… Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible"); Cal. Code Regs. tit. 14 § 15364 (defining feasibility). *Covington, supra,* at 883.
[61] PRC § 21081(a)(3), (b); CEQA Guidelines § 15091; *Covington, supra,* at 883.
[62] Clark Comments, pgs. 5-7.

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2. MM AQ-1 is Vague and Non-Binding Mitigation

B03-11

The DEIR claims that MM AQ-1 would reduce emissions from Project operation, and calculates that it would result in specific reductions in VOCs, CO, NOx, Sulfur Dioxide ("SOx"), PM10, and PM2.5 emissions.[63] The DEIR calculates that PM10 emissions would be reduced to a less than significant level. The unmitigated and mitigated emissions are reflected in Tables AQ-8 and AQ-9.[64]

The emissions reductions reflected in AQ-9 are unsupported by substantial evidence because measures discussed in MM AQ-1 are vague and non-binding. MM AQ-1 states that "[t]he PVSP *may* implement energy-efficient heating and cooling systems," which "*may* include using electric alternatives in residences, including installing electric hearths and stoves instead of natural gas or wood stoves and hearths."[65] "Additionally, the project owner *may* utilize low VOC paints and cleaning supplies where applicable."[66]

CEQA requires that mitigation measures must be fully enforceable through permit conditions, agreements, or other measures.[67] CEQA requires that the DEIR's analysis of mitigation measures be supported by substantial evidence.[68] CEQA generally prohibits deferred formulation of mitigation measures, but provides that specific details may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard.[69]

Here, the DEIR fails to meet CEQA's standards because it assumes specific reductions in emissions from implementation of a measure that does not require any specific mitigation. Because MM AQ-1 only describes measures that "may" be required, the measure is non-binding and fails to specify performance standards. As a result, the emissions reductions "calculated" in the DEIR are illusory and unsupported. MM AQ-1 is not an example of permissibly deferred mitigation because it fails to commit itself to any specific mitigation, lacks performance standards, and may never be implemented.

[63] DEIR, Appendix A, pg. 17, 18.
[64] *Id.*
[65] DEIR, pg. 3.3-10.
[66] *Id.*
[67] Cal. Code Regs. Tit. 14, § 15091(d).
[68] *See* Cal. Code Regs. Tit. 14, §§ 15126.4, 15384.
[69] Cal. Code Regs. Tit. 14, § 15126.4.

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As a result, the emissions reductions calculated by the DEIR are unsupported by substantial evidence. The City therefore lacks substantial evidence to conclude that the Project's significant PM10 emissions would be mitigated to a less than significant level. The Project's emissions of PM10 thus remain potentially significant. The DEIR must be revised to include binding and feasible mitigation to reduce emissions to the greatest extent feasible. **B03-11 (cont'd)**

B. The DEIR Fails to Analyze and Mitigate Potentially Significant Health Risk Impacts **B03-12**

1. The DEIR Fails to Disclose Health Risks from Project Construction and Operation

The DEIR fails to disclose that Project construction and operations would result in potentially significant health risk impacts from exposure to TACs such as Diesel Particulate Matter ("DPM"). The DEIR discusses the health consequences of exposure to TACs[70] and acknowledges that construction activities would generate DPM emissions,[71] but fails to disclose that the land uses authorized by the PVSP would generate TACs. The DEIR also fails to quantify the health risks from exposure to these TACs, either from construction activities or operations.

CEQA requires 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 prepare an EIR if the environmental effects of a project will cause a substantial adverse effect on human beings.[72] The Supreme Court, in *Sierra Club v. County of Fresno,* has also explained that CEQA requires the lead agency to disclose the health consequences that result from exposure to a project's air emissions.[73] Courts have held that an environmental review document must disclose a project's potential health risks to a degree of specificity that would allow the public to make the correlation between the project's impacts and adverse effects to human health.[74] The *Sierra Club* decision states that, although CEQA does not specifically require that health risk impacts be analyzed in a Health Risk Assessment, it must connect "the general health effects associated with a particular pollutant and the estimated amount of that pollutant the project will likely

[70] DEIR, Appendix A, PDF pg. 6.
[71] DEIR, pg. 3.3-10.
[72] PRC § 21083(b)(3), (d).
[73] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, 523; *see Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184 (finding that the EIR's description of health risks were insufficient and that after reading them, "the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin").
[74] *Bakersfield Citizens for Local Control, supra,* 124 Cal.App.4th at 1220.

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produce."[75] CEQA mandates discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health.[76] **B03-12 (cont'd)**

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.[77] 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 the dose of each TAC at that location, and quantify the cancer risk and hazard index for each of the chemicals of concern.[78] Following that analysis, then the City can make a determination of the relative significance of the emissions. The DEIR provides that exposure to TACs would be significant if it would result in a cancer risk greater than or equal to 10 in a million and/or a HI [non-cancerous] greater than or equal to 1.[79]

Here, the DEIR fails to disclose health risks from the operations of land uses authorized by the Project, even in a qualitative discussion. This omission violates CEQA's disclosure requirements. Dr. Clark explains that the Project's operations would generate TACs from sources such as diesel trucks and diesel-fueled stationary equipment like backup generators and fire pumps.[80] The DEIR's failure to disclose these impacts violates the informational requirements articulated in *Sierra Club v. County of Fresno* and *Bakersfield Citizens for Local Control v. City of Bakersfield*. The DEIR must be revised to disclose operational health risks.

The Project's operational and construction health risks should also be quantified in a HRA prepared in accordance with OEHHA guidelines. The significance threshold selected by the City is that exposure to TACs would be **B03-13**

[75] *Sierra Club*, 6 Cal.5th at 525.
[76] *Sierra Club*, 6 Cal.5th at 518–522.
[77] 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.
[78] *Id.*
[79] AVAQMD, California Environmental Quality Act (CEQA) and Federal Conformity Guidelines (August 2016), available at https://www.avaqmd.ca.gov/files/e5b34d385/AV%20CEQA%20Guides%202016.pdf.
[80] Clark Comments, pg. 11; SCAQMD, Classification of Diesel PM as a Carcinogen, https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/iws-facilities/dice/dice-b2; OEHHA, Health Effects of Diesel Exhaust (May 21, 2001).

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significant if it would result in a cancer risk greater than or equal to 10 in a million and/or a HI [non-cancerous] greater than or equal to 1.[81] The DEIR cannot conclude that impacts would not exceed this numerical threshold without quantitative analysis. The DEIR's significance finding is thus currently unsupported by substantial evidence.

B03-13 (cont'd)

The City may argue that the Project is a program-level analysis, and thus need not quantify speculative impacts from future projects. But the courts have addressed to what degree a program-level EIR such as this must analyze health risk impacts. In *Cleveland National Forest Foundation v. San Diego Assn. of Governments*, the Fourth District Court of Appeal held that a program-level EIR's environmental setting and impacts analysis for health risk impacts violated CEQA.[82] The EIR's environmental setting was challenged for failing to disclose the public's existing exposure to TACs. The record showed that there was available data with which the lead agency could have developed a reasoned estimate of the region's existing exposures to TACs.[83] The fact that the EIR was program-level did not relieve the lead agency of the requirement to establish the environmental setting, stating: "[t]he fact more precise information may be available during the next tier of environmental review does not excuse SANDAG from providing what information it reasonably can now… Moreover, if known impacts are not analyzed and addressed in a program EIR, they may potentially escape analysis in a later tier EIR."[84]

The EIR's impacts analysis was also challenged for failing to correlate the project's adverse air quality impacts to resulting adverse health impacts.[85] The lead agency argued that its disclosure efforts were adequate for the program level of environmental review and producing additional information at this level was infeasible.[86] But the Court held that the EIR's analysis was too broad to meaningfully correlate the Project's emissions to anticipated adverse health impacts from emissions.[87] The Court observed that although there are limitations to the precision of a program-level analysis, the record did not contain substantial

[81] AVAQMD, California Environmental Quality Act (CEQA) and Federal Conformity Guidelines (August 2016), available at https://www.avaqmd.ca.gov/files/e5b34d385/AV%20CEQA%20Guides%202016.pdf.
[82] *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 225.
[83] *Id.* at 572, 573.
[84] *Id.* at 573.
[85] *Id.*
[86] *Id.* at 574.
[87] *Id.*

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B03-13 (cont'd)

evidence showing that a more detailed analysis was infeasible.[88] The lead agency was "obliged to disclose what it reasonably can."[89]

The instant DEIR is similarly inadequate, as there is no evidence in the record suggesting that a quantitative analysis of TACs and resultant health risk impacts is infeasible at this stage, particularly given the specificity of the Project's proposed buildout. As in *Cleveland National Forest Foundation v. San Diego Assn. of Governments*, even if more detailed information will become available at the project-level, the City must still analyze what it reasonably can. And here, there is no evidence in the record suggesting that it will become more feasible to analyze the *total* health risk impacts of the PVSP in a future project-level EIR. Dr. Clark explains that an analysis of the Project's health risks can be conducted using data in the DEIR's air study, and conducts an analysis finding that impacts would be significant.[90] The DEIR must be revised to include this omitted analysis in order to meaningfully correlate the Project's emissions to its health risk impacts.

A key flaw in the DEIR is that it fails to treat the PVSP's total health risk impacts (from the total development authorized by the plan) as a programmatic issue. The CEQA Guidelines explain that program EIRs are best suited for considering broad programmatic issues for related actions at an early stage of the planning process.[91] As stated above, there is no evidence in the record suggesting that it will become more feasible to analyze the *total* health risk impacts of the PVSP in a future project-level EIR. Accordingly, if Specific Plan-wide health risk impacts are not disclosed and mitigated at this time, they may escape analysis in future project-level analyses. As stated in *Cleveland National Forest Foundation*, if known impacts are not analyzed and addressed in a program EIR, they may potentially escape analysis in a later tier EIR."[92]

Here, the DEIR adopts significance thresholds from the Antelope Valley Air Quality Management District ("AVAQMD") CEQA and Federal Conformity Guidelines.[93] The AVAQMD guidelines provide that a significant impact would occur if a project's emissions result in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.[94] These guidelines do not set forth protocols for analysis of cumulative impacts, so it is possible that the specific plan-wide impacts would escape analysis in a future

[88] *Id.*
[89] *Id.*
[90] Clark Comments, pg. 12.
[91] 14 Cal Code Regs §15168(b)(1)–(4).
[92] *Cleveland National Forest Foundation, supra*, at 225.
[93] DEIR, Appendix A, pg. 16; AVAQMD CEQA and Federal Conformity Guidelines.
[94] AVAQMD CEQA and Federal Conformity Guidelines, pg. 11.

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project-level EIR.[95] To ensure that the Project's total health risk impacts are actually evaluated, the DEIR must be revised to analyze construction and operational impacts in as much detail feasible. **B03-13 (cont'd)**

2. The DEIR Lacks Substantial Evidence to Find that Health Risks from Construction Emissions would be Less than Significant **B03-14**

The DEIR acknowledges that the Project's construction activities would generate TACs resulting in potential health risks.[96] The DEIR claims that with mitigation to reduce engine exhaust emissions (MM AQ-2),[97] the impact of localized ground level concentrations and incremental health effects of toxic air contaminants would be less than significant.[98] This conclusion is unsupported by substantial evidence because the DEIR fails to calculate the Project's unmitigated health risks from construction activities. Courts have held that "CEQA EIR requirements are not satisfied by saying an environmental impact is something less than some previously unknown amount."[99] As such, the DEIR's claim that impacts would be less than significant due to reductions from MM AQ-2 is unsupported by substantial evidence.

3. The Project's Emissions of TACs would Result in a Significant Health Risk Impact **B03-15**

Dr. Clark performed a quantitative health risk analysis using values from the DEIR's air study. Dr. Clark's analysis demonstrates that emissions from the Project's construction could result in an excess cancer risk of 12.3 in one million for a sensitive receptor (infant) at existing residences.[100] This cancer risk would exceed the AVAQMD significance threshold of 10 in one million. This significant impact must be disclosed and mitigated in an EIR.

[95] *Id.*
[96] DEIR, Appendix A, pg. 19.
[97] DEIR, pg. 3.3-10 (MM AQ-2 requires Tier 4 engines would be required for all construction equipment over 50 horsepower (hp), but Tier 3 equipment may be used for equipment over 100 hp if Tier 4 is unavailable.)
[98] *Id.*
[99] *California Clean Energy Commission v. City of Woodland* (2014) 225 CA4th 173, 210.
[100] Clark Comments, pg. 12.

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C. The DEIR Fails to Adequately Disclose and Mitigate Potentially Significant Health Risk from Exposure to Valley Fever

B03-16

The DEIR acknowledges that Valley Fever is highly endemic in Antelope Valley, meaning that the annual incidence rate of Valley Fever is greater than 20 cases per 100,000 persons per year.[101] The DEIR claims that with implementation of MM-AQ-3, impacts would be less than significant.[102] But Dr. Clark explains that the DEIR's mitigation would not protect nearby residents, as the measures in MM-AQ-3 primarily apply to workers. Specifically, given the proximity of the Project Site to nearby residential receptors to the northwest and southeast of the Site, residential receptors could be exposed to Valley Fever (Coccidiodes imimitis) from fugitive dust generated during construction. [103] Dr. Clark explains that compliance with standard dust control regulations such as AVAQMD Rule 403 do not meaningfully reduce Valley Fever risks.[104] Conventional dust control measures do not prevent the spread Valley Fever because they largely focus on visible dust or larger dust particles—the PM_{10} fraction—not the very fine particles where the Valley Fever spores are found.[105]

Dr. Clark proposes feasible and effective mitigation measures, including watering the site three times a day and offering filtration for homes near the Project Site.[106] These measures must be considered in a revised DEIR that acknowledges existing residents' potentially significant risk of exposure to Valley Fever.

D. The DEIR Fails to Adequately Analyze and Mitigate Potentially Significant Greenhouse Gas Impacts

B03-17

The DEIR states that the Project would generate a less than significant amount of GHGs.[107] CEQA Guidelines Section 15064.4 provides that a lead agency should consider the extent to which a project complies with GHG reduction plans.[108] The Project is inconsistent with key policies in the 2022 California Air Resources Board ("CARB") Scoping Plan and the City's Climate Action Plan.[109] These inconsistencies constitute a significant impact not disclosed in the DEIR.[110]

[101] DEIR, pg. 3.3-10.
[102] *Id.*
[103] Clark Comments, pg. 8.
[104] Clark Comments, pg. 10.
[105] Clark Comments, pg. 9.
[106] Clark Comments, pg. 9-10.
[107] DEIR, pg. 3.3-13, 14.
[108] DEIR, pg. 3.3-14.
[109] DEIR, pg. 3.3-14.
[110] 14 Cal Code Regs §15125(d).

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1. The Project is Inconsistent with Policies in the 2022 CARB Scoping Plan

B03-18

Appendix D ("Local Actions") of the 2022 Scoping Plan identifies eight project attributes for residential and mixed-use projects to qualitatively determine consistency with the Scoping Plan.[111] The Plan explains that residential and mixed-use projects that have all of the listed project attributes should accommodate growth in a manner consistent with State GHG reduction and equity prioritization goals. The California Air Resources Board ("CARB") recommended, in its comments on the Project's Notice of Preparation, that the DEIR "include a robust discussion of the project's consistency with the recommendations in Appendix D."[112] Despite the directive in CEQA Guidelines Section 15064.4 and CARB's recommendation, the DEIR fails to disclose the Project's inconsistency with key attributes in Appendix D.

The Project is inconsistent with the attribute: "[p]rovides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval."[113] The CALGreen Tier 2 voluntary standard calls for 55% of parking spaces to be equipped with Level 2 EV charging receptacles, or a combination of 20% Level 2 EV chargers and 50% of required chargers be equipped with J1772 connectors.[114] The DEIR does not require this level of charging infrastructure for developments in the Specific Plan area, and thus is inconsistent with the 2022 Scoping Plan.

B03-19

The Project is inconsistent with an attribute providing: "located on infill sites… presently served by existing utilities…"[115] There is no evidence in the DEIR that the Project is adequately served by existing utilities. The DEIR states that "[i]t is possible that the growth in the Plan area…would result in a need for new or expanded wastewater treatment facilities."[116] The DEIR also states that "[d[evelopment associated with the buildout of the PVSP would increase water demand and the need for new water supply, storage, and transmission facilities."[117]

[111] 2022 CARB Scoping Plan, Appendix D, available at https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf.
[112] DEIR, Appendix F, PDF pg. 7.
[113] 2022 CARB Scoping Plan, Appendix D, pg. 22.
[114] CALGreen Section A4.106.8.2.1.
[115] 2022 CARB Scoping Plan, Appendix D, pg. 22.
[116] DEIR, pg. 3.13-18.
[117] *Id.*

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The Project is inconsistent with the attribute: "[d]oes not result in the loss or conversion of natural and working lands."[118] This attribute is related to the 2022 Scoping Plan's "Priority GHG Reduction Strategy" of "[p]reserv[ing] natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements)."[119] Here, the Project would rezone a vacant site historically used for agricultural.[120] Even if the site is not currently utilized for agricultural purposes, this Project is inconsistent with the Scoping Plan's recommendation against mixed-use development on greenfield land. **B03-20**

The Project is inconsistent with the attribute: "[c]onsists of transit-supportive densities (minimum of 20 residential dwelling units per acre)."[121] The DEIR states that the Project would have a "gross target density of 18.7 dwelling units per acre,"[122] which is less dense than recommended in Appendix D of the Scoping Plan. **B03-21**

The Project is inconsistent with the attribute: "[r]educes parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit."[123] The DEIR and draft Specific Plan fail to include measures reducing parking requirements or unbundling parking. The only discussion of parking requirements in these documents provides: "[e]xcept as provided for in State law, for all uses and developments, the developer, property owner, or authorized agent shall determine the number of parking spaces sufficient for the proposed use in order to adequately facilitate operations and shall provide justification acceptable to the Director of Community Development and/or the Planning Commission to support the determination."[124] Thus, the Project is inconsistent with the Scoping Plan. **B03-22**

The Project is inconsistent with the attribute: "[a]t least 20 percent of units included are affordable to lower-income residents."[125] Here, the Project does not commit to making at least 20 percent of the proposed residential units affordable to **B03-23**

[118] 2022 CARB Scoping Plan, Appendix D, pg. 22.
[119] 2022 CARB Scoping Plan, Appendix D, pg. 12.
[120] DEIR, pg. 3.7-2 ("The site was used for agricultural purposes from prior to 1948 to around 1974").
[121] 2022 CARB Scoping Plan, Appendix D, pg. 22.
[122] DEIR, pg. 2-6.
[123] 2022 CARB Scoping Plan, Appendix D, pg. 22-23.
[124] DEIR, pg. 2-13; Draft Specific Plan, pg. 100.
[125] 2022 CARB Scoping Plan, Appendix D, pg. 23.

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lower-income residents. The DEIR states that the Project would allow "a range of household sizes and income levels to locate in the Plan Area," but does not reference any requirement that any units would be made affordable to low-income residents.[126] The is another inconsistency with the Scoping Plan. **B03-23 (cont'd)**

The Project is inconsistent with the attribute: "[u]ses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking."[127] The DEIR lacks any condition requiring all-electric appliances. MM-AQ-1 provides that "[t]he PSVP shall implement energy-efficient heating and cooling systems to decrease reliance on natural gas," but fails to outright require all-electric appliances in the proposed residential uses.[128] **B03-24**

To comply with CEQA, the DEIR must be revised to disclose the Project's inconsistencies with the 2022 Scoping Plan. The DEIR must also evaluate mitigation measures to address the Scoping Plan inconsistencies.

2. The Project is Inconsistent with the Climate Action Plan **B03-25**

Climate action plans "'may, if sufficiently detailed and adequately supported, be used in later project-specific CEQA documents to simplify the evaluation of the project's cumulative contribution to the effects of greenhouse gas emissions.'"[129] Courts have held that a lead agency "must consider whether the projects comply with each action identified in the Climate Action Plan if it wishes to avail itself to the streamlined review provided by section 15183.5 of the Guidelines…As part of that review, the [agency] must identify the reduction measures that apply to the project and, if they are not otherwise binding and enforceable, include them as mitigation measures."[130]

Here, the DEIR discusses consistency with several Climate Action Plan policies, but fails to discuss any of the policies with which the Project would be inconsistent. Measure 4.8.1b calls for "transit-oriented development," which includes a mixture of housing, office, retail and/or other amenities integrated into a walkable neighborhood and located within a half-mile of quality public transportation.[131] The stated benefits of these types of developments include:

[126] DEIR, pg. 3.12-5.
[127] 2022 CARB Scoping Plan, Appendix D, pg. 23.
[128] DEIR, pg. 3.3-10
[129] Cal. Code Regs. tit. 14 § 15183.5; *McCann v. City of San Diego* (2021) 70 Cal.App.5th 51, 92.
[130] *McCann v. City of San Diego* (2021) 70 Cal.App.5th 51, 97.
[131] Draft Lancaster Climate Action Plan, pg. 4-123.

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reduced driving, air pollution, and greenhouse gas emissions; increased healthy and active lifestyles; increased transit ridership; increased property values; and increased access to jobs and economic opportunities.[132] There is insufficient evidence in the record demonstrating the instant Project would have these GHG-reducing attributes because only a small portion is located in a Priority Growth Area, Transit Priority Area, or High Quality Transit Area.[133] Measure 4.6.1b provides: "[e]stablish goals that new commercial and residential construction exceed the California Building Standards Code energy requirements by 10%."[134] Here, there is no requirement identified in the DEIR that projects in the Plan area must exceed California Building Standards Code energy requirements by 10%. Due to these inconsistencies with the Climate Action Plan, the City lacks substantial evidence to conclude that the Project (which would emit 45,623 mtco2e per year of GHGs)[135] would result in a less-than-significant GHG impact.

B03-25 (cont'd)

B03-26

E. The DEIR's Energy Analysis is Incomplete and Unsupported by Substantial Evidence

B03-27

The DEIR states that a significant impact would occur if the Project would "[r]esult in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation."[136] The DEIR concludes that impacts would be less than significant.[137] But the DEIR's analysis of this impact is unsupported by substantial evidence because, in summary, it is less than one page in length,[138] fails to quantify the Project's energy consumption during either construction or operation, and assumes that compliance with building codes would ensure energy impacts would be less than significant. This fails to meet CEQA's requirements.

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[132] *Id.*
[133] https://hub.scag.ca.gov/datasets/10edc64279ff4ebeb99a191161416422/explore?location=34.660723%2C-118.136421%2C13.80; https://opendata.mtc.ca.gov/datasets/5572ccb7bfe2426eae086c35931f1d0e_0/explore; https://gisdata-caltrans.opendata.arcgis.com/datasets/863e61eacbf3463ab239beb3cee4a2c3_0/explore?location=34.666187%2C-118.138716%2C14.92 (last visited 10/28/2025)
[134] *Id.* at 4-92.
[135] DEIR, pg. 3.3-13.
[136] DEIR, pg. 3.6-11.
[137] DEIR, pg. 3.6-12.
[138] 3.6-12.

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B03-28

1. The DEIR's Energy Analysis Lacks Analysis Called For in the CEQA Guidelines

Section 15126.2(b) of the CEQA Guidelines provides that an energy analysis "should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation... In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project." Appendix F, of the CEQA Guidelines calls, in part, for discussion of:

II.A. Project Description may include the following items:

1. Energy consuming equipment and processes which will be used during construction, operation and/or removal of the project. If appropriate, this discussion should consider the energy intensiveness of materials and equipment required for the project.
2. Total energy requirements of the project by fuel type and end use.
3. Energy conservation equipment and design features.
4. Identification of energy supplies that would serve the project.
5. Total estimated daily vehicle trips to be generated by the project and the additional energy consumed per trip by mode.

C. Environmental Impacts may include:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives

Courts have rejected EIRs that have failed to analyze relevant considerations listed above. In *California Clean Energy Commission v. City of Woodland*

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("*CCEC*"),[139] the Third District Court of Appeal reviewed an EIR for a shopping center on undeveloped agricultural land. The Court found that the EIR was deficient insofar as it does not assess or consider mitigation for transportation energy impacts of the project, which would generate up to 40,051 new vehicle trips a day.[140] The Court explained that "Appendix F states that environmental impacts subject to the EIR process include '[t]he project's projected transportation energy use requirements and its overall use of efficient transportation alternatives,'"[141] concluding that the omission of this analysis violated CEQA. The Court rejected an argument that impacts would be less than significant because the project would include mitigation measures designed to reduce vehicle trips, reasoning "the City cannot say how much less transportation energy is needed for the project as approved because the issue has never been assessed in an EIR… CEQA EIR requirements are not satisfied by saying an environmental impact is something less than some previously unknown amount."[142] **B03-28 (cont'd)**

As in *CCEC*, this DEIR fails to discuss relevant considerations listed in Appendix F. The DEIR fails to analyze the energy intensiveness of materials and equipment required for the project.[143] This analysis is feasible because the DEIR's air quality study provides an estimated construction schedule, lists likely construction and operational equipment necessary for the Project, and estimates emissions from this equipment. **B03-29**

The DEIR also fails to analyze the total energy requirements of the Project by fuel type and end use, either for construction activities or operation.[144] **B03-30**

The DEIR's energy analysis fails to discuss energy conservation equipment and design features beyond stating that the Project would comply with building codes.[145] **B03-31**

The DEIR fails to estimate the energy consumed by vehicle trips generated by the Project.[146] This is a major omission because the Project's operations are estimated in the air quality study to generate a total of 16,513,738 trips per year **B03-32**

[139] (2014) 225 CA4th 173.
[140] *Id.* at 210.
[141] Citing Guidelines, Appendix F, Section II(C)(6).
[142] *CCEC, supra,* 225 CA4th 173 at 210.
[143] CEQA Guidelines, Appendix F, Section II(A)(1), (C)(1).
[144] CEQA Guidelines, Appendix F, Section II(A)(2).
[145] CEQA Guidelines, Appendix F, Section II(A)(3); DEIR, pg. 3.6-12.
[146] CEQA Guidelines, Appendix F, Section II(A)(5), (C)(6).

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(approximately 45,243 trips per day).[147] This is greater than the 40,051 trips in the *CCEC* EIR, demonstrating that this EIR also violates CEQA by omitting study of transportation energy requirements. **B03-32 (cont'd)**

The DEIR fails to estimate the effects of the project on local and regional energy supplies and on requirements for additional capacity.[148] The DEIR also fails to study the effects of the project on energy resources and peak and base period demands for electricity and other forms of energy.[149] These are major omissions given the size of the Project. **B03-33**

The DEIR fails to fully analyze "the degree to which the project complies with existing energy standards."[150] The DEIR states that the Project would comply with Title 24 standards, but fails to evaluate the feasibility of meeting voluntary standards described in Appendix A4, Residential Voluntary Measures, and Appendix A5, Nonresidential Voluntary Measures, of the California Green Building Standards Code. These standards are voluntary measures and are not uniformly required for all development projects, but nonetheless constitute "existing energy standards" applicable to the Project, which proposes both residential and nonresidential uses. **B03-34**

In sum, the DEIR's project description and impacts analysis is incomplete and fails to adequately inform decisionmakers and the public. The omitted analysis must be provided in a revised EIR. In addition to this informational defect, the lack of analysis renders the DEIR's conclusions unsupported by substantial evidence.

2. The DEIR's Conclusions Regarding Energy Impacts Are Unsupported by Substantial Evidence **B03-35**

The one-page analysis of the Project's energy impacts states that energy impacts would be less than significant because the Project would comply with State and local building codes.[151] Courts have held that simply stating that a Project would comply with building standards does not constitute substantial evidence that energy impacts would be less than significant.

[147] DEIR, Appendix A, PDF pg. 205-6 (summing trips/year of each land use proposed by the Project).
[148] CEQA Guidelines, Appendix F, Section II(C)(2).
[149] CEQA Guidelines, Appendix F, Section II(C)(3), (5).
[150] CEQA Guidelines, Appendix F, Section II (C)(4).
[151] DEIR, pg. 3.6-12.

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In the *CCEC* case,[152] the EIR concluded that, due to the proposed project's compliance with Title 24 guidelines and regulations, the Project would be expected to have a less-than-significant impact regarding the wasteful, inefficient, or unnecessary consumption of energy.[153] The Court of Appeal explained that compliance with local and state building codes do not address many aspects of a project's energy consumption: "[l]ike the Building Code, CALGreen does not address construction and operational energy impacts for a project intended to transform agricultural land into a regional commercial shopping center… Moreover, CALGreen does not address transportation energy impacts for a project such as Gateway II."[154] B03-35 (cont'd)

The Court distinguished the Court of Appeal's decision in *Tracy First v. City of Tracy* ("*Tracy First*"),[155] which rejected a challenge to an EIR arguing that "it is improper to rely on state building standards in determining whether an energy impact is significant."[156] The *CCEC* court explained that (1) *Tracy First* involved an EIR including 17 pages discussing energy issues and eight pages discussing energy impacts, (2) the plaintiffs in *Tracy First* made "no argument concerning what more the EIR should have done," and (3) the *CCEC* EIR failed to fully study the construction and operational energy impacts of the project.[157] "The failure to study the energy impacts resulting from a large part of the planned construction" thwarted "the statutory goals of the EIR process."[158]

Here, the DEIR has the same flaws as the EIR rejected in *CCEC*: the instant EIR claims, in a conclusory one-page discussion, that consistency with building codes would result in less than significant impacts, while failing to study major aspects of the Project's energy consumption and resultant impacts. And unlike the plaintiffs in *Tracy First*, this letter identifies omitted analysis that must be included in a revised EIR. The DEIR's energy analysis is thus unsupported by substantial evidence. B03-36

3. The DEIR Fails to Include Sufficient Investigation into Energy Conservation Measures B03-37

The DEIR fails to include sufficient investigation into energy conservation measures that might be available or appropriate for the Project. The DEIR

[152] *CCEC, supra,* 225 CA4th 173.
[153] *Id.* at 212.
[154] *Id.* at 211.
[155] (2009) 177 Cal.App.4th 912, 932.
[156] *CCEC, supra,* 177 Cal.App.4th at 212.
[157] *Id.*
[158] *Id.*

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concludes that operational energy impacts of the Project would be less than significant because the buildings would be designed and constructed in accordance with the State's Title 24 guidelines and regulations.[159] However, compliance with Title 24 regulations alone does not support a conclusion that energy impacts are less than significant, and the DEIR does not sufficiently consider energy conservation measures like solar facilities, use of alternate fuel sources, or passive energy efficiency measures to ensure the Project's energy consumption would not be wasteful, inefficient, or unnecessary. This lack of analysis violates CEQA.

B03-37 (cont'd)

CEQA requires an environmental document to discuss mitigation measures for significant environmental impacts, including "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."[160] The CEQA Guidelines require discussion of energy conservation measures when relevant, and provide examples in Appendix F:[161]

B03-38

1) Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
2) The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.
3) The potential for reducing peak energy demand.
4) Alternate fuels (particularly renewable ones) or energy systems.
5) Energy conservation which could result from recycling efforts.

Courts have rejected EIRs that fail to include adequate analysis investigation into energy conservation measures that might be available or appropriate for a project.[162] In *CCEC*,[163] the Court of Appeal rejected an EIR that failed to include discussion regarding the different renewable energy options that might be available or appropriate for the project. The Court held "the City's EIRs failed to comply with the requirements of Appendix F to the Guidelines by not discussing or analyzing renewable energy options."[164] The lead agency argued that compliance with the

[159] DEIR, pg. 3.6-12.
[160] Pub. Resources Code, § 21100(b)(3); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 930.
[161] CEQA Guidelines, Appendix F, Section II(D); *see* Section 15126.4(a)(1)(C) (stating "'Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.").
[162] *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 CA4th 256; *Spring Valley Lake Ass'n v. City of Victorville* (2016) 248 CA4th 91.
[163] *CCEC, supra,* 225 CA4th 173.
[164] *Id.* at 213.

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Building Code sufficed to address energy impact concerns for the project.[165] But the Court explained: **B03-38 (cont'd)**

> Although the Building Code addresses energy savings for components of a new commercial construction, it does not address many of the considerations required under Appendix F of the CEQA Guidelines… These considerations include whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope. Here, a requirement that Gateway II comply with the Building Code does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts during construction and operation of the project.[166]

The Supreme Court of California agreed with the *CCEC* court's decision in *League to Save Lake Tahoe Mtn. Area Preservation Found. v County of Placer*, holding that even projects that find a less-than-significant energy impact must "discuss whether any renewable energy features could be incorporated into the project."[167] In *Save Lake Tahoe*, the Court considered an EIR for a land use specific plan and rezoning to permit residential and commercial development and preserve forest land near Truckee and Lake Tahoe. The EIR did not consider whether it was feasible to power the project on 100 percent renewable electrical energy or some lesser percentage, nor evaluate strategies for reducing reliance on fossil fuels, increasing reliance on renewable resources, reducing peak loads, and reducing the impacts of relying on remote generation facilities. The lead agency reasoned that this analysis was not required because energy impacts would be less than significant. Citing CEQA Guidelines Section 15126.2, subdivision (b) and the decision in *CCEC*, the Court held that when an EIR analyzes the project's energy use to determine if it creates significant effects, it should discuss whether any renewable energy features could be incorporated into the project. The Court found that the EIR violated CEQA for not discussing whether the project could increase its reliance on renewable energy sources to meet its energy demand.

Here, the DEIR's energy analysis lacks basic analysis of energy consumption measures in violation of CEQA Guidelines Appendix F. The discussion states that "the PVSP's objectives include sustainable design practices, including but not limited energy-conserving buildings, low-water use landscaping, and community **B03-39**

[165] *Id.* at 210, 211.
[166] *CECC* (2014) 225 CA4th 173, 213.
[167] (2022) 75 CA5th 63, 167–68.

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design elements that promote walking and biking over driving."[168] The discussion also states that the PVSP outlines "renewable energy or energy efficiency measures… such as the requirement of solar energy systems on all future residential and commercial buildings."[169] This analysis is vague and fails to study considerations identified in Appendix F, listed above. Further, there is no requirement in the PVSP regarding solar energy systems, contrary to the claim in the DEIR.

B03-39 (cont'd)

There are numerous energy consumption measures applicable to this Project that must be analyzed in a revised EIR. To begin with, the DEIR fails to analyze the feasibility of requiring future development to meet CALGreen voluntary standards. Appendices A4 and A5 describe two tiers of voluntary measures – Tier 1 and Tier 2. Tier 2 standards would result in greater reductions in energy consumption. Under CalGreen Section A4.106.8.2.1, Tier 2 standards require 55% of parking spaces to be equipped with Level 2 EV charging receptacles, or a combination of 20% Level 2 EV chargers and 50% of required chargers be equipped with J1772 connectors. Section A4.106.5.1 calls for increased solar reflectance. Sections A4.203.1.2.1 through A4.203.1.2.8 call for roof deck insulation, high-performance walls, compact hot water distribution systems, drain water heat recovery, heat pump water heater demand management, and other measures. The City must revise the EIR to evaluate the feasibility of these measures and others described in CalGreen Appendix A4.

B03-40

The nonresidential voluntary standards in Appendix A5 include consumption measures applicable to this project. CALGreen Section A5.106.5.1.2 calls for 50% spaces to be reserved for clean air vehicles. CALGreen Section A5.106.5.3 calls for an increased number of EV capable spaces, depending on the total number of spaces.[170] Tier 2 standards require large projects with 201 or more parking spaces to provide 45% EV capable spaces.[171] CALGreen Section A5.203.1.2 sets energy budgets that are less than permitted by the mandatory Title 24 energy standards.[172] CALGreen Section A5.303.2.3 calls for reductions in water consumption by requiring plumbing fixtures and fixture fittings that would reduce the use of potable water by 20% in the case of Tier 2 standards.[173] The DEIR's failure to discuss consistency with CALGreen's voluntary standards is thus a failure to analyze consistency with existing energy standards.

[168] DEIR, pg. 3.6-12.
[169] *Id.* at 3.6-13.
[170] CALGreen, Table A5.106.5.3.1 Tier 1
[171] Table A5.106.5.3.1, A5.106.5.3.2.
[172] CALGreen Sections A5.203.1.2.1, A5.203.1.2.2.
[173] CALGreen Sections A5.303.2.3.1, A5.303.2.3.2

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The DEIR fails to fully analyze the feasibility of onsite solar facilities, such as rooftop, parking lot, or ground-level solar photovoltaics to offset energy consumption. The air study states that the Project would comply with the City's Zero Net Energy Ordinance, which mandates installation of a solar system equivalent to two watts per square foot for each new home built, or payment of in-lieu fees.[174] This does not address whether additional solar facilities would be feasible or effective at reducing emissions, nor address the non-residential components of the Project. The DEIR's analysis must be revised to address the energy requirements of the Project and study the degree to which onsite solar facilities could offset consumption.[175] **B03-41**

The DEIR states that the Plan area would obtain electricity from Lancaster Energy/Lancaster Choice Energy, which supplies power to homes and businesses with an opportunity to opt up to 100% renewable energy.[176] But the DEIR fails to evaluate the feasibility of requiring projects to opt in to the 100% renewable program and makes no commitment to the program. **B03-42**

In sum, the DEIR's energy analysis fails to analyze measures to reduce the wasteful, inefficient, and unnecessary consumption of energy, and fails to meaningfully address Appendix F's considerations of whether developments authorized under the Specific Plan should be constructed at all, how large they should be, where they should be located, whether they should incorporate renewable energy resources, or anything else external to the buildings' envelope.[177] This analysis must be provided in a revised EIR. **B03-43**

F. The DEIR Fails to Adequately Analyze and Mitigate Significant Noise Impacts

1. The DEIR Fails to Adequately Establish the Environmental Setting for Noise Impacts

The DEIR fails to establish accurate baseline noise levels. Mr. Bensing identifies several flaws in the City's approach. First, the DEIR's noise analysis relies on seven short-term measurements (ranging from 10-20 minutes) conducted on a single weekday during the middle of the day.[178] Mr. Bensing observes that **B03-44**

[174] DEIR, Appendix A, pg. 24.
[175] CEQA Guidelines, Appendix F, Section II(D).
[176] DEIR, pg. 3.13-5; 3.13-18.
[177] *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 CA4th 256, 264.
[178] Bensing Comments, pg. 2.

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there is no discussion of how representative the noise results are at that time compared to a morning or evening period.[179] Second, the DEIR fails to measure nighttime conditions. Third, the DEIR fails to validate its traffic noise model. **B03-44 (cont'd)**

CEQA requires that a lead agency include a description of the physical environmental conditions, or "baseline," in the vicinity of the project as they exist at the time environmental review commences.[180] As many courts have held, the impacts of a project must be measured against the "real conditions on the ground."[181] The description of the environmental setting constitutes the "baseline" physical conditions against which the lead agency assesses the significance of a project's impacts.[182] **B03-45**

The DEIR's short-term, 10 to 20-minute noise measurements are inadequate to establish baseline conditions because environmental noise can vary widely throughout the day (+/- 10 dBA or more for areas with intermittent local traffic).[183] The DEIR's assessment of baseline noise levels is not supported by substantial evidence because the DEIR fails to provide evidence of how typical these measurements were for the rest of the daytime and nighttime conditions. Further, the DEIR's reliance on short-term measurements does not meet the standards of the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual ("FTA Manual").[184] The FTA Manual recommends a minimum of three one-hour Leq noise measurements to estimate the 24-hour Ldn/CNEL.[185]

The DEIR fails to measure nighttime conditions, assuming that "[n]ighttime noise levels are typically 5-10 dBA lower than daytime noise levels."[186] Mr. Bensing observes that this assumption is not supported by evidence in the record, and recommends that the Project must conduct properly documented ambient measurements near sensitive receptors that fully capture the current baseline conditions during full daytime and nighttime hours. **B03-46**

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[179] Id.
[180] 14 CCR § 15125(a); *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321 ("*CBE v. SCAQMD*").
[181] *CBE v. SCAQMD*, 48 Cal. 4th at 321; *Save Our Peninsula Com. v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 121-22; *City of Carmel-by-the-Sea v. Bd. of Supervisors of Monterey County* (1986) 183 Cal.App.3d 229, 246.
[182] 14 CCR § 15125(a); *CBE v. SCAQMD*, 48 Cal. 4th at 321.
[183] Bensing Comments, pg. 2.
[184] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf
[185] *Id.*
[186] DEIR, Appendix D, pg. 9.

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The DEIR's description of existing traffic noise is also not supported by substantial evidence. The DEIR characterizes absolute noise levels from existing traffic based on an outdated traffic model – FHWA Noise Prediction Model (FHWA-RD-77-108).[187] Mr. Bensing explains that state of the art traffic modeling uses the Traffic Noise Model ("TNM") with the most current revision 3.2.[188] The DEIR provides no evidence to tie its absolute values to existing measured conditions. Mr. Bensing observes that the DEIR fails to include validation measurements to verify that the model is accurate. Caltrans acknowledges that a validated TNM model may fall within +/- 3 dBA of the measured result, which undermines attempts to use modeled-only results for absolute noise characterization of the ambient condition.[189] B03-47

In sum, the DEIR fails to provide a description, supported by substantial evidence, of the "real conditions on the ground" related to existing noise levels.[190]

2. The DEIR's Construction Noise Threshold is Not Supported by Substantial Evidence B03-48

The DEIR provides that construction noise impacts would be significant if they exceed 15 dBA above the exterior noise objectives outlined in the City's Noise Compatible Land Use Objectives.[191] The exterior noise objective for residential land uses is 65 dBA, so a significant impact would be recognized at 80 dBA.[192] This approach ignores that existing ambient noise levels at some sensitive receptors are far quieter than 65 dBA (ranging from 44.3 dBA Leq to approximately 75.4 dBA Leq).[193] The noise level at receptor ST2, a residential community, was measured at 49.3. The Project would generate noise impacts 33 dB greater than the existing noise measured at ST2.[194] The DEIR's failure to assess the significance of construction noise in relation to existing ambient noise levels fails to meet CEQA's requirements.

Appendix G of the CEQA Guidelines provides that the Project would cause a significant noise impact if it would result in "[g]eneration of a *substantial temporary or permanent increase in ambient noise* levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable

[187] Bensing Comments, pg. 4.
[188] *Id.*
[189] *Id.*
[190] *Save Our Peninsula Com. v. Monterey Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 121-22; *City of Carmel-by-the Sea v. Bd. of Supervisors* (1986) 183 Cal.App.3d 229, 246.
[191] DEIR, pg. 3.11-16.
[192] *Id.*
[193] DEIR, Appendix D, pg. 9.
[194] Bensing Comments, pg. 3.

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standards of other agencies." Accordingly, courts have held that "the lead agency should consider both the increase in noise level and the absolute noise level associated with a project."[195]

B03-48 (cont'd)

The courts have held that reliance on a maximum noise level as the sole threshold of significance for noise impacts violates CEQA because it fails to consider whether the magnitude of changes in noise levels is significant.[196] In *Keep our Mountains Quiet v. County of Santa Clara*,[197] neighbors of a wedding venue sued over the County of Santa Clara's failure to prepare an EIR for a proposed project to allow use permits for wedding and other party events at a residential property abutting an open space preserve. Neighbors and their noise expert contended that previous events at the facility had caused significant noise impacts that reverberated in neighbors' homes and disrupted the use and enjoyment of their property.[198] Similar to the DEIR's construction noise threshold in this case, the County's EIR relied on the noise standards set forth in its noise ordinance as its thresholds for significant noise exposure from the project, deeming any increase to be insignificant so long as the absolute noise level did not exceed those standards.[199] The Court examined a long line of CEQA cases which have uniformly held that conformity with land use regulations is not conclusive of whether or not a project has significant noise impacts[200] in holding that the County's reliance on the project's compliance with noise regulations did not constitute substantial evidence supporting the County's finding of no significant impacts.[201]

In *King and Gardiner Farms, LLC v. County of Kern*,[202] the Court of Appeal cited *Keep our Mountains Quiet* and decisions cited therein when it rejected the use of a single "absolute noise level" threshold of significance (construction and

[195] *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 733; see *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 894 (citing *Keep Our Mountains Quiet*).
[196] *King & Gardiner Farms, LLC,* 45 Cal.App.5th at 865.
[197] *Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714.
[198] *Id*. at 724.
[199] *Id.* at 732.
[200] *Id., citing Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 881–882; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project's effects can be significant even if "they are not greater than those deemed acceptable in a general plan"); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, ("CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan").
[201] *Id*. at 732-734; see also *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 893, as modified on denial of rehearing (Mar. 20, 2020).
[202] *King and Gardiner Farms, LLC, supra,* 45 Cal.App.5th 814.

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operational noise impacts were only deemed significant if they exceeded 65 dBA CNEL) on the grounds that the sole use of such a threshold fails to consider the magnitude or severity of increases in noise levels attributable to the project in different environments. The Court explained the lead agency failed to "refer to evidence showing why the magnitude of an increase was irrelevant in determining the significance of a change in noise."[203] **B03-48 (cont'd)**

Here, the DEIR's construction noise threshold violates CEQA because it fails to consider the magnitude of increases in noise over ambient levels. But, as in *King and Gardiner Farms*, the DEIR fails to refer to substantial evidence showing why the magnitude of the increase over ambient levels is irrelevant. Per *Keep our Mountains Quiet*, conformity with land use regulations is not conclusive of whether or not a project has significant noise impacts.

3. The DEIR's Operational Noise Threshold Is Not Supported By Substantial Evidence

B03-49

The DEIR states that, "a substantial increase in ambient noise levels associated with long-term operational activities would be defined as an increase of 3 dBA, or greater."[204] However, the DEIR's analysis fails to analyze the Project's impacts in reference to ambient noise levels. Instead, the DEIR analyzes whether impacts would exceed the City's minimum exterior residential noise standard of 65 dBA and interior noise standards of 45 dBA.[205] This analysis violates CEQA for the same reasons as discussed in the preceding section.

4. The DEIR Underestimates Significant Construction Noise and Vibration Impacts

B03-50

The DEIR's noise and vibration impacts analysis contains flaws that render its findings unsupported by substantial evidence.

Mr. Bensing explains that the DEIR underestimates construction noise because it fails to consider the cumulative effect from simultaneous equipment operation.[206] The DEIR finds that noise levels associated with the single loudest piece of construction equipment could reach up to 82 dBA Leq,1-hour at 50 feet.[207] Conversely, thee total noise generated from operation of the two loudest pieces of

[203] *Id.* at 894.
[204] DEIR, pg. 3.11-15, 16.
[205] *See* DEIR, pg. 3.11-19.
[206] Bensing Comments, pg. 3.
[207] DEIR, Appendix D, pg. 41.

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equipment in any given hour would result in 85 dBA Leq,1-hour at 50 feet, an increase of 36 dB above the existing noise measured at ST2.[208] Mr. Bensing also demonstrates that this impact would also exceed the City's 80 dBA threshold.[209] The DEIR thus fails to disclose the full magnitude of the Project's impacts. The DEIR must be revised to analyze and mitigate the combined effects of multiple pieces of equipment operating simultaneously. **B03-50 (cont'd)**

Mr. Bensing also demonstrates that the DEIR underestimates construction noise and vibration impacts by failing to include impacts from pile driving. The DEIR claims that pile driving is not anticipated to be required, but fails to present substantial evidence supporting this assumption. Mr. Bensing explains that certain types of buildings proposed by the Project may require pile driving.[210] Thus, the DEIR should consider the impacts from pile driving. **B03-51**

The DEIR must be revised and recirculated to fully disclose the Project's noise and vibration impacts.

5. The DEIR Underestimates Noise from Project Operations **B03-52**

The DEIR underestimates operational noise from air conditioning and mechanical noise because the DEIR fails to consider combined noise from multiple units. The DEIR uses a reference level of 65 dBA Leq at 3 feet for the residential-use air conditioners, and a reference level of 88 dBA Leq at 3 feet for commercial units.[211] Mr. Bensing explains that this erroneously implies that sensitive receptors will be exposed to a single unit from the entire Project, which includes up to 3,462 residential units and 750,000+ square feet of commercial development.[212] The DEIR must be revised to disclose the combined impacts of the development proposed by the Project.

6. The DEIR Fails to Mitigate Significant Construction Noise Impacts **B03-53**

The DEIR calculates that the Project's construction would generate noise levels in excess of its 80 dBA significance threshold.[213] The DEIR claims that impacts would be reduced to a less than significant level through imposition of MM-

[208] *Id.*
[209] *Id.*
[210] Bensing Comments, pg. 5.
[211] DEIR, pg. 3.11-19.
[212] Bensing Comments, pg. 3.
[213] DEIR, pg. 3.11-18.

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NOI-1, which lists measures to reduce construction noise.[214] However, the noise reductions the DEIR attributes to MM-NOI-1 are not supported by substantial evidence, and impacts remain potentially significant. **B03-53 (cont'd)**

Mr. Bensing first explains that, due to the DEIR's inadequate assessment of baseline conditions, the City lacks substantial evidence to conclude that any reductions in noise from MM-NOI-1 would fully mitigate construction noise impacts.[215]

Second, the DEIR assumes that equipping all construction equipment with mufflers would result in a 10 dB reduction.[216] Mr. Bensing explains that the noise reference levels for construction equipment already assumes that mufflers would be equipped, as virtually all construction equipment was fit with mufflers by the 1990s.[217] The DEIR lacks substantial evidence to find that impacts would be reduced below the City's threshold. **B03-54**

To adequately mitigate construction noise, the DEIR must analyze the effectiveness and feasibility of requiring noise barriers between construction activities and sensitive receptors. The General Plan includes policies requiring use of noise barriers "whenever feasible" to reduce significant noise impacts.[218]

7. The DEIR Fails to Mitigate Significant Vibration Impacts **B03-55**

The DEIR acknowledges that construction of the PVSP could result in increased levels of annoyance to occupants of nearby structures.[219] Specifically, "predicted vibration levels at the nearest occupied structures located within 13 feet of onsite construction activities could potentially exceed the commonly applied criteria for the human annoyance of 0.2 in/sec ppv."[220] The DEIR claims that this impact would be fully mitigated through implementation of MM-NOI-1, which

[214] *Id.*
[215] Bensing Comments, pg. 2.
[216] *Id.*; DEIR, Appendix D, pg. 41.
[217] *Id.*
[218] DEIR, Appendix D, pg. 14 ("Action 4.3.3(b): Whenever feasible, require the use of noise barriers (walls, berms, or a combination thereof) to reduce significant noise impacts. • Noise barriers must be massive enough to prevent significant noise transmission and high enough to shield the receiver from the noise source. • The barrier must be carefully constructed so that there are no cracks or openings. • Require landscaping treatment to be provided in conjunction with noise barriers to provide visual relief and to reduce aesthetic impacts.").
[219] DEIR, pg. 3.11-27.
[220] DEIR, pg. 3.11-26, 27.

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would require construction equipment and material staging areas to be located at the furthest distance possible from nearby residential land uses.[221]

B03-55 (cont'd)

The City lacks substantial evidence to find that MM-NOI-1 would fully mitigate impacts because it does not actually preclude construction activities within 13 feet of sensitive land uses.[222] Mr. Bensing explains that unless the DEIR can demonstrate that highest vibration-generating construction equipment will not be required within 13 feet of all nearby sensitive land uses, vibration impacts remain potentially significant.[223]

B03-56

8. The DEIR Fails to Mitigate Significant Operational Noise Impacts

The DEIR finds that the Project's operational, non-transportation noise impacts would be significant prior to mitigation.[224] The DEIR claims that with the implementation of MM-NOI-2, impacts would be reduced to a less than significant level.[225] MM-NOI-2 of the DEIR requires that an acoustical analysis be prepared for future commercial land use noise sources.[226] The DEIR claims that noise-reduction measures can reduce operational noise by 5 dB.[227]

The DEIR's conclusion that operational noise impacts would be reduced to a less than significant level is not supported by substantial evidence. Even noise-reduction measures can reduce operational noise by 5 dB, there is inadequate documentation in the DEIR that this would be sufficient to reduce impacts to a less than significant level. Mr. Bensing notes that a much greater reduction in noise would be required to reduce nighttime impacts to a less than significant level.[228]

B03-57

The DEIR must be revised and recirculated to analyze the feasibility of fully mitigating the Project's operational noise impacts, and to adopt all feasible mitigation. To begin with, the DEIR's MM-NOI-2 can be revised to include proposed language from the noise study. The noise study's proposed MM-NOI-2 provides:

> Air conditioning units for residential and non-residential land uses shall be located in areas shielded from direct line-of-sight of nearby noise-sensitive

[221] DEIR, pg. 3.11-27.
[222] DEIR, pg. 3.11-18.
[223] Bensing Comments, pg. 4.
[224] DEIR, pg. 3.11-20 – 3.11-22.
[225] DEIR, pg. 3.11-22.
[226] *Id.*
[227] *Id.*
[228] Bensing Comments, pg. 4.

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land uses. To the extent allowed per building code requirements, commercial-use air conditioning units should be located on building rooftop areas and shielded by a rooftop parapet. Rooftop parapets should be constructed to a minimum height of approximately 3 feet.[229]

B03-57 (cont'd)

G. The Project Fails to Provide Affordable Housing, In Conflict with General Plan Policies

B03-58

Under the CEQA Guidelines, an environmental document must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans."[230] The DEIR fails to analyze inconsistencies with policies in the City's 2021-2029 Housing Element that call for provision of affordable housing:

> Policy H-1.1 Provide for adequate sites that will enable the production of 9,023 housing units through October 2029 to meet the demands of present and future residents, including an adequate number and range of new dwelling types affordable to extremely low-, very low-, low-, moderate-, and above moderate- income households.
>
> Policy H-1.2 Encourage a mix of housing types are provided, including single- and multi-family housing within a variety of price ranges to provide a range of housing options for Lancaster residents.
>
> Policy H-1.6 Encourage affordable mixed-use and multi-family residential housing developments on mixed-use zoned sites.[231]

This Project is inconsistent with the policies above because although the Project proposes 3,462 residential units, none of the residential units are conditioned to be affordable units.[232] The Project is inconsistent with Policy H-1.1 because the Project proposes a zone change without providing affordable housing. Policy H-1.1 calls for provision of adequate sites to meet affordable housing demands, not just market-rate housing demands. Policy H-1.2 encourages a mix of housing types, but this Project would allow for exclusively market-rate housing. Policy H-1.6 encourages affordable mixed-use and multi-family residential housing

[229] DEIR, Appendix D, pg. 22.
[230] 14 Cal Code Regs §15125(d).
[231] Lancaster General Plan Housing Element, pg. H-16, available at https://www.hcd.ca.gov/housing-elements/docs/lancaster-6th-adopted062422.pdf.
[232] DEIR, pg. 3.12-5. For the same reason, the Project is also inconsistent with SCAG's Regional Comprehensive Plan objective to foster affordable housing. DEIR, p. 3.14-9.

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

developments on mixed-use-zoned sites, but this Project proposes development without affordable units on a mixed-use-zoned site. These Housing Element inconsistencies must be analyzed in a revised EIR. **B03-58 (cont'd)**

II. CONCLUSION

For the reasons discussed above, the DEIR for the Project is inadequate under CEQA. It must be revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. These revisions will necessarily require that the DEIR be recirculated for additional public review. Until the DEIR has been revised and recirculated, as described herein, the City may not lawfully approve the Project.

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

Sincerely,



Aidan P. Marshall

Attachments
APM:acp

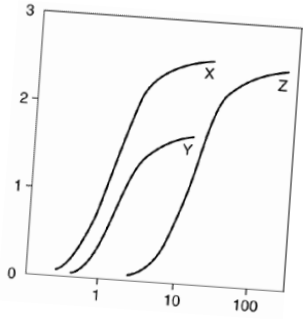
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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

EXHIBIT A

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)



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November 10, 2025

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Aidan Marshall

Subject: Comments On Parkway Village Specific Plan

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed the materials related to the City of Lancaster's (the City) Draft Environmental Impact Report (DEIR) for the above referenced project.

Clark's review does not constitute validation or endorsement of the conclusions or content presented in the DEIR. Any lack of comment on specific items should not be interpreted as acceptance or approval of those items.

According to project summary listed in CEQANet, "The City of Lancaster is proposing to adopt the Parkway Village Specific Plan (*sic*, PSVP), which would provide direction for development within the plan area over a 20-year period. The Specific Plan is proposed to allow for a site-specific land use plan, development standards, design guidelines, infrastructure systems, and implementation strategies on which subsequent development activities would be implemented. This plan provides for a mixed-use community with a variety of commercial, residential, medical and open space/public uses. The project site would be divided into a multiple planning areas dedicated to different types of uses. These include 43 residential, commercial and mixed use areas; 13 park areas, 1 school area, the Sierra Highway Transit Corridor, the Kaiser Permanente

1

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

facility/expansion areas, and the Los Angeles County Waterworks facility. The maximum development allowed by the Parkway Village Specific Plan includes the uses listed below. Additionally, the existing uses within the plan area, including St. Paul's Episcopal Church and the commercial/residential uses along Sierra Highway, would remain.

The Parkway Village Specific Plan[1,2] includes the following:

- 4,246 residential units according to the Parkway Village Specific Plan[3] and 3,462 residential units according to the EIR. A transit center may also be located within the boundaries of Planning Areas 7 and 8.
- 130 hotel rooms in one or more hotels
- 150,000 square feet of commercial within the Town Center (Planning Areas 1-6);
- 415,000 square feet of office, medical office, assisted/supportive living, and uses support of office including restaurants, financial institutions, professional services, etc., in Planning Areas 15, 42, and 43.
- 185,000 square feet of commercial uses including indoor technical schools, fitness center and gymnasiums in Planning Areas 25 and 26.
- 8.7 acres for school uses (Planning Area F)
- 27.8 acres for parks of varying sizes
- 200 bed hospital and up to 500,000 square feet of medical-related uses including skilled nursing, and assisted living supporting Kaiser's needs.
- 10.2 acre aquatic center

The Project Site is located in the Antelope Valley Air Quality Management District (AV-AQMD). According to the EIR[4], "construction emissions associated with the Project include VOC,

[1] T&B Planning. 2025. Parkway Specific Plan Public Review Drat. Prepared for City of Lancaster. Prepared by T&B Planning. Dated September 2025. Pg 2

[2] Aspen. 2025. Environmental Impact Report Parkway Village Specific Plan. Prepared for the City of Lancaster Planning Department. Prepared by Aspen Environmental Group. Dated September 2025. pg

[3] T&B Planning. 2025. Parkway Specific Plan Public Review Drat. Prepared for City of Lancaster. Prepared by T&B Planning. Dated September 2025. Pg 2

[4] Aspen. 2025. Environmental Impact Report Parkway Village Specific Plan. Prepared for the City of Lancaster Planning Department. Prepared by Aspen Environmental Group. Dated September 2025. Pg 12

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NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$. These emissions originate or are created primarily by mobile sources during the following phases of construction:

- Site Preparation (e.g., dozers, tractors, loaders, backhoes)
- Grading (e.g., excavators, graders, scrapers)
- Building Construction (e.g., cranes, forklifts, generators sets, welders)
- Architectural Coating (e.g., painting)
- Paving (e.g., pavers, rollers)
- Construction worker commuting (e.g., vehicle miles traveled)

Construction activities are expected to begin in 2030, and it is anticipated that the complete build out would occur over a 20-year period. Construction is expected to occur in five phases, excluding demolition, as the existing site is clear vacant land. Individual projects will begin and complete construction throughout the 20-year period, with no current schedule. For that reason, construction emissions were modelled to occur at an even rate over the entire 20 years."

Table AQ-4. Estimated Parkway Village Construction Schedule

Phase	Name	Start Date	End Date	Days/Week	Total Days
1	Site Preparation	1/1/2030	7/29/2030	5	150
2	Grading	7/30/2030	6/9/2031	5	225
3	Building Construction	6/10/2031	12/14/2037	5	1700
4	Paving	12/15/2037	6/20/2044	5	1700
5	Architectural	6/21/2044	12/26/2050	5	1700

Figure 1: Estimated Construction Schedule

Clark's review of the DEIR and the facts presented in this comment letter lead me to reasonably conclude that the Project would result in significant, unmitigated impacts if allowed to proceed as envisioned in the DEIR. A revised DEIR is necessary to address these impacts fully and transparently.

Specific Comments B03-59

1. The DEIR Identifies A Significant And Unavoidable Air Quality Impact From The Operational Phase Of The Project But Does Not Require All Feasible Mitigation Measures

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-59 (cont'd)

Section 3.3 of the DEIR states that there will be a cumulatively considerable net increase in criteria pollutant(s) for which the PVSP region is in non-attainment under federal and or state air quality standards (Impact AQ-2) as well as exposing sensitive receptors to substantial pollutant concentrations (Impact AQ-3). Based on the analysis presented in Table 3.3-7 of the DEIR (page 3.3-9) the exceedances come from releases of volatile organic compounds (VOCs) and carbon monoxide (CO). VOCs are primarily emitted from area sources and mobile (traffic related) sources. CO is primarily associated with emissions from mobile sources.

Table 3.3-7. Parkway Village Specific Plan: Operation, Annual Emissions with Mitigation

	Maximum Annual Emissions (tons/year)					
Source Type	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile	16.54	11.69	107.45	0.29	13.74	3.65
Area	16.88	0.00	0.00	0.00	0.00	0.00
Energy	0.25	2.31	1.94	0.01	0.18	0.18
Maximum Total Emissions	33.67	14.00	109.39	0.31	13.91	3.82
AVAQMD Yearly Thresholds (Operation)	25	25	100	25	15	12
Exceedance (Y/N)	Y	N	Y	N	N	N

Source: Appendix A, AQ/GHG Calculations.

Figure 2: Mitigated Operational Emissions

The majority of both of those pollutants come from mobile sources associated with the Project. The DEIR offers two mitigation measures, MM AQ-1 (Operational Area Source Emission Reduction Plan) and MM AQ-2 (Control On-Site Off-Road Equipment Emissions) to reduce the overall impacts of AQ-2 and AQ-3. These measures fail to fully mitigate the significant emissions of VOCs and CO. As shown in Tables 3.3-6 and 3.3-7, these measures are claimed to reduce VOCs by 5.82 tons per year and CO by 33.49 tons per year. After these reductions, VOCs exceed the 25 ton per year threshold by 8.67 tons per year, and CO exceeds the 100 ton per year threshold by 9.39 tons per year.

To further reduce VOC emissions from the area sources, the City should implement additional measures such as requiring the use of low-VOC products in the PSVP area and properly storing chemicals. While use of low-VOC coatings does not reduce mobile-source VOC emissions, it would further reduce the Project's overall VOC emissions, thus reducing the severity of the impact. Mitigation measures to reduce volatile organic compounds (VOCs) from mobile sources could include implementing strategies such as those described in more detail below, such as improving infrastructure

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

and incentives for electric vehicles.

B03-59 (cont'd)

Mitigation measures that would further reduce carbon monoxide (CO) emissions from the Project's mobile sources may include implementing strategies such as those described below ..

Specific mitigation measures that the City should consider to further decrease VOCs and CO in the PSVP area would include:

- Use of Super-Compliant Low-VOC Paint During Construction. During construction, the Project shall use super-compliant low volatile organic compounds (VOC) paint (less than 10 grams per liter VOC) for all interior and exterior paint applications for residential and non-residential land uses.
- Low-VOC Cleaning Supplies and Paint Educational Program. Prior to the occupancy of any on-site development, the applicant or its designee shall provide evidence to the City of Lancaster that the applicant/phase developer has developed a Green Cleaning Product and Paint education program to be made available at rental and purchasing offices and/or on websites. The educational program shall include a flyer (hardcopy and/or digital) that includes, at a minimum, an explanation of what volatile organic compounds (VOCs) are, how VOCs affect us, where to find low-VOC alternatives for cleaning supplies and paint, and additional resources for learning more.
- Use Low-VOC Cleaning Supplies and Paint for Applicant and Homeowners Association Operated Spaces. Prior to the issuance of building permits, the applicant or its designee shall provide evidence to the City of Lancaster that for applicant (or its designee) and homeowners association operated spaces that provisions are in place to ensure only zero- or low-volatile organic compound (VOC) cleaning supplies and super compliant-VOC paints (less than 10 grams per liter VOC) are used during Project operation.
- Use of Zero-Emission Landscape Equipment for Applicant-Operated and Homeowners Association Land. Only zero-emission landscaping equipment will be used during project operation on land controlled by the applicant (or its designee) or a homeowners association. Gasoline-fueled landscaping equipment will be prohibited.
- Landscape Maintenance Equipment Emission Reduction. The Project Applicant shall implement the following landscape maintenance equipment reduction measures:[5]

[5] SEIR for the Aquabella Specific Plan Amendment Project, SCH No. 2023100145, pg. 1A-29.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-59 (cont'd)

- Outdoor Electrical Outlets. Prior to the issuance of building permits, the Project Applicant or its designee shall provide evidence to the City of Lancaster that the design plans include electrical outlets on the exterior of the structure to facilitate use of electrical lawn and garden equipment.
- Encourage Utilization of Existing Yard Equipment Exchange and Rebate Programs. The applicant (of its designee) or Project's future homeowners association shall educate future residents about the South Coast Air Quality Management District (SCAQMD) Electric Lawn Mower Rebate Program and the Commercial Electric Lawn and Garden Equipment Exchange Program. When conventional gasoline-powered yard equipment (e.g., lawn mowers, leaf blowers and vacuums, exchanged for electric and rechargeable battery-powered yard equipment, direct greenhouse gas (GHG) emissions from fossil-fuel combustion are displaced by indirect GHG emissions associated with the generation of electricity used to power the equipment.

- Electric Vehicle Charging Infrastructure. For the commercial portion of the Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for the future installation of electric vehicle (EV) charging stations (including for trucks) on the site. The Project Applicant shall provide building design plans demonstrating this to the City of Lancaster for their review and approval prior to issuance of a building permit. Conduit shall be installed from the electrical room to parking spaces in a logical location(s) on the site determined by the Project Applicant during construction document plan check, for the purpose of accommodating the future installation of EV vehicle charging stations at such time this technology becomes commercially available and the buildings are being served by trucks with electric powered engines. For the residential portion of the Project, the residences' electrical panel shall be sufficiently sized to hold additional panels that may be needed to supply power for the future installation of electric vehicle (EV) charging stations on the site.
- Transportation Demand Management (TDM) Program. Prior to issuance of occupancy permits for the commercial portion of the Project, the Project Applicant/Developer shall prepare and submit a Transportation Demand Management (TDM) program detailing strategies that would reduce the use of single occupant vehicles by employees by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. The TDM Program shall be subject to review

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B03-59 (cont'd)

and approval by the City of Lancaster. The TDM shall include, but is not limited to the following:

- Provide a transportation information center and on-site TDM coordinator to educate employers, employees, and visitors of surrounding transportation options.
- Promote bicycling and walking through design features such as showers for employees, self-service bicycle repair area, etc. around the Project site.
- Provide secure bicycle storage space equivalent to two percent of the automobile parking spaces provided.
- Provide on-site car share amenities for employees who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day.
- Promote and support carpool/vanpool/rideshare use through parking incentives and administrative support, such as ridematching service.
- Incorporate incentives for using alternative travel modes, such as preferential load/unload areas or convenient designated parking spaces for carpool/vanpool users.
- Provide meal options on-site or shuttles between the facility and nearby meal destinations.
- Each building shall provide preferred parking for electric, low emitting and fuel-efficient vehicles equivalent to at least twenty-five percent of the required number of parking spaces.

- Electric Vehicle Charging Infrastructure. The Project Applicant/Developer or designee shall provide electric vehicle (EV) charging infrastructure that meets or exceeds 2022 California Green Building Standards Code Tier 2 standards to encourage use of EVs.

These simple mitigation measures should be included in a revised DEIR for the Project to ensure that the community is protected from the adverse impacts from exposure to the criteria pollutants emitted from the operational phase of the Project.

B03-60

2. The DEIR Incorrectly Claims That Mitigation Measures Meant To Comply With Rule 403 Will Be Sufficient To Prevent Exposure To Valley Fever Cocci.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-60 (cont'd)

Mitigation Measure AQ-3 (Valley Fever Awareness and Prevention) requires that the project operator shall provide evidence to the Community Development Director that the project operator and/or construction manager has developed a "Valley Fever Training Handout", training, and schedule of sessions for education to be provided to all construction personnel. All evidence of the training session materials, handout(s) and schedule shall be submitted to the Community Development Director within 24 hours of the first training session. Additionally, the project operator also shall consult with the Los Angeles County Public Health to develop a Valley Fever Dust Management Plan that addresses the potential presence of the Coccidioides spore and mitigates for the potential for Coccidioidomycosis (Valley Fever).

But given the proximity of the Project Site to nearby residential receptors to the northwest and southeast of the Site, it is clear that residential receptors, as well as workers, at the project site could be exposed to Valley Fever (*Coccidiodes imimitis)* from fugitive dust generated during construction. According to the County of Los Angeles' Department of Public Health, the Project Site is located in Service Planning Area 1 of the County. In 2022, the County reported 309 cases of Valley Fever in SPA 1. This rate is the second highest of all the 8 SPAs.

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-60 (cont'd)

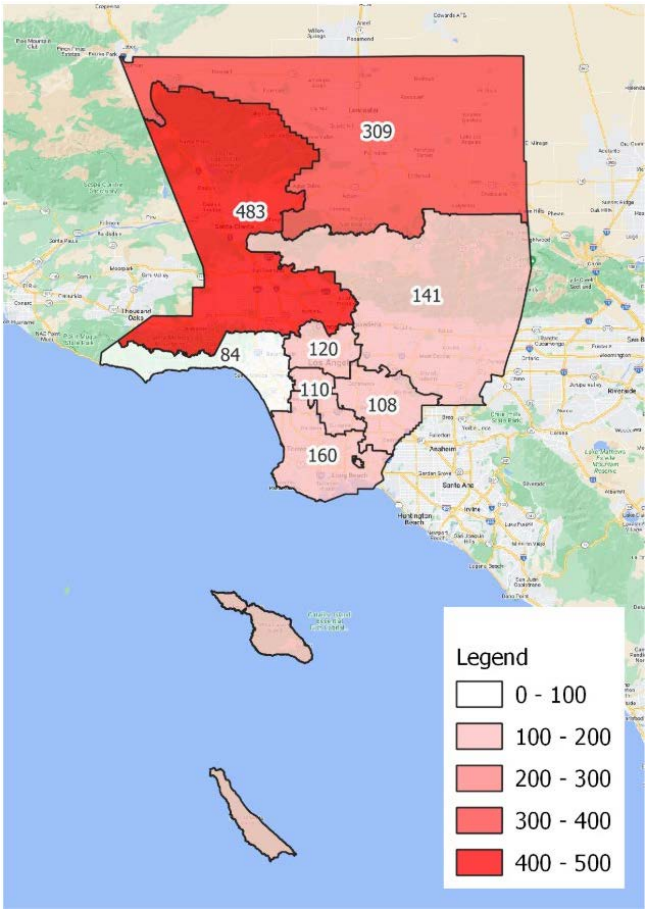


Figure 3: Valley Fever Cases Reported By County For SPAs

Even if all mitigation measures outlined in the DEIR's Valley Fever plan were incorporated, they would still allow for a percentage of the dust that could be generated to be migrate offsite. Conventional dust control measures like these primarily focus on visible dust or larger dust particles—the PM_{10} fraction—and fail to address the very fine particles that transport Valley Fever spores, which are approximately 5 times smaller than typical PM_{10} particles and remain airborne much longer.[6] These fine particles, when disturbed by soil-disturbing activities, spread widely beyond site, posing a significant risk to both onsite workers and nearby communities. Thus, even if the Applicant fully complies with the DEIR's dust control mitigation, it will not reduce the significant risk of exposure to valley fever spores.

[6] See, e.g., Cummings and others, 2010, p. 509; Schneider et al., 1997, p. 908 ("Primary prevention strategies (e.g., dust-control measures) for coccidioidomycosis in endemic areas have limited effectiveness.").

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-60 (cont'd)

The proposed compliance with Rule 403, which relies on a visual opacity reading for dust control, is also insufficient to prevent exposure to Valley Fever spores. These rules are based on smoke-monitoring methods (U.S. EPA Methods 9 and 22) that require active monitoring by certified observers, rely on subjective observation, and are affected by variable such as lighting, distance, and weather conditions. Due to these limitations, opacity readings do not provide accurate, continuous data on fine airborne particles.

In addition to the educational components outlined in MM AQ-3, the City should add a requirement to offer filtration for homes near the Project Site. The use of minimum efficiency reporting value (MERV) 16 filters on the homes nearby would reduce exposure to the spores by as much as 95 percent (95%). Given that the Project will be directly responsible for the generation of the spores into the local environment it is reasonable that they provide the necessary mitigation measures for the surrounding community. This measure should be included in a revised draft EIR for the Project.

B03-61

3. The DEIR Incorrectly Claims That No Health Risk Assessment (HRA) Is Necessary Based on AVAQMD CEQA And Federal Conformity Guidelines.

Page 12 of the Air Quality Analysis[7] states:

> AVAQMD CEQA and Federal Conformity Guidelines lists the following project types to evaluate exposure of sensitive receptors to substantial toxic air pollutant concentrations:
>
> • Any industrial project within 1,000 feet of a sensitive receptor land use;
> • A distribution center (40 or more trucks per day) within 1,000 feet;
> • A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
> • A dry cleaner using perchloroethylene within 500 feet; and
> • A gasoline dispensing facility within 300 feet.
>
> The PVSP is a planned community, which does not fall under any of the above project types. The commercial activities that are associated with the project do not include industrial activities that would contribute to HAP/TAC emissions. As such, the PVSP is not considered to have a significant health impact to sensitive receptors. Therefore, HAP emissions were not calculated, and the project was not evaluated for potential health risks to sensitive receptors."

[7] Aspen. 2024. Air Quality/GHG Technical Report. Prepared for City of Lancaster. Prepared by Aspen Environmental Group. pg 12

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This analysis fails to consider the significant amount of DPM that will be emitted from the PVSP during the construction phase. The City should evaluate whether those emissions pose a potential health risk to the residents in a revised environmental impact report (R-EIR). **B03-61 (cont'd)**

4. The City's Air Quality Analysis Fails To Include A Quantitative Health Risk Analysis Of The Impacts Of Toxic Air Contaminants From The Construction Phase And Operational Phase Of The Project For The Nearest Sensitive Receptor(s) **B03-62**

On page 3.3-10 of the DEIR, the Proponent states that "The proposed Plan would not directly result in any activities that generate TAC emissions. However, construction activities associated with new development would generate DPM emissions and other air toxics from gasoline-fueled equipment that would cause some increase in TAC health risks." While the DEIR acknowledges that Project construction will involve the use of TAC-generating equipment, this assertion is demonstrably false with regard to operational health risk since the land uses permitted under the specific plan are associated with the use of diesel trucks, emergency generators, fire pumps, etc., which also emit toxic air contaminants (TACs).

The determination of significance for the human health risk associated with exposure to TAC's generated by Project construction activities and operational activities requires a multi-step ***quantitative risk analysis*** of TACs from the construction and operational phases of the Project. No effort is made in the DEIR to quantify the potential health impacts from TACs generated by construction activities from the Project on local sensitive receptors. Given that the closest receptor to the Project site is the residence located less than 25 meters from the edge of the Project Site, it is clear that there is sufficient evidence to warrant a quantitative analysis of the potential health risks to the residents. Further, due to the phased nature of the Project, the Project may place future residents of the Project near to ongoing construction activities.[8]

The City therefore lacks supporting evidence for its conclusion that the emissions from the Project would not result in significant health effects by virtue of the distance to the receptors. The

[8] DEIR, Appendix A, PDF pg. 17 ("Individual projects will begin and complete construction throughout the 20-year period, with no current schedule.").

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

City's failure to perform such an analysis is clearly a major flaw in the DEIR and may be placing the residents of the nearby homes at risk from the construction phase and operational phase of the Project. **B03-62 (cont'd)**

The inherent toxicity of TACs requires the City to first quantify the concentration of each TAC released into the environment at each of the sensitive receptor locations through air dispersion modeling, calculate the dose of each TAC at that location, and quantify the cancer risk and hazard index for each of the chemicals of concern. Following that analysis, then the City can make a determination of the relative significance of the emissions. The results should then be presented in a revised DEIR prior to approving any agreements with the Proponent or issuing any permits for the Project.

5. The Concentration Of DPM At The Fenceline To The Nearest Residence Results In An Excess Cancer Risk Greater Than 10 In One Million. **B03-63**

Using the City's own air quality analysis, I performed a quantitative health risk analysis of the TAC emissions from the offroad equipment that will be used during the Construction Phase of the Project. Using the averaged emission of DPM from the first three years of construction phase, I have calculated an annual concentration of 0.03225 micrograms per cubic meter ($\mu g/m^3$) of DPM at the residences to the west of the Project Site along West Avenue K-8. This concentration results in an excess cancer risk of 12.3 in one million for a sensitive receptor (infant) at that location. Clearly, the emissions of DPM will need to be reduced to ensure that the excess cancer risk is below the AV-AQMD's significance threshold of 10 in one million.

Using the emission rate calculated in the CalEEMOD model for each construction phase, the total amount of DPM emitted from off-road equipment would be equal to the number of work days multiplied by the emission rate calculated in the CalEEMOD model.

$$DPM\ (lbs) = \sum Emission\ Rate\ \left(\frac{lbs}{day}\right) * Number\ Of\ Work\ Days\ (days)$$

The total amount of DPM emitted from off-road equipment used in the first three years of the construction phase would therefore be 460 pounds (See Table 2.3 of CalEEMod Analysis for annual emissions of 0.13 tons (260 lbs) for 2030, 0.07 tons (140 lbs) for 2031, and 0.03 tons (60 lbs) for 2032. The averaged emission of DPM is 153.33 lbs of DPM per year (260+140+60/3 = 153.33 lbs per year or 69,550.47 grams per year). This would equate to approximately 92.74 grams of DPM per day being

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-63 (cont'd)

emitted, assuming that there were a total 750 days of construction during the first three years of construction.

To calculate the daily emission rate of DPM for each year of construction period, the total mass of DPM emitted was divided by the area of the construction site (approximately 1,684,602 square meters (m^2) divided by the number of hours of construction expressed as seconds per day (8 hours/day = 28,800 seconds/day).

$$Emission\ Rate\ For\ Model\ \left(\frac{grams}{sec * m^2}\right)$$

Limiting the emissions to an 8-hour period during weekdays, the emission rate was calculated to be 5.73 x 10^{-9} grams per second per square meter. During the first year of construction the emissions were calculated to be 5.73 x 10^{-9} grams per second per square meter, almost twice as much as the average value.

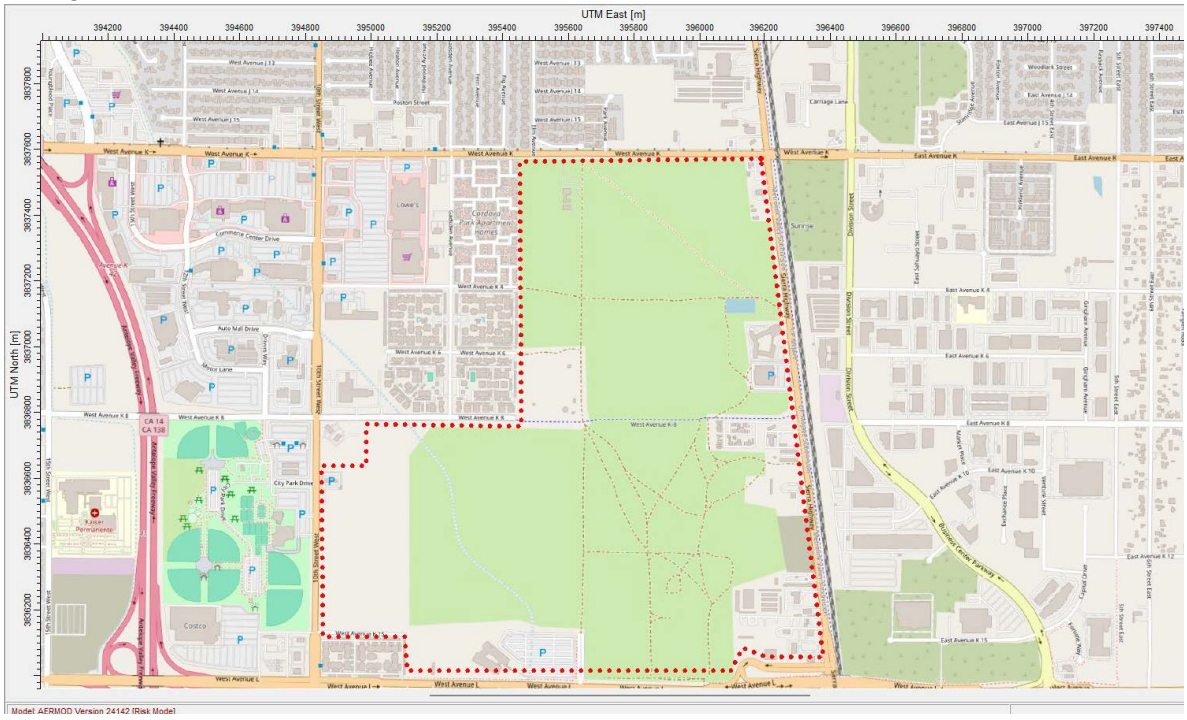


Figure 4: Assumed Source Area (Project Site)

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. AERMOD is an acronym for the American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee's Dispersion Model. AERMOD contains the necessary

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-63 (cont'd)

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 building around the Project site are indicated in the figure below. The green area is the source area of DPM from construction of the Project.

The population of Lancaster is approximately 161,700 individuals over a 94 square mile area (243.5 square kilometers). This is equivalent to a population density of 645 individuals per square kilometer. The model was run using the Urban setting to account for heat island effects with a standard surface roughness of 1 meter. Four uniform grids representing residences to the southwest and northwest of the Project site were overlayed on the modeling domain.

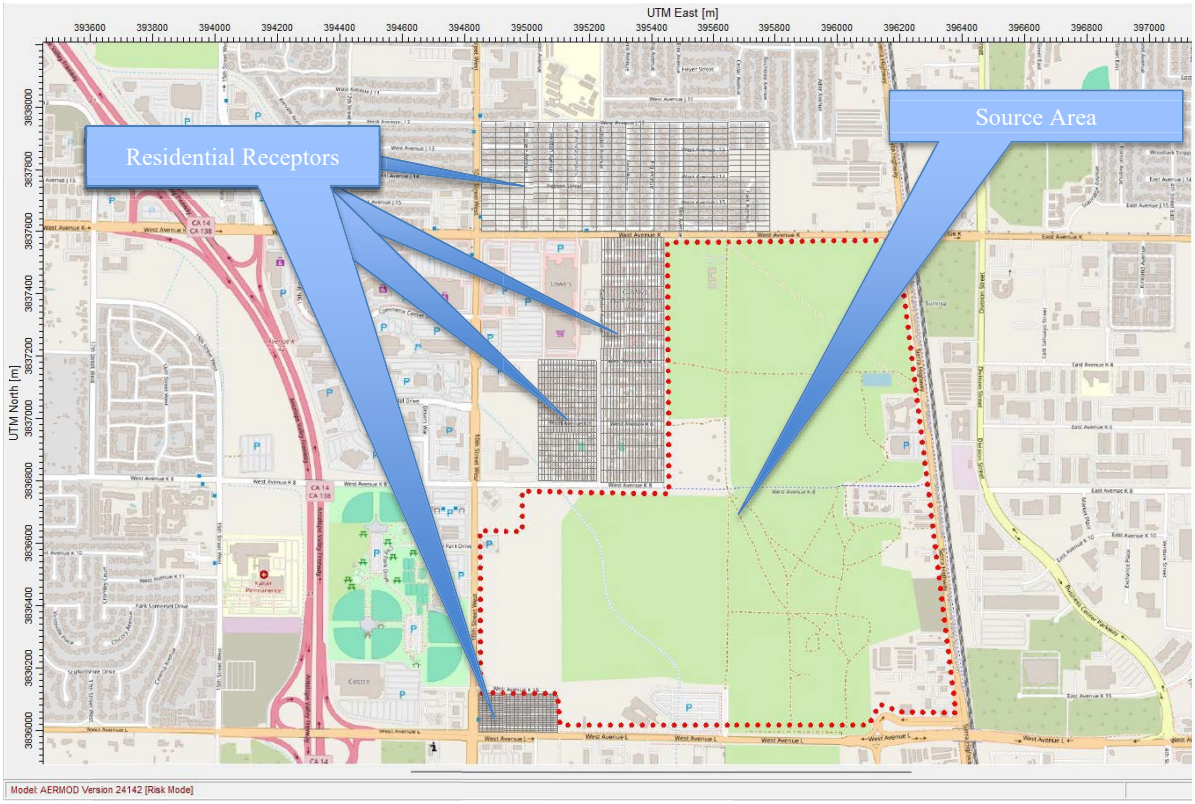


Figure 5: Model Receptors And Source Area

Using the United States Geological Services (USGS) National Elevation Data (NED) GEOTIFF Digital Terrain Files for the Lancaster West region I have input the elevation for Project Site and the receptors nearby. Receptors next the Project Site were at the fenceline or at the mid-point of the residential parcel.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-63 (cont'd)

The AERMOD model was run assuming that emissions occurred only during the weekdays during an 8-hour period. The results of the model are attached as an Exhibit to this letter. The annual DPM concentrations calculated for the period of the construction at the closest receptors (the residences to the west of the Project Site along West Avenue K-8) was 0.03225 µg/m^3. The 1-hour maximum DPM concentration was calculated to be 0.49907 µg/m^3.

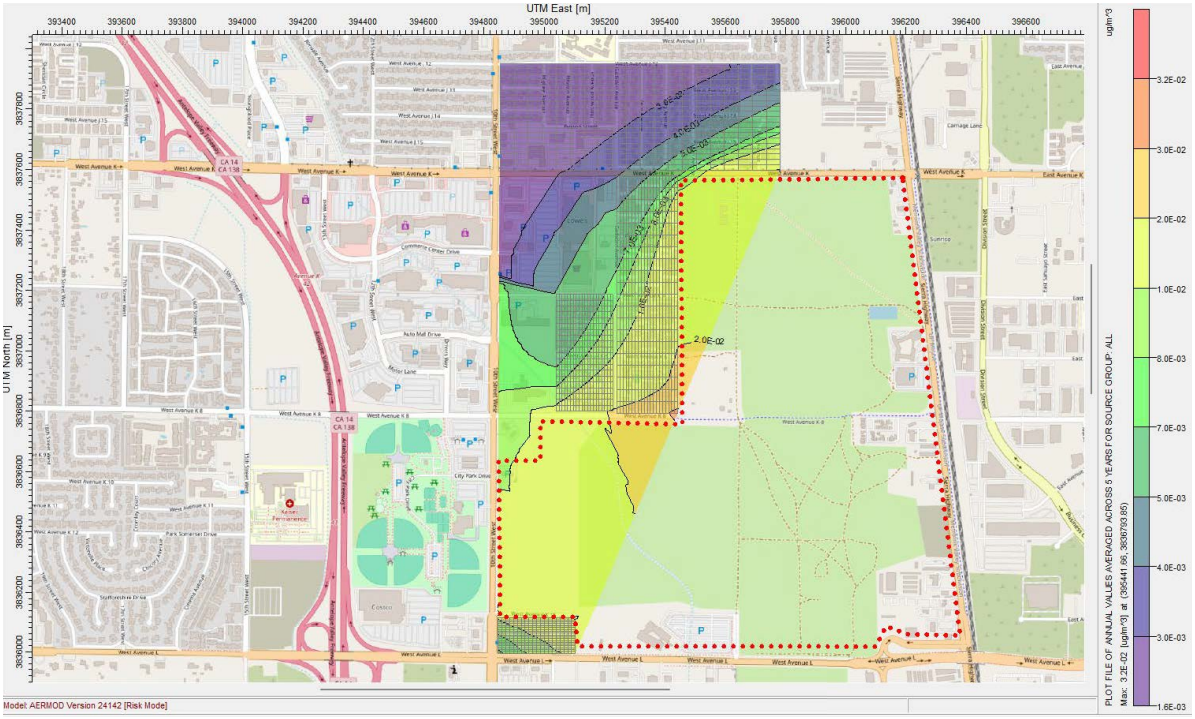


Figure 6: Annual Average Model Results (DPM in ug/m^3)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-63 (cont'd)

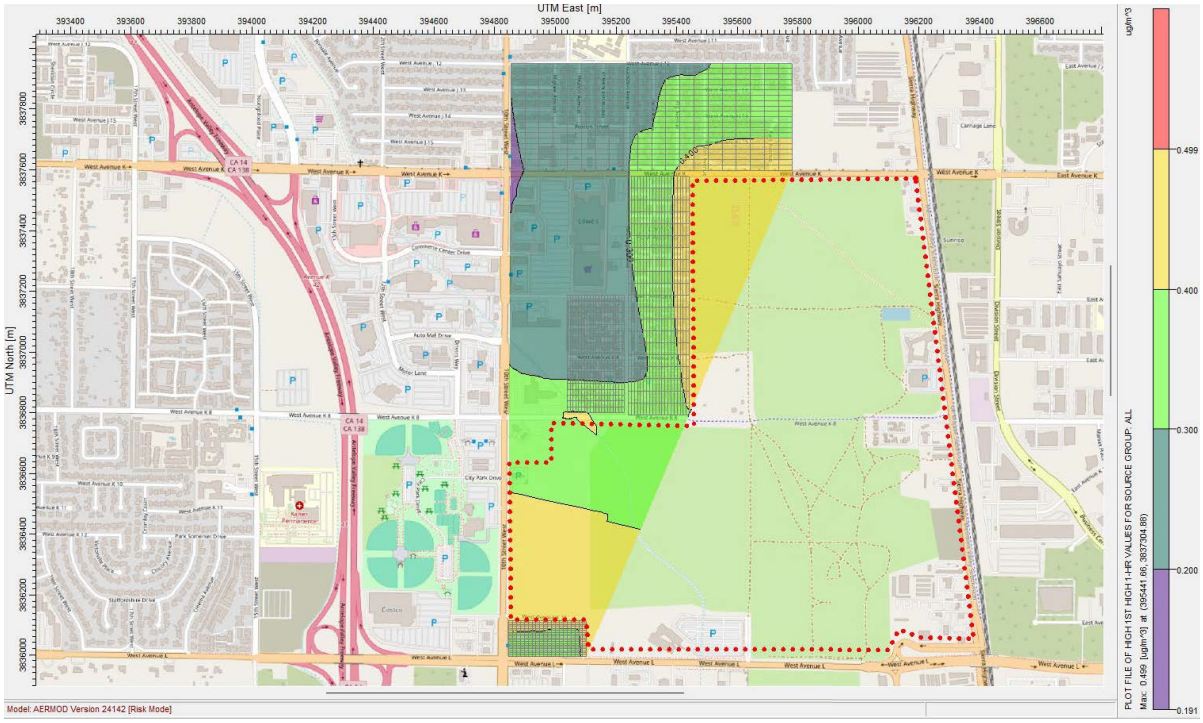


Figure 7: 1-Hour Maximum Model Results (DPM in ug/m³)

Using the algorithm outlined in OEHHA's HARP 2 Standalone Risk software, the cancer risk to the most sensitive population, infants less than 3 years old was calculated. To calculate the inhalation cancer risk for any receptor in the modeling domain dose of the chemical in air ($Dose_{air}$) is calculated from the annual concentration of the carcinogen (C_{air}). The exposure concentration is then multiplied by the breathing rate per body weight (BR/BW), inhalation absorption factor (A), the exposure frequency (days per 365 days) and a conversion factor of 10^{-6} (micrograms to milligrams, liters to cubic meters). This annual average concentration is multiplied by the cancer slope (CPF) for the chemical along with the appropriate age sensitivity factor (ASF) the exposure duration (ED) and then divided by the averaging time (AT)

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

$$Risk_{inh} = Dose_{air} * CPF * ASF * ED/AT$$

Using the maximum concentration modeled, the cumulative risk for exposure of infants during the 3 years (21 months) of construction is 12.3 in 1,000,000, much greater than the 10 in 1,000,000

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

significance threshold outlined by AV-AQMD, resulting in a significant impact. The results of the air model and the health risk analysis are attached as an appendix to this letter. The City must quantify and disclose these significant impacts in an EIR for the Project

B03-63 (cont'd)

6. The CalEEMod Analysis For The Operational Phase Does Not Include Back-Up Generators Or Fire Pumps.

B03-64

The DEIR notes that the Project will include commercial, educational, medical, and residential uses. To be compliant with the California Fire Code (CFC) and local fire authorities, the Project will be required to install fire pump systems and are likely to have a back-up generator (BUG) onsite for the medical and commercial projects. The fire pump and BUG will need to be tested and maintained annually. Under the California Air Resources Board (CARB) Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines Guidance, the District may allow a new stationary emergency standby diesel-fueled Cl engine (> 50 hp) to operate up to 100 hours per year for maintenance and testing purposes on a site-specific basis, provided the diesel PM emission rate is less than or equal to 0.01 g/bhp-hr. In addition to the testing emissions the air quality analysis in the DEIR must include the substantial increase in operational emissions from BUGs in the Air Basin due to unscheduled events, including but not limited to Public Safety Power Shutoff (PSPS) events and extreme heat events. Nowhere in the City's analysis of the operational emissions of stationary equipment (i.e., fire pumps and or BUGs) or emissions from those sources included in the CalEEMOD analysis.

This failure to include the emissions from the fire pumps and BUGS are a significant unaddressed emission source for the Project. The City's analysis is therefore incomplete and must be corrected in a revised EIR for the Project.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Conclusion

The facts presented in this comment letter lead me to reasonably conclude that the Project could result in significant impacts. A revised EIR is necessary to address these substantial concerns fully and transparently.

Sincerely,



Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Appendix A:

AERMOD Model Results And HRA

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Control Pathway

AERMOD

Dispersion Options

Titles

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Dispersion Options

☐ Regulatory Default ☒ Non-Default Options

- ☒ Elevated Terrain
- ☐ No Stack-Tip Downwash (NOSTD)
- ☐ Run in Screening Mode
- ☐ Conversion of NOx to NO2 (OLM or PVMRM)
- ☐ No Checks for Non-Sequential Met Data
- ☐ Fast All Sources (FASTALL)
- ☐ Fast Area Sources (FASTAREA)
- ☐ Optimized Area Source Plume Depletion
- ☒ Gas Deposition

BETA Options:

- ☐ Capped and Horizontal Stack Releases
- ☐ Adjusted Friction Velocity (u*) in AERMET (ADJ_U*)
- ☐ Low Wind Options

- ☐ SCIM (Sampled Chronological Input Model)
- ☐ Ignore Urban Night / Daytime Transition (NOURBTRAN)

Dispersion Coefficient

Urban — Population: Name (Optional): Roughness Length:

Output Type

- ☒ Concentration
- ☒ Total Deposition (Dry & Wet)
- ☒ Dry Deposition
- ☒ Wet Deposition

Plume Depletion

- ☒ Dry Removal
- ☒ Wet Removal

Output Warnings

- ☐ No Output Warnings
- ☐ Non-fatal Warnings for Non-sequential Met Data

Pollutant / Averaging Time / Terrain Options

Pollutant Type

OTHER - DPM

Averaging Time Options

Hours: ☒ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 6 ☐ 8 ☐ 12 ☐ 24

☐ Month ☐ Period ☒ Annual

Exponential Decay

☐ Yes ☒ No

Terrain Height Options

☐ Flat ☒ Elevated

SO: Meters
RE: Meters
TG: Meters

Flagpole Receptors

☐ Yes ☒ No

Default Height = 0.00 m

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Control Pathway

AERMOD

Optional Files

Re-Start File	Init File	Multi-Year Analyses	Event Input File	Error Listing File
☐	☐	☐	☐	■

Detailed Error Listing File

Filename: Parkway Village EIR Construction.err

Project File: C:\Lakes\AERMOD View\15805 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Networks

Note: Terrain Elevations and Flagpole Heights for Network Grids are in Page RE2 - 1 (If applicable)
Generated Discrete Receptors for Multi-Tier (Risk) Grid and Receptor Locations for Fenceline Grid are in Page RE3 - 1 (If applicable)

Uniform Cartesian Grid

Receptor Network ID	Grid Origin X Coordinate [m]	Grid Origin Y Coordinate [m]	No. of X-Axis Receptors	No. of Y-Axis Receptors	Spacing for X-Axis [m]	Spacing for Y-Axis [m]
UCART1	394846.05	3835994.10	21	21	12.84	6.07
UCART2	395240.46	3836793.85	21	21	10.06	39.31
UCART3	395039.27	3836800.04	21	21	9.44	19.35
UCART4	394853.55	3837598.62	21	21	46.43	17.64

Discrete Receptors

Plant Boundary Receptors

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Terrain Elevations and Flagpole Heights for Network Grids

Uniform Cartesian Grid

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	394846.05	3835994.10	749.90	Option not Selected
	394858.89	3835994.10	749.50	
	394871.73	3835994.10	749.60	
	394884.57	3835994.10	749.60	
	394897.41	3835994.10	749.60	
	394910.25	3835994.10	749.60	
	394923.09	3835994.10	749.60	
	394935.93	3835994.10	749.50	
	394948.77	3835994.10	749.50	
	394961.61	3835994.10	749.40	
	394974.45	3835994.10	749.50	
	394987.29	3835994.10	749.40	
	395000.13	3835994.10	749.40	
	395012.97	3835994.10	749.40	
	395025.81	3835994.10	749.40	
	395038.65	3835994.10	749.60	
	395051.49	3835994.10	749.70	
	395064.33	3835994.10	749.80	
	395077.17	3835994.10	749.90	
	395090.01	3835994.10	749.80	
	395102.85	3835994.10	749.90	
	394846.05	3836000.17	749.70	
	394858.89	3836000.17	749.30	
	394871.73	3836000.17	749.30	
	394884.57	3836000.17	749.30	
	394897.41	3836000.17	749.20	
	394910.25	3836000.17	749.20	
	394923.09	3836000.17	749.20	
	394935.93	3836000.17	749.10	
	394948.77	3836000.17	749.10	
	394961.61	3836000.17	749.10	
	394974.45	3836000.17	749.20	
	394987.29	3836000.17	749.10	
	395000.13	3836000.17	749.20	
	395012.97	3836000.17	749.10	
	395025.81	3836000.17	749.20	
	395038.65	3836000.17	749.30	
	395051.49	3836000.17	749.50	
	395064.33	3836000.17	749.60	
	395077.17	3836000.17	749.70	
	395090.01	3836000.17	749.70	
	395102.85	3836000.17	749.80	
	394846.05	3836006.24	749.60	
	394858.89	3836006.24	749.20	
	394871.73	3836006.24	749.10	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	394884.57	3836006.24	749.10	Option not Selected
	394897.41	3836006.24	749.10	
	394910.25	3836006.24	749.00	
	394923.09	3836006.24	749.00	
	394935.93	3836006.24	749.00	
	394948.77	3836006.24	748.90	
	394961.61	3836006.24	749.00	
	394974.45	3836006.24	749.10	
	394987.29	3836006.24	749.10	
	395000.13	3836006.24	749.10	
	395012.97	3836006.24	749.20	
	395025.81	3836006.24	749.20	
	395038.65	3836006.24	749.40	
	395051.49	3836006.24	749.50	
	395064.33	3836006.24	749.70	
	395077.17	3836006.24	749.70	
	395090.01	3836006.24	749.60	
	395102.85	3836006.24	749.70	
	394846.05	3836012.31	749.60	
	394858.89	3836012.31	749.40	
	394871.73	3836012.31	749.40	
	394884.57	3836012.31	749.40	
	394897.41	3836012.31	749.30	
	394910.25	3836012.31	749.30	
	394923.09	3836012.31	749.20	
	394935.93	3836012.31	749.10	
	394948.77	3836012.31	748.90	
	394961.61	3836012.31	749.10	
	394974.45	3836012.31	749.20	
	394987.29	3836012.31	749.30	
	395000.13	3836012.31	749.40	
	395012.97	3836012.31	749.40	
	395025.81	3836012.31	749.40	
	395038.65	3836012.31	749.60	
	395051.49	3836012.31	749.70	
	395064.33	3836012.31	749.80	
	395077.17	3836012.31	749.90	
	395090.01	3836012.31	749.60	
	395102.85	3836012.31	749.60	
	394846.05	3836018.38	749.60	
	394858.89	3836018.38	749.50	
	394871.73	3836018.38	749.50	
	394884.57	3836018.38	749.50	
	394897.41	3836018.38	749.50	
	394910.25	3836018.38	749.40	
	394923.09	3836018.38	749.30	
	394935.93	3836018.38	749.10	
	394948.77	3836018.38	748.90	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	394961.61	3836018.38	749.20	Option not Selected
	394974.45	3836018.38	749.30	
	394987.29	3836018.38	749.50	
	395000.13	3836018.38	749.50	
	395012.97	3836018.38	749.60	
	395025.81	3836018.38	749.50	
	395038.65	3836018.38	749.70	
	395051.49	3836018.38	749.80	
	395064.33	3836018.38	749.90	
	395077.17	3836018.38	749.90	
	395090.01	3836018.38	749.60	
	395102.85	3836018.38	749.50	
	394846.05	3836024.45	749.60	
	394858.89	3836024.45	749.60	
	394871.73	3836024.45	749.60	
	394884.57	3836024.45	749.70	
	394897.41	3836024.45	749.70	
	394910.25	3836024.45	749.50	
	394923.09	3836024.45	749.40	
	394935.93	3836024.45	749.20	
	394948.77	3836024.45	748.90	
	394961.61	3836024.45	749.20	
	394974.45	3836024.45	749.30	
	394987.29	3836024.45	749.60	
	395000.13	3836024.45	749.70	
	395012.97	3836024.45	749.70	
	395025.81	3836024.45	749.60	
	395038.65	3836024.45	749.80	
	395051.49	3836024.45	749.90	
	395064.33	3836024.45	749.90	
	395077.17	3836024.45	749.90	
	395090.01	3836024.45	749.50	
	395102.85	3836024.45	749.50	
	394846.05	3836030.52	749.60	
	394858.89	3836030.52	749.60	
	394871.73	3836030.52	749.60	
	394884.57	3836030.52	749.70	
	394897.41	3836030.52	749.70	
	394910.25	3836030.52	749.50	
	394923.09	3836030.52	749.40	
	394935.93	3836030.52	749.20	
	394948.77	3836030.52	748.80	
	394961.61	3836030.52	749.20	
	394974.45	3836030.52	749.30	
	394987.29	3836030.52	749.60	
	395000.13	3836030.52	749.70	
	395012.97	3836030.52	749.70	
	395025.81	3836030.52	749.60	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	395038.65	3836030.52	749.80	Option not Selected
	395051.49	3836030.52	749.90	
	395064.33	3836030.52	749.90	
	395077.17	3836030.52	749.90	
	395090.01	3836030.52	749.50	
	395102.85	3836030.52	749.40	
	394846.05	3836036.59	749.50	
	394858.89	3836036.59	749.60	
	394871.73	3836036.59	749.60	
	394884.57	3836036.59	749.70	
	394897.41	3836036.59	749.60	
	394910.25	3836036.59	749.50	
	394923.09	3836036.59	749.30	
	394935.93	3836036.59	749.10	
	394948.77	3836036.59	748.80	
	394961.61	3836036.59	749.20	
	394974.45	3836036.59	749.40	
	394987.29	3836036.59	749.60	
	395000.13	3836036.59	749.70	
	395012.97	3836036.59	749.70	
	395025.81	3836036.59	749.70	
	395038.65	3836036.59	749.80	
	395051.49	3836036.59	749.90	
	395064.33	3836036.59	750.00	
	395077.17	3836036.59	749.90	
	395090.01	3836036.59	749.50	
	395102.85	3836036.59	749.40	
	394846.05	3836042.66	749.50	
	394858.89	3836042.66	749.50	
	394871.73	3836042.66	749.60	
	394884.57	3836042.66	749.60	
	394897.41	3836042.66	749.60	
	394910.25	3836042.66	749.40	
	394923.09	3836042.66	749.30	
	394935.93	3836042.66	749.10	
	394948.77	3836042.66	748.80	
	394961.61	3836042.66	749.20	
	394974.45	3836042.66	749.40	
	394987.29	3836042.66	749.60	
	395000.13	3836042.66	749.70	
	395012.97	3836042.66	749.70	
	395025.81	3836042.66	749.70	
	395038.65	3836042.66	749.70	
	395051.49	3836042.66	749.80	
	395064.33	3836042.66	750.00	
	395077.17	3836042.66	749.90	
	395090.01	3836042.66	749.40	
	395102.85	3836042.66	749.40	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	394846.05	3836048.73	749.40	Option not Selected
	394858.89	3836048.73	749.50	
	394871.73	3836048.73	749.50	
	394884.57	3836048.73	749.60	
	394897.41	3836048.73	749.50	
	394910.25	3836048.73	749.40	
	394923.09	3836048.73	749.30	
	394935.93	3836048.73	749.10	
	394948.77	3836048.73	748.80	
	394961.61	3836048.73	749.20	
	394974.45	3836048.73	749.40	
	394987.29	3836048.73	749.60	
	395000.13	3836048.73	749.70	
	395012.97	3836048.73	749.70	
	395025.81	3836048.73	749.70	
	395038.65	3836048.73	749.60	
	395051.49	3836048.73	749.80	
	395064.33	3836048.73	750.00	
	395077.17	3836048.73	749.90	
	395090.01	3836048.73	749.40	
	395102.85	3836048.73	749.30	
	394846.05	3836054.80	749.40	
	394858.89	3836054.80	749.50	
	394871.73	3836054.80	749.50	
	394884.57	3836054.80	749.50	
	394897.41	3836054.80	749.50	
	394910.25	3836054.80	749.40	
	394923.09	3836054.80	749.40	
	394935.93	3836054.80	749.10	
	394948.77	3836054.80	748.80	
	394961.61	3836054.80	749.20	
	394974.45	3836054.80	749.40	
	394987.29	3836054.80	749.60	
	395000.13	3836054.80	749.70	
	395012.97	3836054.80	749.70	
	395025.81	3836054.80	749.60	
	395038.65	3836054.80	749.50	
	395051.49	3836054.80	749.70	
	395064.33	3836054.80	750.00	
	395077.17	3836054.80	749.90	
	395090.01	3836054.80	749.40	
	395102.85	3836054.80	749.20	
	394846.05	3836060.87	749.30	
	394858.89	3836060.87	749.40	
	394871.73	3836060.87	749.40	
	394884.57	3836060.87	749.40	
	394897.41	3836060.87	749.40	
	394910.25	3836060.87	749.40	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	394923.09	3836060.87	749.40	Option not Selected
	394935.93	3836060.87	749.20	
	394948.77	3836060.87	748.80	
	394961.61	3836060.87	749.20	
	394974.45	3836060.87	749.40	
	394987.29	3836060.87	749.50	
	395000.13	3836060.87	749.70	
	395012.97	3836060.87	749.70	
	395025.81	3836060.87	749.60	
	395038.65	3836060.87	749.50	
	395051.49	3836060.87	749.70	
	395064.33	3836060.87	749.90	
	395077.17	3836060.87	749.80	
	395090.01	3836060.87	749.30	
	395102.85	3836060.87	749.20	
	394846.05	3836066.94	749.30	
	394858.89	3836066.94	749.40	
	394871.73	3836066.94	749.40	
	394884.57	3836066.94	749.40	
	394897.41	3836066.94	749.40	
	394910.25	3836066.94	749.30	
	394923.09	3836066.94	749.40	
	394935.93	3836066.94	749.20	
	394948.77	3836066.94	748.80	
	394961.61	3836066.94	749.10	
	394974.45	3836066.94	749.30	
	394987.29	3836066.94	749.50	
	395000.13	3836066.94	749.60	
	395012.97	3836066.94	749.60	
	395025.81	3836066.94	749.60	
	395038.65	3836066.94	749.50	
	395051.49	3836066.94	749.60	
	395064.33	3836066.94	749.80	
	395077.17	3836066.94	749.70	
	395090.01	3836066.94	749.30	
	395102.85	3836066.94	749.10	
	394846.05	3836073.01	749.20	
	394858.89	3836073.01	749.40	
	394871.73	3836073.01	749.30	
	394884.57	3836073.01	749.30	
	394897.41	3836073.01	749.30	
	394910.25	3836073.01	749.20	
	394923.09	3836073.01	749.30	
	394935.93	3836073.01	749.10	
	394948.77	3836073.01	748.70	
	394961.61	3836073.01	749.10	
	394974.45	3836073.01	749.20	
	394987.29	3836073.01	749.50	

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AERMOD View by Lakes Environmental Software RE2 - 6 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	395000.13	3836073.01	749.60	Option not Selected
	395012.97	3836073.01	749.60	
	395025.81	3836073.01	749.60	
	395038.65	3836073.01	749.60	
	395051.49	3836073.01	749.60	
	395064.33	3836073.01	749.80	
	395077.17	3836073.01	749.70	
	395090.01	3836073.01	749.30	
	395102.85	3836073.01	749.10	
	394846.05	3836079.08	749.20	
	394858.89	3836079.08	749.30	
	394871.73	3836079.08	749.30	
	394884.57	3836079.08	749.30	
	394897.41	3836079.08	749.30	
	394910.25	3836079.08	749.20	
	394923.09	3836079.08	749.20	
	394935.93	3836079.08	749.10	
	394948.77	3836079.08	748.70	
	394961.61	3836079.08	749.00	
	394974.45	3836079.08	749.20	
	394987.29	3836079.08	749.50	
	395000.13	3836079.08	749.50	
	395012.97	3836079.08	749.60	
	395025.81	3836079.08	749.50	
	395038.65	3836079.08	749.50	
	395051.49	3836079.08	749.60	
	395064.33	3836079.08	749.70	
	395077.17	3836079.08	749.60	
	395090.01	3836079.08	749.30	
	395102.85	3836079.08	749.10	
	394846.05	3836085.15	749.10	
	394858.89	3836085.15	749.20	
	394871.73	3836085.15	749.20	
	394884.57	3836085.15	749.20	
	394897.41	3836085.15	749.20	
	394910.25	3836085.15	749.10	
	394923.09	3836085.15	749.20	
	394935.93	3836085.15	749.00	
	394948.77	3836085.15	748.70	
	394961.61	3836085.15	749.00	
	394974.45	3836085.15	749.20	
	394987.29	3836085.15	749.40	
	395000.13	3836085.15	749.50	
	395012.97	3836085.15	749.50	
	395025.81	3836085.15	749.50	
	395038.65	3836085.15	749.40	
	395051.49	3836085.15	749.50	
	395064.33	3836085.15	749.60	

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AERMOD View by Lakes Environmental Software RE2 - 7 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	395077.17	3836085.15	749.50	Option not Selected
	395090.01	3836085.15	749.20	
	395102.85	3836085.15	749.00	
	394846.05	3836091.22	749.00	
	394858.89	3836091.22	749.10	
	394871.73	3836091.22	749.10	
	394884.57	3836091.22	749.00	
	394897.41	3836091.22	749.00	
	394910.25	3836091.22	749.00	
	394923.09	3836091.22	749.00	
	394935.93	3836091.22	748.90	
	394948.77	3836091.22	748.70	
	394961.61	3836091.22	748.90	
	394974.45	3836091.22	749.00	
	394987.29	3836091.22	749.10	
	395000.13	3836091.22	749.10	
	395012.97	3836091.22	749.20	
	395025.81	3836091.22	749.20	
	395038.65	3836091.22	749.20	
	395051.49	3836091.22	749.30	
	395064.33	3836091.22	749.30	
	395077.17	3836091.22	749.30	
	395090.01	3836091.22	749.20	
	395102.85	3836091.22	749.00	
	394846.05	3836097.29	748.90	
	394858.89	3836097.29	748.90	
	394871.73	3836097.29	748.90	
	394884.57	3836097.29	748.80	
	394897.41	3836097.29	748.80	
	394910.25	3836097.29	748.80	
	394923.09	3836097.29	748.80	
	394935.93	3836097.29	748.80	
	394948.77	3836097.29	748.70	
	394961.61	3836097.29	748.80	
	394974.45	3836097.29	748.80	
	394987.29	3836097.29	748.90	
	395000.13	3836097.29	748.90	
	395012.97	3836097.29	749.00	
	395025.81	3836097.29	749.00	
	395038.65	3836097.29	749.10	
	395051.49	3836097.29	749.10	
	395064.33	3836097.29	749.10	
	395077.17	3836097.29	749.20	
	395090.01	3836097.29	749.20	
	395102.85	3836097.29	749.00	
	394846.05	3836103.36	748.80	
	394858.89	3836103.36	748.80	
	394871.73	3836103.36	748.80	

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AERMOD View by Lakes Environmental Software RE2 - 8 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	394884.57	3836103.36	748.80	Option not Selected
	394897.41	3836103.36	748.80	
	394910.25	3836103.36	748.80	
	394923.09	3836103.36	748.80	
	394935.93	3836103.36	748.70	
	394948.77	3836103.36	748.70	
	394961.61	3836103.36	748.80	
	394974.45	3836103.36	748.80	
	394987.29	3836103.36	748.80	
	395000.13	3836103.36	748.90	
	395012.97	3836103.36	748.90	
	395025.81	3836103.36	749.00	
	395038.65	3836103.36	749.00	
	395051.49	3836103.36	749.10	
	395064.33	3836103.36	749.10	
	395077.17	3836103.36	749.10	
	395090.01	3836103.36	749.20	
	395102.85	3836103.36	749.10	
	394846.05	3836109.43	748.70	
	394858.89	3836109.43	748.70	
	394871.73	3836109.43	748.70	
	394884.57	3836109.43	748.70	
	394897.41	3836109.43	748.70	
	394910.25	3836109.43	748.70	
	394923.09	3836109.43	748.70	
	394935.93	3836109.43	748.70	
	394948.77	3836109.43	748.70	
	394961.61	3836109.43	748.80	
	394974.45	3836109.43	748.80	
	394987.29	3836109.43	748.80	
	395000.13	3836109.43	748.80	
	395012.97	3836109.43	748.90	
	395025.81	3836109.43	749.00	
	395038.65	3836109.43	749.00	
	395051.49	3836109.43	749.00	
	395064.33	3836109.43	749.00	
	395077.17	3836109.43	749.10	
	395090.01	3836109.43	749.10	
	395102.85	3836109.43	749.00	
	394846.05	3836115.50	748.60	
	394858.89	3836115.50	748.60	
	394871.73	3836115.50	748.60	
	394884.57	3836115.50	748.70	
	394897.41	3836115.50	748.70	
	394910.25	3836115.50	748.70	
	394923.09	3836115.50	748.70	
	394935.93	3836115.50	748.70	
	394948.77	3836115.50	748.70	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART1	394961.61	3836115.50	748.80	Option not Selected
	394974.45	3836115.50	748.80	
	394987.29	3836115.50	748.80	
	395000.13	3836115.50	748.80	
	395012.97	3836115.50	748.90	
	395025.81	3836115.50	748.90	
	395038.65	3836115.50	748.90	
	395051.49	3836115.50	748.90	
	395064.33	3836115.50	749.00	
	395077.17	3836115.50	749.00	
	395090.01	3836115.50	749.00	
	395102.85	3836115.50	748.90	

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395240.46	3836793.85	743.70	Option not Selected
	395250.52	3836793.85	744.00	
	395260.58	3836793.85	744.20	
	395270.64	3836793.85	744.30	
	395280.70	3836793.85	744.30	
	395290.76	3836793.85	744.40	
	395300.82	3836793.85	744.40	
	395310.88	3836793.85	744.40	
	395320.94	3836793.85	744.50	
	395331.00	3836793.85	744.50	
	395341.06	3836793.85	744.50	
	395351.12	3836793.85	744.50	
	395361.18	3836793.85	744.40	
	395371.24	3836793.85	744.20	
	395381.30	3836793.85	744.50	
	395391.36	3836793.85	744.70	
	395401.42	3836793.85	744.80	
	395411.48	3836793.85	744.80	
	395421.54	3836793.85	744.80	
	395431.60	3836793.85	744.90	
	395441.66	3836793.85	744.90	
	395240.46	3836833.16	743.10	
	395250.52	3836833.16	743.50	
	395260.58	3836833.16	743.80	
	395270.64	3836833.16	743.80	
	395280.70	3836833.16	743.40	
	395290.76	3836833.16	743.50	
	395300.82	3836833.16	743.50	
	395310.88	3836833.16	743.60	
	395320.94	3836833.16	743.70	
	395331.00	3836833.16	743.80	
	395341.06	3836833.16	743.80	
	395351.12	3836833.16	743.80	

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AERMOD View by Lakes Environmental Software RE2 - 10 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395361.18	3836833.16	743.80	Option not Selected
	395371.24	3836833.16	743.90	
	395381.30	3836833.16	744.00	
	395391.36	3836833.16	744.10	
	395401.42	3836833.16	744.10	
	395411.48	3836833.16	744.10	
	395421.54	3836833.16	744.10	
	395431.60	3836833.16	744.00	
	395441.66	3836833.16	744.30	
	395240.46	3836872.47	742.60	
	395250.52	3836872.47	742.90	
	395260.58	3836872.47	742.80	
	395270.64	3836872.47	742.90	
	395280.70	3836872.47	743.10	
	395290.76	3836872.47	743.10	
	395300.82	3836872.47	743.10	
	395310.88	3836872.47	743.20	
	395320.94	3836872.47	743.50	
	395331.00	3836872.47	743.70	
	395341.06	3836872.47	743.80	
	395351.12	3836872.47	744.00	
	395361.18	3836872.47	744.10	
	395371.24	3836872.47	744.10	
	395381.30	3836872.47	744.10	
	395391.36	3836872.47	743.90	
	395401.42	3836872.47	743.80	
	395411.48	3836872.47	743.80	
	395421.54	3836872.47	743.60	
	395431.60	3836872.47	743.40	
	395441.66	3836872.47	743.80	
	395240.46	3836911.78	742.10	
	395250.52	3836911.78	742.50	
	395260.58	3836911.78	742.90	
	395270.64	3836911.78	742.80	
	395280.70	3836911.78	742.40	
	395290.76	3836911.78	742.50	
	395300.82	3836911.78	742.90	
	395310.88	3836911.78	743.00	
	395320.94	3836911.78	743.40	
	395331.00	3836911.78	743.60	
	395341.06	3836911.78	743.70	
	395351.12	3836911.78	743.50	
	395361.18	3836911.78	743.00	
	395371.24	3836911.78	742.90	
	395381.30	3836911.78	743.40	
	395391.36	3836911.78	743.60	
	395401.42	3836911.78	743.60	
	395411.48	3836911.78	743.60	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395421.54	3836911.78	743.10	Option not Selected
	395431.60	3836911.78	742.90	
	395441.66	3836911.78	743.40	
	395240.46	3836951.09	741.60	
	395250.52	3836951.09	742.30	
	395260.58	3836951.09	743.00	
	395270.64	3836951.09	743.00	
	395280.70	3836951.09	743.00	
	395290.76	3836951.09	743.00	
	395300.82	3836951.09	743.10	
	395310.88	3836951.09	743.10	
	395320.94	3836951.09	743.10	
	395331.00	3836951.09	743.10	
	395341.06	3836951.09	743.20	
	395351.12	3836951.09	743.30	
	395361.18	3836951.09	743.30	
	395371.24	3836951.09	743.30	
	395381.30	3836951.09	743.20	
	395391.36	3836951.09	743.30	
	395401.42	3836951.09	743.30	
	395411.48	3836951.09	743.30	
	395421.54	3836951.09	742.90	
	395431.60	3836951.09	742.60	
	395441.66	3836951.09	742.90	
	395240.46	3836990.40	741.30	
	395250.52	3836990.40	741.50	
	395260.58	3836990.40	741.70	
	395270.64	3836990.40	741.70	
	395280.70	3836990.40	741.80	
	395290.76	3836990.40	741.90	
	395300.82	3836990.40	741.90	
	395310.88	3836990.40	741.90	
	395320.94	3836990.40	742.00	
	395331.00	3836990.40	742.00	
	395341.06	3836990.40	742.00	
	395351.12	3836990.40	742.10	
	395361.18	3836990.40	742.10	
	395371.24	3836990.40	742.10	
	395381.30	3836990.40	742.20	
	395391.36	3836990.40	742.20	
	395401.42	3836990.40	742.30	
	395411.48	3836990.40	742.30	
	395421.54	3836990.40	742.30	
	395431.60	3836990.40	742.40	
	395441.66	3836990.40	742.60	
	395240.46	3837029.71	741.00	
	395250.52	3837029.71	741.10	
	395260.58	3837029.71	741.10	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395270.64	3837029.71	741.30	Option not Selected
	395280.70	3837029.71	741.80	
	395290.76	3837029.71	742.00	
	395300.82	3837029.71	742.00	
	395310.88	3837029.71	742.10	
	395320.94	3837029.71	742.10	
	395331.00	3837029.71	742.40	
	395341.06	3837029.71	742.40	
	395351.12	3837029.71	742.50	
	395361.18	3837029.71	742.60	
	395371.24	3837029.71	742.60	
	395381.30	3837029.71	742.60	
	395391.36	3837029.71	742.60	
	395401.42	3837029.71	742.70	
	395411.48	3837029.71	742.70	
	395421.54	3837029.71	742.30	
	395431.60	3837029.71	741.90	
	395441.66	3837029.71	742.20	
	395240.46	3837069.02	740.70	
	395250.52	3837069.02	740.90	
	395260.58	3837069.02	740.90	
	395270.64	3837069.02	740.90	
	395280.70	3837069.02	740.90	
	395290.76	3837069.02	741.00	
	395300.82	3837069.02	741.30	
	395310.88	3837069.02	741.70	
	395320.94	3837069.02	741.80	
	395331.00	3837069.02	741.80	
	395341.06	3837069.02	741.90	
	395351.12	3837069.02	742.10	
	395361.18	3837069.02	742.30	
	395371.24	3837069.02	742.10	
	395381.30	3837069.02	742.20	
	395391.36	3837069.02	742.30	
	395401.42	3837069.02	742.30	
	395411.48	3837069.02	742.10	
	395421.54	3837069.02	741.60	
	395431.60	3837069.02	741.30	
	395441.66	3837069.02	741.60	
	395240.46	3837108.33	740.20	
	395250.52	3837108.33	740.30	
	395260.58	3837108.33	740.40	
	395270.64	3837108.33	740.50	
	395280.70	3837108.33	741.00	
	395290.76	3837108.33	741.10	
	395300.82	3837108.33	741.30	
	395310.88	3837108.33	741.40	
	395320.94	3837108.33	741.30	

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
AERMOD View by Lakes Environmental Software RE2 - 13 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395331.00	3837108.33	741.40	Option not Selected
	395341.06	3837108.33	741.40	
	395351.12	3837108.33	741.60	
	395361.18	3837108.33	741.80	
	395371.24	3837108.33	741.70	
	395381.30	3837108.33	741.70	
	395391.36	3837108.33	741.60	
	395401.42	3837108.33	741.50	
	395411.48	3837108.33	741.40	
	395421.54	3837108.33	741.00	
	395431.60	3837108.33	740.70	
	395441.66	3837108.33	741.20	
	395240.46	3837147.64	739.50	
	395250.52	3837147.64	739.60	
	395260.58	3837147.64	739.60	
	395270.64	3837147.64	739.70	
	395280.70	3837147.64	740.00	
	395290.76	3837147.64	740.10	
	395300.82	3837147.64	740.10	
	395310.88	3837147.64	740.10	
	395320.94	3837147.64	740.10	
	395331.00	3837147.64	740.20	
	395341.06	3837147.64	740.20	
	395351.12	3837147.64	740.20	
	395361.18	3837147.64	740.30	
	395371.24	3837147.64	740.30	
	395381.30	3837147.64	740.40	
	395391.36	3837147.64	740.40	
	395401.42	3837147.64	740.30	
	395411.48	3837147.64	740.40	
	395421.54	3837147.64	740.30	
	395431.60	3837147.64	740.30	
	395441.66	3837147.64	740.80	
	395240.46	3837186.95	739.10	
	395250.52	3837186.95	739.20	
	395260.58	3837186.95	739.40	
	395270.64	3837186.95	739.40	
	395280.70	3837186.95	739.50	
	395290.76	3837186.95	739.50	
	395300.82	3837186.95	739.40	
	395310.88	3837186.95	739.40	
	395320.94	3837186.95	739.50	
	395331.00	3837186.95	739.50	
	395341.06	3837186.95	739.50	
	395351.12	3837186.95	739.60	
	395361.18	3837186.95	739.60	
	395371.24	3837186.95	739.70	
	395381.30	3837186.95	739.80	

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AERMOD View by Lakes Environmental Software RE2 - 14 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395391.36	3837186.95	739.90	Option not Selected
	395401.42	3837186.95	740.00	
	395411.48	3837186.95	740.00	
	395421.54	3837186.95	740.00	
	395431.60	3837186.95	740.10	
	395441.66	3837186.95	740.20	
	395240.46	3837226.26	738.80	
	395250.52	3837226.26	739.10	
	395260.58	3837226.26	739.40	
	395270.64	3837226.26	739.20	
	395280.70	3837226.26	739.20	
	395290.76	3837226.26	739.10	
	395300.82	3837226.26	739.00	
	395310.88	3837226.26	738.90	
	395320.94	3837226.26	739.10	
	395331.00	3837226.26	739.20	
	395341.06	3837226.26	739.10	
	395351.12	3837226.26	739.20	
	395361.18	3837226.26	739.20	
	395371.24	3837226.26	739.10	
	395381.30	3837226.26	738.90	
	395391.36	3837226.26	739.30	
	395401.42	3837226.26	739.50	
	395411.48	3837226.26	739.40	
	395421.54	3837226.26	739.50	
	395431.60	3837226.26	739.70	
	395441.66	3837226.26	739.70	
	395240.46	3837265.57	738.50	
	395250.52	3837265.57	738.80	
	395260.58	3837265.57	739.20	
	395270.64	3837265.57	739.10	
	395280.70	3837265.57	738.90	
	395290.76	3837265.57	738.90	
	395300.82	3837265.57	738.50	
	395310.88	3837265.57	738.30	
	395320.94	3837265.57	738.40	
	395331.00	3837265.57	738.50	
	395341.06	3837265.57	738.40	
	395351.12	3837265.57	738.50	
	395361.18	3837265.57	738.50	
	395371.24	3837265.57	738.40	
	395381.30	3837265.57	738.40	
	395391.36	3837265.57	738.70	
	395401.42	3837265.57	739.10	
	395411.48	3837265.57	739.20	
	395421.54	3837265.57	739.40	
	395431.60	3837265.57	739.60	
	395441.66	3837265.57	739.50	

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AERMOD View by Lakes Environmental Software RE2 - 15 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395240.46	3837304.88	738.10	Option not Selected
	395250.52	3837304.88	738.20	
	395260.58	3837304.88	738.40	
	395270.64	3837304.88	738.30	
	395280.70	3837304.88	738.20	
	395290.76	3837304.88	738.10	
	395300.82	3837304.88	738.10	
	395310.88	3837304.88	738.00	
	395320.94	3837304.88	737.90	
	395331.00	3837304.88	738.10	
	395341.06	3837304.88	738.10	
	395351.12	3837304.88	738.10	
	395361.18	3837304.88	738.10	
	395371.24	3837304.88	738.00	
	395381.30	3837304.88	738.10	
	395391.36	3837304.88	738.20	
	395401.42	3837304.88	738.20	
	395411.48	3837304.88	738.20	
	395421.54	3837304.88	738.40	
	395431.60	3837304.88	738.60	
	395441.66	3837304.88	738.70	
	395240.46	3837344.19	737.80	
	395250.52	3837344.19	737.90	
	395260.58	3837344.19	738.10	
	395270.64	3837344.19	738.10	
	395280.70	3837344.19	738.10	
	395290.76	3837344.19	738.10	
	395300.82	3837344.19	737.70	
	395310.88	3837344.19	737.40	
	395320.94	3837344.19	737.70	
	395331.00	3837344.19	738.00	
	395341.06	3837344.19	738.00	
	395351.12	3837344.19	738.30	
	395361.18	3837344.19	738.30	
	395371.24	3837344.19	737.90	
	395381.30	3837344.19	737.60	
	395391.36	3837344.19	737.80	
	395401.42	3837344.19	738.10	
	395411.48	3837344.19	738.20	
	395421.54	3837344.19	738.10	
	395431.60	3837344.19	738.10	
	395441.66	3837344.19	738.20	
	395240.46	3837383.50	737.40	
	395250.52	3837383.50	737.50	
	395260.58	3837383.50	737.80	
	395270.64	3837383.50	737.70	
	395280.70	3837383.50	737.70	
	395290.76	3837383.50	737.70	

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AERMOD View by Lakes Environmental Software RE2 - 16 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395300.82	3837383.50	737.50	Option not Selected
	395310.88	3837383.50	737.30	
	395320.94	3837383.50	737.50	
	395331.00	3837383.50	737.70	
	395341.06	3837383.50	737.70	
	395351.12	3837383.50	737.80	
	395361.18	3837383.50	737.90	
	395371.24	3837383.50	737.70	
	395381.30	3837383.50	737.50	
	395391.36	3837383.50	737.50	
	395401.42	3837383.50	737.80	
	395411.48	3837383.50	737.80	
	395421.54	3837383.50	737.90	
	395431.60	3837383.50	738.10	
	395441.66	3837383.50	738.00	
	395240.46	3837422.81	736.90	
	395250.52	3837422.81	737.10	
	395260.58	3837422.81	737.60	
	395270.64	3837422.81	737.60	
	395280.70	3837422.81	737.50	
	395290.76	3837422.81	737.50	
	395300.82	3837422.81	737.30	
	395310.88	3837422.81	737.10	
	395320.94	3837422.81	737.30	
	395331.00	3837422.81	737.50	
	395341.06	3837422.81	737.60	
	395351.12	3837422.81	737.60	
	395361.18	3837422.81	737.70	
	395371.24	3837422.81	737.50	
	395381.30	3837422.81	737.30	
	395391.36	3837422.81	737.40	
	395401.42	3837422.81	737.50	
	395411.48	3837422.81	737.60	
	395421.54	3837422.81	737.50	
	395431.60	3837422.81	737.60	
	395441.66	3837422.81	737.70	
	395240.46	3837462.12	736.40	
	395250.52	3837462.12	736.60	
	395260.58	3837462.12	737.30	
	395270.64	3837462.12	737.40	
	395280.70	3837462.12	737.40	
	395290.76	3837462.12	737.40	
	395300.82	3837462.12	737.40	
	395310.88	3837462.12	737.30	
	395320.94	3837462.12	737.10	
	395331.00	3837462.12	737.00	
	395341.06	3837462.12	737.20	
	395351.12	3837462.12	737.30	

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AERMOD View by Lakes Environmental Software RE2 - 17 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395361.18	3837462.12	737.30	Option not Selected
	395371.24	3837462.12	737.30	
	395381.30	3837462.12	737.60	
	395391.36	3837462.12	737.70	
	395401.42	3837462.12	737.80	
	395411.48	3837462.12	737.80	
	395421.54	3837462.12	737.90	
	395431.60	3837462.12	737.90	
	395441.66	3837462.12	737.70	
	395240.46	3837501.43	736.00	
	395250.52	3837501.43	736.20	
	395260.58	3837501.43	736.80	
	395270.64	3837501.43	736.80	
	395280.70	3837501.43	736.90	
	395290.76	3837501.43	736.90	
	395300.82	3837501.43	736.80	
	395310.88	3837501.43	736.70	
	395320.94	3837501.43	737.10	
	395331.00	3837501.43	737.20	
	395341.06	3837501.43	737.30	
	395351.12	3837501.43	737.30	
	395361.18	3837501.43	737.30	
	395371.24	3837501.43	737.20	
	395381.30	3837501.43	737.00	
	395391.36	3837501.43	737.00	
	395401.42	3837501.43	737.20	
	395411.48	3837501.43	737.30	
	395421.54	3837501.43	737.30	
	395431.60	3837501.43	737.40	
	395441.66	3837501.43	737.30	
	395240.46	3837540.74	735.90	
	395250.52	3837540.74	736.00	
	395260.58	3837540.74	736.50	
	395270.64	3837540.74	736.50	
	395280.70	3837540.74	736.50	
	395290.76	3837540.74	736.70	
	395300.82	3837540.74	736.60	
	395310.88	3837540.74	736.50	
	395320.94	3837540.74	736.60	
	395331.00	3837540.74	736.70	
	395341.06	3837540.74	736.70	
	395351.12	3837540.74	736.70	
	395361.18	3837540.74	736.80	
	395371.24	3837540.74	736.80	
	395381.30	3837540.74	736.70	
	395391.36	3837540.74	736.80	
	395401.42	3837540.74	737.00	
	395411.48	3837540.74	737.00	

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AERMOD View by Lakes Environmental Software RE2 - 18 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART2	395421.54	3837540.74	736.80	Option not Selected
	395431.60	3837540.74	737.00	
	395441.66	3837540.74	736.90	
	395240.46	3837580.05	735.70	
	395250.52	3837580.05	735.80	
	395260.58	3837580.05	735.80	
	395270.64	3837580.05	735.90	
	395280.70	3837580.05	735.90	
	395290.76	3837580.05	735.90	
	395300.82	3837580.05	736.00	
	395310.88	3837580.05	736.00	
	395320.94	3837580.05	736.00	
	395331.00	3837580.05	736.00	
	395341.06	3837580.05	736.00	
	395351.12	3837580.05	736.10	
	395361.18	3837580.05	736.10	
	395371.24	3837580.05	736.10	
	395381.30	3837580.05	736.10	
	395391.36	3837580.05	736.20	
	395401.42	3837580.05	736.20	
	395411.48	3837580.05	736.20	
	395421.54	3837580.05	736.30	
	395431.60	3837580.05	736.30	
	395441.66	3837580.05	736.30	

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395039.27	3836800.04	742.60	Option not Selected
	395048.71	3836800.04	742.40	
	395058.15	3836800.04	741.60	
	395067.59	3836800.04	742.10	
	395077.03	3836800.04	742.80	
	395086.47	3836800.04	742.80	
	395095.91	3836800.04	742.90	
	395105.35	3836800.04	743.10	
	395114.79	3836800.04	743.30	
	395124.23	3836800.04	743.50	
	395133.67	3836800.04	743.60	
	395143.11	3836800.04	743.60	
	395152.55	3836800.04	743.30	
	395161.99	3836800.04	743.10	
	395171.43	3836800.04	743.50	
	395180.87	3836800.04	743.80	
	395190.31	3836800.04	743.90	
	395199.75	3836800.04	743.90	
	395209.19	3836800.04	744.00	
	395218.63	3836800.04	743.90	
	395228.07	3836800.04	743.70	

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AERMOD View by Lakes Environmental Software RE2 - 19 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395039.27	3836819.39	742.30	Option not Selected
	395048.71	3836819.39	740.30	
	395058.15	3836819.39	739.30	
	395067.59	3836819.39	740.90	
	395077.03	3836819.39	742.30	
	395086.47	3836819.39	742.80	
	395095.91	3836819.39	743.10	
	395105.35	3836819.39	743.20	
	395114.79	3836819.39	743.00	
	395124.23	3836819.39	743.00	
	395133.67	3836819.39	743.10	
	395143.11	3836819.39	743.10	
	395152.55	3836819.39	743.00	
	395161.99	3836819.39	742.90	
	395171.43	3836819.39	743.20	
	395180.87	3836819.39	743.30	
	395190.31	3836819.39	743.40	
	395199.75	3836819.39	743.60	
	395209.19	3836819.39	743.90	
	395218.63	3836819.39	743.90	
	395228.07	3836819.39	743.50	
	395039.27	3836838.74	742.20	
	395048.71	3836838.74	741.30	
	395058.15	3836838.74	741.80	
	395067.59	3836838.74	742.60	
	395077.03	3836838.74	742.80	
	395086.47	3836838.74	742.90	
	395095.91	3836838.74	742.70	
	395105.35	3836838.74	742.40	
	395114.79	3836838.74	742.30	
	395124.23	3836838.74	742.50	
	395133.67	3836838.74	742.80	
	395143.11	3836838.74	743.00	
	395152.55	3836838.74	743.10	
	395161.99	3836838.74	743.10	
	395171.43	3836838.74	743.20	
	395180.87	3836838.74	743.10	
	395190.31	3836838.74	743.00	
	395199.75	3836838.74	743.10	
	395209.19	3836838.74	743.10	
	395218.63	3836838.74	743.10	
	395228.07	3836838.74	743.00	
	395039.27	3836858.09	742.20	
	395048.71	3836858.09	742.40	
	395058.15	3836858.09	742.70	
	395067.59	3836858.09	742.70	
	395077.03	3836858.09	742.50	
	395086.47	3836858.09	742.10	

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AERMOD View by Lakes Environmental Software RE2 - 20 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395095.91	3836858.09	742.00	Option not Selected
	395105.35	3836858.09	742.20	
	395114.79	3836858.09	742.40	
	395124.23	3836858.09	742.40	
	395133.67	3836858.09	742.50	
	395143.11	3836858.09	743.00	
	395152.55	3836858.09	743.30	
	395161.99	3836858.09	743.30	
	395171.43	3836858.09	743.30	
	395180.87	3836858.09	743.20	
	395190.31	3836858.09	743.20	
	395199.75	3836858.09	743.20	
	395209.19	3836858.09	742.80	
	395218.63	3836858.09	742.70	
	395228.07	3836858.09	742.90	
	395039.27	3836877.44	742.30	
	395048.71	3836877.44	742.50	
	395058.15	3836877.44	742.40	
	395067.59	3836877.44	741.90	
	395077.03	3836877.44	741.70	
	395086.47	3836877.44	741.90	
	395095.91	3836877.44	742.30	
	395105.35	3836877.44	742.70	
	395114.79	3836877.44	742.80	
	395124.23	3836877.44	742.70	
	395133.67	3836877.44	742.50	
	395143.11	3836877.44	742.30	
	395152.55	3836877.44	742.20	
	395161.99	3836877.44	742.30	
	395171.43	3836877.44	742.60	
	395180.87	3836877.44	742.80	
	395190.31	3836877.44	742.90	
	395199.75	3836877.44	742.90	
	395209.19	3836877.44	742.50	
	395218.63	3836877.44	742.50	
	395228.07	3836877.44	742.70	
	395039.27	3836896.79	742.20	
	395048.71	3836896.79	742.30	
	395058.15	3836896.79	742.00	
	395067.59	3836896.79	741.60	
	395077.03	3836896.79	741.70	
	395086.47	3836896.79	742.10	
	395095.91	3836896.79	742.30	
	395105.35	3836896.79	742.40	
	395114.79	3836896.79	742.50	
	395124.23	3836896.79	742.60	
	395133.67	3836896.79	742.60	
	395143.11	3836896.79	742.30	

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AERMOD View by Lakes Environmental Software RE2 - 21 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395152.55	3836896.79	741.90	Option not Selected
	395161.99	3836896.79	741.90	
	395171.43	3836896.79	742.20	
	395180.87	3836896.79	742.40	
	395190.31	3836896.79	742.40	
	395199.75	3836896.79	742.50	
	395209.19	3836896.79	742.50	
	395218.63	3836896.79	742.40	
	395228.07	3836896.79	742.30	
	395039.27	3836916.14	742.10	
	395048.71	3836916.14	742.20	
	395058.15	3836916.14	742.00	
	395067.59	3836916.14	741.60	
	395077.03	3836916.14	741.80	
	395086.47	3836916.14	742.30	
	395095.91	3836916.14	742.30	
	395105.35	3836916.14	742.30	
	395114.79	3836916.14	742.30	
	395124.23	3836916.14	742.50	
	395133.67	3836916.14	742.50	
	395143.11	3836916.14	742.30	
	395152.55	3836916.14	741.90	
	395161.99	3836916.14	741.90	
	395171.43	3836916.14	742.20	
	395180.87	3836916.14	742.30	
	395190.31	3836916.14	742.10	
	395199.75	3836916.14	742.30	
	395209.19	3836916.14	742.90	
	395218.63	3836916.14	742.90	
	395228.07	3836916.14	742.40	
	395039.27	3836935.49	741.50	
	395048.71	3836935.49	741.30	
	395058.15	3836935.49	741.30	
	395067.59	3836935.49	741.40	
	395077.03	3836935.49	741.40	
	395086.47	3836935.49	741.40	
	395095.91	3836935.49	741.50	
	395105.35	3836935.49	741.50	
	395114.79	3836935.49	741.50	
	395124.23	3836935.49	741.60	
	395133.67	3836935.49	741.60	
	395143.11	3836935.49	741.60	
	395152.55	3836935.49	741.70	
	395161.99	3836935.49	741.70	
	395171.43	3836935.49	741.80	
	395180.87	3836935.49	741.80	
	395190.31	3836935.49	741.90	
	395199.75	3836935.49	742.20	

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AERMOD View by Lakes Environmental Software RE2 - 22 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395209.19	3836935.49	742.80	Option not Selected
	395218.63	3836935.49	742.80	
	395228.07	3836935.49	742.20	
	395039.27	3836954.84	741.30	
	395048.71	3836954.84	741.20	
	395058.15	3836954.84	741.60	
	395067.59	3836954.84	741.90	
	395077.03	3836954.84	741.90	
	395086.47	3836954.84	741.90	
	395095.91	3836954.84	741.90	
	395105.35	3836954.84	742.00	
	395114.79	3836954.84	742.10	
	395124.23	3836954.84	742.10	
	395133.67	3836954.84	742.10	
	395143.11	3836954.84	742.20	
	395152.55	3836954.84	742.30	
	395161.99	3836954.84	742.30	
	395171.43	3836954.84	742.30	
	395180.87	3836954.84	742.40	
	395190.31	3836954.84	742.50	
	395199.75	3836954.84	742.50	
	395209.19	3836954.84	742.50	
	395218.63	3836954.84	742.40	
	395228.07	3836954.84	741.90	
	395039.27	3836974.19	741.00	
	395048.71	3836974.19	740.90	
	395058.15	3836974.19	741.00	
	395067.59	3836974.19	741.10	
	395077.03	3836974.19	741.10	
	395086.47	3836974.19	741.20	
	395095.91	3836974.19	741.20	
	395105.35	3836974.19	741.30	
	395114.79	3836974.19	741.30	
	395124.23	3836974.19	741.30	
	395133.67	3836974.19	741.40	
	395143.11	3836974.19	741.40	
	395152.55	3836974.19	741.50	
	395161.99	3836974.19	741.50	
	395171.43	3836974.19	741.50	
	395180.87	3836974.19	741.60	
	395190.31	3836974.19	741.60	
	395199.75	3836974.19	741.70	
	395209.19	3836974.19	741.70	
	395218.63	3836974.19	741.70	
	395228.07	3836974.19	741.50	
	395039.27	3836993.54	740.90	
	395048.71	3836993.54	740.90	
	395058.15	3836993.54	741.00	

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AERMOD View by Lakes Environmental Software RE2 - 23 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395067.59	3836993.54	741.00	Option not Selected
	395077.03	3836993.54	741.10	
	395086.47	3836993.54	741.10	
	395095.91	3836993.54	741.10	
	395105.35	3836993.54	741.20	
	395114.79	3836993.54	741.20	
	395124.23	3836993.54	741.30	
	395133.67	3836993.54	741.30	
	395143.11	3836993.54	741.40	
	395152.55	3836993.54	741.40	
	395161.99	3836993.54	741.40	
	395171.43	3836993.54	741.40	
	395180.87	3836993.54	741.50	
	395190.31	3836993.54	741.50	
	395199.75	3836993.54	741.60	
	395209.19	3836993.54	741.60	
	395218.63	3836993.54	741.60	
	395228.07	3836993.54	741.60	
	395039.27	3837012.89	740.70	
	395048.71	3837012.89	740.90	
	395058.15	3837012.89	741.20	
	395067.59	3837012.89	741.40	
	395077.03	3837012.89	741.40	
	395086.47	3837012.89	741.50	
	395095.91	3837012.89	741.50	
	395105.35	3837012.89	741.50	
	395114.79	3837012.89	741.60	
	395124.23	3837012.89	741.60	
	395133.67	3837012.89	741.60	
	395143.11	3837012.89	741.60	
	395152.55	3837012.89	741.60	
	395161.99	3837012.89	741.70	
	395171.43	3837012.89	741.70	
	395180.87	3837012.89	741.70	
	395190.31	3837012.89	741.70	
	395199.75	3837012.89	741.70	
	395209.19	3837012.89	741.60	
	395218.63	3837012.89	741.50	
	395228.07	3837012.89	741.40	
	395039.27	3837032.24	740.50	
	395048.71	3837032.24	740.60	
	395058.15	3837032.24	741.10	
	395067.59	3837032.24	741.40	
	395077.03	3837032.24	741.40	
	395086.47	3837032.24	741.50	
	395095.91	3837032.24	741.60	
	395105.35	3837032.24	741.50	
	395114.79	3837032.24	741.60	

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AERMOD View by Lakes Environmental Software RE2 - 24 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395124.23	3837032.24	741.60	Option not Selected
	395133.67	3837032.24	741.60	
	395143.11	3837032.24	741.60	
	395152.55	3837032.24	741.60	
	395161.99	3837032.24	741.70	
	395171.43	3837032.24	741.70	
	395180.87	3837032.24	741.80	
	395190.31	3837032.24	741.80	
	395199.75	3837032.24	741.70	
	395209.19	3837032.24	741.40	
	395218.63	3837032.24	741.30	
	395228.07	3837032.24	741.30	
	395039.27	3837051.59	740.30	
	395048.71	3837051.59	740.40	
	395058.15	3837051.59	740.80	
	395067.59	3837051.59	741.10	
	395077.03	3837051.59	741.10	
	395086.47	3837051.59	741.30	
	395095.91	3837051.59	741.40	
	395105.35	3837051.59	741.40	
	395114.79	3837051.59	741.50	
	395124.23	3837051.59	741.50	
	395133.67	3837051.59	741.40	
	395143.11	3837051.59	741.40	
	395152.55	3837051.59	741.40	
	395161.99	3837051.59	741.70	
	395171.43	3837051.59	741.70	
	395180.87	3837051.59	741.70	
	395190.31	3837051.59	741.60	
	395199.75	3837051.59	741.50	
	395209.19	3837051.59	741.20	
	395218.63	3837051.59	741.10	
	395228.07	3837051.59	741.20	
	395039.27	3837070.94	740.20	
	395048.71	3837070.94	740.20	
	395058.15	3837070.94	740.50	
	395067.59	3837070.94	740.70	
	395077.03	3837070.94	740.90	
	395086.47	3837070.94	741.00	
	395095.91	3837070.94	741.00	
	395105.35	3837070.94	741.10	
	395114.79	3837070.94	741.20	
	395124.23	3837070.94	741.20	
	395133.67	3837070.94	741.10	
	395143.11	3837070.94	741.10	
	395152.55	3837070.94	741.10	
	395161.99	3837070.94	741.20	
	395171.43	3837070.94	741.30	

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AERMOD View by Lakes Environmental Software RE2 - 25 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395180.87	3837070.94	741.20	Option not Selected
	395190.31	3837070.94	741.00	
	395199.75	3837070.94	741.00	
	395209.19	3837070.94	740.90	
	395218.63	3837070.94	740.90	
	395228.07	3837070.94	740.90	
	395039.27	3837090.29	740.10	
	395048.71	3837090.29	740.00	
	395058.15	3837090.29	740.20	
	395067.59	3837090.29	740.50	
	395077.03	3837090.29	740.60	
	395086.47	3837090.29	740.70	
	395095.91	3837090.29	740.70	
	395105.35	3837090.29	740.80	
	395114.79	3837090.29	740.90	
	395124.23	3837090.29	740.90	
	395133.67	3837090.29	741.00	
	395143.11	3837090.29	741.00	
	395152.55	3837090.29	741.00	
	395161.99	3837090.29	741.00	
	395171.43	3837090.29	741.10	
	395180.87	3837090.29	741.00	
	395190.31	3837090.29	740.80	
	395199.75	3837090.29	740.70	
	395209.19	3837090.29	740.70	
	395218.63	3837090.29	740.60	
	395228.07	3837090.29	740.70	
	395039.27	3837109.64	739.90	
	395048.71	3837109.64	739.80	
	395058.15	3837109.64	740.10	
	395067.59	3837109.64	740.30	
	395077.03	3837109.64	740.30	
	395086.47	3837109.64	740.40	
	395095.91	3837109.64	740.50	
	395105.35	3837109.64	740.60	
	395114.79	3837109.64	740.60	
	395124.23	3837109.64	740.60	
	395133.67	3837109.64	740.50	
	395143.11	3837109.64	740.50	
	395152.55	3837109.64	740.60	
	395161.99	3837109.64	741.00	
	395171.43	3837109.64	741.10	
	395180.87	3837109.64	741.10	
	395190.31	3837109.64	741.00	
	395199.75	3837109.64	740.90	
	395209.19	3837109.64	740.50	
	395218.63	3837109.64	740.30	
	395228.07	3837109.64	740.40	

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AERMOD View by Lakes Environmental Software RE2 - 26 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395039.27	3837128.99	739.80	Option not Selected
	395048.71	3837128.99	739.60	
	395058.15	3837128.99	739.90	
	395067.59	3837128.99	740.10	
	395077.03	3837128.99	740.00	
	395086.47	3837128.99	740.20	
	395095.91	3837128.99	740.20	
	395105.35	3837128.99	740.30	
	395114.79	3837128.99	740.30	
	395124.23	3837128.99	740.30	
	395133.67	3837128.99	740.20	
	395143.11	3837128.99	740.30	
	395152.55	3837128.99	740.20	
	395161.99	3837128.99	740.30	
	395171.43	3837128.99	740.40	
	395180.87	3837128.99	740.50	
	395190.31	3837128.99	740.60	
	395199.75	3837128.99	740.50	
	395209.19	3837128.99	740.10	
	395218.63	3837128.99	739.90	
	395228.07	3837128.99	740.10	
	395039.27	3837148.34	739.60	
	395048.71	3837148.34	739.40	
	395058.15	3837148.34	739.50	
	395067.59	3837148.34	739.60	
	395077.03	3837148.34	739.60	
	395086.47	3837148.34	739.70	
	395095.91	3837148.34	739.70	
	395105.35	3837148.34	739.80	
	395114.79	3837148.34	739.80	
	395124.23	3837148.34	739.80	
	395133.67	3837148.34	739.80	
	395143.11	3837148.34	739.80	
	395152.55	3837148.34	739.80	
	395161.99	3837148.34	739.80	
	395171.43	3837148.34	740.00	
	395180.87	3837148.34	740.00	
	395190.31	3837148.34	740.00	
	395199.75	3837148.34	740.00	
	395209.19	3837148.34	739.80	
	395218.63	3837148.34	739.60	
	395228.07	3837148.34	739.80	
	395039.27	3837167.69	739.00	
	395048.71	3837167.69	739.00	
	395058.15	3837167.69	739.00	
	395067.59	3837167.69	739.10	
	395077.03	3837167.69	739.10	
	395086.47	3837167.69	739.10	

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AERMOD View by Lakes Environmental Software RE2 - 27 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART3	395095.91	3837167.69	739.20	Option not Selected
	395105.35	3837167.69	739.20	
	395114.79	3837167.69	739.20	
	395124.23	3837167.69	739.30	
	395133.67	3837167.69	739.30	
	395143.11	3837167.69	739.40	
	395152.55	3837167.69	739.40	
	395161.99	3837167.69	739.40	
	395171.43	3837167.69	739.50	
	395180.87	3837167.69	739.50	
	395190.31	3837167.69	739.50	
	395199.75	3837167.69	739.60	
	395209.19	3837167.69	739.50	
	395218.63	3837167.69	739.50	
	395228.07	3837167.69	739.40	
	395039.27	3837187.04	738.70	
	395048.71	3837187.04	738.70	
	395058.15	3837187.04	738.80	
	395067.59	3837187.04	738.80	
	395077.03	3837187.04	738.80	
	395086.47	3837187.04	738.80	
	395095.91	3837187.04	738.80	
	395105.35	3837187.04	738.80	
	395114.79	3837187.04	738.90	
	395124.23	3837187.04	738.90	
	395133.67	3837187.04	739.00	
	395143.11	3837187.04	739.10	
	395152.55	3837187.04	739.10	
	395161.99	3837187.04	739.10	
	395171.43	3837187.04	739.20	
	395180.87	3837187.04	739.30	
	395190.31	3837187.04	739.40	
	395199.75	3837187.04	739.40	
	395209.19	3837187.04	739.40	
	395218.63	3837187.04	739.30	
	395228.07	3837187.04	739.10	

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	394853.55	3837598.62	734.10	Option not Selected
	394899.98	3837598.62	734.50	
	394946.41	3837598.62	734.80	
	394992.84	3837598.62	735.10	
	395039.27	3837598.62	735.10	
	395085.70	3837598.62	735.20	
	395132.13	3837598.62	735.30	
	395178.56	3837598.62	735.40	
	395224.99	3837598.62	735.40	

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AERMOD View by Lakes Environmental Software RE2 - 28 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	395271.42	3837598.62	735.30	Option not Selected
	395317.85	3837598.62	735.40	
	395364.28	3837598.62	735.50	
	395410.71	3837598.62	735.80	
	395457.14	3837598.62	736.40	
	395503.57	3837598.62	736.30	
	395550.00	3837598.62	736.50	
	395596.43	3837598.62	736.70	
	395642.86	3837598.62	736.80	
	395689.29	3837598.62	737.00	
	395735.72	3837598.62	737.00	
	395782.15	3837598.62	737.00	
	394853.55	3837616.26	734.00	
	394899.98	3837616.26	734.40	
	394946.41	3837616.26	735.20	
	394992.84	3837616.26	735.40	
	395039.27	3837616.26	735.00	
	395085.70	3837616.26	735.00	
	395132.13	3837616.26	735.40	
	395178.56	3837616.26	735.20	
	395224.99	3837616.26	735.20	
	395271.42	3837616.26	735.20	
	395317.85	3837616.26	735.10	
	395364.28	3837616.26	735.50	
	395410.71	3837616.26	735.50	
	395457.14	3837616.26	736.50	
	395503.57	3837616.26	736.30	
	395550.00	3837616.26	736.40	
	395596.43	3837616.26	736.90	
	395642.86	3837616.26	737.00	
	395689.29	3837616.26	737.00	
	395735.72	3837616.26	736.80	
	395782.15	3837616.26	736.90	
	394853.55	3837633.90	733.80	
	394899.98	3837633.90	734.30	
	394946.41	3837633.90	735.30	
	394992.84	3837633.90	735.40	
	395039.27	3837633.90	734.80	
	395085.70	3837633.90	734.80	
	395132.13	3837633.90	735.20	
	395178.56	3837633.90	735.00	
	395224.99	3837633.90	735.00	
	395271.42	3837633.90	735.20	
	395317.85	3837633.90	734.90	
	395364.28	3837633.90	735.60	
	395410.71	3837633.90	735.30	
	395457.14	3837633.90	736.30	
	395503.57	3837633.90	736.10	

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AERMOD View by Lakes Environmental Software RE2 - 29 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	395550.00	3837633.90	736.30	Option not Selected
	395596.43	3837633.90	737.00	
	395642.86	3837633.90	737.20	
	395689.29	3837633.90	736.80	
	395735.72	3837633.90	736.60	
	395782.15	3837633.90	736.80	
	394853.55	3837651.54	733.60	
	394899.98	3837651.54	734.20	
	394946.41	3837651.54	735.30	
	394992.84	3837651.54	735.40	
	395039.27	3837651.54	734.60	
	395085.70	3837651.54	734.40	
	395132.13	3837651.54	734.80	
	395178.56	3837651.54	734.90	
	395224.99	3837651.54	734.80	
	395271.42	3837651.54	735.00	
	395317.85	3837651.54	734.80	
	395364.28	3837651.54	735.50	
	395410.71	3837651.54	735.10	
	395457.14	3837651.54	735.90	
	395503.57	3837651.54	735.30	
	395550.00	3837651.54	735.50	
	395596.43	3837651.54	735.80	
	395642.86	3837651.54	736.00	
	395689.29	3837651.54	736.30	
	395735.72	3837651.54	736.40	
	395782.15	3837651.54	736.60	
	394853.55	3837669.18	733.40	
	394899.98	3837669.18	734.00	
	394946.41	3837669.18	734.90	
	394992.84	3837669.18	735.10	
	395039.27	3837669.18	734.30	
	395085.70	3837669.18	734.10	
	395132.13	3837669.18	734.70	
	395178.56	3837669.18	734.70	
	395224.99	3837669.18	734.80	
	395271.42	3837669.18	734.90	
	395317.85	3837669.18	734.60	
	395364.28	3837669.18	735.30	
	395410.71	3837669.18	734.90	
	395457.14	3837669.18	735.60	
	395503.57	3837669.18	734.90	
	395550.00	3837669.18	735.20	
	395596.43	3837669.18	735.40	
	395642.86	3837669.18	735.60	
	395689.29	3837669.18	736.00	
	395735.72	3837669.18	736.30	
	395782.15	3837669.18	736.40	

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AERMOD View by Lakes Environmental Software RE2 - 30 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	394853.55	3837686.82	733.30	Option not Selected
	394899.98	3837686.82	733.70	
	394946.41	3837686.82	734.10	
	394992.84	3837686.82	734.20	
	395039.27	3837686.82	734.20	
	395085.70	3837686.82	733.80	
	395132.13	3837686.82	734.60	
	395178.56	3837686.82	734.50	
	395224.99	3837686.82	734.60	
	395271.42	3837686.82	734.70	
	395317.85	3837686.82	734.50	
	395364.28	3837686.82	735.10	
	395410.71	3837686.82	734.70	
	395457.14	3837686.82	735.50	
	395503.57	3837686.82	734.40	
	395550.00	3837686.82	734.70	
	395596.43	3837686.82	734.90	
	395642.86	3837686.82	735.10	
	395689.29	3837686.82	736.00	
	395735.72	3837686.82	736.00	
	395782.15	3837686.82	736.20	
	394853.55	3837704.46	733.10	
	394899.98	3837704.46	733.40	
	394946.41	3837704.46	733.80	
	394992.84	3837704.46	733.80	
	395039.27	3837704.46	734.00	
	395085.70	3837704.46	733.60	
	395132.13	3837704.46	734.60	
	395178.56	3837704.46	734.50	
	395224.99	3837704.46	734.50	
	395271.42	3837704.46	734.50	
	395317.85	3837704.46	734.30	
	395364.28	3837704.46	735.00	
	395410.71	3837704.46	734.60	
	395457.14	3837704.46	735.30	
	395503.57	3837704.46	734.50	
	395550.00	3837704.46	734.90	
	395596.43	3837704.46	735.20	
	395642.86	3837704.46	735.40	
	395689.29	3837704.46	735.70	
	395735.72	3837704.46	735.70	
	395782.15	3837704.46	735.90	
	394853.55	3837722.10	732.90	
	394899.98	3837722.10	733.20	
	394946.41	3837722.10	733.60	
	394992.84	3837722.10	733.60	
	395039.27	3837722.10	733.50	
	395085.70	3837722.10	733.50	

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AERMOD View by Lakes Environmental Software RE2 - 31 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	395132.13	3837722.10	734.40	Option not Selected
	395178.56	3837722.10	734.40	
	395224.99	3837722.10	734.20	
	395271.42	3837722.10	734.30	
	395317.85	3837722.10	734.10	
	395364.28	3837722.10	734.80	
	395410.71	3837722.10	734.40	
	395457.14	3837722.10	735.10	
	395503.57	3837722.10	734.50	
	395550.00	3837722.10	735.00	
	395596.43	3837722.10	735.40	
	395642.86	3837722.10	735.60	
	395689.29	3837722.10	735.40	
	395735.72	3837722.10	735.60	
	395782.15	3837722.10	735.70	
	394853.55	3837739.74	732.80	
	394899.98	3837739.74	733.40	
	394946.41	3837739.74	733.60	
	394992.84	3837739.74	733.40	
	395039.27	3837739.74	733.30	
	395085.70	3837739.74	733.30	
	395132.13	3837739.74	733.30	
	395178.56	3837739.74	733.30	
	395224.99	3837739.74	733.50	
	395271.42	3837739.74	734.10	
	395317.85	3837739.74	734.00	
	395364.28	3837739.74	734.60	
	395410.71	3837739.74	734.20	
	395457.14	3837739.74	734.90	
	395503.57	3837739.74	734.00	
	395550.00	3837739.74	734.50	
	395596.43	3837739.74	734.70	
	395642.86	3837739.74	734.90	
	395689.29	3837739.74	735.20	
	395735.72	3837739.74	735.60	
	395782.15	3837739.74	735.50	
	394853.55	3837757.38	732.80	
	394899.98	3837757.38	733.30	
	394946.41	3837757.38	733.40	
	394992.84	3837757.38	733.30	
	395039.27	3837757.38	733.60	
	395085.70	3837757.38	733.30	
	395132.13	3837757.38	733.60	
	395178.56	3837757.38	733.40	
	395224.99	3837757.38	733.60	
	395271.42	3837757.38	734.00	
	395317.85	3837757.38	733.80	
	395364.28	3837757.38	734.50	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	395410.71	3837757.38	734.10	Option not Selected
	395457.14	3837757.38	734.90	
	395503.57	3837757.38	733.90	
	395550.00	3837757.38	734.10	
	395596.43	3837757.38	734.40	
	395642.86	3837757.38	734.60	
	395689.29	3837757.38	735.10	
	395735.72	3837757.38	735.00	
	395782.15	3837757.38	735.40	
	394853.55	3837775.02	732.80	
	394899.98	3837775.02	733.00	
	394946.41	3837775.02	733.10	
	394992.84	3837775.02	733.00	
	395039.27	3837775.02	733.40	
	395085.70	3837775.02	733.00	
	395132.13	3837775.02	733.40	
	395178.56	3837775.02	733.30	
	395224.99	3837775.02	733.50	
	395271.42	3837775.02	733.70	
	395317.85	3837775.02	733.60	
	395364.28	3837775.02	734.30	
	395410.71	3837775.02	733.90	
	395457.14	3837775.02	734.60	
	395503.57	3837775.02	733.40	
	395550.00	3837775.02	733.70	
	395596.43	3837775.02	733.90	
	395642.86	3837775.02	734.20	
	395689.29	3837775.02	734.60	
	395735.72	3837775.02	735.00	
	395782.15	3837775.02	735.20	
	394853.55	3837792.66	732.50	
	394899.98	3837792.66	732.70	
	394946.41	3837792.66	732.70	
	394992.84	3837792.66	732.70	
	395039.27	3837792.66	733.20	
	395085.70	3837792.66	732.80	
	395132.13	3837792.66	733.20	
	395178.56	3837792.66	733.10	
	395224.99	3837792.66	733.30	
	395271.42	3837792.66	733.60	
	395317.85	3837792.66	733.40	
	395364.28	3837792.66	734.00	
	395410.71	3837792.66	733.80	
	395457.14	3837792.66	734.40	
	395503.57	3837792.66	733.80	
	395550.00	3837792.66	734.20	
	395596.43	3837792.66	734.30	
	395642.86	3837792.66	734.50	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	395689.29	3837792.66	734.60	Option not Selected
	395735.72	3837792.66	735.00	
	395782.15	3837792.66	735.30	
	394853.55	3837810.30	732.50	
	394899.98	3837810.30	733.00	
	394946.41	3837810.30	733.20	
	394992.84	3837810.30	732.70	
	395039.27	3837810.30	733.00	
	395085.70	3837810.30	732.60	
	395132.13	3837810.30	733.00	
	395178.56	3837810.30	732.90	
	395224.99	3837810.30	733.10	
	395271.42	3837810.30	733.40	
	395317.85	3837810.30	733.30	
	395364.28	3837810.30	733.90	
	395410.71	3837810.30	733.60	
	395457.14	3837810.30	734.20	
	395503.57	3837810.30	733.70	
	395550.00	3837810.30	734.30	
	395596.43	3837810.30	734.40	
	395642.86	3837810.30	734.60	
	395689.29	3837810.30	734.50	
	395735.72	3837810.30	734.90	
	395782.15	3837810.30	735.30	
	394853.55	3837827.94	732.40	
	394899.98	3837827.94	732.90	
	394946.41	3837827.94	733.00	
	394992.84	3837827.94	732.60	
	395039.27	3837827.94	732.80	
	395085.70	3837827.94	732.40	
	395132.13	3837827.94	732.80	
	395178.56	3837827.94	732.70	
	395224.99	3837827.94	733.00	
	395271.42	3837827.94	733.20	
	395317.85	3837827.94	733.10	
	395364.28	3837827.94	733.70	
	395410.71	3837827.94	733.50	
	395457.14	3837827.94	734.10	
	395503.57	3837827.94	733.50	
	395550.00	3837827.94	733.90	
	395596.43	3837827.94	734.10	
	395642.86	3837827.94	734.30	
	395689.29	3837827.94	734.30	
	395735.72	3837827.94	734.70	
	395782.15	3837827.94	734.80	
	394853.55	3837845.58	732.10	
	394899.98	3837845.58	732.50	
	394946.41	3837845.58	732.50	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	394992.84	3837845.58	732.20	Option not Selected
	395039.27	3837845.58	732.70	
	395085.70	3837845.58	732.20	
	395132.13	3837845.58	732.60	
	395178.56	3837845.58	732.60	
	395224.99	3837845.58	732.70	
	395271.42	3837845.58	733.00	
	395317.85	3837845.58	733.00	
	395364.28	3837845.58	733.50	
	395410.71	3837845.58	733.30	
	395457.14	3837845.58	733.90	
	395503.57	3837845.58	733.30	
	395550.00	3837845.58	733.70	
	395596.43	3837845.58	733.90	
	395642.86	3837845.58	734.10	
	395689.29	3837845.58	734.10	
	395735.72	3837845.58	734.40	
	395782.15	3837845.58	734.50	
	394853.55	3837863.22	731.90	
	394899.98	3837863.22	732.00	
	394946.41	3837863.22	732.00	
	394992.84	3837863.22	731.80	
	395039.27	3837863.22	732.60	
	395085.70	3837863.22	732.00	
	395132.13	3837863.22	732.50	
	395178.56	3837863.22	732.50	
	395224.99	3837863.22	732.60	
	395271.42	3837863.22	732.80	
	395317.85	3837863.22	732.80	
	395364.28	3837863.22	733.40	
	395410.71	3837863.22	733.10	
	395457.14	3837863.22	733.70	
	395503.57	3837863.22	733.00	
	395550.00	3837863.22	733.40	
	395596.43	3837863.22	733.50	
	395642.86	3837863.22	733.80	
	395689.29	3837863.22	733.30	
	395735.72	3837863.22	734.30	
	395782.15	3837863.22	733.60	
	394853.55	3837880.86	731.90	
	394899.98	3837880.86	732.30	
	394946.41	3837880.86	732.20	
	394992.84	3837880.86	731.90	
	395039.27	3837880.86	732.30	
	395085.70	3837880.86	731.80	
	395132.13	3837880.86	732.40	
	395178.56	3837880.86	732.40	
	395224.99	3837880.86	732.40	

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	395271.42	3837880.86	732.60	Option not Selected
	395317.85	3837880.86	732.60	
	395364.28	3837880.86	733.30	
	395410.71	3837880.86	733.00	
	395457.14	3837880.86	733.60	
	395503.57	3837880.86	733.20	
	395550.00	3837880.86	733.70	
	395596.43	3837880.86	733.90	
	395642.86	3837880.86	734.00	
	395689.29	3837880.86	733.10	
	395735.72	3837880.86	734.10	
	395782.15	3837880.86	733.60	
	394853.55	3837898.50	731.70	
	394899.98	3837898.50	732.30	
	394946.41	3837898.50	732.30	
	394992.84	3837898.50	731.80	
	395039.27	3837898.50	732.10	
	395085.70	3837898.50	731.70	
	395132.13	3837898.50	732.30	
	395178.56	3837898.50	732.20	
	395224.99	3837898.50	732.20	
	395271.42	3837898.50	732.30	
	395317.85	3837898.50	732.50	
	395364.28	3837898.50	733.30	
	395410.71	3837898.50	732.80	
	395457.14	3837898.50	733.50	
	395503.57	3837898.50	733.20	
	395550.00	3837898.50	733.70	
	395596.43	3837898.50	733.90	
	395642.86	3837898.50	734.10	
	395689.29	3837898.50	733.10	
	395735.72	3837898.50	734.00	
	395782.15	3837898.50	733.60	
	394853.55	3837916.14	731.30	
	394899.98	3837916.14	731.70	
	394946.41	3837916.14	731.90	
	394992.84	3837916.14	731.70	
	395039.27	3837916.14	732.00	
	395085.70	3837916.14	731.50	
	395132.13	3837916.14	732.10	
	395178.56	3837916.14	732.10	
	395224.99	3837916.14	732.00	
	395271.42	3837916.14	732.10	
	395317.85	3837916.14	732.40	
	395364.28	3837916.14	733.00	
	395410.71	3837916.14	732.60	
	395457.14	3837916.14	733.30	
	395503.57	3837916.14	733.20	

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
AERMOD View by Lakes Environmental Software RE2 - 36 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Receptor Network ID	Location: X-Coordinate [m]	Location: Y-Coordinate [m]	Terrain Elevations (Optional)	Flagpole Heights (Optional)
UCART4	395550.00	3837916.14	733.50	Option not Selected
	395596.43	3837916.14	733.70	
	395642.86	3837916.14	733.80	
	395689.29	3837916.14	733.00	
	395735.72	3837916.14	733.90	
	395782.15	3837916.14	733.50	
	394853.55	3837933.78	731.00	
	394899.98	3837933.78	731.30	
	394946.41	3837933.78	731.50	
	394992.84	3837933.78	731.40	
	395039.27	3837933.78	731.80	
	395085.70	3837933.78	731.30	
	395132.13	3837933.78	731.80	
	395178.56	3837933.78	731.90	
	395224.99	3837933.78	731.70	
	395271.42	3837933.78	732.00	
	395317.85	3837933.78	732.20	
	395364.28	3837933.78	732.60	
	395410.71	3837933.78	732.40	
	395457.14	3837933.78	733.00	
	395503.57	3837933.78	732.90	
	395550.00	3837933.78	733.20	
	395596.43	3837933.78	733.30	
	395642.86	3837933.78	733.50	
	395689.29	3837933.78	732.90	
	395735.72	3837933.78	733.50	
	395782.15	3837933.78	733.40	
	394853.55	3837951.42	730.90	
	394899.98	3837951.42	731.20	
	394946.41	3837951.42	731.30	
	394992.84	3837951.42	731.30	
	395039.27	3837951.42	731.00	
	395085.70	3837951.42	731.20	
	395132.13	3837951.42	731.40	
	395178.56	3837951.42	731.50	
	395224.99	3837951.42	731.30	
	395271.42	3837951.42	731.80	
	395317.85	3837951.42	732.10	
	395364.28	3837951.42	732.30	
	395410.71	3837951.42	732.50	
	395457.14	3837951.42	732.60	
	395503.57	3837951.42	732.70	
	395550.00	3837951.42	732.90	
	395596.43	3837951.42	733.10	
	395642.86	3837951.42	733.30	
	395689.29	3837951.42	733.10	
	395735.72	3837951.42	733.20	
	395782.15	3837951.42	733.60	

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
AERMOD View by Lakes Environmental Software RE2 - 37 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Receptor Pathway

AERMOD

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
AERMOD View by Lakes Environmental Software RE2 - 38 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Source Pathway - Source Inputs

B03-1 (cont'd) AERMOD

Polygon Area Sources

Source Type: AREA POLY

Source: PAREA1 (Construction Area)

Base Elevation (Optional)	Release Height [m]	Emission Rate [g/ (s-m^2)]	Initial Vertical Dim. [m]	Number of Vertices (or sides)	X Coordinate for Vertices [m]	Y Coordinate for Vertices [m]
738.25	4.30	5.73E-9	2.15	13	396189.69	3837571.10
		5.73E-9			395452.88	3837562.53
		5.73E-9			395457.16	3836757.18
		5.73E-9			394985.94	3836765.74
		5.73E-9			394985.94	3836637.23
		5.73E-9			394848.86	3836637.23
		5.73E-9			394853.14	3836118.89
		5.73E-9			395101.61	3836118.89
		5.73E-9			395110.17	3836016.08
		5.73E-9			396099.73	3836016.08
		5.73E-9			396134.00	3836084.62
		5.73E-9			396202.54	3836058.92
		5.73E-9			396378.18	3836054.63

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
AERMOD View by Lakes Environmental Software SO1 - 1 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Source Pathway

AERMOD

Building Downwash Information

Option not in use

Emission Rate Units for Output

For Concentration		For Deposition	
Unit Factor:	1E6	Unit Factor:	3.6E3
Emission Unit Label:	GRAMS/SEC	Emission Unit Label:	GRAMS/SEC
Concentration Unit Label:	MICROGRAMS/M**3	Deposition Unit Label:	GRAMS/M**2

Data for Gases

0.00

Gas & Particle Data For Risk Mode

Vapor Phase

Source ID	Scavenging Coef. Liquid [(s-mm/hr)^-1]	Scavenging Coef. Frozen [(s-mm/hr)^-1]

Particle Phase

Source ID	Particle Diameter [microns]	Mass Fraction [0 to 1]	Particle Density [g/cm^3]	Scavenging Coef. Liquid [(s-mm/hr)^-1]	Scavenging Coef. Frozen [(s-mm/hr)^-1]

Particle-Bound Phase

Source ID	Particle Diameter [microns]	Mass Fraction [0 to 1]	Particle Density [g/cm^3]	Scavenging Coef. Liquid [(s-mm/hr)^-1]	Scavenging Coef. Frozen [(s-mm/hr)^-1]

Hourly Emission Rate File

Hourly Emission Rate Filename:
Parkway Village EIR Construction.emi
Sources or Range of Sources in Hourly File
PAREA1

Variable Emissions

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Source Pathway

AERMOD

Hour / Day-of-Week Emission Rate Variation

Scenario: Scenario 1

Source ID: PAREA1

Hour	Mon	Tues	Wed	Thr	Fri	Sat	Sun
1:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
9:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
10:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
11:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
12:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
14:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
15:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
16:00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
17:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Meteorology Pathway

AERMOD

Met Input Data

Surface Met Data

Filename: C:\Users\jclar\OneDrive\Clark and Associates\Project 287 - ABJC - Victorville Warehouse MND\AERMOD\KV
Format Type: Default AERMET format

Profile Met Data

Filename: C:\Users\jclar\OneDrive\Clark and Associates\Project 287 - ABJC - Victorville Warehouse MND\AERMOD\KV
Format Type: Default AERMET format

Wind Speed

☐ Wind Speeds are Vector Mean (Not Scalar Means)

Wind Direction

Rotation Adjustment [deg]:

Potential Temperature Profile

Base Elevation above MSL (for Primary Met Tower): 2,345.00 [ft]

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface		2017			
Upper Air		2017			

Data Period

Data Period to Process

Start Date: 1/1/2017 Start Hour: 1 End Date: 12/31/2021 End Hour: 24

Wind Speed Categories

Stability Category	Wind Speed [m/s]	Stability Category	Wind Speed [m/s]
A	1.54	D	8.23
B	3.09	E	10.8
C	5.14	F	No Upper Bound

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
AERMOD View by Lakes Environmental Software ME - 1 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Output Pathway

AERMOD

Tabular Printed Outputs

Short Term Averaging Period	RECTABLE Highest Values Table										MAXTABLE Maximum Values Table	DAYTABLE Daily Values Table
	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th		
1	☑	☐	☐	☐	☐	☐	☐	☐	☐	☐		No

Contour Plot Files (PLOTFILE)

Path for PLOTFILES: Parkway Village EIR Construction.AD

Averaging Period	Source Group ID	High Value	File Name
1	ALL	1st	01H1GALL.PLT
Annual	ALL	N/A	AN00GALL.PLT

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc
AERMOD View by Lakes Environmental Software OU - 1 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Results Summary

C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\

B03-1

DPM - Concentration - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	0.49907	ug/m^3	395441.66	3837304.88	738.70	0.00	738.70	6/3/2019, 6
ANNUAL		0.03225	ug/m^3	395441.66	3836793.85	744.90	0.00	744.90	

DPM - Deposition - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	0.00001	g/m^2	394846.05	3835994.10	749.90	0.00	749.90	
ANNUAL		0.00257	g/m^2	395441.66	3836793.85	744.90	0.00	744.90	

DPM - Dry Deposition - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	0.00001	g/m^2	394846.05	3835994.10	749.90	0.00	749.90	
ANNUAL		0.00254	g/m^2	395441.66	3836793.85	744.90	0.00	744.90	

DPM - Wet Deposition - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	0.00001	g/m^2	394846.05	3835994.10	749.90	0.00	749.90	
ANNUAL		0.00004	g/m^2	395421.54	3836911.78	743.10	0.00	743.10	

Project File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR Construction.isc

AERMOD View by Lakes Environmental Software RS - 1 of 1 10/31/2025

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

```
**
**************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 13.0.0
** Lakes Environmental Software Inc.
** Date: 10/31/2025
** File: C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\Parkway Village EIR
Construction.ADI
**
**************************************
**
**
**************************************
** AERMOD Control Pathway
**************************************
**
**
CO STARTING
  TITLEONE C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\
  MODELOPT CONC DEPOS DDEP WDEP DRYDPLT WETDPLT ALPHA
  GDSEASON 4 4 5 5 5 1 1 1 2 2 3 3
  GDLANUSE 36*1
  AVERTIME 1 ANNUAL
  URBANOPT 645 Lancaster_Population
  POLLUTID DPM
  RUNORNOT RUN
  ERRORFIL "Parkway Village EIR Construction.err"
CO FINISHED
**
**************************************
** AERMOD Source Pathway
**************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
  LOCATION PAREA1      AREAPOLY   396189.692  3837571.098     738.250
** DESCRSRC Construction Area
** Source Parameters **
  SRCPARAM PAREA1      5.7342E-09    4.300       13    2.150
  AREAVERT PAREA1      396189.692 3837571.098 395452.878 3837562.531
  AREAVERT PAREA1      395457.161 3836757.176 394985.943 3836765.743
  AREAVERT PAREA1      394985.943 3836637.229 394848.861 3836637.229
  AREAVERT PAREA1      394853.145 3836118.889 395101.606 3836118.889
  AREAVERT PAREA1      395110.173 3836016.077 396099.732 3836016.077
  AREAVERT PAREA1      396134.003 3836084.618 396202.544 3836058.915
  AREAVERT PAREA1      396378.180 3836054.631
  URBANSRC ALL

** Variable Emissions Type: "By Hour / Seven Days (HRDOW7)"
** Variable Emission Scenario: "Scenario 1"
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 1.0
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

```
  EMISFACT PAREA1      HRDOW7 1.0 1.0 1.0 0.0 1.0 1.0 1.0 1.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 1.0
  EMISFACT PAREA1      HRDOW7 1.0 1.0 1.0 0.0 1.0 1.0 1.0 1.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 1.0
  EMISFACT PAREA1      HRDOW7 1.0 1.0 1.0 0.0 1.0 1.0 1.0 1.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 1.0
  EMISFACT PAREA1      HRDOW7 1.0 1.0 1.0 0.0 1.0 1.0 1.0 1.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 1.0
  EMISFACT PAREA1      HRDOW7 1.0 1.0 1.0 0.0 1.0 1.0 1.0 1.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 1.0
  EMISFACT PAREA1      HRDOW7 1.0 1.0 1.0 0.0 1.0 1.0 1.0 1.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  EMISFACT PAREA1      HRDOW7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0
  METHOD_2 PAREA1      0.9 1.0
  HOUREMIS "PARKWAY VILLAGE EIR CONSTRUCTION.EMI" PAREA1
  SRCGROUP ALL
SO FINISHED
**
**************************************
** AERMOD Receptor Pathway
**************************************
**
**
RE STARTING
  INCLUDED "Parkway Village EIR Construction.rou"
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
ME STARTING
  SURFFILE "C:\Users\jclar\OneDrive\Clark and Associates\Project 287 - ABJC - Victorville Warehouse
MND\AERMOD\KWJF_723816_03159\723816_2017-2021_AdjU.sfc"
  PROFFILE "C:\Users\jclar\OneDrive\Clark and Associates\Project 287 - ABJC - Victorville Warehouse
MND\AERMOD\KWJF_723816_03159\723816_2017-2021_AdjU.PFL"
  SURFDATA 3159 2017
  UAIRDATA 93214 2017
  PROFBASE 2345.0 FEET
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

```
OU STARTING
  RECTABLE ALLAVE 1ST
  RECTABLE 1 1ST
** 1-Hour Binary POSTFILE(s) for the Plume Animation
  POSTFILE 1 ALL UNFORM "Parkway Village EIR Construction.AD\1HGALLUN_PA.POS" 31
** Auto-Generated Plotfiles
  PLOTFILE 1 ALL 1ST "Parkway Village EIR Construction.AD\01H1GALL.PLT" 32
  PLOTFILE ANNUAL ALL "Parkway Village EIR Construction.AD\AN00GALL.PLT" 33
  SUMMFILE "Parkway Village EIR Construction.sum"
OU FINISHED


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

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

 A Total of         0 Fatal Error Message(s)
 A Total of         3 Warning Message(s)
 A Total of         0 Informational Message(s)


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


   ********  WARNING MESSAGES  ********
 CO W320     24     URBOPT: Input Parameter May Be Out-of-Range for Parameter      URB-POP
 ME W186     99     MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used         0.50
 ME W187     99     MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

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

   *** AERMOD - VERSION 24142  ***   *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
 *** AERMET - VERSION  21112 ***  ***                                                ***       08:45:15
                                                                    PAGE  1
 *** MODELOPTs:   NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA
URBAN  ADJ_U*

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

 ** Model Options Selected:
    * Model Allows User-Specified Options
    * Model Is Setup For Calculation of Average CONCentration Values.
    * Model Is Setup For Calculation of Total DEPOSition Values.
    * Model Is Setup For Calculation of Dry DEPosition Values.
    * Model Is Setup For Calculation of Wet DEPosition Values.
    * NO GAS DEPOSITION Data Provided.
    * PARTICLE DEPOSITION Data Provided.
    * Model Uses DRY DEPLETION. DDPLETE = T
    * Model Uses WET DEPLETION. WETDPLT = T
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

```
  * Stack-tip Downwash.
  * Model Accounts for ELEVated Terrain Effects.
  * Use Calms Processing Routine.
  * Use Missing Data Processing Routine.
  * No Exponential Decay.
  * Model Uses URBAN Dispersion Algorithm for the SBL for     1 Source(s),
    for Total of    1 Urban Area(s):
Urban Population =       645.0 ; Urban Roughness Length =  1.000 m
  * Urban Roughness Length of 1.0 Meter Used.
  * 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  1 Short Term Average(s) of:   1-HR
  and Calculates ANNUAL Averages

**This Run Includes:      1 Source(s);       1 Source Group(s); and    1764 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 Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)
      Model Outputs External File(s) of Concurrent Values for Postprocessing (POSTFILE Keyword)
      Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
      Model Outputs Separate Summary File of High Ranked Values (SUMMFILE 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) =   714.76 ;  Decay Coef. =    0.000     ;  Rot. Angle =     0.0
 Concentration:  Emission Units = GRAMS/SEC                        ;  Emission Rate Unit Factor =   0.10000E+07
           Output Units   = MICROGRAMS/M**3
   Deposition:  Emission Units = GRAMS/SEC                         ;  Emission Rate Unit Factor =    3600.0
           Output Units   = GRAMS/M**2

**Approximate Storage Requirements of Model =      3.9 MB of RAM.
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

```
**Input Runstream File:         aermod.inp
**Output Print File:            aermod.out

**Detailed Error/Message File:   Parkway Village EIR Construction.err
**File for Summary of Results:   Parkway Village EIR Construction.sum
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                          ***       08:45:15
                                                                  PAGE   2
*** MODELOPTs:  NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA
URBAN  ADJ_U*


                          *** AREAPOLY SOURCE DATA ***

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

PAREA1       METH2  0.57342E-08  396189.7 3837571.1  738.2    4.30     13        2.15     YES  HOURLY          NO
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                          ***       08:45:15
                                                                  PAGE   3
*** MODELOPTs:  NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA
URBAN  ADJ_U*


                       *** SOURCE IDs DEFINING SOURCE GROUPS ***

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


ALL       PAREA1     ,
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                          ***       08:45:15
                                                                  PAGE   4
*** MODELOPTs:  NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA
URBAN  ADJ_U*


                       *** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID   URBAN POP                SOURCE IDs
--------  ---------                ----------


          645.  PAREA1     ,
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 5
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** SOURCE PARTICULATE/GAS DATA ***

*** SOURCE ID = PAREA1 ; SOURCE TYPE = AREAPOLY ***

FINE PARTICLE MASS FRACTION =
0.90000,

PARTICLE DIAMETER (MICRONS) =
1.00000,

PARTICLE DENSITY (G/CM**3) =
1.00000,
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 6
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** GRIDDED RECEPTOR NETWORK SUMMARY ***

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

*** X-COORDINATES OF GRID ***
(METERS)

394846.0, 394858.9, 394871.7, 394884.6, 394897.4, 394910.2, 394923.1, 394935.9, 394948.8, 394961.6, 394974.5, 394987.3, 395000.1, 395013.0, 395025.8, 395038.6, 395051.5, 395064.3, 395077.2, 395090.0, 395102.8,

*** Y-COORDINATES OF GRID ***
(METERS)

3835994.1, 3836000.2, 3836006.2, 3836012.3, 3836018.4, 3836024.5, 3836030.5, 3836036.6, 3836042.7, 3836048.7,
3836054.8, 3836060.9, 3836066.9, 3836073.0, 3836079.1, 3836085.1, 3836091.2, 3836097.3, 3836103.4, 3836109.4,
3836115.5,
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 7
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	394846.05	394858.89	394871.73	394884.57	394897.41	394910.25	394923.09	394935.93	394948.77
3836115.50	748.60	748.60	748.60	748.70	748.70	748.70	748.70	748.70	748.70
3836109.43	748.70	748.70	748.70	748.70	748.70	748.70	748.70	748.70	748.70
3836103.36	748.80	748.80	748.80	748.80	748.80	748.80	748.80	748.70	748.70
3836097.29	748.90	748.90	748.90	748.80	748.80	748.80	748.80	748.80	748.70
3836091.22	749.00	749.10	749.10	749.00	749.00	749.00	749.00	748.90	748.70
3836085.15	749.10	749.20	749.20	749.20	749.20	749.10	749.20	749.00	748.70
3836079.08	749.20	749.30	749.30	749.30	749.30	749.20	749.20	749.10	748.70
3836073.01	749.20	749.40	749.30	749.30	749.30	749.20	749.30	749.10	748.70
3836066.94	749.30	749.40	749.40	749.40	749.40	749.30	749.40	749.20	748.80
3836060.87	749.30	749.40	749.40	749.40	749.40	749.40	749.40	749.20	748.80
3836054.80	749.40	749.50	749.50	749.50	749.50	749.40	749.40	749.10	748.80
3836048.73	749.40	749.50	749.50	749.60	749.50	749.40	749.30	749.10	748.80
3836042.66	749.50	749.50	749.60	749.60	749.60	749.40	749.30	749.10	748.80
3836036.59	749.50	749.60	749.60	749.70	749.60	749.50	749.30	749.10	748.80
3836030.52	749.60	749.60	749.60	749.70	749.70	749.50	749.40	749.20	748.80
3836024.45	749.60	749.60	749.60	749.70	749.70	749.50	749.40	749.20	748.90
3836018.38	749.60	749.50	749.50	749.50	749.50	749.40	749.30	749.10	748.90
3836012.31	749.60	749.40	749.40	749.40	749.30	749.30	749.20	749.10	748.90
3836006.24	749.60	749.20	749.10	749.10	749.10	749.00	749.00	749.00	748.90
3836000.17	749.70	749.30	749.30	749.30	749.20	749.20	749.20	749.10	749.10
3835994.10	749.90	749.50	749.60	749.60	749.60	749.60	749.60	749.50	749.50

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	394961.61	394974.45	394987.29	395000.13	395012.97	395025.81	395038.65	395051.49	395064.33
3836115.50	748.80	748.80	748.80	748.80	748.90	748.90	748.90	748.90	749.00
3836109.43	748.80	748.80	748.80	748.80	748.90	749.00	749.00	749.00	749.00
3836103.36	748.80	748.80	748.80	748.90	748.90	749.00	749.00	749.10	749.10
3836097.29	748.80	748.80	748.90	748.90	749.00	749.00	749.10	749.10	749.10
3836091.22	748.90	749.00	749.10	749.10	749.20	749.20	749.20	749.30	749.30
3836085.15	749.00	749.20	749.40	749.50	749.50	749.50	749.40	749.50	749.60
3836079.08	749.00	749.20	749.50	749.50	749.60	749.50	749.50	749.60	749.70
3836073.01	749.10	749.20	749.50	749.60	749.60	749.60	749.60	749.60	749.80

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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3836066.94 |   749.10   749.30   749.50   749.60   749.60   749.60   749.50   749.60   749.80
3836060.87 |   749.20   749.40   749.50   749.70   749.70   749.60   749.50   749.70   749.90
3836054.80 |   749.20   749.40   749.60   749.70   749.70   749.60   749.50   749.70   750.00
3836048.73 |   749.20   749.40   749.60   749.70   749.70   749.70   749.60   749.80   750.00
3836042.66 |   749.20   749.40   749.60   749.70   749.70   749.70   749.70   749.80   750.00
3836036.59 |   749.20   749.40   749.60   749.70   749.70   749.70   749.80   749.90   750.00
3836030.52 |   749.20   749.30   749.60   749.70   749.70   749.60   749.80   749.90   749.90
3836024.45 |   749.20   749.30   749.60   749.70   749.70   749.60   749.80   749.90   749.90
3836018.38 |   749.20   749.30   749.50   749.50   749.60   749.50   749.70   749.80   749.90
3836012.31 |   749.10   749.20   749.30   749.40   749.40   749.40   749.60   749.70   749.80
3836006.24 |   749.00   749.10   749.10   749.10   749.20   749.20   749.40   749.50   749.70
3836000.17 |   749.10   749.20   749.10   749.20   749.10   749.20   749.30   749.50   749.60
3835994.10 |   749.40   749.50   749.40   749.40   749.40   749.40   749.60   749.70   749.80
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                          ***       08:45:15
                                                                    PAGE  9
*** MODELOPTs:   NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

                    *** NETWORK ID: UCART1   ;  NETWORK TYPE: GRIDCART ***

                              * ELEVATION HEIGHTS IN METERS *

  Y-COORD  |                          X-COORD (METERS)
  (METERS) |   395077.17   395090.01   395102.85
-------------------------------------------------------------------------

3836115.50 |   749.00   749.00   748.90
3836109.43 |   749.10   749.10   749.00
3836103.36 |   749.10   749.20   749.10
3836097.29 |   749.20   749.20   749.00
3836091.22 |   749.30   749.20   749.00
3836085.15 |   749.50   749.20   749.00
3836079.08 |   749.60   749.30   749.10
3836073.01 |   749.70   749.30   749.10
3836066.94 |   749.70   749.30   749.10
3836060.87 |   749.80   749.30   749.20
3836054.80 |   749.90   749.40   749.20
3836048.73 |   749.90   749.40   749.30
3836042.66 |   749.90   749.40   749.40
3836036.59 |   749.90   749.50   749.40
3836030.52 |   749.90   749.50   749.40
3836024.45 |   749.90   749.50   749.50
3836018.38 |   749.90   749.60   749.50
3836012.31 |   749.90   749.60   749.60
3836006.24 |   749.70   749.60   749.70
3836000.17 |   749.70   749.70   749.80
3835994.10 |   749.90   749.80   749.90
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                          ***       08:45:15
                                                                   PAGE  10
*** MODELOPTs:   NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

URBAN ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	394846.05	394858.89	394871.73	394884.57	394897.41	394910.25	394923.09	394935.93	394948.77
3836115.50	748.60	748.60	748.60	748.70	748.70	748.70	748.70	748.70	748.70
3836109.43	748.70	748.70	748.70	748.70	748.70	748.70	748.70	748.70	748.70
3836103.36	748.80	748.80	748.80	748.80	748.80	748.80	748.80	748.70	748.70
3836097.29	748.90	748.90	748.90	748.80	748.80	748.80	748.80	748.80	748.70
3836091.22	749.00	749.10	749.10	749.00	749.00	749.00	749.00	748.90	748.70
3836085.15	749.10	749.20	749.20	749.20	749.20	749.10	749.20	749.00	748.70
3836079.08	749.20	749.30	749.30	749.30	749.30	749.20	749.20	749.10	748.70
3836073.01	749.20	749.40	749.30	749.30	749.30	749.20	749.30	749.10	748.70
3836066.94	749.30	749.40	749.40	749.40	749.40	749.30	749.40	749.20	748.80
3836060.87	749.30	749.40	749.40	749.40	749.40	749.40	749.40	749.20	748.80
3836054.80	749.40	749.50	749.50	749.50	749.50	749.40	749.40	749.10	748.80
3836048.73	749.40	749.50	749.50	749.60	749.50	749.40	749.30	749.10	748.80
3836042.66	749.50	749.50	749.60	749.60	749.60	749.40	749.30	749.10	748.80
3836036.59	749.50	749.60	749.60	749.70	749.60	749.50	749.30	749.10	748.80
3836030.52	749.60	749.60	749.60	749.70	749.70	749.50	749.40	749.20	748.80
3836024.45	749.60	749.60	749.60	749.70	749.70	749.50	749.40	749.20	748.90
3836018.38	749.60	749.50	749.50	749.50	749.50	749.40	749.30	749.10	748.90
3836012.31	749.60	749.40	749.40	749.40	749.30	749.30	749.20	749.10	748.90
3836006.24	749.60	749.20	749.10	749.10	749.10	749.00	749.00	749.00	748.90
3836000.17	749.70	749.30	749.30	749.30	749.20	749.20	749.20	749.10	749.10
3835994.10	749.90	749.50	749.60	749.60	749.60	749.60	749.60	749.50	749.50

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	394961.61	394974.45	394987.29	395000.13	395012.97	395025.81	395038.65	395051.49	395064.33
3836115.50	748.80	748.80	748.80	748.80	748.90	748.90	748.90	748.90	749.00
3836109.43	748.80	748.80	748.80	748.80	748.90	749.00	749.00	749.00	749.00
3836103.36	748.80	748.80	748.80	748.90	748.90	749.00	749.00	749.10	749.10
3836097.29	748.80	748.80	748.90	748.90	749.00	749.00	749.10	749.10	749.10
3836091.22	748.90	749.00	749.10	749.10	749.20	749.20	749.20	749.30	749.30
3836085.15	749.00	749.20	749.40	749.50	749.50	749.50	749.40	749.50	749.60

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

```
3836079.08 |   749.00   749.20   749.50   749.50   749.60   749.50   749.50   749.60   749.70
3836073.01 |   749.10   749.20   749.50   749.60   749.60   749.60   749.60   749.60   749.80
3836066.94 |   749.10   749.30   749.50   749.60   749.60   749.60   749.50   749.60   749.80
3836060.87 |   749.20   749.40   749.50   749.70   749.70   749.60   749.50   749.70   749.90
3836054.80 |   749.20   749.40   749.60   749.70   749.70   749.60   749.50   749.70   750.00
3836048.73 |   749.20   749.40   749.60   749.70   749.70   749.70   749.60   749.80   750.00
3836042.66 |   749.20   749.40   749.60   749.70   749.70   749.70   749.70   749.80   750.00
3836036.59 |   749.20   749.40   749.60   749.70   749.70   749.70   749.80   749.90   750.00
3836030.52 |   749.20   749.30   749.60   749.70   749.70   749.60   749.80   749.90   749.90
3836024.45 |   749.20   749.30   749.60   749.70   749.70   749.60   749.80   749.90   749.90
3836018.38 |   749.20   749.30   749.50   749.50   749.60   749.50   749.70   749.80   749.90
3836012.31 |   749.10   749.20   749.30   749.40   749.40   749.40   749.60   749.70   749.80
3836006.24 |   749.00   749.10   749.10   749.10   749.20   749.20   749.40   749.50   749.70
3836000.17 |   749.10   749.20   749.10   749.20   749.10   749.20   749.30   749.50   749.60
3835994.10 |   749.40   749.50   749.40   749.40   749.40   749.40   749.60   749.70   749.80
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
 *** AERMET - VERSION  21112 ***  ***                                        ***       08:45:15
                                                                    PAGE  12
 *** MODELOPTs:   NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

                    *** NETWORK ID: UCART1   ;  NETWORK TYPE: GRIDCART ***

                              * HILL HEIGHT SCALES IN METERS *

  Y-COORD  |                          X-COORD (METERS)
  (METERS) |   395077.17   395090.01   395102.85
-------------------------------------------------------------------------

3836115.50 |   749.00   749.00   748.90
3836109.43 |   749.10   749.10   749.00
3836103.36 |   749.10   749.20   749.10
3836097.29 |   749.20   749.20   749.00
3836091.22 |   749.30   749.20   749.00
3836085.15 |   749.50   749.20   749.00
3836079.08 |   749.60   749.30   749.10
3836073.01 |   749.70   749.30   749.10
3836066.94 |   749.70   749.30   749.10
3836060.87 |   749.80   749.30   749.20
3836054.80 |   749.90   749.40   749.20
3836048.73 |   749.90   749.40   749.30
3836042.66 |   749.90   749.40   749.40
3836036.59 |   749.90   749.50   749.40
3836030.52 |   749.90   749.50   749.40
3836024.45 |   749.90   749.50   749.50
3836018.38 |   749.90   749.60   749.50
3836012.31 |   749.90   749.60   749.60
3836006.24 |   749.70   749.60   749.70
3836000.17 |   749.70   749.70   749.80
3835994.10 |   749.90   749.80   749.90
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
 *** AERMET - VERSION  21112 ***  ***                                        ***       08:45:15
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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

PAGE 13
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** GRIDDED RECEPTOR NETWORK SUMMARY ***

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

*** X-COORDINATES OF GRID ***
(METERS)

395240.5, 395250.5, 395260.6, 395270.6, 395280.7, 395290.8, 395300.8, 395310.9, 395320.9, 395331.0, 395341.1, 395351.1, 395361.2, 395371.2, 395381.3, 395391.4, 395401.4, 395411.5, 395421.5, 395431.6, 395441.7,

*** Y-COORDINATES OF GRID ***
(METERS)

3836793.8, 3836833.2, 3836872.5, 3836911.8, 3836951.1, 3836990.4, 3837029.7, 3837069.0, 3837108.3, 3837147.6,
3837186.9, 3837226.3, 3837265.6, 3837304.9, 3837344.2, 3837383.5, 3837422.8, 3837462.1, 3837501.4, 3837540.7,
3837580.0,
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 395240.46	395250.52	395260.58	395270.64	395280.70	395290.76	395300.82	395310.88	395320.94
3837580.05	735.70	735.80	735.80	735.90	735.90	735.90	736.00	736.00	736.00
3837540.74	735.90	736.00	736.50	736.50	736.50	736.70	736.60	736.50	736.60
3837501.43	736.00	736.20	736.80	736.80	736.90	736.90	736.80	736.70	737.10
3837462.12	736.40	736.60	737.30	737.40	737.40	737.40	737.40	737.30	737.10
3837422.81	736.90	737.10	737.60	737.60	737.50	737.50	737.30	737.10	737.30
3837383.50	737.40	737.50	737.80	737.70	737.70	737.70	737.50	737.30	737.50
3837344.19	737.80	737.90	738.10	738.10	738.10	738.10	737.70	737.40	737.70
3837304.88	738.10	738.20	738.40	738.30	738.20	738.10	738.10	738.00	737.90
3837265.57	738.50	738.80	739.20	739.10	738.90	738.90	738.50	738.30	738.40
3837226.26	738.80	739.10	739.40	739.20	739.20	739.10	739.00	738.90	739.10
3837186.95	739.10	739.20	739.40	739.40	739.50	739.50	739.40	739.40	739.50
3837147.64	739.50	739.60	739.60	739.70	740.00	740.10	740.10	740.10	740.10
3837108.33	740.20	740.30	740.40	740.50	741.00	741.10	741.30	741.40	741.30
3837069.02	740.70	740.90	740.90	740.90	740.90	741.00	741.30	741.70	741.80
3837029.71	741.00	741.10	741.10	741.30	741.80	742.00	742.00	742.10	742.10

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836990.40	741.30	741.50	741.70	741.70	741.80	741.90	741.90	741.90	742.00
3836951.09	741.60	742.30	743.00	743.00	743.00	743.00	743.10	743.10	743.10
3836911.78	742.10	742.50	742.90	742.80	742.40	742.50	742.90	743.00	743.40
3836872.47	742.60	742.90	742.80	742.90	743.10	743.10	743.10	743.20	743.50
3836833.16	743.10	743.50	743.80	743.80	743.40	743.50	743.50	743.60	743.70
3836793.85	743.70	744.00	744.20	744.30	744.30	744.40	744.40	744.40	744.50

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	395331.00	395341.06	395351.12	395361.18	395371.24	395381.30	395391.36	395401.42	395411.48
3837580.05	736.00	736.00	736.10	736.10	736.10	736.10	736.20	736.20	736.20
3837540.74	736.70	736.70	736.70	736.80	736.80	736.70	736.80	737.00	737.00
3837501.43	737.20	737.30	737.30	737.30	737.20	737.00	737.00	737.20	737.30
3837462.12	737.00	737.20	737.30	737.30	737.30	737.60	737.70	737.80	737.80
3837422.81	737.50	737.60	737.60	737.70	737.50	737.30	737.40	737.50	737.60
3837383.50	737.70	737.70	737.80	737.90	737.70	737.50	737.50	737.80	737.80
3837344.19	738.00	738.00	738.30	738.30	737.90	737.60	737.80	738.10	738.20
3837304.88	738.10	738.10	738.10	738.10	738.00	738.10	738.20	738.20	738.20
3837265.57	738.50	738.40	738.50	738.50	738.40	738.40	738.70	739.10	739.20
3837226.26	739.20	739.10	739.20	739.20	739.10	738.90	739.30	739.50	739.40
3837186.95	739.50	739.50	739.60	739.60	739.70	739.80	739.90	740.00	740.00
3837147.64	740.20	740.20	740.20	740.30	740.30	740.40	740.40	740.30	740.40
3837108.33	741.40	741.40	741.60	741.80	741.70	741.70	741.60	741.50	741.40
3837069.02	741.80	741.90	742.10	742.30	742.10	742.20	742.30	742.30	742.10
3837029.71	742.40	742.40	742.50	742.60	742.60	742.60	742.60	742.70	742.70
3836990.40	742.00	742.00	742.10	742.10	742.10	742.20	742.20	742.30	742.30
3836951.09	743.10	743.20	743.30	743.30	743.30	743.20	743.30	743.30	743.30
3836911.78	743.60	743.70	743.50	743.00	742.90	743.40	743.60	743.60	743.60
3836872.47	743.70	743.80	744.00	744.10	744.10	744.10	743.90	743.80	743.80
3836833.16	743.80	743.80	743.80	743.80	743.90	744.00	744.10	744.10	744.10
3836793.85	744.50	744.50	744.50	744.40	744.20	744.50	744.70	744.80	744.80

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Y-COORD (METERS)	X-COORD (METERS)		
	395421.54	395431.60	395441.66
3837580.05	736.30	736.30	736.30
3837540.74	736.80	737.00	736.90
3837501.43	737.30	737.40	737.30
3837462.12	737.90	737.90	737.70
3837422.81	737.50	737.60	737.70
3837383.50	737.90	738.10	738.00
3837344.19	738.10	738.10	738.20
3837304.88	738.40	738.60	738.70
3837265.57	739.40	739.60	739.50
3837226.26	739.50	739.70	739.70
3837186.95	740.00	740.10	740.20
3837147.64	740.30	740.30	740.80
3837108.33	741.00	740.70	741.20
3837069.02	741.60	741.30	741.60
3837029.71	742.30	741.90	742.20
3836990.40	742.30	742.40	742.60
3836951.09	742.90	742.60	742.90
3836911.78	743.10	742.90	743.40
3836872.47	743.60	743.40	743.80
3836833.16	744.10	744.00	744.30
3836793.85	744.80	744.90	744.90

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	395240.46	395250.52	395260.58	395270.64	395280.70	395290.76	395300.82	395310.88	395320.94
3837580.05	735.70	735.80	735.80	735.90	735.90	735.90	736.00	736.00	736.00
3837540.74	735.90	736.00	736.50	736.50	736.50	736.70	736.60	736.50	736.60
3837501.43	736.00	736.20	736.80	736.80	736.90	736.90	736.80	736.70	737.10
3837462.12	736.40	736.60	737.30	737.40	737.40	737.40	737.40	737.30	737.10
3837422.81	736.90	737.10	737.60	737.60	737.50	737.50	737.30	737.10	737.30
3837383.50	737.40	737.50	737.80	737.70	737.70	737.70	737.50	737.30	737.50
3837344.19	737.80	737.90	738.10	738.10	738.10	738.10	737.70	737.40	737.70
3837304.88	738.10	738.20	738.40	738.30	738.20	738.10	738.10	738.00	737.90
3837265.57	738.50	738.80	739.20	739.10	738.90	738.90	738.50	738.30	738.40
3837226.26	738.80	739.10	739.40	739.20	739.20	739.10	739.00	738.90	739.10
3837186.95	739.10	739.20	739.40	739.40	739.50	739.50	739.40	739.40	739.50
3837147.64	739.50	739.60	739.60	739.70	740.00	740.10	740.10	740.10	740.10
3837108.33	740.20	740.30	740.40	740.50	741.00	741.10	741.30	741.40	741.30

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837069.02	740.70	740.90	740.90	740.90	740.90	741.00	741.30	741.70	741.80
3837029.71	741.00	741.10	741.10	741.30	741.80	742.00	742.00	742.10	742.10
3836990.40	741.30	741.50	741.70	741.70	741.80	741.90	741.90	741.90	742.00
3836951.09	741.60	742.30	743.00	743.00	743.00	743.00	743.10	743.10	743.10
3836911.78	742.10	742.50	742.90	742.80	742.40	742.50	742.90	743.00	743.40
3836872.47	742.60	742.90	742.80	742.90	743.10	743.10	743.10	743.20	743.50
3836833.16	743.10	743.50	743.80	743.80	743.40	743.50	743.50	743.60	743.70
3836793.85	743.70	744.00	744.20	744.30	744.30	744.40	744.40	744.40	744.50

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	395331.00	395341.06	395351.12	395361.18	395371.24	395381.30	395391.36	395401.42	395411.48
3837580.05	736.00	736.00	736.10	736.10	736.10	736.10	736.20	736.20	736.20
3837540.74	736.70	736.70	736.70	736.80	736.80	736.70	736.80	737.00	737.00
3837501.43	737.20	737.30	737.30	737.30	737.20	737.00	737.00	737.20	737.30
3837462.12	737.00	737.20	737.30	737.30	737.30	737.60	737.70	737.80	737.80
3837422.81	737.50	737.60	737.60	737.70	737.50	737.30	737.40	737.50	737.60
3837383.50	737.70	737.70	737.80	737.90	737.70	737.50	737.50	737.80	737.80
3837344.19	738.00	738.00	738.30	738.30	737.90	737.60	737.80	738.10	738.20
3837304.88	738.10	738.10	738.10	738.10	738.00	738.10	738.20	738.20	738.20
3837265.57	738.50	738.40	738.50	738.50	738.40	738.40	738.70	739.10	739.20
3837226.26	739.20	739.10	739.20	739.20	739.10	738.90	739.30	739.50	739.40
3837186.95	739.50	739.50	739.60	739.60	739.70	739.80	739.90	740.00	740.00
3837147.64	740.20	740.20	740.20	740.30	740.30	740.40	740.40	740.30	740.40
3837108.33	741.40	741.40	741.60	741.80	741.70	741.70	741.60	741.50	741.40
3837069.02	741.80	741.90	742.10	742.30	742.10	742.20	742.30	742.30	742.10
3837029.71	742.40	742.40	742.50	742.60	742.60	742.60	742.60	742.70	742.70
3836990.40	742.00	742.00	742.10	742.10	742.10	742.20	742.20	742.30	742.30
3836951.09	743.10	743.20	743.30	743.30	743.30	743.20	743.30	743.30	743.30
3836911.78	743.60	743.70	743.50	743.00	742.90	743.40	743.60	743.60	743.60
3836872.47	743.70	743.80	744.00	744.10	744.10	744.10	743.90	743.80	743.80
3836833.16	743.80	743.80	743.80	743.80	743.90	744.00	744.10	744.10	744.10
3836793.85	744.50	744.50	744.50	744.40	744.20	744.50	744.70	744.80	744.80

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 395421.54	395431.60	395441.66
3837580.05	736.30	736.30	736.30
3837540.74	736.80	737.00	736.90
3837501.43	737.30	737.40	737.30
3837462.12	737.90	737.90	737.70
3837422.81	737.50	737.60	737.70
3837383.50	737.90	738.10	738.00
3837344.19	738.10	738.10	738.20
3837304.88	738.40	738.60	738.70
3837265.57	739.40	739.60	739.50
3837226.26	739.50	739.70	739.70
3837186.95	740.00	740.10	740.20
3837147.64	740.30	740.30	740.80
3837108.33	741.00	740.70	741.20
3837069.02	741.60	741.30	741.60
3837029.71	742.30	741.90	742.20
3836990.40	742.30	742.40	742.60
3836951.09	742.90	742.60	742.90
3836911.78	743.10	742.90	743.40
3836872.47	743.60	743.40	743.80
3836833.16	744.10	744.00	744.30
3836793.85	744.80	744.90	744.90

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** GRIDDED RECEPTOR NETWORK SUMMARY ***

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

*** X-COORDINATES OF GRID ***
(METERS)

395039.3, 395048.7, 395058.2, 395067.6, 395077.0, 395086.5, 395095.9, 395105.4, 395114.8, 395124.2, 395133.7, 395143.1, 395152.6, 395162.0, 395171.4, 395180.9, 395190.3, 395199.8, 395209.2, 395218.6, 395228.1,

*** Y-COORDINATES OF GRID ***
(METERS)

3836800.0, 3836819.4, 3836838.7, 3836858.1, 3836877.4, 3836896.8, 3836916.1, 3836935.5, 3836954.8, 3836974.2,
3836993.5, 3837012.9, 3837032.2, 3837051.6, 3837070.9, 3837090.3, 3837109.6, 3837129.0, 3837148.3, 3837167.7,
3837187.0,
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	395039.27	395048.71	395058.15	395067.59	395077.03	395086.47	395095.91	395105.35	395114.79
3837187.04	738.70	738.70	738.80	738.80	738.80	738.80	738.80	738.80	738.90
3837167.69	739.00	739.00	739.00	739.10	739.10	739.10	739.20	739.20	739.20
3837148.34	739.60	739.40	739.50	739.60	739.60	739.70	739.70	739.80	739.80
3837128.99	739.80	739.60	739.90	740.10	740.00	740.20	740.20	740.30	740.30
3837109.64	739.90	739.80	740.10	740.30	740.30	740.40	740.50	740.60	740.60
3837090.29	740.10	740.00	740.20	740.50	740.60	740.70	740.70	740.80	740.90
3837070.94	740.20	740.20	740.50	740.70	740.90	741.00	741.00	741.10	741.20
3837051.59	740.30	740.40	740.80	741.10	741.10	741.30	741.40	741.40	741.50
3837032.24	740.50	740.60	741.10	741.40	741.40	741.50	741.60	741.50	741.60
3837012.89	740.70	740.90	741.20	741.40	741.40	741.50	741.50	741.50	741.60
3836993.54	740.90	740.90	741.00	741.00	741.10	741.10	741.10	741.20	741.20
3836974.19	741.00	740.90	741.00	741.10	741.10	741.20	741.20	741.30	741.30
3836954.84	741.30	741.20	741.60	741.90	741.90	741.90	741.90	742.00	742.10
3836935.49	741.50	741.30	741.30	741.40	741.40	741.40	741.50	741.50	741.50
3836916.14	742.10	742.20	742.00	741.60	741.80	742.30	742.30	742.30	742.30
3836896.79	742.20	742.30	742.00	741.60	741.70	742.10	742.30	742.40	742.50
3836877.44	742.30	742.50	742.40	741.90	741.70	741.90	742.30	742.70	742.80
3836858.09	742.20	742.40	742.70	742.70	742.50	742.10	742.00	742.20	742.40
3836838.74	742.20	741.30	741.80	742.60	742.80	742.90	742.70	742.40	742.30
3836819.39	742.30	740.30	739.30	740.90	742.30	742.80	743.10	743.20	743.00
3836800.04	742.60	742.40	741.60	742.10	742.80	742.80	742.90	743.10	743.30

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	395124.23	395133.67	395143.11	395152.55	395161.99	395171.43	395180.87	395190.31	395199.75
3837187.04	738.90	739.00	739.10	739.10	739.10	739.20	739.30	739.40	739.40
3837167.69	739.30	739.30	739.40	739.40	739.40	739.50	739.50	739.50	739.60

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837148.34	739.80	739.80	739.80	739.80	739.80	740.00	740.00	740.00	740.00
3837128.99	740.30	740.20	740.30	740.20	740.30	740.40	740.50	740.60	740.50
3837109.64	740.60	740.50	740.50	740.60	741.00	741.10	741.10	741.00	740.90
3837090.29	740.90	741.00	741.00	741.00	741.00	741.10	741.00	740.80	740.70
3837070.94	741.20	741.10	741.10	741.10	741.20	741.30	741.20	741.00	741.00
3837051.59	741.50	741.40	741.40	741.40	741.70	741.70	741.70	741.60	741.50
3837032.24	741.60	741.60	741.60	741.60	741.70	741.70	741.80	741.80	741.70
3837012.89	741.60	741.60	741.60	741.60	741.70	741.70	741.70	741.70	741.70
3836993.54	741.30	741.30	741.40	741.40	741.40	741.40	741.50	741.50	741.60
3836974.19	741.30	741.40	741.40	741.50	741.50	741.50	741.60	741.60	741.70
3836954.84	742.10	742.10	742.20	742.30	742.30	742.30	742.40	742.50	742.50
3836935.49	741.60	741.60	741.60	741.70	741.70	741.80	741.80	741.90	742.20
3836916.14	742.50	742.50	742.30	741.90	741.90	742.20	742.30	742.10	742.30
3836896.79	742.60	742.60	742.30	741.90	741.90	742.20	742.40	742.40	742.50
3836877.44	742.70	742.50	742.30	742.20	742.30	742.60	742.80	742.90	742.90
3836858.09	742.40	742.50	743.00	743.30	743.30	743.30	743.20	743.20	743.20
3836838.74	742.50	742.80	743.00	743.10	743.10	743.20	743.10	743.00	743.10
3836819.39	743.00	743.10	743.10	743.00	742.90	743.20	743.30	743.40	743.60
3836800.04	743.50	743.60	743.60	743.30	743.10	743.50	743.80	743.90	743.90

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 395209.19	395218.63	395228.07
3837187.04	739.40	739.30	739.10
3837167.69	739.50	739.50	739.40
3837148.34	739.80	739.60	739.80
3837128.99	740.10	739.90	740.10
3837109.64	740.50	740.30	740.40
3837090.29	740.70	740.60	740.70
3837070.94	740.90	740.90	740.90
3837051.59	741.20	741.10	741.20
3837032.24	741.40	741.30	741.30
3837012.89	741.60	741.50	741.40
3836993.54	741.60	741.60	741.60
3836974.19	741.70	741.70	741.50
3836954.84	742.50	742.40	741.90
3836935.49	742.80	742.80	742.20
3836916.14	742.90	742.90	742.40
3836896.79	742.50	742.40	742.30
3836877.44	742.50	742.50	742.70
3836858.09	742.80	742.70	742.90
3836838.74	743.10	743.10	743.00
3836819.39	743.90	743.90	743.50

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836800.04 | 744.00 743.90 743.70
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	395039.27	395048.71	395058.15	395067.59	395077.03	395086.47	395095.91	395105.35	395114.79
3837187.04	738.70	738.70	738.80	738.80	738.80	738.80	738.80	738.80	738.90
3837167.69	739.00	739.00	739.00	739.10	739.10	739.10	739.20	739.20	739.20
3837148.34	739.60	739.40	739.50	739.60	739.60	739.70	739.70	739.80	739.80
3837128.99	739.80	739.60	739.90	740.10	740.00	740.20	740.20	740.30	740.30
3837109.64	739.90	739.80	740.10	740.30	740.30	740.40	740.50	740.60	740.60
3837090.29	740.10	740.00	740.20	740.50	740.60	740.70	740.70	740.80	740.90
3837070.94	740.20	740.20	740.50	740.70	740.90	741.00	741.00	741.10	741.20
3837051.59	740.30	740.40	740.80	741.10	741.10	741.30	741.40	741.40	741.50
3837032.24	740.50	740.60	741.10	741.40	741.40	741.50	741.60	741.50	741.60
3837012.89	740.70	740.90	741.20	741.40	741.40	741.50	741.50	741.50	741.60
3836993.54	740.90	740.90	741.00	741.00	741.10	741.10	741.10	741.20	741.20
3836974.19	741.00	740.90	741.00	741.10	741.10	741.20	741.20	741.30	741.30
3836954.84	741.30	741.20	741.60	741.90	741.90	741.90	741.90	742.00	742.10
3836935.49	741.50	741.30	741.30	741.40	741.40	741.40	741.50	741.50	741.50
3836916.14	742.10	742.20	742.00	741.60	741.80	742.30	742.30	742.30	742.30
3836896.79	742.20	742.30	742.00	741.60	741.70	742.10	742.30	742.40	742.50
3836877.44	742.30	742.50	742.40	741.90	741.70	741.90	742.30	742.70	742.80
3836858.09	742.20	742.40	742.70	742.70	742.50	742.10	742.00	742.20	742.40
3836838.74	742.20	742.40	741.80	742.60	742.80	742.90	742.70	742.40	742.30
3836819.39	742.30	742.50	743.00	743.00	742.30	742.80	743.10	743.20	743.00
3836800.04	742.60	742.40	742.50	743.00	742.80	742.80	742.90	743.10	743.30

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	395124.23	395133.67	395143.11	395152.55	395161.99	395171.43	395180.87	395190.31	395199.75

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837187.04	738.90	739.00	739.10	739.10	739.10	739.20	739.30	739.40	739.40
3837167.69	739.30	739.30	739.40	739.40	739.40	739.50	739.50	739.50	739.60
3837148.34	739.80	739.80	739.80	739.80	739.80	740.00	740.00	740.00	740.00
3837128.99	740.30	740.20	740.30	740.20	740.30	740.40	740.50	740.60	740.50
3837109.64	740.60	740.50	740.50	740.60	741.00	741.10	741.10	741.00	740.90
3837090.29	740.90	741.00	741.00	741.00	741.00	741.10	741.00	740.80	740.70
3837070.94	741.20	741.10	741.10	741.10	741.20	741.30	741.20	741.00	741.00
3837051.59	741.50	741.40	741.40	741.40	741.70	741.70	741.70	741.60	741.50
3837032.24	741.60	741.60	741.60	741.60	741.70	741.70	741.80	741.80	741.70
3837012.89	741.60	741.60	741.60	741.60	741.70	741.70	741.70	741.70	741.70
3836993.54	741.30	741.30	741.40	741.40	741.40	741.40	741.50	741.50	741.60
3836974.19	741.30	741.40	741.40	741.50	741.50	741.50	741.60	741.60	741.70
3836954.84	742.10	742.10	742.20	742.30	742.30	742.30	742.40	742.50	742.50
3836935.49	741.60	741.60	741.60	741.70	741.70	741.80	741.80	741.90	742.20
3836916.14	742.50	742.50	742.30	741.90	741.90	742.20	742.30	742.10	742.30
3836896.79	742.60	742.60	742.30	741.90	741.90	742.20	742.40	742.40	742.50
3836877.44	742.70	742.50	742.30	742.20	742.30	742.60	742.80	742.90	742.90
3836858.09	742.40	742.50	743.00	743.30	743.30	743.30	743.20	743.20	743.20
3836838.74	742.50	742.80	743.00	743.10	743.10	743.20	743.10	743.00	743.10
3836819.39	743.00	743.10	743.10	743.00	742.90	743.20	743.30	743.40	743.60
3836800.04	743.50	743.60	743.60	743.30	743.10	743.50	743.80	743.90	743.90

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 395209.19	395218.63	395228.07
3837187.04	739.40	739.30	739.10
3837167.69	739.50	739.50	739.40
3837148.34	739.80	739.60	739.80
3837128.99	740.10	739.90	740.10
3837109.64	740.50	740.30	740.40
3837090.29	740.70	740.60	740.70
3837070.94	740.90	740.90	740.90
3837051.59	741.20	741.10	741.20
3837032.24	741.40	741.30	741.30
3837012.89	741.60	741.50	741.40
3836993.54	741.60	741.60	741.60
3836974.19	741.70	741.70	741.50
3836954.84	742.50	742.40	741.90
3836935.49	742.80	742.80	742.20
3836916.14	742.90	742.90	742.40
3836896.79	742.50	742.40	742.30
3836877.44	742.50	742.50	742.70
3836858.09	742.80	742.70	742.90

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836838.74 | 743.10 743.10 743.00
3836819.39 | 743.90 743.90 743.50
3836800.04 | 744.00 743.90 743.70
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** GRIDDED RECEPTOR NETWORK SUMMARY ***

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

*** X-COORDINATES OF GRID ***
(METERS)

394853.5, 394900.0, 394946.4, 394992.8, 395039.3, 395085.7, 395132.1, 395178.6, 395225.0, 395271.4, 395317.8, 395364.3, 395410.7, 395457.1, 395503.6, 395550.0, 395596.4, 395642.9, 395689.3, 395735.7, 395782.1,

*** Y-COORDINATES OF GRID ***
(METERS)

3837598.6, 3837616.3, 3837633.9, 3837651.5, 3837669.2, 3837686.8, 3837704.5, 3837722.1, 3837739.7, 3837757.4,
3837775.0, 3837792.7, 3837810.3, 3837827.9, 3837845.6, 3837863.2, 3837880.9, 3837898.5, 3837916.1, 3837933.8,
3837951.4,
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	394853.55	394899.98	394946.41	394992.84	395039.27	395085.70	395132.13	395178.56	395224.99
3837951.42	730.90	731.20	731.30	731.30	731.00	731.20	731.40	731.50	731.30
3837933.78	731.00	731.30	731.50	731.40	731.80	731.30	731.80	731.90	731.70
3837916.14	731.30	731.70	731.90	731.70	732.00	731.50	732.10	732.10	732.00
3837898.50	731.70	732.30	732.30	731.80	732.10	731.70	732.30	732.20	732.20
3837880.86	731.90	732.30	732.20	731.90	732.30	731.80	732.40	732.40	732.40
3837863.22	731.90	732.00	732.00	731.80	732.60	732.00	732.50	732.50	732.60
3837845.58	732.10	732.50	732.50	732.20	732.70	732.20	732.60	732.60	732.70
3837827.94	732.40	732.90	733.00	732.60	732.80	732.40	732.80	732.70	733.00
3837810.30	732.50	733.00	733.20	732.70	733.00	732.60	733.00	732.90	733.10

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837792.66	732.50	732.70	732.70	732.70	733.20	732.80	733.20	733.10	733.30
3837775.02	732.80	733.00	733.10	733.00	733.40	733.00	733.40	733.30	733.50
3837757.38	732.80	733.30	733.40	733.30	733.60	733.30	733.60	733.40	733.60
3837739.74	732.80	733.40	733.60	733.40	733.30	733.30	733.30	733.30	733.50
3837722.10	732.90	733.20	733.60	733.60	733.50	733.50	734.40	734.40	734.20
3837704.46	733.10	733.40	733.80	733.80	734.00	733.60	734.60	734.50	734.50
3837686.82	733.30	733.70	734.10	734.20	734.20	733.80	734.60	734.50	734.60
3837669.18	733.40	734.00	734.90	735.10	734.30	734.10	734.70	734.70	734.80
3837651.54	733.60	734.20	735.30	735.40	734.60	734.40	734.80	734.90	734.80
3837633.90	733.80	734.30	735.30	735.40	734.80	734.80	735.20	735.00	735.00
3837616.26	734.00	734.40	735.20	735.40	735.00	735.00	735.40	735.20	735.20
3837598.62	734.10	734.50	734.80	735.10	735.10	735.20	735.30	735.40	735.40

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	395271.42	395317.85	395364.28	395410.71	395457.14	395503.57	395550.00	395596.43	395642.86
3837951.42	731.80	732.10	732.30	732.50	732.60	732.70	732.90	733.10	733.30
3837933.78	732.00	732.20	732.60	732.40	733.00	732.90	733.20	733.30	733.50
3837916.14	732.10	732.40	733.00	732.60	733.30	733.20	733.50	733.70	733.80
3837898.50	732.30	732.50	733.30	732.80	733.50	733.20	733.70	733.90	734.10
3837880.86	732.60	732.60	733.30	733.00	733.60	733.20	733.70	733.90	734.00
3837863.22	732.80	732.80	733.40	733.10	733.70	733.00	733.40	733.50	733.80
3837845.58	733.00	733.00	733.50	733.30	733.90	733.30	733.70	733.90	734.10
3837827.94	733.20	733.10	733.70	733.50	734.10	733.50	733.90	734.10	734.30
3837810.30	733.40	733.30	733.90	733.60	734.20	733.70	734.30	734.40	734.60
3837792.66	733.60	733.40	734.00	733.80	734.40	733.80	734.20	734.30	734.50
3837775.02	733.70	733.60	734.30	733.90	734.60	733.40	733.70	733.90	734.20
3837757.38	734.00	733.80	734.50	734.10	734.90	733.90	734.10	734.40	734.60
3837739.74	734.10	734.00	734.60	734.20	734.90	734.00	734.50	734.70	734.90
3837722.10	734.30	734.10	734.80	734.40	735.10	734.50	735.00	735.40	735.60
3837704.46	734.50	734.30	735.00	734.60	735.30	734.50	734.90	735.20	735.40
3837686.82	734.70	734.50	735.10	734.70	735.50	734.40	734.70	734.90	735.10
3837669.18	734.90	734.60	735.30	734.90	735.60	734.90	735.20	735.40	735.60
3837651.54	735.00	734.80	735.50	735.10	735.90	735.30	735.50	735.80	736.00
3837633.90	735.20	734.90	735.60	735.30	736.30	736.10	736.30	737.00	737.20
3837616.26	735.20	735.10	735.50	735.50	736.50	736.30	736.40	736.90	737.00
3837598.62	735.30	735.40	735.50	735.80	736.40	736.30	736.50	736.70	736.80

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

URBAN ADJ_U*

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 395689.29	395735.72	395782.15
3837951.42	733.10	733.20	733.60
3837933.78	732.90	733.50	733.40
3837916.14	733.00	733.90	733.50
3837898.50	733.10	734.00	733.60
3837880.86	733.10	734.10	733.60
3837863.22	733.30	734.30	733.60
3837845.58	734.10	734.40	734.50
3837827.94	734.30	734.70	734.80
3837810.30	734.50	734.90	735.30
3837792.66	734.60	735.00	735.30
3837775.02	734.60	735.00	735.20
3837757.38	735.10	735.00	735.40
3837739.74	735.20	735.60	735.50
3837722.10	735.40	735.60	735.70
3837704.46	735.70	735.70	735.90
3837686.82	736.00	736.00	736.20
3837669.18	736.00	736.30	736.40
3837651.54	736.30	736.40	736.60
3837633.90	736.80	736.60	736.80
3837616.26	737.00	736.80	736.90
3837598.62	737.00	737.00	737.00

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 394853.55	394899.98	394946.41	394992.84	395039.27	395085.70	395132.13	395178.56	395224.99
3837951.42	730.90	731.20	731.30	731.30	731.00	731.20	731.40	731.50	731.30
3837933.78	731.00	731.30	731.50	731.40	731.80	731.30	731.80	731.90	731.70
3837916.14	731.30	731.70	731.90	731.70	732.00	731.50	732.10	732.10	732.00
3837898.50	731.70	732.30	732.30	731.80	732.10	731.70	732.30	732.20	732.20
3837880.86	731.90	732.30	732.20	731.90	732.30	731.80	732.40	732.40	732.40
3837863.22	731.90	732.00	732.00	731.80	732.60	732.00	732.50	732.50	732.60
3837845.58	732.10	732.50	732.50	732.20	732.70	732.20	732.60	732.60	732.70

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837827.94	732.40	732.90	733.00	732.60	732.80	732.40	732.80	732.70	733.00
3837810.30	732.50	733.00	733.20	732.70	733.00	732.60	733.00	732.90	733.10
3837792.66	732.50	732.70	732.70	732.70	733.20	732.80	733.20	733.10	733.30
3837775.02	732.80	733.00	733.10	733.00	733.40	733.00	733.40	733.30	733.50
3837757.38	732.80	733.30	733.40	733.30	733.60	733.30	733.60	733.40	733.60
3837739.74	732.80	733.40	733.60	733.40	733.30	733.30	733.30	733.30	733.50
3837722.10	732.90	733.20	733.60	733.60	733.50	733.50	734.40	734.40	734.20
3837704.46	733.10	733.40	733.80	733.80	734.00	733.60	734.60	734.50	734.50
3837686.82	733.30	733.70	734.10	734.20	734.20	733.80	734.60	734.50	734.60
3837669.18	733.40	734.00	734.90	735.10	734.30	734.10	734.70	734.70	734.80
3837651.54	733.60	734.20	735.30	735.40	734.60	734.40	734.80	734.90	734.80
3837633.90	733.80	734.30	735.30	735.40	734.80	734.80	735.20	735.00	735.00
3837616.26	734.00	734.40	735.20	735.40	735.00	735.00	735.40	735.20	735.20
3837598.62	734.10	734.50	734.80	735.10	735.10	735.20	735.30	735.40	735.40

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 395271.42	395317.85	395364.28	395410.71	395457.14	395503.57	395550.00	395596.43	395642.86
3837951.42	731.80	732.10	732.30	732.50	732.60	732.70	732.90	733.10	733.30
3837933.78	732.00	732.20	732.60	732.40	733.00	732.90	733.20	733.30	733.50
3837916.14	732.10	732.40	733.00	732.60	733.30	733.20	733.50	733.70	733.80
3837898.50	732.30	732.50	733.30	732.80	733.50	733.20	733.70	733.90	734.10
3837880.86	732.60	732.60	733.30	733.00	733.60	733.20	733.70	733.90	734.00
3837863.22	732.80	732.80	733.40	733.10	733.70	733.00	733.40	733.50	733.80
3837845.58	733.00	733.00	733.50	733.30	733.90	733.30	733.70	733.90	734.10
3837827.94	733.20	733.10	733.70	733.50	734.10	733.50	733.90	734.10	734.30
3837810.30	733.40	733.30	733.90	733.60	734.20	733.70	734.30	734.40	734.60
3837792.66	733.60	733.40	734.00	733.80	734.40	733.80	734.20	734.30	734.50
3837775.02	733.70	733.60	734.30	733.90	734.60	733.40	733.70	733.90	734.20
3837757.38	734.00	733.80	734.50	734.10	734.90	733.90	734.10	734.40	734.60
3837739.74	734.10	734.00	734.60	734.20	734.90	734.00	734.50	734.70	734.90
3837722.10	734.30	734.10	734.80	734.40	735.10	734.50	735.00	735.40	735.60
3837704.46	734.50	734.30	735.00	734.60	735.30	734.50	734.90	735.20	735.40
3837686.82	734.70	734.50	735.10	734.70	735.50	734.40	734.70	734.90	735.10
3837669.18	734.90	734.60	735.30	734.90	735.60	734.90	735.20	735.40	735.60
3837651.54	735.00	734.80	735.50	735.10	735.90	735.30	735.50	735.80	737.20
3837633.90	735.20	734.90	735.60	735.30	736.30	736.10	736.30	737.00	737.20
3837616.26	735.20	735.10	735.50	735.50	736.50	736.30	736.40	736.90	737.00
3837598.62	735.30	735.40	735.50	735.80	736.40	736.30	736.50	736.70	736.80

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 395689.29	395735.72	395782.15
3837951.42	733.10	733.20	733.60
3837933.78	732.90	733.50	733.40
3837916.14	733.00	733.90	733.50
3837898.50	733.10	734.00	733.60
3837880.86	733.10	734.10	733.60
3837863.22	733.30	734.30	733.60
3837845.58	734.10	734.40	734.50
3837827.94	734.30	734.70	734.80
3837810.30	734.50	734.90	735.30
3837792.66	734.60	735.00	735.30
3837775.02	734.60	735.00	735.20
3837757.38	735.10	735.00	735.40
3837739.74	735.20	735.60	735.50
3837722.10	735.40	735.60	735.70
3837704.46	735.70	735.70	735.90
3837686.82	736.00	736.00	736.20
3837669.18	736.00	736.30	736.40
3837651.54	736.30	736.40	736.60
3837633.90	736.80	736.60	736.80
3837616.26	737.00	736.80	736.90
3837598.62	737.00	737.00	737.00

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** 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
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1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 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.

file:///C/...roject%20338%20-%20ABJC%20-%20Parkway%20Village%20DEIR/Parkway%20Village%20EIR%20Construction%20ADO.txt[10/31/2025 1:12:53 PM]

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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

1.54, 3.09, 5.14, 8.23, 10.80,

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

Surface file: C:\Users\jclar\OneDrive\Clark and Associates\Project 287 - ABJC - Victorville Wa Met Version: 21112
Profile file: C:\Users\jclar\OneDrive\Clark and Associates\Project 287 - ABJC - Victorville Wa
Surface format: FREE
Profile format: FREE
Surface station no.: 3159 Upper air station no.: 93214
Name: UNKNOWN Name: UNKNOWN
Year: 2017 Year: 2017

First 24 hours of scalar data
YR MO DY HR H0 U* W* DT/DZ ZICNV ZIMCH M-O LEN Z0 BOWEN ALB REF WS WD HT REF TA HT IPCOD PRATE RH SFCP CCVR

---

17 01 01 01 -20.9 0.223 -9.000 -9.000 -999. 253. 54.7 0.08 3.25 1.00 2.86 281. 10. 277.0 2. 0 0.00 81. 928. 10
17 01 01 02 -21.4 0.228 -9.000 -9.000 -999. 262. 57.4 0.04 3.25 1.00 3.36 258. 10. 277.5 2. 0 0.00 82. 929. 10
17 01 01 03 -24.6 0.262 -9.000 -9.000 -999. 322. 75.5 0.04 3.25 1.00 3.83 252. 10. 277.0 2. 0 0.00 81. 928. 7
17 01 01 04 -16.2 0.175 -9.000 -9.000 -999. 179. 33.7 0.03 3.25 1.00 2.69 216. 10. 275.9 2. 0 0.00 85. 928. 0
17 01 01 05 -8.9 0.130 -9.000 -9.000 -999. 113. 20.5 0.05 3.25 1.00 1.91 171. 10. 277.0 2. 0 0.00 85. 928. 0
17 01 01 06 -25.8 0.275 -9.000 -9.000 -999. 347. 83.4 0.03 3.25 1.00 4.14 231. 10. 277.0 2. 0 0.00 81. 929. 0
17 01 01 07 -37.5 0.397 -9.000 -9.000 -999. 600. 173.3 0.08 3.25 1.00 4.97 278. 10. 275.4 2. 0 0.00 85. 929. 0
17 01 01 08 -23.5 0.297 -9.000 -9.000 -999. 395. 97.2 0.04 3.25 0.60 4.31 244. 10. 279.2 2. 0 0.00 73. 928. 0
17 01 01 09 25.2 0.504 0.475 0.008 141. 860. -421.5 0.04 3.25 0.37 6.89 260. 10. 281.4 2. 0 0.00 65. 929. 0
17 01 01 10 94.9 0.626 1.121 0.005 492. 1188. -214.6 0.04 3.25 0.29 8.45 261. 10. 283.8 2. 0 0.00 58. 929. 0
17 01 01 11 143.7 0.772 1.460 0.007 718. 1624. -265.1 0.08 3.25 0.26 9.10 273. 10. 284.9 2. 0 0.00 54. 929. 0
17 01 01 12 168.0 1.035 1.602 0.005 810. 2516. -544.8 0.08 3.25 0.25 12.35 271. 10. 285.9 2. 0 0.00 50. 927. 0
17 01 01 13 167.0 0.882 1.755 0.011 1072. 2031. -339.9 0.04 3.25 0.26 12.01 265. 10. 287.0 2. 0 0.00 38.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

927. 0
17 01 01 14 139.7 0.925 1.670 0.009 1104. 2131. -468.2 0.04 3.25 0.27 12.65 256. 10. 286.4 2. 0 0.00 50.
927. 0
17 01 01 15 87.7 0.788 1.438 0.008 1122. 1711. -461.8 0.04 3.25 0.30 10.78 243. 10. 284.9 2. 0 0.00 58.
928. 0
17 01 01 16 16.4 0.685 0.822 0.005 1124. 1381. -1627.1 0.03 3.25 0.39 9.75 237. 10. 283.1 2. 0 0.00 65.
928. 0
17 01 01 17 -57.0 0.667 -9.000 -9.000 -999. 1311. 490.0 0.04 3.25 0.65 9.39 242. 10. 281.4 2. 0 0.00 70.
928. 0
17 01 01 18 -54.1 0.585 -9.000 -9.000 -999. 1084. 376.6 0.04 3.25 1.00 8.28 244. 10. 280.9 2. 0 0.00 70.
928. 0
17 01 01 19 -56.2 0.606 -9.000 -9.000 -999. 1132. 404.5 0.03 3.25 1.00 8.83 237. 10. 280.4 2. 0 0.00 73.
929. 0
17 01 01 20 -55.2 0.595 -9.000 -9.000 -999. 1103. 389.9 0.04 3.25 1.00 8.42 243. 10. 280.4 2. 0 0.00 76.
929. 0
17 01 01 21 -62.0 0.668 -9.000 -9.000 -999. 1306. 490.3 0.03 3.25 1.00 9.69 239. 10. 280.4 2. 0 0.00 73.
930. 0
17 01 01 22 -64.0 0.715 -9.000 -9.000 -999. 1447. 561.6 0.04 3.25 1.00 10.05 240. 10. 279.9 2. 0 0.00 76.
931. 0
17 01 01 23 -54.5 0.586 -9.000 -9.000 -999. 1096. 377.4 0.03 3.25 1.00 8.54 236. 10. 279.9 2. 0 0.00 76.
931. 0
17 01 01 24 -46.2 0.496 -9.000 -9.000 -999. 848. 270.7 0.03 3.25 1.00 7.28 236. 10. 279.2 2. 0 0.00 79.
930. 0

First hour of profile data
YR MO DY HR HEIGHT F WDIR WSPD AMB_TMP sigmaA sigmaW sigmaV
17 01 01 01 10.0 1 281. 2.86 277.1 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)								
	394846.05	394858.89	394871.73	394884.57	394897.41	394910.25	394923.09	394935.93	394948.77
3836115.50	0.01020	0.01066	0.01119	0.01172	0.01232	0.01292	0.01351	0.01409	0.01465
3836109.43	0.00989	0.01027	0.01069	0.01116	0.01167	0.01220	0.01273	0.01325	0.01376

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836103.36 | 0.00959 0.00993 0.01029 0.01069 0.01113 0.01159 0.01205 0.01257 0.01304
3836097.29 | 0.00932 0.00962 0.00995 0.01034 0.01072 0.01113 0.01154 0.01197 0.01244
3836091.22 | 0.00907 0.00932 0.00962 0.00997 0.01031 0.01066 0.01104 0.01146 0.01194
3836085.15 | 0.00884 0.00907 0.00935 0.00964 0.00994 0.01030 0.01060 0.01102 0.01150
3836079.08 | 0.00863 0.00884 0.00910 0.00937 0.00965 0.00997 0.01028 0.01064 0.01112
3836073.01 | 0.00845 0.00863 0.00889 0.00915 0.00941 0.00972 0.00997 0.01034 0.01078
3836066.94 | 0.00827 0.00846 0.00868 0.00892 0.00917 0.00945 0.00970 0.01003 0.01045
3836060.87 | 0.00812 0.00830 0.00851 0.00873 0.00897 0.00921 0.00947 0.00979 0.01019
3836054.80 | 0.00795 0.00812 0.00832 0.00854 0.00876 0.00902 0.00926 0.00959 0.00994
3836048.73 | 0.00782 0.00798 0.00817 0.00835 0.00859 0.00883 0.00909 0.00938 0.00972
3836042.66 | 0.00767 0.00784 0.00801 0.00820 0.00840 0.00866 0.00891 0.00919 0.00951
3836036.59 | 0.00754 0.00769 0.00787 0.00804 0.00825 0.00848 0.00874 0.00901 0.00932
3836030.52 | 0.00741 0.00757 0.00774 0.00790 0.00809 0.00833 0.00855 0.00881 0.00913
3836024.45 | 0.00730 0.00745 0.00762 0.00777 0.00795 0.00818 0.00840 0.00865 0.00894
3836018.38 | 0.00719 0.00736 0.00752 0.00768 0.00786 0.00806 0.00828 0.00852 0.00878
3836012.31 | 0.00709 0.00727 0.00742 0.00758 0.00777 0.00795 0.00816 0.00838 0.00862
3836006.24 | 0.00699 0.00719 0.00736 0.00752 0.00768 0.00788 0.00806 0.00826 0.00848
3836000.17 | 0.00688 0.00708 0.00722 0.00737 0.00755 0.00772 0.00790 0.00810 0.00830
3835994.10 | 0.00676 0.00695 0.00708 0.00722 0.00738 0.00754 0.00771 0.00790 0.00809

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD | X-COORD (METERS)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(METERS) | 394961.61 394974.45 394987.29 395000.13 395012.97 395025.81 395038.65 395051.49 395064.33

3836115.50 | 0.01512 0.01564 0.01614 0.01664 0.01705 0.01754 0.01802 0.01851 0.01893
3836109.43 | 0.01420 0.01468 0.01516 0.01564 0.01603 0.01643 0.01690 0.01739 0.01790
3836103.36 | 0.01345 0.01391 0.01436 0.01475 0.01520 0.01559 0.01605 0.01646 0.01698
3836097.29 | 0.01283 0.01325 0.01363 0.01406 0.01443 0.01487 0.01527 0.01575 0.01626
3836091.22 | 0.01225 0.01260 0.01296 0.01336 0.01372 0.01415 0.01459 0.01501 0.01552
3836085.15 | 0.01175 0.01204 0.01233 0.01267 0.01306 0.01347 0.01395 0.01437 0.01482
3836079.08 | 0.01136 0.01163 0.01187 0.01223 0.01257 0.01301 0.01344 0.01385 0.01430
3836073.01 | 0.01097 0.01127 0.01150 0.01181 0.01218 0.01257 0.01298 0.01343 0.01383
3836066.94 | 0.01067 0.01091 0.01117 0.01147 0.01183 0.01221 0.01266 0.01306 0.01345
3836060.87 | 0.01036 0.01060 0.01088 0.01113 0.01148 0.01188 0.01232 0.01267 0.01306
3836054.80 | 0.01011 0.01034 0.01057 0.01086 0.01119 0.01158 0.01201 0.01235 0.01269
3836048.73 | 0.00988 0.01010 0.01033 0.01060 0.01092 0.01127 0.01168 0.01202 0.01239
3836042.66 | 0.00966 0.00988 0.01010 0.01036 0.01068 0.01101 0.01138 0.01175 0.01211
3836036.59 | 0.00947 0.00967 0.00989 0.01014 0.01045 0.01077 0.01109 0.01145 0.01184
3836030.52 | 0.00928 0.00950 0.00969 0.00993 0.01023 0.01058 0.01086 0.01120 0.01161
3836024.45 | 0.00910 0.00932 0.00950 0.00974 0.01002 0.01036 0.01063 0.01095 0.01135
3836018.38 | 0.00894 0.00915 0.00934 0.00960 0.00985 0.01017 0.01044 0.01075 0.01110
3836012.31 | 0.00880 0.00900 0.00922 0.00944 0.00971 0.01000 0.01025 0.01055 0.01088
3836006.24 | 0.00867 0.00886 0.00910 0.00934 0.00958 0.00986 0.01010 0.01039 0.01066
3836000.17 | 0.00850 0.00869 0.00893 0.00915 0.00942 0.00966 0.00992 0.01016 0.01045
3835994.10 | 0.00830 0.00848 0.00871 0.00894 0.00918 0.00943 0.00964 0.00989 0.01015

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)		
	395077.17	395090.01	395102.85
3836115.50	0.01946	0.02004	0.02079
3836109.43	0.01837	0.01898	0.01978
3836103.36	0.01754	0.01811	0.01893
3836097.29	0.01678	0.01744	0.01834
3836091.22	0.01611	0.01684	0.01775
3836085.15	0.01546	0.01631	0.01721
3836079.08	0.01493	0.01576	0.01664
3836073.01	0.01445	0.01532	0.01619
3836066.94	0.01406	0.01492	0.01577
3836060.87	0.01365	0.01454	0.01531
3836054.80	0.01327	0.01413	0.01494
3836048.73	0.01295	0.01378	0.01452
3836042.66	0.01265	0.01345	0.01412
3836036.59	0.01236	0.01309	0.01377
3836030.52	0.01207	0.01277	0.01342
3836024.45	0.01179	0.01246	0.01303
3836018.38	0.01151	0.01210	0.01266
3836012.31	0.01123	0.01177	0.01223
3836006.24	0.01102	0.01144	0.01179
3836000.17	0.01075	0.01109	0.01138
3835994.10	0.01041	0.01074	0.01100

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)							
	395240.46	395250.52	395260.58	395270.64	395280.70	395290.76	395300.82	395310.88	395320.94
3837580.05	0.00396	0.00404	0.00411	0.00419	0.00428	0.00437	0.00446	0.00456	0.00467

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837540.74 | 0.00431 0.00440 0.00451 0.00461 0.00472 0.00484 0.00496 0.00508 0.00523
3837501.43 | 0.00469 0.00480 0.00493 0.00506 0.00520 0.00534 0.00549 0.00566 0.00586
3837462.12 | 0.00509 0.00523 0.00539 0.00554 0.00570 0.00587 0.00606 0.00626 0.00647
3837422.81 | 0.00551 0.00567 0.00584 0.00601 0.00619 0.00638 0.00658 0.00680 0.00705
3837383.50 | 0.00592 0.00609 0.00627 0.00645 0.00665 0.00686 0.00708 0.00731 0.00758
3837344.19 | 0.00631 0.00649 0.00668 0.00688 0.00709 0.00731 0.00754 0.00778 0.00807
3837304.88 | 0.00668 0.00687 0.00707 0.00727 0.00749 0.00772 0.00798 0.00824 0.00852
3837265.57 | 0.00704 0.00723 0.00743 0.00765 0.00788 0.00812 0.00838 0.00866 0.00896
3837226.26 | 0.00739 0.00758 0.00779 0.00801 0.00825 0.00850 0.00877 0.00906 0.00936
3837186.95 | 0.00774 0.00794 0.00815 0.00838 0.00862 0.00888 0.00916 0.00945 0.00976
3837147.64 | 0.00809 0.00830 0.00853 0.00876 0.00901 0.00927 0.00955 0.00985 0.01017
3837108.33 | 0.00847 0.00869 0.00892 0.00917 0.00941 0.00968 0.00996 0.01027 0.01060
3837069.02 | 0.00891 0.00914 0.00938 0.00964 0.00992 0.01020 0.01049 0.01079 0.01113
3837029.71 | 0.00945 0.00969 0.00995 0.01022 0.01049 0.01078 0.01110 0.01143 0.01179
3836990.40 | 0.01013 0.01040 0.01068 0.01097 0.01128 0.01160 0.01194 0.01230 0.01267
3836951.09 | 0.01108 0.01135 0.01162 0.01194 0.01228 0.01263 0.01299 0.01337 0.01377
3836911.78 | 0.01244 0.01275 0.01308 0.01345 0.01385 0.01423 0.01459 0.01499 0.01489
3836872.47 | 0.01451 0.01487 0.01527 0.01566 0.01605 0.01646 0.01688 0.01730 0.01711
3836833.16 | 0.01785 0.01750 0.01782 0.01824 0.01881 0.01920 0.01963 0.02003 0.02044
3836793.85 | 0.02256 0.02284 0.02316 0.02353 0.02397 0.02434 0.02478 0.02522 0.02559

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

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

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Y-COORD (METERS)	X-COORD (METERS)									
	395331.00	395341.06	395351.12	395361.18	395371.24	395381.30	395391.36	395401.42	395411.48	
3837580.05	0.00478	0.00489	0.00503	0.00516	0.00531	0.00547	0.00564	0.00583	0.00604	
3837540.74	0.00539	0.00555	0.00574	0.00594	0.00617	0.00642	0.00672	0.00708	0.00750	
3837501.43	0.00606	0.00629	0.00654	0.00682	0.00712	0.00747	0.00788	0.00838	0.00897	
3837462.12	0.00670	0.00698	0.00728	0.00760	0.00797	0.00842	0.00891	0.00948	0.01013	
3837422.81	0.00733	0.00763	0.00795	0.00832	0.00870	0.00913	0.00965	0.01025	0.01094	
3837383.50	0.00788	0.00819	0.00854	0.00893	0.00934	0.00979	0.01032	0.01096	0.01166	
3837344.19	0.00839	0.00872	0.00909	0.00949	0.00990	0.01035	0.01092	0.01158	0.01232	
3837304.88	0.00885	0.00918	0.00955	0.00996	0.01040	0.01091	0.01148	0.01212	0.01285	
3837265.57	0.00928	0.00963	0.01001	0.01042	0.01088	0.01139	0.01196	0.01258	0.01331	
3837226.26	0.00968	0.01004	0.01042	0.01084	0.01131	0.01183	0.01239	0.01302	0.01377	
3837186.95	0.01009	0.01046	0.01084	0.01127	0.01174	0.01225	0.01282	0.01346	0.01420	
3837147.64	0.01051	0.01088	0.01128	0.01171	0.01218	0.01270	0.01328	0.01394	0.01468	
3837108.33	0.01094	0.01132	0.01171	0.01213	0.01262	0.01314	0.01373	0.01439	0.01514	
3837069.02	0.01149	0.01187	0.01227	0.01270	0.01321	0.01373	0.01430	0.01496	0.01572	
3837029.71	0.01215	0.01255	0.01297	0.01342	0.01392	0.01446	0.01506	0.01571	0.01645	
3836990.40	0.01307	0.01350	0.01394	0.01442	0.01494	0.01550	0.01611	0.01678	0.01754	
3836951.09	0.01418	0.01461	0.01460	0.01507	0.01557	0.01667	0.01669	0.01733	0.01803	
3836911.78	0.01526	0.01568	0.01618	0.01731	0.01787	0.01776	0.01829	0.01892	0.01963	
3836872.47	0.01749	0.01792	0.01832	0.01878	0.01929	0.01984	0.02050	0.02118	0.02188	
3836833.16	0.02085	0.02131	0.02180	0.02229	0.02277	0.02327	0.02381	0.02443	0.02512	
3836793.85	0.02604	0.02649	0.02696	0.02752	0.02817	0.02847	0.02886	0.02936	0.02999	

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)		
	395421.54	395431.60	395441.66
3837580.05	0.00628	0.00653	0.00682
3837540.74	0.00797	0.00862	0.00933
3837501.43	0.00966	0.01050	0.01142
3837462.12	0.01093	0.01185	0.01285
3837422.81	0.01171	0.01267	0.01378
3837383.50	0.01251	0.01354	0.01465
3837344.19	0.01315	0.01415	0.01536
3837304.88	0.01372	0.01474	0.01593
3837265.57	0.01415	0.01514	0.01635
3837226.26	0.01462	0.01562	0.01682
3837186.95	0.01506	0.01606	0.01725
3837147.64	0.01555	0.01656	0.01770
3837108.33	0.01604	0.01710	0.01823
3837069.02	0.01665	0.01770	0.01886
3837029.71	0.01737	0.01844	0.01959
3836990.40	0.01841	0.01940	0.02056
3836951.09	0.01964	0.02071	0.02184
3836911.78	0.02138	0.02243	0.02248
3836872.47	0.02276	0.02376	0.02460
3836833.16	0.02588	0.02680	0.02760
3836793.85	0.03068	0.03136	0.03225

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)							
	395039.27	395048.71	395058.15	395067.59	395077.03	395086.47	395095.91	395105.35	395114.79
3837187.04	0.00507	0.00516	0.00525	0.00534	0.00543	0.00552	0.00562	0.00573	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00583
3837167.69 | 0.00519 0.00528 0.00537 0.00546 0.00555 0.00565 0.00575 0.00586
0.00597
3837148.34 | 0.00531 0.00540 0.00549 0.00558 0.00568 0.00578 0.00589 0.00599
0.00610
3837128.99 | 0.00543 0.00553 0.00562 0.00571 0.00581 0.00591 0.00602 0.00613
0.00624
3837109.64 | 0.00556 0.00566 0.00575 0.00585 0.00595 0.00605 0.00616 0.00627
0.00639
3837090.29 | 0.00569 0.00579 0.00589 0.00599 0.00609 0.00620 0.00631 0.00642
0.00654
3837070.94 | 0.00583 0.00593 0.00603 0.00613 0.00624 0.00635 0.00646 0.00658
0.00670
3837051.59 | 0.00598 0.00608 0.00618 0.00628 0.00640 0.00651 0.00662 0.00675
0.00687
3837032.24 | 0.00613 0.00624 0.00634 0.00645 0.00656 0.00668 0.00680 0.00693
0.00706
3837012.89 | 0.00630 0.00641 0.00651 0.00663 0.00675 0.00687 0.00700 0.00713
0.00726
3836993.54 | 0.00648 0.00659 0.00671 0.00683 0.00695 0.00708 0.00722 0.00736
0.00750
3836974.19 | 0.00667 0.00679 0.00692 0.00704 0.00718 0.00731 0.00745 0.00760
0.00775
3836954.84 | 0.00688 0.00701 0.00713 0.00726 0.00740 0.00755 0.00770 0.00786
0.00802
3836935.49 | 0.00712 0.00726 0.00740 0.00755 0.00770 0.00786 0.00802 0.00819
0.00837
3836916.14 | 0.00738 0.00752 0.00768 0.00785 0.00802 0.00817 0.00836 0.00855
0.00875
3836896.79 | 0.00769 0.00785 0.00803 0.00823 0.00841 0.00860 0.00880 0.00901
0.00923
3836877.44 | 0.00807 0.00824 0.00844 0.00867 0.00890 0.00913 0.00935 0.00959
0.00985
3836858.09 | 0.00854 0.00875 0.00897 0.00922 0.00950 0.00981 0.01011 0.01041
0.01073
3836838.74 | 0.00915 0.00948 0.00975 0.01002 0.01035 0.01071 0.01110 0.01152
0.01192
3836819.39 | 0.01000 0.01053 0.01102 0.01138 0.01172 0.01214 0.01258 0.01305
0.01356
3836800.04 | 0.01140 0.01201 0.01272 0.01328 0.01378 0.01439 0.01498 0.01553
0.01526

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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

Y-COORD (METERS)	X-COORD (METERS)							
	395124.23	395133.67	395143.11	395152.55	395161.99	395171.43	395180.87	395190.31	395199.75
3837187.04	0.00594	0.00606	0.00618	0.00630	0.00643	0.00656	0.00670	0.00684	0.00699
3837167.69	0.00608	0.00620	0.00632	0.00644	0.00658	0.00671	0.00685	0.00700	0.00715
3837148.34	0.00622	0.00634	0.00646	0.00659	0.00673	0.00686	0.00701	0.00716	0.00731
3837128.99	0.00636	0.00648	0.00661	0.00674	0.00688	0.00702	0.00716	0.00732	0.00748
3837109.64	0.00651	0.00664	0.00677	0.00690	0.00703	0.00718	0.00733	0.00749	0.00765
3837090.29	0.00667	0.00679	0.00693	0.00706	0.00721	0.00735	0.00751	0.00768	0.00785
3837070.94	0.00683	0.00696	0.00710	0.00724	0.00739	0.00754	0.00770	0.00787	0.00804
3837051.59	0.00700	0.00714	0.00728	0.00743	0.00757	0.00773	0.00790	0.00807	0.00825
3837032.24	0.00719	0.00734	0.00748	0.00763	0.00779	0.00795	0.00812	0.00830	0.00849
3837012.89	0.00741	0.00755	0.00771	0.00787	0.00803	0.00820	0.00838	0.00857	0.00876
3836993.54	0.00765	0.00780	0.00796	0.00813	0.00831	0.00849	0.00867	0.00887	0.00907
3836974.19	0.00791	0.00807	0.00825	0.00842	0.00861	0.00880	0.00900	0.00921	0.00943
3836954.84	0.00819	0.00837	0.00855	0.00874	0.00894	0.00915	0.00936	0.00958	0.00982
3836935.49	0.00856	0.00875	0.00896	0.00917	0.00939	0.00962	0.00985	0.01010	0.01034
3836916.14	0.00895	0.00917	0.00940	0.00966	0.00991	0.01015	0.01040	0.01069	0.01095
3836896.79	0.00947	0.00972	0.00999	0.01028	0.01056	0.01083	0.01111	0.01141	0.01171
3836877.44	0.01014	0.01044	0.01076	0.01107	0.01138	0.01168	0.01200	0.01232	0.01266
3836858.09	0.01106	0.01140	0.01171	0.01161	0.01196	0.01231	0.01313	0.01350	0.01387
3836838.74	0.01231	0.01269	0.01307	0.01347	0.01388	0.01428	0.01470	0.01512	0.01551
3836819.39	0.01404	0.01450	0.01497	0.01546	0.01594	0.01634	0.01607	0.01647	0.01683
3836800.04	0.01572	0.01621	0.01672	0.01736	0.01881	0.01825	0.01858	0.01900	0.01945

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395209.19	395218.63	395228.07
3837187.04	0.00715	0.00732	0.00749
3837167.69	0.00732	0.00748	0.00766
3837148.34	0.00748	0.00766	0.00783
3837128.99	0.00765	0.00783	0.00801
3837109.64	0.00783	0.00801	0.00820
3837090.29	0.00802	0.00821	0.00840
3837070.94	0.00823	0.00841	0.00861
3837051.59	0.00845	0.00864	0.00884
3837032.24	0.00869	0.00890	0.00911
3837012.89	0.00897	0.00918	0.00940
3836993.54	0.00929	0.00951	0.00974
3836974.19	0.00965	0.00989	0.01014
3836954.84	0.01006	0.01032	0.01060
3836935.49	0.01057	0.01084	0.01115
3836916.14	0.01120	0.01150	0.01183
3836896.79	0.01203	0.01235	0.01268
3836877.44	0.01303	0.01338	0.01371
3836858.09	0.01429	0.01467	0.01503
3836838.74	0.01592	0.01632	0.01674
3836819.39	0.01714	0.01755	0.01812
3836800.04	0.01984	0.02033	0.02087

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 394853.55	394899.98	394946.41	394992.84	395039.27	395085.70	395132.13	395178.56	395224.99

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837951.42 | 0.00159 0.00165 0.00171 0.00177 0.00183 0.00189 0.00196 0.00203
0.00210
3837933.78 | 0.00161 0.00167 0.00174 0.00180 0.00187 0.00193 0.00201 0.00208
0.00215
3837916.14 | 0.00164 0.00170 0.00177 0.00183 0.00190 0.00197 0.00205 0.00213
0.00221
3837898.50 | 0.00167 0.00173 0.00180 0.00187 0.00194 0.00201 0.00210 0.00218
0.00226
3837880.86 | 0.00170 0.00176 0.00183 0.00190 0.00198 0.00205 0.00214 0.00223
0.00232
3837863.22 | 0.00172 0.00179 0.00186 0.00193 0.00202 0.00210 0.00219 0.00228
0.00238
3837845.58 | 0.00175 0.00183 0.00190 0.00197 0.00206 0.00214 0.00224 0.00233
0.00244
3837827.94 | 0.00179 0.00186 0.00194 0.00201 0.00210 0.00219 0.00229 0.00239
0.00250
3837810.30 | 0.00182 0.00189 0.00197 0.00205 0.00215 0.00224 0.00234 0.00245
0.00257
3837792.66 | 0.00185 0.00193 0.00201 0.00209 0.00219 0.00229 0.00240 0.00251
0.00264
3837775.02 | 0.00189 0.00197 0.00205 0.00214 0.00224 0.00234 0.00246 0.00257
0.00271
3837757.38 | 0.00192 0.00201 0.00209 0.00219 0.00229 0.00239 0.00252 0.00264
0.00278
3837739.74 | 0.00196 0.00205 0.00214 0.00223 0.00234 0.00245 0.00257 0.00271
0.00286
3837722.10 | 0.00200 0.00209 0.00218 0.00228 0.00239 0.00251 0.00265 0.00279
0.00295
3837704.46 | 0.00204 0.00213 0.00223 0.00234 0.00245 0.00257 0.00272 0.00287
0.00304
3837686.82 | 0.00208 0.00218 0.00228 0.00239 0.00251 0.00264 0.00279 0.00295
0.00313
3837669.18 | 0.00212 0.00223 0.00234 0.00246 0.00258 0.00271 0.00287 0.00304
0.00323
3837651.54 | 0.00217 0.00228 0.00240 0.00252 0.00264 0.00278 0.00295 0.00313
0.00334
3837633.90 | 0.00222 0.00233 0.00245 0.00258 0.00271 0.00286 0.00304 0.00323
0.00345
3837616.26 | 0.00227 0.00238 0.00251 0.00264 0.00278 0.00295 0.00313 0.00334
0.00358
3837598.62 | 0.00231 0.00243 0.00256 0.00270 0.00286 0.00303 0.00322 0.00345
0.00371

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)							
	395271.42	395317.85	395364.28	395410.71	395457.14	395503.57	395550.00	395596.43
395642.86								
3837951.42	0.00218	0.00226	0.00235	0.00244	0.00253	0.00263	0.00273	0.00284
0.00296								
3837933.78	0.00223	0.00232	0.00241	0.00251	0.00262	0.00272	0.00283	0.00294
0.00307								
3837916.14	0.00229	0.00238	0.00248	0.00258	0.00270	0.00281	0.00293	0.00306
0.00319								
3837898.50	0.00235	0.00245	0.00256	0.00266	0.00279	0.00290	0.00303	0.00317
0.00332								
3837880.86	0.00241	0.00251	0.00263	0.00274	0.00288	0.00300	0.00314	0.00329
0.00346								
3837863.22	0.00248	0.00259	0.00271	0.00283	0.00297	0.00310	0.00325	0.00341
0.00360								
3837845.58	0.00255	0.00266	0.00279	0.00292	0.00308	0.00322	0.00339	0.00356
0.00377								
3837827.94	0.00262	0.00274	0.00288	0.00302	0.00319	0.00334	0.00353	0.00372
0.00395								
3837810.30	0.00269	0.00282	0.00298	0.00313	0.00331	0.00348	0.00368	0.00390
0.00416								
3837792.66	0.00277	0.00291	0.00308	0.00324	0.00344	0.00362	0.00384	0.00409
0.00438								
3837775.02	0.00285	0.00301	0.00319	0.00336	0.00358	0.00376	0.00400	0.00428
0.00462								
3837757.38	0.00294	0.00311	0.00330	0.00349	0.00373	0.00394	0.00421	0.00454
0.00494								
3837739.74	0.00303	0.00321	0.00342	0.00363	0.00390	0.00413	0.00445	0.00483
0.00530								
3837722.10	0.00313	0.00332	0.00356	0.00379	0.00408	0.00436	0.00473	0.00519
0.00576								
3837704.46	0.00323	0.00344	0.00370	0.00396	0.00429	0.00459	0.00502	0.00557
0.00626								
3837686.82	0.00334	0.00357	0.00385	0.00414	0.00452	0.00486	0.00536	0.00604
0.00688								
3837669.18	0.00346	0.00371	0.00402	0.00435	0.00478	0.00520	0.00583	0.00670
0.00773								
3837651.54	0.00358	0.00386	0.00421	0.00459	0.00509	0.00561	0.00643	0.00757
0.00884								
3837633.90	0.00372	0.00402	0.00441	0.00486	0.00546	0.00616	0.00731	0.00887
0.01044								
3837616.26	0.00386	0.00419	0.00463	0.00517	0.00591	0.00687	0.00852	0.01051
0.01237								
3837598.62	0.00401	0.00439	0.00488	0.00554	0.00647	0.00794	0.01038	0.01285
0.01508								

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395689.29	395735.72	395782.15
383795I.42	0.00308	0.00322	0.00339
3837933.78	0.00319	0.00336	0.00353
3837916.14	0.00332	0.00351	0.00370
3837898.50	0.00346	0.00367	0.00388
3837880.86	0.00362	0.00385	0.00408
3837863.22	0.00379	0.00405	0.00430
3837845.58	0.00400	0.00428	0.00459
3837827.94	0.00421	0.00453	0.00489
3837810.30	0.00446	0.00482	0.00523
3837792.66	0.00473	0.00515	0.00561
3837775.02	0.00504	0.00553	0.00605
3837757.38	0.00543	0.00596	0.00657
3837739.74	0.00587	0.00652	0.00717
3837722.10	0.00641	0.00714	0.00788
3837704.46	0.00706	0.00789	0.00874
3837686.82	0.00787	0.00882	0.00977
3837669.18	0.00886	0.00997	0.01102
3837651.54	0.01014	0.01138	0.01257
3837633.90	0.01185	0.01320	0.01453
3837616.26	0.01408	0.01559	0.01704
3837598.62	0.01712	0.01888	0.02047

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS) 394846.05	394858.89	394871.73	394884.57	394897.41	394910.25	394923.09	394935.93

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

394948.77

3836115.50 | 0.00112 0.00120 0.00126 0.00131 0.00136 0.00140 0.00143 0.00147 0.00150
3836109.43 | 0.00105 0.00111 0.00116 0.00120 0.00124 0.00127 0.00130 0.00133 0.00136
3836103.36 | 0.00098 0.00103 0.00107 0.00110 0.00114 0.00117 0.00120 0.00123 0.00125
3836097.29 | 0.00093 0.00097 0.00100 0.00103 0.00106 0.00109 0.00112 0.00114 0.00117
3836091.22 | 0.00088 0.00091 0.00094 0.00097 0.00099 0.00102 0.00104 0.00107 0.00110
3836085.15 | 0.00084 0.00087 0.00089 0.00092 0.00094 0.00096 0.00098 0.00101 0.00104
3836079.08 | 0.00081 0.00083 0.00085 0.00087 0.00089 0.00091 0.00094 0.00096 0.00099
3836073.01 | 0.00078 0.00079 0.00082 0.00084 0.00085 0.00087 0.00089 0.00092 0.00094
3836066.94 | 0.00075 0.00076 0.00078 0.00080 0.00082 0.00084 0.00086 0.00088 0.00090
3836060.87 | 0.00072 0.00074 0.00076 0.00077 0.00079 0.00081 0.00082 0.00084 0.00087
3836054.80 | 0.00070 0.00071 0.00073 0.00075 0.00076 0.00078 0.00080 0.00082 0.00084
3836048.73 | 0.00068 0.00069 0.00071 0.00072 0.00074 0.00075 0.00077 0.00079 0.00081
3836042.66 | 0.00066 0.00067 0.00069 0.00070 0.00071 0.00073 0.00075 0.00077 0.00079
3836036.59 | 0.00064 0.00065 0.00067 0.00068 0.00069 0.00071 0.00073 0.00074 0.00076
3836030.52 | 0.00062 0.00064 0.00065 0.00066 0.00068 0.00069 0.00071 0.00072 0.00074
3836024.45 | 0.00061 0.00062 0.00063 0.00065 0.00066 0.00067 0.00069 0.00070 0.00072
3836018.38 | 0.00060 0.00061 0.00062 0.00063 0.00064 0.00066 0.00067 0.00069 0.00071
3836012.31 | 0.00058 0.00059 0.00061 0.00062 0.00063 0.00064 0.00066 0.00067 0.00069
3836006.24 | 0.00057 0.00058 0.00059 0.00061 0.00062 0.00063 0.00064 0.00066 0.00067
3836000.17 | 0.00056 0.00057 0.00058 0.00059 0.00060 0.00062 0.00063 0.00064 0.00066
3835994.10 | 0.00055 0.00056 0.00057 0.00058 0.00059 0.00060 0.00061 0.00063 0.00064

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	394961.61	394974.45	394987.29	395000.13	395012.97	395025.81	395038.65	395051.49
395064.33								
3836115.50	0.00152	0.00155	0.00158	0.00161	0.00164	0.00167	0.00171	0.00175
0.00180								
3836109.43	0.00139	0.00141	0.00144	0.00147	0.00150	0.00153	0.00157	0.00162
0.00167								
3836103.36	0.00128	0.00131	0.00133	0.00136	0.00139	0.00142	0.00146	0.00151
0.00157								
3836097.29	0.00119	0.00122	0.00124	0.00127	0.00130	0.00134	0.00137	0.00143
0.00149								
3836091.22	0.00112	0.00114	0.00116	0.00119	0.00122	0.00126	0.00130	0.00135
0.00142								
3836085.15	0.00105	0.00108	0.00110	0.00112	0.00116	0.00119	0.00124	0.00129
0.00136								
3836079.08	0.00100	0.00102	0.00104	0.00107	0.00110	0.00114	0.00119	0.00124
0.00131								
3836073.01	0.00096	0.00098	0.00100	0.00103	0.00106	0.00110	0.00114	0.00120
0.00127								
3836066.94	0.00092	0.00094	0.00096	0.00099	0.00102	0.00106	0.00111	0.00116
0.00123								
3836060.87	0.00088	0.00090	0.00093	0.00095	0.00098	0.00102	0.00107	0.00113
0.00120								
3836054.80	0.00085	0.00087	0.00090	0.00092	0.00095	0.00099	0.00104	0.00110
0.00116								
3836048.73	0.00083	0.00085	0.00087	0.00089	0.00093	0.00096	0.00101	0.00106
0.00113								
3836042.66	0.00080	0.00082	0.00084	0.00087	0.00090	0.00094	0.00098	0.00103
0.00110								
3836036.59	0.00078	0.00080	0.00082	0.00084	0.00088	0.00091	0.00095	0.00100
0.00107								
3836030.52	0.00076	0.00078	0.00080	0.00082	0.00085	0.00089	0.00093	0.00098
0.00104								
3836024.45	0.00074	0.00076	0.00078	0.00080	0.00083	0.00086	0.00090	0.00095
0.00101								
3836018.38	0.00072	0.00074	0.00076	0.00078	0.00081	0.00084	0.00088	0.00092
0.00098								
3836012.31	0.00070	0.00072	0.00074	0.00076	0.00079	0.00082	0.00086	0.00090
0.00095								
3836006.24	0.00069	0.00071	0.00073	0.00075	0.00077	0.00080	0.00083	0.00087
0.00091								
3836000.17	0.00067	0.00069	0.00071	0.00073	0.00075	0.00078	0.00081	0.00084
0.00088								
3835994.10	0.00066	0.00067	0.00069	0.00071	0.00073	0.00076	0.00079	0.00082
0.00085								

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS) 395077.17	395090.01	395102.85
3836115.50	0.00187	0.00196	0.00208
3836109.43	0.00175	0.00185	0.00200
3836103.36	0.00166	0.00177	0.00193
3836097.29	0.00158	0.00171	0.00188
3836091.22	0.00152	0.00166	0.00183
3836085.15	0.00146	0.00161	0.00179
3836079.08	0.00141	0.00156	0.00174
3836073.01	0.00137	0.00152	0.00170
3836066.94	0.00133	0.00148	0.00166
3836060.87	0.00130	0.00144	0.00161
3836054.80	0.00126	0.00140	0.00157
3836048.73	0.00122	0.00136	0.00153
3836042.66	0.00119	0.00132	0.00148
3836036.59	0.00116	0.00128	0.00143
3836030.52	0.00112	0.00123	0.00138
3836024.45	0.00108	0.00119	0.00131
3836018.38	0.00104	0.00114	0.00125
3836012.31	0.00100	0.00108	0.00117
3836006.24	0.00097	0.00103	0.00109
3836000.17	0.00093	0.00098	0.00102
3835994.10	0.00089	0.00093	0.00096

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Y-COORD (METERS)	X-COORD (METERS)								
	395240.46	395250.52	395260.58	395270.64	395280.70	395290.76	395300.82	395310.88	395320.94
3837580.05	0.00029	0.00030	0.00031	0.00032	0.00032	0.00033	0.00034	0.00035	0.00036
3837540.74	0.00033	0.00033	0.00034	0.00035	0.00036	0.00038	0.00039	0.00040	0.00042
3837501.43	0.00036	0.00037	0.00038	0.00040	0.00041	0.00042	0.00044	0.00046	0.00048
3837462.12	0.00040	0.00041	0.00042	0.00044	0.00046	0.00047	0.00049	0.00052	0.00054
3837422.81	0.00043	0.00045	0.00046	0.00048	0.00050	0.00052	0.00054	0.00057	0.00060
3837383.50	0.00047	0.00048	0.00050	0.00052	0.00054	0.00056	0.00059	0.00061	0.00064
3837344.19	0.00050	0.00051	0.00053	0.00055	0.00057	0.00060	0.00062	0.00065	0.00068
3837304.88	0.00052	0.00054	0.00056	0.00058	0.00060	0.00063	0.00065	0.00068	0.00071
3837265.57	0.00055	0.00057	0.00059	0.00061	0.00063	0.00065	0.00068	0.00071	0.00074
3837226.26	0.00057	0.00059	0.00061	0.00063	0.00065	0.00068	0.00071	0.00074	0.00077
3837186.95	0.00060	0.00061	0.00063	0.00065	0.00068	0.00070	0.00073	0.00076	0.00079
3837147.64	0.00062	0.00064	0.00066	0.00068	0.00070	0.00073	0.00075	0.00078	0.00082
3837108.33	0.00064	0.00066	0.00068	0.00070	0.00072	0.00075	0.00077	0.00080	0.00084
3837069.02	0.00067	0.00068	0.00071	0.00073	0.00075	0.00078	0.00080	0.00083	0.00087
3837029.71	0.00070	0.00072	0.00074	0.00076	0.00078	0.00081	0.00084	0.00087	0.00090
3836990.40	0.00074	0.00076	0.00078	0.00081	0.00083	0.00086	0.00089	0.00092	0.00095
3836951.09	0.00080	0.00082	0.00084	0.00086	0.00089	0.00092	0.00094	0.00098	0.00101
3836911.78	0.00088	0.00090	0.00092	0.00095	0.00098	0.00101	0.00104	0.00107	0.00108
3836872.47	0.00101	0.00103	0.00106	0.00108	0.00111	0.00114	0.00117	0.00120	0.00121
3836833.16	0.00122	0.00122	0.00124	0.00127	0.00130	0.00133	0.00136	0.00139	0.00142
3836793.85	0.00161	0.00162	0.00164	0.00166	0.00168	0.00171	0.00173	0.00176	0.00179

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395331.00	395341.06	395351.12	395361.18	395371.24	395381.30	395391.36	395401.42
395411.48								
3837580.05	0.00037	0.00039	0.00040	0.00042	0.00043	0.00046	0.00048	0.00051
0.00054								
3837540.74	0.00044	0.00046	0.00048	0.00051	0.00054	0.00058	0.00063	0.00069
0.00077								
3837501.43	0.00051	0.00053	0.00057	0.00060	0.00065	0.00071	0.00077	0.00086
0.00097								
3837462.12	0.00057	0.00061	0.00064	0.00069	0.00074	0.00080	0.00088	0.00097
0.00109								
3837422.81	0.00063	0.00066	0.00071	0.00075	0.00081	0.00087	0.00095	0.00105
0.00117								
3837383.50	0.00068	0.00071	0.00076	0.00081	0.00086	0.00093	0.00101	0.00111
0.00123								
3837344.19	0.00072	0.00075	0.00080	0.00085	0.00090	0.00097	0.00105	0.00115
0.00127								
3837304.88	0.00075	0.00079	0.00083	0.00088	0.00094	0.00101	0.00109	0.00119
0.00131								
3837265.57	0.00078	0.00082	0.00086	0.00091	0.00097	0.00104	0.00112	0.00121
0.00133								
3837226.26	0.00080	0.00084	0.00089	0.00094	0.00100	0.00107	0.00114	0.00123
0.00135								
3837186.95	0.00083	0.00087	0.00091	0.00096	0.00102	0.00108	0.00116	0.00125
0.00137								
3837147.64	0.00085	0.00089	0.00093	0.00098	0.00104	0.00111	0.00118	0.00128
0.00139								
3837108.33	0.00087	0.00091	0.00095	0.00100	0.00106	0.00112	0.00120	0.00129
0.00140								
3837069.02	0.00090	0.00094	0.00098	0.00103	0.00109	0.00115	0.00122	0.00131
0.00142								
3837029.71	0.00094	0.00098	0.00102	0.00107	0.00112	0.00119	0.00126	0.00134
0.00145								
3836990.40	0.00099	0.00103	0.00107	0.00112	0.00118	0.00124	0.00132	0.00140
0.00151								
3836951.09	0.00105	0.00109	0.00112	0.00116	0.00122	0.00130	0.00135	0.00144
0.00153								
3836911.78	0.00112	0.00116	0.00120	0.00127	0.00133	0.00137	0.00144	0.00152
0.00161								
3836872.47	0.00125	0.00129	0.00133	0.00137	0.00142	0.00148	0.00155	0.00164
0.00173								
3836833.16	0.00145	0.00149	0.00153	0.00158	0.00162	0.00168	0.00174	0.00182
0.00191								
3836793.85	0.00182	0.00185	0.00189	0.00193	0.00198	0.00202	0.00207	0.00213

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00221
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)		
	395421.54	395431.60	395441.66
3837580.05	0.00058	0.00062	0.00067
3837540.74	0.00088	0.00104	0.00124
3837501.43	0.00112	0.00131	0.00156
3837462.12	0.00125	0.00145	0.00171
3837422.81	0.00133	0.00153	0.00179
3837383.50	0.00139	0.00159	0.00185
3837344.19	0.00143	0.00163	0.00189
3837304.88	0.00146	0.00166	0.00192
3837265.57	0.00147	0.00166	0.00191
3837226.26	0.00150	0.00168	0.00192
3837186.95	0.00151	0.00169	0.00192
3837147.64	0.00153	0.00171	0.00192
3837108.33	0.00154	0.00172	0.00193
3837069.02	0.00156	0.00174	0.00194
3837029.71	0.00158	0.00176	0.00195
3836990.40	0.00163	0.00179	0.00199
3836951.09	0.00169	0.00185	0.00204
3836911.78	0.00177	0.00193	0.00207
3836872.47	0.00185	0.00200	0.00217
3836833.16	0.00202	0.00216	0.00232
3836793.85	0.00231	0.00242	0.00257

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395039.27	395048.71	395058.15	395067.59	395077.03	395086.47	395095.91	395105.35
395114.79								
3837187.04	0.00038	0.00038	0.00039	0.00040	0.00040	0.00041	0.00042	0.00043
0.00044								
3837167.69	0.00039	0.00039	0.00040	0.00040	0.00041	0.00042	0.00043	0.00044
0.00044								
3837148.34	0.00039	0.00040	0.00041	0.00041	0.00042	0.00043	0.00044	0.00044
0.00045								
3837128.99	0.00040	0.00041	0.00041	0.00042	0.00043	0.00044	0.00044	0.00045
0.00046								
3837109.64	0.00041	0.00042	0.00042	0.00043	0.00044	0.00045	0.00045	0.00046
0.00047								
3837090.29	0.00042	0.00043	0.00043	0.00044	0.00045	0.00045	0.00046	0.00047
0.00048								
3837070.94	0.00043	0.00044	0.00044	0.00045	0.00046	0.00046	0.00047	0.00048
0.00049								
3837051.59	0.00044	0.00045	0.00045	0.00046	0.00047	0.00047	0.00048	0.00049
0.00050								
3837032.24	0.00045	0.00046	0.00046	0.00047	0.00048	0.00049	0.00049	0.00050
0.00051								
3837012.89	0.00046	0.00047	0.00047	0.00048	0.00049	0.00050	0.00051	0.00052
0.00053								
3836993.54	0.00047	0.00048	0.00049	0.00050	0.00051	0.00051	0.00052	0.00053
0.00054								
3836974.19	0.00049	0.00049	0.00050	0.00051	0.00052	0.00053	0.00054	0.00055
0.00056								
3836954.84	0.00050	0.00051	0.00052	0.00053	0.00054	0.00055	0.00056	0.00057
0.00058								
3836935.49	0.00052	0.00053	0.00054	0.00055	0.00056	0.00057	0.00058	0.00059
0.00060								
3836916.14	0.00054	0.00055	0.00056	0.00057	0.00058	0.00059	0.00061	0.00062
0.00063								
3836896.79	0.00057	0.00058	0.00059	0.00060	0.00062	0.00063	0.00064	0.00065
0.00067								
3836877.44	0.00060	0.00061	0.00062	0.00064	0.00066	0.00067	0.00068	0.00070
0.00072								
3836858.09	0.00064	0.00066	0.00067	0.00069	0.00071	0.00073	0.00075	0.00077
0.00079								
3836838.74	0.00070	0.00073	0.00075	0.00076	0.00078	0.00081	0.00083	0.00086
0.00088								
3836819.39	0.00080	0.00084	0.00088	0.00089	0.00091	0.00093	0.00096	0.00098
0.00101								
3836800.04	0.00095	0.00099	0.00105	0.00107	0.00110	0.00113	0.00117	0.00119
0.00120								

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395124.23	395133.67	395143.11	395152.55	395161.99	395171.43	395180.87	395190.31
395199.75								
3837187.04	0.00044	0.00045	0.00046	0.00047	0.00048	0.00049	0.00050	0.00052
0.00053								
3837167.69	0.00045	0.00046	0.00047	0.00048	0.00049	0.00050	0.00051	0.00053
0.00054								
3837148.34	0.00046	0.00047	0.00048	0.00049	0.00050	0.00051	0.00052	0.00054
0.00055								
3837128.99	0.00047	0.00048	0.00049	0.00050	0.00051	0.00052	0.00053	0.00055
0.00056								
3837109.64	0.00048	0.00049	0.00050	0.00051	0.00052	0.00053	0.00054	0.00056
0.00057								
3837090.29	0.00049	0.00050	0.00051	0.00052	0.00053	0.00054	0.00055	0.00057
0.00058								
3837070.94	0.00050	0.00051	0.00052	0.00053	0.00054	0.00055	0.00057	0.00058
0.00059								
3837051.59	0.00051	0.00052	0.00053	0.00054	0.00055	0.00057	0.00058	0.00059
0.00061								
3837032.24	0.00052	0.00053	0.00054	0.00056	0.00057	0.00058	0.00059	0.00061
0.00062								
3837012.89	0.00054	0.00055	0.00056	0.00057	0.00058	0.00060	0.00061	0.00062
0.00064								
3836993.54	0.00055	0.00057	0.00058	0.00059	0.00060	0.00061	0.00063	0.00064
0.00066								
3836974.19	0.00057	0.00058	0.00060	0.00061	0.00062	0.00064	0.00065	0.00067
0.00068								
3836954.84	0.00059	0.00060	0.00062	0.00063	0.00064	0.00066	0.00067	0.00069
0.00071								
3836935.49	0.00062	0.00063	0.00064	0.00066	0.00067	0.00069	0.00071	0.00072
0.00074								
3836916.14	0.00065	0.00066	0.00068	0.00069	0.00071	0.00073	0.00074	0.00076
0.00078								
3836896.79	0.00068	0.00070	0.00072	0.00074	0.00076	0.00077	0.00079	0.00081
0.00083								
3836877.44	0.00073	0.00075	0.00077	0.00079	0.00081	0.00083	0.00085	0.00087
0.00089								
3836858.09	0.00081	0.00083	0.00084	0.00085	0.00087	0.00089	0.00093	0.00095
0.00097								
3836838.74	0.00090	0.00092	0.00095	0.00097	0.00099	0.00101	0.00104	0.00106
0.00108								
3836819.39	0.00104	0.00107	0.00109	0.00112	0.00114	0.00116	0.00117	0.00119

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00121
3836800.04 | 0.00123 0.00125 0.00128 0.00131 0.00136 0.00136 0.00137 0.00139
0.00142
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)		
	395209.19	395218.63	395228.07
3837187.04	0.00054	0.00056	0.00057
3837167.69	0.00055	0.00057	0.00058
3837148.34	0.00056	0.00058	0.00059
3837128.99	0.00057	0.00059	0.00060
3837109.64	0.00058	0.00060	0.00062
3837090.29	0.00060	0.00061	0.00063
3837070.94	0.00061	0.00062	0.00064
3837051.59	0.00062	0.00064	0.00065
3837032.24	0.00064	0.00065	0.00067
3837012.89	0.00065	0.00067	0.00069
3836993.54	0.00067	0.00069	0.00071
3836974.19	0.00070	0.00072	0.00073
3836954.84	0.00072	0.00074	0.00076
3836935.49	0.00075	0.00077	0.00080
3836916.14	0.00080	0.00082	0.00084
3836896.79	0.00085	0.00087	0.00089
3836877.44	0.00091	0.00094	0.00096
3836858.09	0.00100	0.00102	0.00104
3836838.74	0.00111	0.00113	0.00115
3836819.39	0.00123	0.00125	0.00128
3836800.04	0.00144	0.00146	0.00149

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	394853.55	394899.98	394946.41	394992.84	395039.27	395085.70	395132.13	395178.56
395224.99								
3837951.42	0.00012	0.00012	0.00013	0.00013	0.00013	0.00013	0.00014	0.00014
0.00014								
3837933.78	0.00012	0.00013	0.00013	0.00013	0.00013	0.00014	0.00014	0.00014
0.00015								
3837916.14	0.00012	0.00013	0.00013	0.00013	0.00014	0.00014	0.00014	0.00015
0.00015								
3837898.50	0.00013	0.00013	0.00013	0.00014	0.00014	0.00014	0.00015	0.00015
0.00016								
3837880.86	0.00013	0.00013	0.00014	0.00014	0.00014	0.00015	0.00015	0.00016
0.00016								
3837863.22	0.00013	0.00013	0.00014	0.00014	0.00015	0.00015	0.00015	0.00016
0.00016								
3837845.58	0.00013	0.00014	0.00014	0.00014	0.00015	0.00015	0.00016	0.00016
0.00017								
3837827.94	0.00014	0.00014	0.00014	0.00015	0.00015	0.00016	0.00016	0.00017
0.00017								
3837810.30	0.00014	0.00014	0.00015	0.00015	0.00016	0.00016	0.00017	0.00017
0.00018								
3837792.66	0.00014	0.00015	0.00015	0.00015	0.00016	0.00016	0.00017	0.00018
0.00018								
3837775.02	0.00014	0.00015	0.00015	0.00016	0.00016	0.00017	0.00018	0.00018
0.00019								
3837757.38	0.00015	0.00015	0.00016	0.00016	0.00017	0.00017	0.00018	0.00019
0.00020								
3837739.74	0.00015	0.00015	0.00016	0.00017	0.00017	0.00018	0.00018	0.00019
0.00020								
3837722.10	0.00015	0.00016	0.00016	0.00017	0.00018	0.00018	0.00019	0.00020
0.00021								
3837704.46	0.00016	0.00016	0.00017	0.00017	0.00018	0.00019	0.00020	0.00021
0.00022								
3837686.82	0.00016	0.00016	0.00017	0.00018	0.00018	0.00019	0.00020	0.00021
0.00022								
3837669.18	0.00016	0.00017	0.00017	0.00018	0.00019	0.00020	0.00021	0.00022
0.00023								
3837651.54	0.00017	0.00017	0.00018	0.00019	0.00019	0.00020	0.00021	0.00023
0.00024								
3837633.90	0.00017	0.00018	0.00018	0.00019	0.00020	0.00021	0.00022	0.00024
0.00025								
3837616.26	0.00017	0.00018	0.00019	0.00020	0.00020	0.00022	0.00023	0.00024
0.00026								
3837598.62	0.00018	0.00018	0.00019	0.00020	0.00021	0.00022	0.00024	0.00025
0.00027								

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

*** AERMET - VERSION 21112 *** *** *** 08:45:15

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395271.42	395317.85	395364.28	395410.71	395457.14	395503.57	395550.00	395596.43
3837951.42	0.00015	0.00015	0.00015	0.00016	0.00016	0.00016	0.00017	0.00017
3837933.78	0.00015	0.00016	0.00016	0.00016	0.00017	0.00017	0.00017	0.00018
3837916.14	0.00016	0.00016	0.00016	0.00017	0.00017	0.00018	0.00018	0.00019
3837898.50	0.00016	0.00016	0.00017	0.00017	0.00018	0.00018	0.00019	0.00019
3837880.86	0.00016	0.00017	0.00017	0.00018	0.00018	0.00019	0.00019	0.00020
3837863.22	0.00017	0.00017	0.00018	0.00018	0.00019	0.00020	0.00020	0.00021
3837845.58	0.00017	0.00018	0.00019	0.00019	0.00020	0.00020	0.00021	0.00022
3837827.94	0.00018	0.00019	0.00019	0.00020	0.00021	0.00021	0.00022	0.00023
3837810.30	0.00019	0.00019	0.00020	0.00021	0.00022	0.00022	0.00023	0.00024
3837792.66	0.00019	0.00020	0.00021	0.00022	0.00022	0.00023	0.00024	0.00026
3837775.02	0.00020	0.00021	0.00022	0.00023	0.00024	0.00025	0.00026	0.00027
3837757.38	0.00020	0.00021	0.00023	0.00024	0.00025	0.00026	0.00027	0.00029
3837739.74	0.00021	0.00022	0.00024	0.00025	0.00026	0.00028	0.00029	0.00031
3837722.10	0.00022	0.00023	0.00025	0.00026	0.00028	0.00029	0.00031	0.00034
3837704.46	0.00023	0.00024	0.00026	0.00028	0.00030	0.00032	0.00034	0.00037
3837686.82	0.00024	0.00026	0.00027	0.00030	0.00032	0.00034	0.00037	0.00041
3837669.18	0.00025	0.00027	0.00029	0.00032	0.00035	0.00038	0.00042	0.00047
3837651.54	0.00026	0.00028	0.00031	0.00034	0.00038	0.00042	0.00048	0.00054
3837633.90	0.00027	0.00030	0.00033	0.00037	0.00042	0.00048	0.00056	0.00065

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00073
3837616.26 | 0.00029 0.00032 0.00036 0.00041 0.00048 0.00057 0.00069 0.00080
0.00090
3837598.62 | 0.00030 0.00033 0.00039 0.00046 0.00058 0.00073 0.00090 0.00104
0.00115
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL TOTAL DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)		
	395689.29	395735.72	395782.15
3837951.42	0.00018	0.00019	0.00019
3837933.78	0.00019	0.00019	0.00020
3837916.14	0.00020	0.00020	0.00021
3837898.50	0.00020	0.00021	0.00022
3837880.86	0.00021	0.00022	0.00024
3837863.22	0.00023	0.00024	0.00025
3837845.58	0.00024	0.00025	0.00027
3837827.94	0.00025	0.00027	0.00028
3837810.30	0.00027	0.00029	0.00030
3837792.66	0.00029	0.00031	0.00033
3837775.02	0.00031	0.00033	0.00036
3837757.38	0.00033	0.00036	0.00039
3837739.74	0.00037	0.00040	0.00043
3837722.10	0.00040	0.00044	0.00047
3837704.46	0.00045	0.00049	0.00053
3837686.82	0.00051	0.00055	0.00059
3837669.18	0.00058	0.00063	0.00067
3837651.54	0.00067	0.00073	0.00078
3837633.90	0.00080	0.00086	0.00092
3837616.26	0.00098	0.00105	0.00110
3837598.62	0.00125	0.00132	0.00139

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 60
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	394846.05	394858.89	394871.73	394884.57	394897.41	394910.25	394923.09	394935.93 394948.77
3836115.50	0.00111	0.00119	0.00125	0.00130	0.00134	0.00138	0.00142	0.00145 0.00148
3836109.43	0.00103	0.00109	0.00114	0.00118	0.00122	0.00125	0.00129	0.00132 0.00134
3836103.36	0.00097	0.00101	0.00105	0.00109	0.00112	0.00115	0.00118	0.00121 0.00124
3836097.29	0.00091	0.00095	0.00098	0.00102	0.00104	0.00107	0.00110	0.00112 0.00115
3836091.22	0.00087	0.00090	0.00092	0.00095	0.00098	0.00100	0.00103	0.00105 0.00108
3836085.15	0.00083	0.00085	0.00088	0.00090	0.00092	0.00095	0.00097	0.00099 0.00102
3836079.08	0.00079	0.00081	0.00083	0.00086	0.00088	0.00090	0.00092	0.00094 0.00097
3836073.01	0.00076	0.00078	0.00080	0.00082	0.00084	0.00086	0.00088	0.00090 0.00092
3836066.94	0.00073	0.00075	0.00077	0.00079	0.00080	0.00082	0.00084	0.00086 0.00088
3836060.87	0.00071	0.00072	0.00074	0.00076	0.00077	0.00079	0.00081	0.00083 0.00085
3836054.80	0.00068	0.00070	0.00071	0.00073	0.00075	0.00076	0.00078	0.00080 0.00082
3836048.73	0.00066	0.00068	0.00069	0.00071	0.00072	0.00074	0.00076	0.00077 0.00079
3836042.66	0.00064	0.00066	0.00067	0.00068	0.00070	0.00072	0.00073	0.00075 0.00077
3836036.59	0.00063	0.00064	0.00065	0.00066	0.00068	0.00069	0.00071	0.00073 0.00075
3836030.52	0.00061	0.00062	0.00063	0.00065	0.00066	0.00068	0.00069	0.00071 0.00073
3836024.45	0.00060	0.00061	0.00062	0.00063	0.00064	0.00066	0.00067	0.00069 0.00071
3836018.38	0.00058	0.00059	0.00060	0.00062	0.00063	0.00064	0.00066	0.00067 0.00069
3836012.31	0.00057	0.00058	0.00059	0.00060	0.00061	0.00063	0.00064	0.00066 0.00067
3836006.24	0.00056	0.00057	0.00058	0.00059	0.00060	0.00061	0.00063	0.00064 0.00066
3836000.17	0.00054	0.00056	0.00057	0.00058	0.00059	0.00060	0.00061	0.00063 0.00064
3835994.10	0.00053	0.00054	0.00055	0.00056	0.00057	0.00059	0.00060	0.00061 0.00062

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 61
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	394961.61	394974.45	394987.29	395000.13	395012.97	395025.81	395038.65	395051.49	395064.33
3836115.50	0.00150	0.00153	0.00156	0.00159	0.00162	0.00165	0.00169	0.00173	0.00178
3836109.43	0.00137	0.00140	0.00142	0.00145	0.00148	0.00151	0.00155	0.00160	0.00165
3836103.36	0.00126	0.00129	0.00131	0.00134	0.00137	0.00140	0.00144	0.00149	0.00155
3836097.29	0.00117	0.00120	0.00122	0.00125	0.00128	0.00132	0.00136	0.00141	0.00147
3836091.22	0.00110	0.00112	0.00115	0.00117	0.00120	0.00124	0.00128	0.00133	0.00140
3836085.15	0.00104	0.00106	0.00108	0.00111	0.00114	0.00117	0.00122	0.00127	0.00134
3836079.08	0.00099	0.00101	0.00103	0.00105	0.00108	0.00112	0.00117	0.00122	0.00129
3836073.01	0.00094	0.00096	0.00098	0.00101	0.00104	0.00108	0.00112	0.00118	0.00125
3836066.94	0.00090	0.00092	0.00094	0.00097	0.00100	0.00104	0.00109	0.00114	0.00121
3836060.87	0.00087	0.00089	0.00091	0.00094	0.00097	0.00101	0.00105	0.00111	0.00118
3836054.80	0.00084	0.00086	0.00088	0.00090	0.00094	0.00098	0.00102	0.00108	0.00114
3836048.73	0.00081	0.00083	0.00085	0.00088	0.00091	0.00095	0.00099	0.00105	0.00111
3836042.66	0.00079	0.00080	0.00083	0.00085	0.00088	0.00092	0.00096	0.00102	0.00108
3836036.59	0.00076	0.00078	0.00080	0.00083	0.00086	0.00089	0.00094	0.00099	0.00105
3836030.52	0.00074	0.00076	0.00078	0.00081	0.00084	0.00087	0.00091	0.00096	0.00102
3836024.45	0.00072	0.00074	0.00076	0.00078	0.00081	0.00085	0.00089	0.00093	0.00099
3836018.38	0.00070	0.00072	0.00074	0.00077	0.00079	0.00083	0.00086	0.00091	0.00096
3836012.31	0.00069	0.00071	0.00073	0.00075	0.00077	0.00081	0.00084	0.00088	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00093
3836006.24 | 0.00067 0.00069 0.00071 0.00073 0.00076 0.00079 0.00082 0.00085
0.00090
3836000.17 | 0.00066 0.00067 0.00069 0.00071 0.00074 0.00076 0.00079 0.00083
0.00087
3835994.10 | 0.00064 0.00066 0.00067 0.00069 0.00072 0.00074 0.00077 0.00080
0.00083
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)		
	395077.17	395090.01	395102.85
3836115.50	0.00184	0.00193	0.00206
3836109.43	0.00172	0.00183	0.00198
3836103.36	0.00164	0.00175	0.00191
3836097.29	0.00156	0.00169	0.00186
3836091.22	0.00150	0.00164	0.00181
3836085.15	0.00144	0.00159	0.00177
3836079.08	0.00139	0.00154	0.00172
3836073.01	0.00135	0.00150	0.00168
3836066.94	0.00132	0.00146	0.00164
3836060.87	0.00128	0.00142	0.00159
3836054.80	0.00124	0.00138	0.00155
3836048.73	0.00121	0.00134	0.00151
3836042.66	0.00117	0.00130	0.00146
3836036.59	0.00114	0.00126	0.00141
3836030.52	0.00110	0.00122	0.00136
3836024.45	0.00107	0.00117	0.00130
3836018.38	0.00103	0.00112	0.00123
3836012.31	0.00099	0.00107	0.00115
3836006.24	0.00095	0.00101	0.00107
3836000.17	0.00091	0.00096	0.00100
3835994.10	0.00087	0.00091	0.00094

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395240.46	395250.52	395260.58	395270.64	395280.70	395290.76	395300.82	395310.88
395320.94								
3837580.05	0.00028	0.00029	0.00029	0.00030	0.00031	0.00032	0.00033	0.00034
0.00035								
3837540.74	0.00031	0.00032	0.00033	0.00034	0.00035	0.00036	0.00037	0.00039
0.00040								
3837501.43	0.00035	0.00036	0.00037	0.00038	0.00039	0.00041	0.00043	0.00045
0.00047								
3837462.12	0.00038	0.00039	0.00041	0.00042	0.00044	0.00046	0.00048	0.00050
0.00053								
3837422.81	0.00042	0.00043	0.00045	0.00046	0.00048	0.00050	0.00053	0.00055
0.00058								
3837383.50	0.00045	0.00047	0.00048	0.00050	0.00052	0.00054	0.00057	0.00059
0.00062								
3837344.19	0.00048	0.00050	0.00051	0.00053	0.00055	0.00058	0.00060	0.00063
0.00066								
3837304.88	0.00051	0.00052	0.00054	0.00056	0.00058	0.00061	0.00063	0.00066
0.00069								
3837265.57	0.00053	0.00055	0.00057	0.00059	0.00061	0.00063	0.00066	0.00069
0.00072								
3837226.26	0.00055	0.00057	0.00059	0.00061	0.00063	0.00066	0.00069	0.00072
0.00075								
3837186.95	0.00058	0.00059	0.00061	0.00063	0.00066	0.00068	0.00071	0.00074
0.00077								
3837147.64	0.00060	0.00061	0.00063	0.00066	0.00068	0.00070	0.00073	0.00076
0.00079								
3837108.33	0.00062	0.00064	0.00066	0.00068	0.00070	0.00072	0.00075	0.00078
0.00081								
3837069.02	0.00064	0.00066	0.00068	0.00070	0.00073	0.00075	0.00078	0.00081
0.00084								
3837029.71	0.00067	0.00069	0.00071	0.00074	0.00076	0.00078	0.00081	0.00084
0.00087								
3836990.40	0.00071	0.00073	0.00076	0.00078	0.00080	0.00083	0.00086	0.00089
0.00092								
3836951.09	0.00077	0.00079	0.00081	0.00083	0.00086	0.00089	0.00091	0.00095
0.00098								
3836911.78	0.00085	0.00087	0.00089	0.00092	0.00095	0.00098	0.00101	0.00104
0.00106								
3836872.47	0.00098	0.00100	0.00103	0.00105	0.00108	0.00111	0.00114	0.00117
0.00119								
3836833.16	0.00119	0.00120	0.00122	0.00124	0.00128	0.00130	0.00133	0.00136
0.00139								
3836793.85	0.00158	0.00159	0.00161	0.00163	0.00166	0.00168	0.00170	0.00173

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00176
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 64
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395331.00	395341.06	395351.12	395361.18	395371.24	395381.30	395391.36	395401.42
3837580.05	0.00036	0.00037	0.00038	0.00040	0.00042	0.00044	0.00046	0.00049
3837540.74	0.00042	0.00044	0.00046	0.00049	0.00052	0.00056	0.00061	0.00067
3837501.43	0.00049	0.00052	0.00055	0.00059	0.00063	0.00069	0.00076	0.00084
3837462.12	0.00056	0.00059	0.00063	0.00067	0.00072	0.00078	0.00086	0.00095
3837422.81	0.00061	0.00065	0.00069	0.00073	0.00079	0.00085	0.00093	0.00103
3837383.50	0.00066	0.00069	0.00074	0.00078	0.00084	0.00091	0.00099	0.00108
3837344.19	0.00070	0.00073	0.00078	0.00083	0.00088	0.00095	0.00103	0.00113
3837304.88	0.00073	0.00077	0.00081	0.00086	0.00092	0.00099	0.00107	0.00116
3837265.57	0.00076	0.00080	0.00084	0.00089	0.00095	0.00102	0.00110	0.00119
3837226.26	0.00078	0.00082	0.00086	0.00091	0.00097	0.00104	0.00112	0.00121
3837186.95	0.00080	0.00084	0.00089	0.00094	0.00099	0.00106	0.00113	0.00122
3837147.64	0.00083	0.00086	0.00091	0.00096	0.00101	0.00108	0.00115	0.00125
3837108.33	0.00085	0.00088	0.00093	0.00097	0.00103	0.00109	0.00117	0.00126
3837069.02	0.00087	0.00091	0.00095	0.00100	0.00106	0.00112	0.00119	0.00128
3837029.71	0.00091	0.00095	0.00099	0.00104	0.00109	0.00116	0.00123	0.00131
3836990.40	0.00096	0.00100	0.00104	0.00109	0.00115	0.00121	0.00128	0.00137
3836951.09	0.00102	0.00106	0.00109	0.00114	0.00119	0.00126	0.00132	0.00141

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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0.00151
 3836911.78 |    0.00109    0.00113    0.00118    0.00124    0.00130    0.00134    0.00141    0.00149
0.00159
 3836872.47 |    0.00122    0.00126    0.00130    0.00134    0.00139    0.00145    0.00152    0.00161
0.00170
 3836833.16 |    0.00142    0.00146    0.00150    0.00155    0.00159    0.00165    0.00171    0.00179
0.00188
 3836793.85 |    0.00179    0.00182    0.00186    0.00190    0.00195    0.00199    0.00204    0.00210
0.00218
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
 *** AERMET - VERSION  21112 ***  ***                                                ***      08:45:15
                                                                          PAGE  65
 *** MODELOPTs:   NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

            *** THE ANNUAL    DRY DEPOSITION      VALUES AVERAGED OVER  5 YEARS FOR SOURCE
GROUP: ALL     ***
                    INCLUDING SOURCE(S):    PAREA1     ,

                     *** NETWORK ID: UCART2   ;  NETWORK TYPE: GRIDCART ***

                       ** DEPO OF DPM      IN GRAMS/M**2/YR                    **

  Y-COORD  |                          X-COORD (METERS)
  (METERS) |   395421.54   395431.60   395441.66
-------------------------------------------------------------------------

 3837580.05 |    0.00056    0.00060    0.00066
 3837540.74 |    0.00086    0.00102    0.00122
 3837501.43 |    0.00110    0.00129    0.00154
 3837462.12 |    0.00122    0.00143    0.00168
 3837422.81 |    0.00131    0.00151    0.00177
 3837383.50 |    0.00136    0.00156    0.00182
 3837344.19 |    0.00140    0.00161    0.00186
 3837304.88 |    0.00144    0.00164    0.00189
 3837265.57 |    0.00145    0.00163    0.00188
 3837226.26 |    0.00147    0.00165    0.00190
 3837186.95 |    0.00148    0.00166    0.00189
 3837147.64 |    0.00150    0.00168    0.00189
 3837108.33 |    0.00151    0.00169    0.00189
 3837069.02 |    0.00153    0.00170    0.00191
 3837029.71 |    0.00155    0.00172    0.00192
 3836990.40 |    0.00160    0.00176    0.00195
 3836951.09 |    0.00165    0.00181    0.00200
 3836911.78 |    0.00173    0.00189    0.00204
 3836872.47 |    0.00182    0.00197    0.00214
 3836833.16 |    0.00199    0.00212    0.00228
 3836793.85 |    0.00227    0.00239    0.00254
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
 *** AERMET - VERSION  21112 ***  ***                                                ***      08:45:15
                                                                          PAGE  66
 *** MODELOPTs:   NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395039.27	395048.71	395058.15	395067.59	395077.03	395086.47	395095.91	395105.35
395114.79								
3837187.04	0.00036	0.00037	0.00037	0.00038	0.00039	0.00039	0.00040	0.00041
0.00042								
3837167.69	0.00037	0.00038	0.00038	0.00039	0.00040	0.00040	0.00041	0.00042
0.00043								
3837148.34	0.00038	0.00038	0.00039	0.00040	0.00040	0.00041	0.00042	0.00043
0.00043								
3837128.99	0.00038	0.00039	0.00040	0.00040	0.00041	0.00042	0.00043	0.00043
0.00044								
3837109.64	0.00039	0.00040	0.00041	0.00041	0.00042	0.00043	0.00044	0.00044
0.00045								
3837090.29	0.00040	0.00041	0.00042	0.00042	0.00043	0.00044	0.00044	0.00045
0.00046								
3837070.94	0.00041	0.00042	0.00042	0.00043	0.00044	0.00045	0.00045	0.00046
0.00047								
3837051.59	0.00042	0.00043	0.00043	0.00044	0.00045	0.00046	0.00046	0.00047
0.00048								
3837032.24	0.00043	0.00044	0.00044	0.00045	0.00046	0.00047	0.00048	0.00048
0.00049								
3837012.89	0.00044	0.00045	0.00046	0.00046	0.00047	0.00048	0.00049	0.00050
0.00051								
3836993.54	0.00045	0.00046	0.00047	0.00048	0.00049	0.00049	0.00050	0.00051
0.00052								
3836974.19	0.00047	0.00048	0.00048	0.00049	0.00050	0.00051	0.00052	0.00053
0.00054								
3836954.84	0.00048	0.00049	0.00050	0.00051	0.00052	0.00053	0.00054	0.00055
0.00056								
3836935.49	0.00050	0.00051	0.00052	0.00053	0.00054	0.00055	0.00056	0.00057
0.00058								
3836916.14	0.00052	0.00053	0.00054	0.00055	0.00056	0.00057	0.00058	0.00060
0.00061								
3836896.79	0.00055	0.00056	0.00057	0.00058	0.00059	0.00060	0.00062	0.00063
0.00064								
3836877.44	0.00058	0.00059	0.00060	0.00062	0.00063	0.00065	0.00066	0.00068
0.00069								
3836858.09	0.00062	0.00063	0.00065	0.00066	0.00068	0.00070	0.00072	0.00074
0.00076								
3836838.74	0.00068	0.00071	0.00072	0.00074	0.00076	0.00078	0.00080	0.00083
0.00085								
3836819.39	0.00077	0.00082	0.00086	0.00087	0.00088	0.00091	0.00093	0.00096

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00099
3836800.04 | 0.00093 0.00097 0.00102 0.00105 0.00107 0.00111 0.00114 0.00117
0.00118
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 67
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)								
	395124.23	395133.67	395143.11	395152.55	395161.99	395171.43	395180.87	395190.31	395199.75
3837187.04	0.00043	0.00044	0.00044	0.00045	0.00046	0.00048	0.00049	0.00050	0.00051
3837167.69	0.00044	0.00044	0.00045	0.00046	0.00047	0.00048	0.00050	0.00051	0.00052
3837148.34	0.00044	0.00045	0.00046	0.00047	0.00048	0.00049	0.00050	0.00052	0.00053
3837128.99	0.00045	0.00046	0.00047	0.00048	0.00049	0.00050	0.00051	0.00053	0.00054
3837109.64	0.00046	0.00047	0.00048	0.00049	0.00050	0.00051	0.00052	0.00054	0.00055
3837090.29	0.00047	0.00048	0.00049	0.00050	0.00051	0.00052	0.00053	0.00055	0.00056
3837070.94	0.00048	0.00049	0.00050	0.00051	0.00052	0.00053	0.00055	0.00056	0.00057
3837051.59	0.00049	0.00050	0.00051	0.00052	0.00053	0.00054	0.00056	0.00057	0.00058
3837032.24	0.00050	0.00051	0.00052	0.00053	0.00055	0.00056	0.00057	0.00058	0.00060
3837012.89	0.00052	0.00053	0.00054	0.00055	0.00056	0.00057	0.00059	0.00060	0.00061
3836993.54	0.00053	0.00054	0.00055	0.00057	0.00058	0.00059	0.00061	0.00062	0.00063
3836974.19	0.00055	0.00056	0.00057	0.00059	0.00060	0.00061	0.00063	0.00064	0.00066
3836954.84	0.00057	0.00058	0.00059	0.00061	0.00062	0.00063	0.00065	0.00066	0.00068
3836935.49	0.00059	0.00061	0.00062	0.00063	0.00065	0.00066	0.00068	0.00070	0.00071
3836916.14	0.00062	0.00064	0.00065	0.00067	0.00068	0.00070	0.00072	0.00074	0.00075
3836896.79	0.00066	0.00068	0.00069	0.00071	0.00073	0.00075	0.00076	0.00078	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00080
3836877.44 | 0.00071 0.00073 0.00075 0.00077 0.00079 0.00080 0.00082 0.00084
0.00086
3836858.09 | 0.00078 0.00080 0.00082 0.00083 0.00085 0.00087 0.00090 0.00092
0.00094
3836838.74 | 0.00088 0.00090 0.00092 0.00094 0.00096 0.00098 0.00101 0.00103
0.00105
3836819.39 | 0.00101 0.00104 0.00106 0.00109 0.00111 0.00113 0.00114 0.00116
0.00118
3836800.04 | 0.00120 0.00123 0.00125 0.00129 0.00133 0.00133 0.00135 0.00137
0.00139
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 68
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD | X-COORD (METERS)
(METERS) | 395209.19 395218.63 395228.07

3837187.04 | 0.00052 0.00054 0.00055
3837167.69 | 0.00053 0.00055 0.00056
3837148.34 | 0.00054 0.00056 0.00057
3837128.99 | 0.00055 0.00057 0.00058
3837109.64 | 0.00056 0.00058 0.00059
3837090.29 | 0.00057 0.00059 0.00061
3837070.94 | 0.00059 0.00060 0.00062
3837051.59 | 0.00060 0.00062 0.00063
3837032.24 | 0.00061 0.00063 0.00065
3837012.89 | 0.00063 0.00065 0.00066
3836993.54 | 0.00065 0.00067 0.00068
3836974.19 | 0.00067 0.00069 0.00071
3836954.84 | 0.00070 0.00071 0.00074
3836935.49 | 0.00073 0.00075 0.00077
3836916.14 | 0.00077 0.00079 0.00081
3836896.79 | 0.00082 0.00084 0.00086
3836877.44 | 0.00089 0.00091 0.00093
3836858.09 | 0.00097 0.00099 0.00101
3836838.74 | 0.00108 0.00110 0.00112
3836819.39 | 0.00120 0.00122 0.00125
3836800.04 | 0.00141 0.00143 0.00146
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

PAGE 69

*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	394853.55	394899.98	394946.41	394992.84	395039.27	395085.70	395132.13	395178.56	395224.99
3837951.42	0.00011	0.00012	0.00012	0.00012	0.00012	0.00013	0.00013	0.00013	0.00013
3837933.78	0.00012	0.00012	0.00012	0.00012	0.00013	0.00013	0.00013	0.00014	0.00014
3837916.14	0.00012	0.00012	0.00012	0.00013	0.00013	0.00013	0.00014	0.00014	0.00014
3837898.50	0.00012	0.00012	0.00013	0.00013	0.00013	0.00013	0.00014	0.00014	0.00015
3837880.86	0.00012	0.00012	0.00013	0.00013	0.00013	0.00014	0.00014	0.00015	0.00015
3837863.22	0.00012	0.00013	0.00013	0.00013	0.00014	0.00014	0.00014	0.00015	0.00015
3837845.58	0.00013	0.00013	0.00013	0.00014	0.00014	0.00014	0.00015	0.00015	0.00016
3837827.94	0.00013	0.00013	0.00014	0.00014	0.00014	0.00015	0.00015	0.00016	0.00016
3837810.30	0.00013	0.00013	0.00014	0.00014	0.00015	0.00015	0.00016	0.00016	0.00017
3837792.66	0.00013	0.00014	0.00014	0.00015	0.00015	0.00016	0.00016	0.00017	0.00017
3837775.02	0.00014	0.00014	0.00014	0.00015	0.00015	0.00016	0.00016	0.00017	0.00018
3837757.38	0.00014	0.00014	0.00015	0.00015	0.00016	0.00016	0.00017	0.00018	0.00018
3837739.74	0.00014	0.00015	0.00015	0.00016	0.00016	0.00017	0.00017	0.00018	0.00019
3837722.10	0.00014	0.00015	0.00015	0.00016	0.00017	0.00017	0.00018	0.00019	0.00020
3837704.46	0.00015	0.00015	0.00016	0.00016	0.00017	0.00018	0.00019	0.00019	0.00020
3837686.82	0.00015	0.00016	0.00016	0.00017	0.00017	0.00018	0.00019	0.00020	0.00021
3837669.18	0.00015	0.00016	0.00017	0.00017	0.00018	0.00019	0.00020	0.00021	0.00022
3837651.54	0.00016	0.00016	0.00017	0.00018	0.00018	0.00019	0.00020	0.00021	0.00023
3837633.90	0.00016	0.00017	0.00017	0.00018	0.00019	0.00020	0.00021	0.00022	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00024
3837616.26 | 0.00016 0.00017 0.00018 0.00019 0.00019 0.00020 0.00022 0.00023
0.00025
3837598.62 | 0.00017 0.00017 0.00018 0.00019 0.00020 0.00021 0.00022 0.00024
0.00026
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 70
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD | X-COORD (METERS)
(METERS) | 395271.42 395317.85 395364.28 395410.71 395457.14 395503.57 395550.00 395596.43 395642.86

3837951.42 | 0.00014 0.00014 0.00014 0.00015 0.00015 0.00015 0.00016 0.00016
0.00016
3837933.78 | 0.00014 0.00014 0.00015 0.00015 0.00015 0.00016 0.00016 0.00016
0.00017
3837916.14 | 0.00015 0.00015 0.00015 0.00016 0.00016 0.00016 0.00017 0.00017
0.00018
3837898.50 | 0.00015 0.00015 0.00016 0.00016 0.00017 0.00017 0.00017 0.00018
0.00018
3837880.86 | 0.00015 0.00016 0.00016 0.00017 0.00017 0.00018 0.00018 0.00019
0.00019
3837863.22 | 0.00016 0.00016 0.00017 0.00017 0.00018 0.00018 0.00019 0.00019
0.00020
3837845.58 | 0.00016 0.00017 0.00017 0.00018 0.00018 0.00019 0.00020 0.00020
0.00021
3837827.94 | 0.00017 0.00017 0.00018 0.00019 0.00019 0.00020 0.00021 0.00021
0.00022
3837810.30 | 0.00017 0.00018 0.00019 0.00019 0.00020 0.00021 0.00022 0.00023
0.00024
3837792.66 | 0.00018 0.00019 0.00019 0.00020 0.00021 0.00022 0.00023 0.00024
0.00025
3837775.02 | 0.00019 0.00019 0.00020 0.00021 0.00022 0.00023 0.00024 0.00025
0.00027
3837757.38 | 0.00019 0.00020 0.00021 0.00022 0.00023 0.00024 0.00026 0.00027
0.00029
3837739.74 | 0.00020 0.00021 0.00022 0.00023 0.00025 0.00026 0.00028 0.00029
0.00032
3837722.10 | 0.00021 0.00022 0.00023 0.00025 0.00026 0.00028 0.00030 0.00032
0.00035
3837704.46 | 0.00022 0.00023 0.00025 0.00026 0.00028 0.00030 0.00032 0.00035

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00039
3837686.82 | 0.00023 0.00024 0.00026 0.00028 0.00030 0.00033 0.00036 0.00039
0.00044
3837669.18 | 0.00024 0.00025 0.00028 0.00030 0.00033 0.00036 0.00040 0.00045
0.00050
3837651.54 | 0.00025 0.00027 0.00029 0.00033 0.00036 0.00040 0.00046 0.00052
0.00059
3837633.90 | 0.00026 0.00028 0.00032 0.00036 0.00041 0.00046 0.00054 0.00063
0.00071
3837616.26 | 0.00027 0.00030 0.00034 0.00040 0.00047 0.00055 0.00067 0.00078
0.00087
3837598.62 | 0.00029 0.00032 0.00037 0.00045 0.00056 0.00071 0.00088 0.00102
0.00113
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 71
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL DRY DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)		
	395689.29	395735.72	395782.15
3837951.42	0.00017	0.00017	0.00018
3837933.78	0.00017	0.00018	0.00019
3837916.14	0.00018	0.00019	0.00020
3837898.50	0.00019	0.00020	0.00021
3837880.86	0.00020	0.00021	0.00022
3837863.22	0.00021	0.00022	0.00023
3837845.58	0.00022	0.00023	0.00025
3837827.94	0.00023	0.00025	0.00026
3837810.30	0.00025	0.00027	0.00028
3837792.66	0.00027	0.00029	0.00031
3837775.02	0.00029	0.00031	0.00033
3837757.38	0.00031	0.00034	0.00037
3837739.74	0.00035	0.00037	0.00040
3837722.10	0.00038	0.00042	0.00045
3837704.46	0.00043	0.00047	0.00050
3837686.82	0.00048	0.00053	0.00057
3837669.18	0.00056	0.00060	0.00065
3837651.54	0.00065	0.00070	0.00075
3837633.90	0.00078	0.00084	0.00089
3837616.26	0.00095	0.00102	0.00108
3837598.62	0.00122	0.00129	0.00136

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 72
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	394846.05	394858.89	394871.73	394884.57	394897.41	394910.25	394923.09	394935.93 394948.77
3836115.50	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836109.43	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836103.36	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836097.29	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836091.22	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836085.15	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836079.08	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836073.01	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836066.94	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836060.87	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836054.80	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836048.73	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836042.66	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836036.59	0.00001	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836030.52	0.00001	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836024.45	0.00001	0.00001	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836018.38	0.00001	0.00001	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836012.31	0.00001	0.00001	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00002
3836006.24 | 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836000.17 | 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3835994.10 | 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002
0.00002
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 73
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD | X-COORD (METERS)
(METERS) | 394961.61 394974.45 394987.29 395000.13 395012.97 395025.81 395038.65 395051.49
395064.33

3836115.50 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836109.43 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836103.36 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836097.29 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836091.22 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836085.15 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836079.08 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836073.01 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836066.94 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836060.87 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836054.80 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836048.73 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836042.66 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836036.59 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00002
3836030.52 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836024.45 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836018.38 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836012.31 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836006.24 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836000.17 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3835994.10 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 74
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)		
	395077.17	395090.01	395102.85
3836115.50	0.00002	0.00002	0.00002
3836109.43	0.00002	0.00002	0.00002
3836103.36	0.00002	0.00002	0.00002
3836097.29	0.00002	0.00002	0.00002
3836091.22	0.00002	0.00002	0.00002
3836085.15	0.00002	0.00002	0.00002
3836079.08	0.00002	0.00002	0.00002
3836073.01	0.00002	0.00002	0.00002
3836066.94	0.00002	0.00002	0.00002
3836060.87	0.00002	0.00002	0.00002
3836054.80	0.00002	0.00002	0.00002
3836048.73	0.00002	0.00002	0.00002
3836042.66	0.00002	0.00002	0.00002
3836036.59	0.00002	0.00002	0.00002
3836030.52	0.00002	0.00002	0.00002
3836024.45	0.00002	0.00002	0.00002
3836018.38	0.00002	0.00002	0.00002
3836012.31	0.00002	0.00002	0.00002
3836006.24	0.00002	0.00002	0.00002
3836000.17	0.00002	0.00002	0.00002

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3835994.10 | 0.00002 0.00002 0.00002
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 75
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395240.46	395250.52	395260.58	395270.64	395280.70	395290.76	395300.82	395310.88 395320.94
3837580.05	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001 0.00002
3837540.74	0.00001	0.00001	0.00001	0.00001	0.00001	0.00002	0.00002	0.00002 0.00002
3837501.43	0.00001	0.00001	0.00001	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837462.12	0.00001	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837422.81	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837383.50	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837344.19	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837304.88	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837265.57	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837226.26	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837186.95	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837147.64	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837108.33	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00003 0.00003
3837069.02	0.00002	0.00002	0.00002	0.00002	0.00003	0.00003	0.00003	0.00003 0.00003
3837029.71	0.00002	0.00003	0.00003	0.00003	0.00003	0.00003	0.00003	0.00003 0.00003
3836990.40	0.00003	0.00003	0.00003	0.00003	0.00003	0.00003	0.00003	0.00003 0.00003
3836951.09	0.00003	0.00003	0.00003	0.00003	0.00003	0.00003	0.00003	0.00003

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00003
3836911.78 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3836872.47 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3836833.16 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3836793.85 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 76
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD | X-COORD (METERS)
(METERS) | 395331.00 395341.06 395351.12 395361.18 395371.24 395381.30 395391.36 395401.42
395411.48

3837580.05 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837540.74 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837501.43 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837462.12 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837422.81 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837383.50 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837344.19 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837304.88 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00003
3837265.57 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00003
0.00003
3837226.26 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00003 0.00003 0.00003
0.00003
3837186.95 | 0.00002 0.00002 0.00002 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3837147.64 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3837108.33 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

```
0.00003
 3837069.02 |  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003
0.00003
 3837029.71 |  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003
0.00003
 3836990.40 |  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003
0.00003
 3836951.09 |  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003
0.00003
 3836911.78 |  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003
0.00003
 3836872.47 |  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003
0.00003
 3836833.16 |  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003
0.00003
 3836793.85 |  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003  0.00003
0.00003
   *** AERMOD - VERSION 24142  ***   *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
 *** AERMET - VERSION  21112 ***   ***                                          ***       08:45:15
                                                                    PAGE  77
 *** MODELOPTs:   NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

            *** THE ANNUAL    WET DEPOSITION      VALUES AVERAGED OVER   5 YEARS FOR SOURCE
GROUP: ALL     ***
                    INCLUDING SOURCE(S):    PAREA1     ,

                     *** NETWORK ID: UCART2   ;  NETWORK TYPE: GRIDCART ***

                       ** DEPO OF DPM      IN GRAMS/M**2/YR                  **

  Y-COORD  |                          X-COORD (METERS)
  (METERS) |   395421.54   395431.60   395441.66
-------------------------------------------------------------------------

 3837580.05 |  0.00002  0.00002  0.00002
 3837540.74 |  0.00002  0.00002  0.00002
 3837501.43 |  0.00002  0.00002  0.00002
 3837462.12 |  0.00002  0.00002  0.00002
 3837422.81 |  0.00002  0.00002  0.00002
 3837383.50 |  0.00002  0.00002  0.00002
 3837344.19 |  0.00002  0.00003  0.00003
 3837304.88 |  0.00003  0.00003  0.00003
 3837265.57 |  0.00003  0.00003  0.00003
 3837226.26 |  0.00003  0.00003  0.00003
 3837186.95 |  0.00003  0.00003  0.00003
 3837147.64 |  0.00003  0.00003  0.00003
 3837108.33 |  0.00003  0.00003  0.00003
 3837069.02 |  0.00003  0.00003  0.00003
 3837029.71 |  0.00003  0.00003  0.00003
 3836990.40 |  0.00003  0.00003  0.00004
 3836951.09 |  0.00004  0.00004  0.00004
 3836911.78 |  0.00004  0.00004  0.00003
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836872.47 | 0.00003 0.00003 0.00003
3836833.16 | 0.00003 0.00003 0.00003
3836793.85 | 0.00003 0.00003 0.00003
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 78
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	395039.27	395048.71	395058.15	395067.59	395077.03	395086.47	395095.91	395105.35 395114.79
3837187.04	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837167.69	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837148.34	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837128.99	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837109.64	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837090.29	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837070.94	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837051.59	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837032.24	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3837012.89	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836993.54	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836974.19	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836954.84	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836935.49	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836916.14	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002 0.00002
3836896.79	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002	0.00002

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00002
3836877.44 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836858.09 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00003
0.00003
3836838.74 | 0.00002 0.00002 0.00002 0.00002 0.00003 0.00003 0.00003 0.00003
0.00003
3836819.39 | 0.00002 0.00002 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3836800.04 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00002
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 79
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD | X-COORD (METERS)
(METERS) | 395124.23 395133.67 395143.11 395152.55 395161.99 395171.43 395180.87 395190.31
395199.75

3837187.04 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837167.69 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837148.34 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837128.99 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837109.64 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837090.29 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837070.94 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837051.59 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837032.24 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837012.89 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836993.54 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3836974.19 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00002
3836954.84 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002 0.00003
0.00003
3836935.49 | 0.00002 0.00002 0.00002 0.00002 0.00002 0.00003 0.00003 0.00003
0.00003
3836916.14 | 0.00002 0.00002 0.00002 0.00002 0.00003 0.00003 0.00003 0.00003
0.00003
3836896.79 | 0.00002 0.00002 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3836877.44 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3836858.09 | 0.00003 0.00003 0.00003 0.00002 0.00002 0.00002 0.00003 0.00003
0.00003
3836838.74 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003
0.00003
3836819.39 | 0.00003 0.00003 0.00003 0.00003 0.00003 0.00003 0.00002 0.00003
0.00003
3836800.04 | 0.00002 0.00002 0.00002 0.00002 0.00003 0.00003 0.00003 0.00003
0.00003
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 80
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)		
	395209.19	395218.63	395228.07
3837187.04	0.00002	0.00002	0.00002
3837167.69	0.00002	0.00002	0.00002
3837148.34	0.00002	0.00002	0.00002
3837128.99	0.00002	0.00002	0.00002
3837109.64	0.00002	0.00002	0.00002
3837090.29	0.00002	0.00002	0.00002
3837070.94	0.00002	0.00002	0.00002
3837051.59	0.00002	0.00002	0.00002
3837032.24	0.00002	0.00002	0.00002
3837012.89	0.00002	0.00002	0.00002
3836993.54	0.00002	0.00002	0.00003
3836974.19	0.00003	0.00003	0.00003
3836954.84	0.00003	0.00003	0.00003
3836935.49	0.00003	0.00003	0.00003
3836916.14	0.00003	0.00003	0.00003
3836896.79	0.00003	0.00003	0.00003

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836877.44 | 0.00003 0.00003 0.00003
3836858.09 | 0.00003 0.00003 0.00003
3836838.74 | 0.00003 0.00003 0.00003
3836819.39 | 0.00003 0.00003 0.00003
3836800.04 | 0.00003 0.00003 0.00003
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 81
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)							
	394853.55	394899.98	394946.41	394992.84	395039.27	395085.70	395132.13	395178.56
395224.99								
3837951.42	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837933.78	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837916.14	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837898.50	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837880.86	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837863.22	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837845.58	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837827.94	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837810.30	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837792.66	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837775.02	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837757.38	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837739.74	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837722.10	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001
0.00001								
3837704.46	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00001
3837686.82 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
3837669.18 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
3837651.54 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
3837633.90 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
3837616.26 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
3837598.62 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 82
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD | X-COORD (METERS)
(METERS) | 395271.42 395317.85 395364.28 395410.71 395457.14 395503.57 395550.00 395596.43
395642.86

3837951.42 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
3837933.78 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
3837916.14 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00001
3837898.50 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00002
3837880.86 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001
0.00002
3837863.22 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00002
0.00002
3837845.58 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00002
0.00002
3837827.94 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00002
0.00002
3837810.30 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002
0.00002
3837792.66 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002
0.00002
3837775.02 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

0.00002
3837757.38 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002
0.00002
3837739.74 | 0.00001 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002
0.00002
3837722.10 | 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002
0.00002
3837704.46 | 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002
0.00002
3837686.82 | 0.00001 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002
0.00002
3837669.18 | 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837651.54 | 0.00001 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837633.90 | 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837616.26 | 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00002
3837598.62 | 0.00001 0.00001 0.00002 0.00002 0.00002 0.00002 0.00002 0.00002
0.00003
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 83
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE ANNUAL WET DEPOSITION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2/YR **

Y-COORD (METERS)	X-COORD (METERS)		
	395689.29	395735.72	395782.15
3837951.42	0.00002	0.00002	0.00002
3837933.78	0.00002	0.00002	0.00002
3837916.14	0.00002	0.00002	0.00002
3837898.50	0.00002	0.00002	0.00002
3837880.86	0.00002	0.00002	0.00002
3837863.22	0.00002	0.00002	0.00002
3837845.58	0.00002	0.00002	0.00002
3837827.94	0.00002	0.00002	0.00002
3837810.30	0.00002	0.00002	0.00002
3837792.66	0.00002	0.00002	0.00002
3837775.02	0.00002	0.00002	0.00002
3837757.38	0.00002	0.00002	0.00002
3837739.74	0.00002	0.00002	0.00002
3837722.10	0.00002	0.00002	0.00002

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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3837704.46 |    0.00002    0.00002    0.00002
3837686.82 |    0.00002    0.00002    0.00002
3837669.18 |    0.00002    0.00002    0.00003
3837651.54 |    0.00002    0.00003    0.00003
3837633.90 |    0.00003    0.00003    0.00003
3837616.26 |    0.00003    0.00003    0.00003
3837598.62 |    0.00003    0.00003    0.00003
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                          ***      08:45:15
                                                                    PAGE  84
*** MODELOPTs:  NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

                *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION   VALUES FOR SOURCE
GROUP:  ALL     ***
                  INCLUDING SOURCE(S):    PAREA1     ,

                   *** NETWORK ID: UCART1   ;  NETWORK TYPE: GRIDCART ***

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

 Y-COORD |                          X-COORD (METERS)
 (METERS) |    394846.05          394858.89          394871.73          394884.57          394897.41
-------------------------------------------------------------------------------------------------------

 3836115.5 |  0.43744 (17090920)  0.43938 (17090920)  0.43909 (17090920)  0.43757 (17090920)  0.43710
(17090920)
 3836109.4 |  0.43453 (17090920)  0.43518 (17090920)  0.43485 (17090920)  0.43443 (17090920)  0.43392
(17090920)
 3836103.4 |  0.42974 (17090920)  0.42990 (17090920)  0.42955 (17090920)  0.42909 (17090920)  0.42854
(17090920)
 3836097.3 |  0.42416 (17090920)  0.42408 (17090920)  0.42366 (17090920)  0.42408 (17090920)  0.42350
(17090920)
 3836091.2 |  0.41830 (17090920)  0.41718 (17090920)  0.41673 (17090920)  0.41695 (17090920)  0.41636
(17090920)
 3836085.1 |  0.41241 (17090920)  0.41117 (17090920)  0.41077 (17090920)  0.41019 (17090920)  0.40953
(17090920)
 3836079.1 |  0.40656 (17090920)  0.40544 (17090920)  0.40491 (17090920)  0.40430 (17090920)  0.40362
(17090920)
 3836073.0 |  0.40165 (17090920)  0.39977 (17090920)  0.39994 (17090920)  0.39931 (17090920)  0.39862
(17090920)
 3836066.9 |  0.39614 (17090920)  0.39498 (17090920)  0.39439 (17090920)  0.39375 (17090920)  0.39306
(17090920)
 3836060.9 |  0.39146 (17090920)  0.39029 (17090920)  0.38971 (17090920)  0.38905 (17090920)  0.38834
(17090920)
 3836054.8 |  0.38629 (17090920)  0.38513 (17090920)  0.38452 (17090920)  0.38386 (17090920)  0.38315
(17090920)
 3836048.7 |  0.38187 (17090920)  0.38074 (17090920)  0.38013 (17090920)  0.37887 (17090920)  0.37878
(17090920)
 3836042.7 |  0.37704 (17090920)  0.37647 (17090920)  0.37530 (17090920)  0.37465 (17090920)  0.37398
(17090920)
 3836036.6 |  0.37290 (17090920)  0.37180 (17090920)  0.37121 (17090920)  0.37003 (17090920)  0.36995
(17090920)
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836030.5 | 0.36839 (17090920) 0.36784 (17090920) 0.36727 (17090920) 0.36614 (17090920) 0.36556 (17090920)
3836024.5 | 0.36454 (17090920) 0.36401 (17090920) 0.36347 (17090920) 0.36241 (17090920) 0.36189 (17090920)
3836018.4 | 0.36082 (17090920) 0.36079 (17090920) 0.36029 (17090920) 0.35982 (17090920) 0.35939 (17090920)
3836012.3 | 0.35723 (17090920) 0.35767 (17090920) 0.35723 (17090920) 0.35683 (17090920) 0.35699 (17090920)
3836006.2 | 0.35376 (17090920) 0.35508 (17090920) 0.35515 (17090920) 0.35486 (17090920) 0.35467 (17090920)
3836000.2 | 0.34999 (17090920) 0.35131 (17090920) 0.35101 (17090920) 0.35079 (17090920) 0.35114 (17090920)
3835994.1 | 0.34593 (17090920) 0.34729 (17090920) 0.34662 (17090920) 0.34648 (17090920) 0.34646 (17090920)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)				
	394910.25	394923.09	394935.93	394948.77	394961.61
3836115.5	0.43655 (17090920)	0.43638 (17090920)	0.43565 (17090920)	0.43484 (17090920)	0.43277 (17090920)
3836109.4	0.43333 (17090920)	0.43290 (17090920)	0.43214 (17090920)	0.43127 (17090920)	0.42925 (17090920)
3836103.4	0.42791 (17090920)	0.42730 (17090920)	0.42751 (17090920)	0.42663 (17090920)	0.42467 (17090920)
3836097.3	0.42284 (17090920)	0.42199 (17090920)	0.42121 (17090920)	0.42128 (17090920)	0.41939 (17090920)
3836091.2	0.41574 (17090920)	0.41493 (17090920)	0.41495 (17090920)	0.41578 (17090920)	0.41304 (17090920)
3836085.1	0.40963 (17090920)	0.40796 (17090920)	0.40873 (17090920)	0.41027 (17090920)	0.40683 (17090920)
3836079.1	0.40365 (17090920)	0.40279 (17090920)	0.40269 (17090920)	0.40488 (17090920)	0.40162 (17090920)
3836073.0	0.39855 (17090920)	0.39701 (17090920)	0.39761 (17090920)	0.39965 (17090920)	0.39582 (17090920)
3836066.9	0.39295 (17090920)	0.39143 (17090920)	0.39199 (17090920)	0.39394 (17090920)	0.39102 (17090920)
3836060.9	0.38755 (17090920)	0.38676 (17090920)	0.38729 (17090920)	0.38919 (17090920)	0.38579 (17090920)
3836054.8	0.38301 (17090920)	0.38226 (17090920)	0.38344 (17090920)	0.38467 (17090920)	0.38152

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(17090920)
3836048.7 | 0.37865 (17090920) 0.37856 (17090920) 0.37914 (17090920) 0.38041 (17090920) 0.37751 (17090920)
3836042.7 | 0.37447 (17090920) 0.37443 (17090920) 0.37506 (17090920) 0.37639 (17090920) 0.37377 (17090920)
3836036.6 | 0.36991 (17090920) 0.37050 (17090920) 0.37120 (17090920) 0.37263 (17090920) 0.37029 (17090920)
3836030.5 | 0.36611 (17090920) 0.36622 (17090920) 0.36701 (17090920) 0.36912 (17090920) 0.36708 (17090920)
3836024.5 | 0.36250 (17090920) 0.36271 (17090920) 0.36361 (17090920) 0.36532 (17090920) 0.36411 (17090920)
3836018.4 | 0.35958 (17090920) 0.35990 (17090920) 0.36095 (17090920) 0.36230 (17090920) 0.36138 (17090920)
3836012.3 | 0.35679 (17090920) 0.35725 (17090920) 0.35796 (17090920) 0.35950 (17090920) 0.35942 (17090920)
3836006.2 | 0.35508 (17090920) 0.35524 (17090920) 0.35566 (17090920) 0.35692 (17090920) 0.35764 (17090920)
3836000.2 | 0.35122 (17090920) 0.35152 (17090920) 0.35258 (17090920) 0.35356 (17090920) 0.35501 (17090920)
3835994.1 | 0.34664 (17090920) 0.34706 (17090920) 0.34828 (17090920) 0.34942 (17090920) 0.35156 (17090920)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 394974.45	394987.29	395000.13	395012.97	395025.81
3836115.5	0.43178 (17090920)	0.43071 (17090920)	0.42955 (17090920)	0.42714 (17090920)	0.42583 (17090920)
3836109.4	0.42824 (17090920)	0.42715 (17090920)	0.42597 (17090920)	0.42361 (17090920)	0.42117 (17090920)
3836103.4	0.42359 (17090920)	0.42252 (17090920)	0.42031 (17090920)	0.41907 (17090920)	0.41675 (17090920)
3836097.3	0.41835 (17090920)	0.41630 (17090920)	0.41514 (17090920)	0.41300 (17090920)	0.41180 (17090920)
3836091.2	0.41112 (17090920)	0.40914 (17090920)	0.40802 (17090920)	0.40599 (17090920)	0.40496 (17090920)
3836085.1	0.40414 (17090920)	0.40139 (17090920)	0.39947 (17090920)	0.39849 (17090920)	0.39768 (17090920)
3836079.1	0.39906 (17090920)	0.39567 (17090920)	0.39476 (17090920)	0.39316 (17090920)	0.39353 (17090920)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836073.0 | 0.39418 (17090920) 0.39103 (17090920) 0.38951 (17090920) 0.38903 (17090920) 0.38898 (17090920)
3836066.9 | 0.38881 (17090920) 0.38666 (17090920) 0.38541 (17090920) 0.38528 (17090920) 0.38570 (17090920)
3836060.9 | 0.38376 (17090920) 0.38258 (17090920) 0.38092 (17090920) 0.38115 (17090920) 0.38286 (17090920)
3836054.8 | 0.37973 (17090920) 0.37811 (17090920) 0.37752 (17090920) 0.37818 (17090920) 0.38041 (17090920)
3836048.7 | 0.37598 (17090920) 0.37468 (17090920) 0.37446 (17090920) 0.37557 (17090920) 0.37758 (17090920)
3836042.7 | 0.37251 (17090920) 0.37156 (17090920) 0.37173 (17090920) 0.37330 (17090920) 0.37583 (17090920)
3836036.6 | 0.36933 (17090920) 0.36874 (17090920) 0.36931 (17090920) 0.37133 (17090920) 0.37436 (17090920)
3836030.5 | 0.36703 (17090920) 0.36619 (17090920) 0.36717 (17090920) 0.36963 (17090920) 0.37382 (17090920)
3836024.5 | 0.36437 (17090920) 0.36391 (17090920) 0.36528 (17090920) 0.36816 (17090920) 0.37276 (17090920)
3836018.4 | 0.36195 (17090920) 0.36247 (17090920) 0.36488 (17090920) 0.36754 (17090920) 0.37254 (17090920)
3836012.3 | 0.36032 (17090920) 0.36180 (17090920) 0.36401 (17090920) 0.36771 (17090920) 0.37241 (17090920)
3836006.2 | 0.35886 (17090920) 0.36126 (17090920) 0.36445 (17090920) 0.36795 (17090920) 0.37299 (17090920)
3836000.2 | 0.35650 (17090920) 0.35972 (17090920) 0.36264 (17090920) 0.36759 (17090920) 0.37225 (17090920)
3835994.1 | 0.35324 (17090920) 0.35668 (17090920) 0.36035 (17090920) 0.36483 (17090920) 0.37016 (17090920)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)				
	395038.65	395051.49	395064.33	395077.17	395090.01
3836115.5	0.42443 (17090920)	0.42297 (17090920)	0.42026 (17090920)	0.41867 (17090920)	0.41708 (17090920)
3836109.4	0.41980 (17090920)	0.41838 (17090920)	0.41695 (17090920)	0.41451 (17090920)	0.41391 (17090920)
3836103.4	0.41545 (17090920)	0.41314 (17090920)	0.41205 (17090920)	0.41159 (17090920)	0.41173 (17090920)
3836097.3	0.40971 (17090920)	0.40878 (17090920)	0.40839 (17090920)	0.40820 (17090920)	0.41119

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(17090920)
3836091.2 | 0.40412 (17090920) 0.40276 (17090920) 0.40326 (17090920) 0.40551 (17090920) 0.41085 (17090920)
3836085.1 | 0.39813 (17090920) 0.39746 (17090920) 0.39801 (17090920) 0.40243 (17090920) 0.41070 (17090920)
3836079.1 | 0.39361 (17090920) 0.39374 (17090920) 0.39533 (17090920) 0.40076 (17090920) 0.40952 (17090920)
3836073.0 | 0.38964 (17090920) 0.39148 (17090920) 0.39312 (17090920) 0.39931 (17090920) 0.40945 (17090920)
3836066.9 | 0.38785 (17090920) 0.38967 (17090920) 0.39218 (17090920) 0.39899 (17090920) 0.40940 (17090920)
3836060.9 | 0.38566 (17090920) 0.38739 (17090920) 0.39057 (17090920) 0.39775 (17090920) 0.40934 (17090920)
3836054.8 | 0.38384 (17090920) 0.38628 (17090920) 0.38913 (17090920) 0.39657 (17090920) 0.40820 (17090920)
3836048.7 | 0.38157 (17090920) 0.38455 (17090920) 0.38872 (17090920) 0.39640 (17090920) 0.40813 (17090920)
3836042.7 | 0.37958 (17090920) 0.38385 (17090920) 0.38838 (17090920) 0.39625 (17090920) 0.40806 (17090920)
3836036.6 | 0.37782 (17090920) 0.38246 (17090920) 0.38810 (17090920) 0.39610 (17090920) 0.40691 (17090920)
3836030.5 | 0.37700 (17090920) 0.38200 (17090920) 0.38875 (17090920) 0.39595 (17090920) 0.40682 (17090920)
3836024.5 | 0.37633 (17090920) 0.38161 (17090920) 0.38852 (17090920) 0.39580 (17090920) 0.40672 (17090920)
3836018.4 | 0.37649 (17090920) 0.38206 (17090920) 0.38830 (17090920) 0.39564 (17090920) 0.40587 (18111603)
3836012.3 | 0.37670 (17090920) 0.38252 (17090920) 0.38892 (17090920) 0.39541 (17090920) 0.40628 (18111603)
3836006.2 | 0.37762 (17090920) 0.38368 (17090920) 0.38939 (17090920) 0.39679 (17090920) 0.40665 (18111603)
3836000.2 | 0.37772 (17090920) 0.38309 (17090920) 0.38950 (17090920) 0.39561 (17090920) 0.40616 (18111603)
3835994.1 | 0.37487 (17090920) 0.38069 (17090920) 0.38658 (17090920) 0.39173 (17090920) 0.40515 (18111603)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD | X-COORD (METERS)
(METERS) | 395102.85

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836115.5 | 0.41779 (17090920)
3836109.4 | 0.41690 (17090920)
3836103.4 | 0.41646 (18111603)
3836097.3 | 0.41840 (18111603)
3836091.2 | 0.41881 (18111603)
3836085.1 | 0.41991 (18111603)
3836079.1 | 0.42001 (18111603)
3836073.0 | 0.42092 (18111603)
3836066.9 | 0.42175 (18111603)
3836060.9 | 0.42164 (18111603)
3836054.8 | 0.42236 (18111603)
3836048.7 | 0.42216 (18111603)
3836042.7 | 0.42194 (18111603)
3836036.6 | 0.42255 (18111603)
3836030.5 | 0.42312 (18111603)
3836024.5 | 0.42280 (18111603)
3836018.4 | 0.42331 (18111603)
3836012.3 | 0.42298 (18111603)
3836006.2 | 0.42192 (18111603)
3836000.2 | 0.41940 (18111603)
3835994.1 | 0.41583 (18111603)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395240.46	395250.52	395260.58	395270.64	395280.70
3837580.0	0.29895 (19060306)	0.30341 (19060306)	0.30801 (19060306)	0.31287 (19060306)	0.31785 (19060306)
3837540.7	0.29926 (19060306)	0.30379 (19060306)	0.30874 (19060306)	0.31363 (19060306)	0.31868 (19060306)
3837501.4	0.29927 (19060306)	0.30394 (19060306)	0.30900 (19060306)	0.31397 (19060306)	0.31917 (19060306)
3837462.1	0.29913 (19060306)	0.30390 (19060306)	0.30909 (19060306)	0.31420 (19060306)	0.31945 (19060306)
3837422.8	0.29868 (19060306)	0.30354 (19060306)	0.30874 (19060306)	0.31393 (19060306)	0.31922 (19060306)
3837383.5	0.29780 (19060306)	0.30275 (19060306)	0.30796 (19060306)	0.31322 (19060306)	0.31874 (19060306)
3837344.2	0.29643 (19060306)	0.30149 (19060306)	0.30679 (19060306)	0.31221 (19060306)	0.31785 (19060306)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837304.9 | 0.29450 (19060306) 0.29970 (19060306) 0.30506 (19060306) 0.31062 (19060306) 0.31636 (19060306)
3837265.6 | 0.29198 (19060306) 0.29726 (19060306) 0.30271 (19060306) 0.30841 (19060306) 0.31432 (19060306)
3837226.3 | 0.28884 (19060306) 0.29423 (19060306) 0.29982 (19060306) 0.30563 (19060306) 0.31167 (19060306)
3837186.9 | 0.28518 (19060306) 0.29066 (19060306) 0.29633 (19060306) 0.30226 (19060306) 0.30841 (19060306)
3837147.6 | 0.28110 (19060306) 0.28659 (19060306) 0.29233 (19060306) 0.29831 (19060306) 0.30452 (19060306)
3837108.3 | 0.27690 (19060306) 0.28225 (19060306) 0.28791 (19060306) 0.29385 (19060306) 0.30002 (19060306)
3837069.0 | 0.27320 (19060306) 0.27819 (19060306) 0.28357 (19060306) 0.28931 (19060306) 0.29542 (19060306)
3837029.7 | 0.27115 (19060306) 0.27547 (19060306) 0.28023 (19060306) 0.28542 (19060306) 0.29099 (19060306)
3836990.4 | 0.27246 (19060306) 0.27567 (19060306) 0.27935 (19060306) 0.28359 (19060306) 0.28836 (19060306)
3836951.1 | 0.27942 (19060306) 0.28110 (19060306) 0.28318 (19060306) 0.28597 (19060306) 0.28933 (19060306)
3836911.8 | 0.29408 (19060306) 0.29450 (19060306) 0.29520 (19060306) 0.29643 (19060306) 0.29820 (19060306)
3836872.5 | 0.31790 (19060306) 0.31751 (19060306) 0.31743 (19060306) 0.31738 (19060306) 0.31745 (19060306)
3836833.2 | 0.35259 (19060306) 0.34455 (19060306) 0.34319 (19060306) 0.34267 (19060306) 0.34327 (19060306)
3836793.8 | 0.39163 (19060306) 0.38948 (19060306) 0.38781 (19060306) 0.38668 (19060306) 0.38610 (19060306)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)				
	395290.76	395300.82	395310.88	395320.94	395331.00
3837580.0	0.32313 (19060306)	0.32878 (19060306)	0.33469 (19060306)	0.34096 (19060306)	0.34763 (19060306)
3837540.7	0.32417 (19060306)	0.32977 (19060306)	0.33569 (19060306)	0.34211 (19060306)	0.34898 (19060306)
3837501.4	0.32461 (19060306)	0.33028 (19060306)	0.33627 (19060306)	0.34298 (19060306)	0.34992 (19060306)
3837462.1	0.32498 (19060306)	0.33081 (19060306)	0.33690 (19060306)	0.34327 (19060306)	0.35012

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(19060306)
3837422.8 | 0.32485 (19060306) 0.33064 (19060306) 0.33674 (19060306) 0.34346 (19060306) 0.35064 (19060306)
3837383.5 | 0.32442 (19060306) 0.33033 (19060306) 0.33654 (19060306) 0.34336 (19060306) 0.35062 (19060306)
3837344.2 | 0.32374 (19060306) 0.32963 (19060306) 0.33590 (19060306) 0.34289 (19060306) 0.35033 (19060306)
3837304.9 | 0.32232 (19060306) 0.32862 (19060306) 0.33511 (19060306) 0.34200 (19060306) 0.34948 (19060306)
3837265.6 | 0.32046 (19060306) 0.32690 (19060306) 0.33364 (19060306) 0.34069 (19060306) 0.34819 (19060306)
3837226.3 | 0.31796 (19060306) 0.32451 (19060306) 0.33140 (19060306) 0.33864 (19060306) 0.34623 (19060306)
3837186.9 | 0.31481 (19060306) 0.32152 (19060306) 0.32853 (19060306) 0.33590 (19060306) 0.34370 (19060306)
3837147.6 | 0.31102 (19060306) 0.31782 (19060306) 0.32497 (19060306) 0.33247 (19060306) 0.34038 (19060306)
3837108.3 | 0.30656 (19060306) 0.31338 (19060306) 0.32056 (19060306) 0.32819 (19060306) 0.33618 (19060306)
3837069.0 | 0.30188 (19060306) 0.30866 (19060306) 0.31578 (19060306) 0.32339 (19060306) 0.33148 (19060306)
3837029.7 | 0.29706 (19060306) 0.30364 (19060306) 0.31066 (19060306) 0.31820 (19060306) 0.32613 (19060306)
3836990.4 | 0.29369 (19060306) 0.29961 (19060306) 0.30614 (19060306) 0.31325 (19060306) 0.32102 (19060306)
3836951.1 | 0.29330 (19060306) 0.29788 (19060306) 0.30322 (19060306) 0.30931 (19060306) 0.31621 (19060306)
3836911.8 | 0.30028 (19060306) 0.30285 (19060306) 0.30622 (19060306) 0.30320 (19060306) 0.30803 (19060306)
3836872.5 | 0.31789 (19060306) 0.31864 (19060306) 0.31976 (19060306) 0.31359 (19060306) 0.31526 (19060306)
3836833.2 | 0.34248 (19060306) 0.34200 (19060306) 0.34128 (19060306) 0.34065 (19060306) 0.34016 (19060306)
3836793.8 | 0.38493 (19060306) 0.38431 (19060306) 0.38373 (19060306) 0.38250 (19060306) 0.38184 (19060306)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)				
	395341.06	395351.12	395361.18	395371.24	395381.30

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837580.0	0.35478 (19060306)	0.36259 (19060306)	0.37092 (19060306)	0.37995 (19060306)	0.38986 (19060306)
3837540.7	0.35623 (19060306)	0.36405 (19060306)	0.37263 (19060306)	0.38187 (19060306)	0.39185 (19060306)
3837501.4	0.35735 (19060306)	0.36527 (19060306)	0.37385 (19060306)	0.38306 (19060306)	0.39303 (19060306)
3837462.1	0.35767 (19060306)	0.36573 (19060306)	0.37436 (19060306)	0.38374 (19060306)	0.39447 (19060306)
3837422.8	0.35821 (19060306)	0.36627 (19060306)	0.37509 (19060306)	0.38436 (19060306)	0.39447 (19060306)
3837383.5	0.35821 (19060306)	0.36645 (19060306)	0.37536 (19060306)	0.38474 (19060306)	0.39496 (19060306)
3837344.2	0.35804 (19060306)	0.36650 (19060306)	0.37544 (19060306)	0.38481 (19060306)	0.39503 (19060306)
3837304.9	0.35731 (19060306)	0.36570 (19060306)	0.37473 (19060306)	0.38443 (19060306)	0.39526 (19060306)
3837265.6	0.35616 (19060306)	0.36468 (19060306)	0.37384 (19060306)	0.38377 (19060306)	0.39464 (19060306)
3837226.3	0.35434 (19060306)	0.36298 (19060306)	0.37227 (19060306)	0.38233 (19060306)	0.39333 (19060306)
3837186.9	0.35196 (19060306)	0.36069 (19060306)	0.37011 (19060306)	0.38027 (19060306)	0.39133 (19060306)
3837147.6	0.34877 (19060306)	0.35772 (19060306)	0.36720 (19060306)	0.37751 (19060306)	0.38868 (19060306)
3837108.3	0.34467 (19060306)	0.35364 (19060306)	0.36320 (19060306)	0.37360 (19060306)	0.38485 (19060306)
3837069.0	0.34003 (19060306)	0.34907 (19060306)	0.35873 (19060306)	0.36934 (19060306)	0.38062 (19060306)
3837029.7	0.33472 (19060306)	0.34384 (19060306)	0.35362 (19060306)	0.36420 (19060306)	0.37566 (19060306)
3836990.4	0.32944 (19060306)	0.33850 (19060306)	0.34835 (19060306)	0.35900 (19060306)	0.37052 (19060306)
3836951.1	0.32387 (19060306)	0.32750 (19060306)	0.33692 (19060306)	0.34712 (19060306)	0.36363 (19060306)
3836911.8	0.31409 (19060306)	0.32189 (19060306)	0.33729 (19060306)	0.34693 (19060306)	0.35086 (19060306)
3836872.5	0.31809 (19060306)	0.32183 (19060306)	0.32718 (19060306)	0.33435 (19060306)	0.34316 (19060306)
3836833.2	0.34026 (19060306)	0.34081 (19060306)	0.34209 (19060306)	0.34409 (19060306)	0.34760 (19060306)
3836793.8	0.38117 (19060306)	0.38049 (19060306)	0.38041 (19060306)	0.38091 (19060306)	0.37875 (19060306)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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

Y-COORD (METERS)	X-COORD (METERS) 395391.36	395401.42	395411.48	395421.54	395431.60
3837580.0	0.40098 (19060306)	0.41312 (19060306)	0.42646 (19060306)	0.44109 (19060306)	0.45526 (19060306)
3837540.7	0.40321 (19060306)	0.41609 (19060306)	0.42991 (19060306)	0.44482 (19060306)	0.46716 (19060306)
3837501.4	0.40430 (19060306)	0.41726 (19060306)	0.43144 (19060306)	0.44716 (19060306)	0.46967 (19060306)
3837462.1	0.40610 (19060306)	0.41912 (19060306)	0.43337 (19060306)	0.44977 (19060306)	0.47236 (19060306)
3837422.8	0.40607 (19060306)	0.41901 (19060306)	0.43338 (19060306)	0.44896 (19060306)	0.47162 (19060306)
3837383.5	0.40650 (19060306)	0.41990 (19060306)	0.43422 (19060306)	0.45063 (19060306)	0.47391 (19060306)
3837344.2	0.40698 (19060306)	0.42052 (19060306)	0.43526 (19060306)	0.45140 (19060306)	0.47403 (19060306)
3837304.9	0.40725 (19060306)	0.42045 (19060306)	0.43509 (19060306)	0.45175 (19060306)	0.47341 (19060306)
3837265.6	0.40660 (19060306)	0.41985 (19060306)	0.43456 (19060306)	0.45116 (19060306)	0.46922 (19060306)
3837226.3	0.40536 (19060306)	0.41869 (19060306)	0.43356 (19060306)	0.45026 (19060306)	0.46844 (19060306)
3837186.9	0.40349 (19060306)	0.41694 (19060306)	0.43186 (19060306)	0.44874 (19060306)	0.46721 (19060306)
3837147.6	0.40097 (19060306)	0.41462 (19060306)	0.42960 (19060306)	0.44667 (19060306)	0.46539 (19060306)
3837108.3	0.39724 (19060306)	0.41095 (19060306)	0.42622 (19060306)	0.44363 (19060306)	0.46289 (19060306)
3837069.0	0.39293 (19060306)	0.40659 (19060306)	0.42204 (19060306)	0.43948 (19060306)	0.45949 (19060306)
3837029.7	0.38813 (19060306)	0.40177 (19060306)	0.41703 (19060306)	0.43455 (19060306)	0.45501 (19060306)
3836990.4	0.38319 (19060306)	0.39700 (19060306)	0.41249 (19060306)	0.42976 (19060306)	0.44954 (19060306)
3836951.1	0.37009 (19060306)	0.38309 (19060306)	0.39726 (19060306)	0.42316 (19060306)	0.44330 (19060306)
3836911.8	0.36207 (19060306)	0.37492 (19060306)	0.38905 (19060306)	0.41622 (19060306)	0.43642 (19060306)
3836872.5	0.35427 (19060306)	0.36675 (19060306)	0.38048 (19060306)	0.39676 (19060306)	0.41502 (19060306)
3836833.2	0.35311 (19060306)	0.36149 (19060306)	0.37260 (19060306)	0.38636 (19060306)	0.40298 (19060306)
3836793.8	0.37739 (19060306)	0.37725 (19060306)	0.37909 (19060306)	0.38353 (19060306)	0.39115 (19060306)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395441.66
3837580.0	0.46572 (19060306)
3837540.7	0.48837 (19060306)
3837501.4	0.49171 (19060306)
3837462.1	0.49496 (19060306)
3837422.8	0.49546 (19060306)
3837383.5	0.49766 (19060306)
3837344.2	0.49898 (19060306)
3837304.9	0.49907 (19060306)
3837265.6	0.49818 (19060306)
3837226.3	0.49721 (19060306)
3837186.9	0.49539 (19060306)
3837147.6	0.49270 (19060306)
3837108.3	0.48902 (19060306)
3837069.0	0.48216 (19060306)
3837029.7	0.47781 (19060306)
3836990.4	0.47233 (19060306)
3836951.1	0.46592 (19060306)
3836911.8	0.44185 (19060306)
3836872.5	0.43085 (19060306)
3836833.2	0.41806 (19060306)
3836793.8	0.40628 (19060306)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395039.27	395048.71	395058.15	395067.59	395077.03

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837187.0 (19060306)	0.21643 (19060306)	0.21795 (19060306)	0.21962 (19060306)	0.22145 (19060306)	0.22344
3837167.7 (19060306)	0.21769 (19060306)	0.21897 (19060306)	0.22041 (19060306)	0.22199 (19060306)	0.22374
3837148.3 (19060306)	0.21952 (19060306)	0.22057 (19060306)	0.22175 (19060306)	0.22309 (19060306)	0.22458
3837129.0 (19060306)	0.22199 (19060306)	0.22281 (19060306)	0.22374 (19060306)	0.22480 (19060306)	0.22604
3837109.6 (19060306)	0.22514 (19060306)	0.22573 (19060306)	0.22641 (19060306)	0.22723 (19060306)	0.22819
3837090.3 (19060306)	0.22897 (19060306)	0.22935 (19060306)	0.22982 (19060306)	0.23038 (19060306)	0.23108
3837070.9 (19060306)	0.23350 (19060306)	0.23370 (19060306)	0.23396 (19060306)	0.23431 (19060306)	0.23477
3837051.6 (19060306)	0.23873 (19060306)	0.23878 (19060306)	0.23886 (19060306)	0.23901 (19060306)	0.23927
3837032.2 (19060306)	0.24466 (19060306)	0.24458 (19060306)	0.24451 (19060306)	0.24451 (19060306)	0.24459
3837012.9 (19060306)	0.25127 (19060306)	0.25109 (19060306)	0.25094 (19060306)	0.25083 (19060306)	0.25077
3836993.5 (19060306)	0.25858 (19060306)	0.25837 (19060306)	0.25817 (19060306)	0.25799 (19060306)	0.25783
3836974.2 (19060306)	0.26664 (19060306)	0.26640 (19060306)	0.26615 (19060306)	0.26591 (19060306)	0.26569
3836954.8 (19060306)	0.27545 (19060306)	0.27519 (19060306)	0.27487 (19060306)	0.27454 (19060306)	0.27428
3836935.5 (19060306)	0.28515 (19060306)	0.28492 (19060306)	0.28465 (19060306)	0.28435 (19060306)	0.28407
3836916.1 (19060306)	0.29578 (19060306)	0.29547 (19060306)	0.29525 (19060306)	0.29507 (19060306)	0.29474
3836896.8 (19060306)	0.30778 (19060306)	0.30746 (19060306)	0.30729 (19060306)	0.30714 (19060306)	0.30680
3836877.4 (19060306)	0.32138 (19060306)	0.32100 (19060306)	0.32076 (19060306)	0.32068 (19060306)	0.32045
3836858.1 (19060306)	0.33706 (19060306)	0.33666 (19060306)	0.33618 (19060306)	0.33595 (19060306)	0.33577
3836838.7 (19060306)	0.35556 (19060306)	0.35584 (19060306)	0.35522 (19060306)	0.35432 (19060306)	0.35383
3836819.4 (19060306)	0.37800 (19060306)	0.37927 (19060306)	0.37933 (19060306)	0.37820 (19060306)	0.37662
3836800.0 (19060306)	0.40608 (19060306)	0.40603 (19060306)	0.40681 (19060306)	0.40569 (19060306)	0.40414

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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

Y-COORD (METERS)	X-COORD (METERS) 395086.47	395095.91	395105.35	395114.79	395124.23
3837187.0	0.22559 (19060306)	0.22792 (19060306)	0.23042 (19060306)	0.23309 (19060306)	0.23593 (19060306)
3837167.7	0.22566 (19060306)	0.22775 (19060306)	0.23002 (19060306)	0.23247 (19060306)	0.23511 (19060306)
3837148.3	0.22623 (19060306)	0.22807 (19060306)	0.23008 (19060306)	0.23229 (19060306)	0.23468 (19060306)
3837129.0	0.22741 (19060306)	0.22897 (19060306)	0.23070 (19060306)	0.23262 (19060306)	0.23475 (19060306)
3837109.6	0.22929 (19060306)	0.23055 (19060306)	0.23199 (19060306)	0.23362 (19060306)	0.23543 (19060306)
3837090.3	0.23191 (19060306)	0.23289 (19060306)	0.23402 (19060306)	0.23533 (19060306)	0.23683 (19060306)
3837070.9	0.23534 (19060306)	0.23604 (19060306)	0.23688 (19060306)	0.23787 (19060306)	0.23904 (19060306)
3837051.6	0.23960 (19060306)	0.24004 (19060306)	0.24061 (19060306)	0.24130 (19060306)	0.24216 (19060306)
3837032.2	0.24473 (19060306)	0.24495 (19060306)	0.24529 (19060306)	0.24571 (19060306)	0.24627 (19060306)
3837012.9	0.25075 (19060306)	0.25081 (19060306)	0.25093 (19060306)	0.25112 (19060306)	0.25142 (19060306)
3836993.5	0.25770 (19060306)	0.25762 (19060306)	0.25757 (19060306)	0.25759 (19060306)	0.25766 (19060306)
3836974.2	0.26547 (19060306)	0.26529 (19060306)	0.26512 (19060306)	0.26500 (19060306)	0.26492 (19060306)
3836954.8	0.27403 (19060306)	0.27378 (19060306)	0.27353 (19060306)	0.27329 (19060306)	0.27310 (19060306)
3836935.5	0.28378 (19060306)	0.28348 (19060306)	0.28321 (19060306)	0.28293 (19060306)	0.28265 (19060306)
3836916.1	0.29429 (19060306)	0.29399 (19060306)	0.29369 (19060306)	0.29338 (19060306)	0.29301 (19060306)
3836896.8	0.30637 (19060306)	0.30598 (19060306)	0.30563 (19060306)	0.30527 (19060306)	0.30490 (19060306)
3836877.4	0.32007 (19060306)	0.31957 (19060306)	0.31906 (19060306)	0.31868 (19060306)	0.31839 (19060306)
3836858.1	0.33567 (19060306)	0.33540 (19060306)	0.33495 (19060306)	0.33450 (19060306)	0.33415 (19060306)
3836838.7	0.35342 (19060306)	0.35325 (19060306)	0.35315 (19060306)	0.35288 (19060306)	0.35236 (19060306)
3836819.4	0.37572 (19060306)	0.37500 (19060306)	0.37450 (19060306)	0.37437 (19060306)	0.37399 (19060306)
3836800.0	0.40374 (19060306)	0.40315 (19060306)	0.40237 (19060306)	0.39037 (19060306)	0.38905 (19060306)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395133.67	395143.11	395152.55	395161.99	395171.43
3837187.0	0.23895 (19060306)	0.24215 (19060306)	0.24553 (19060306)	0.24909 (19060306)	0.25282 (19060306)
3837167.7	0.23795 (19060306)	0.24097 (19060306)	0.24419 (19060306)	0.24761 (19060306)	0.25121 (19060306)
3837148.3	0.23729 (19060306)	0.24009 (19060306)	0.24311 (19060306)	0.24633 (19060306)	0.24976 (19060306)
3837129.0	0.23709 (19060306)	0.23963 (19060306)	0.24240 (19060306)	0.24539 (19060306)	0.24860 (19060306)
3837109.6	0.23746 (19060306)	0.23972 (19060306)	0.24219 (19060306)	0.24486 (19060306)	0.24780 (19060306)
3837090.3	0.23853 (19060306)	0.24044 (19060306)	0.24258 (19060306)	0.24498 (19060306)	0.24760 (19060306)
3837070.9	0.24041 (19060306)	0.24198 (19060306)	0.24377 (19060306)	0.24579 (19060306)	0.24805 (19060306)
3837051.6	0.24319 (19060306)	0.24440 (19060306)	0.24582 (19060306)	0.24743 (19060306)	0.24931 (19060306)
3837032.2	0.24697 (19060306)	0.24784 (19060306)	0.24888 (19060306)	0.25012 (19060306)	0.25160 (19060306)
3837012.9	0.25183 (19060306)	0.25238 (19060306)	0.25308 (19060306)	0.25394 (19060306)	0.25501 (19060306)
3836993.5	0.25783 (19060306)	0.25809 (19060306)	0.25848 (19060306)	0.25901 (19060306)	0.25970 (19060306)
3836974.2	0.26488 (19060306)	0.26493 (19060306)	0.26505 (19060306)	0.26529 (19060306)	0.26565 (19060306)
3836954.8	0.27294 (19060306)	0.27280 (19060306)	0.27272 (19060306)	0.27272 (19060306)	0.27281 (19060306)
3836935.5	0.28239 (19060306)	0.28217 (19060306)	0.28195 (19060306)	0.28179 (19060306)	0.28166 (19060306)
3836916.1	0.29271 (19060306)	0.29248 (19060306)	0.29231 (19060306)	0.29205 (19060306)	0.29172 (19060306)
3836896.8	0.30457 (19060306)	0.30436 (19060306)	0.30417 (19060306)	0.30384 (19060306)	0.30342 (I9060306)
3836877.4	0.31814 (19060306)	0.31788 (19060306)	0.31757 (19060306)	0.31717 (19060306)	0.31668 (19060306)
3836858.1	0.33372 (19060306)	0.33305 (19060306)	0.32694 (19060306)	0.32658 (19060306)	0.32621 (19060306)
3836838.7	0.35183 (19060306)	0.35127 (19060306)	0.35080 (19060306)	0.35041 (19060306)	0.34992 (19060306)
3836819.4	0.37348 (19060306)	0.37308 (19060306)	0.37280 (19060306)	0.37250 (19060306)	0.37172 (19060306)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836800.0 | 0.38820 (19060306) 0.38782 (19060306) 0.38883 (19060306) 0.39972 (19060306) 0.38710 (19060306)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395180.87	395190.31	395199.75	395209.19	395218.63
3837187.0	0.25671 (19060306)	0.26076 (19060306)	0.26499 (19060306)	0.26939 (19060306)	0.27397 (19060306)
3837167.7	0.25499 (19060306)	0.25896 (19060306)	0.26311 (19060306)	0.26747 (19060306)	0.27200 (19060306)
3837148.3	0.25339 (19060306)	0.25723 (19060306)	0.26129 (19060306)	0.26556 (19060306)	0.27005 (19060306)
3837129.0	0.25203 (19060306)	0.25568 (19060306)	0.25959 (19060306)	0.26376 (19060306)	0.26813 (19060306)
3837109.6	0.25099 (19060306)	0.25443 (19060306)	0.25813 (19060306)	0.26211 (19060306)	0.26633 (19060306)
3837090.3	0.25049 (19060306)	0.25366 (19060306)	0.25709 (19060306)	0.26079 (19060306)	0.26478 (19060306)
3837070.9	0.25059 (19060306)	0.25342 (19060306)	0.25651 (19060306)	0.25991 (19060306)	0.26360 (19060306)
3837051.6	0.25144 (19060306)	0.25386 (19060306)	0.25658 (19060306)	0.25963 (19060306)	0.26298 (19060306)
3837032.2	0.25329 (19060306)	0.25527 (19060306)	0.25755 (19060306)	0.26016 (19060306)	0.26309 (19060306)
3837012.9	0.25629 (19060306)	0.25781 (19060306)	0.25960 (19060306)	0.26171 (19060306)	0.26415 (19060306)
3836993.5	0.26055 (19060306)	0.26163 (19060306)	0.26293 (19060306)	0.26452 (19060306)	0.26642 (19060306)
3836974.2	0.26612 (19060306)	0.26679 (19060306)	0.26764 (19060306)	0.26873 (19060306)	0.27010 (19060306)
3836954.8	0.27297 (19060306)	0.27326 (19060306)	0.27371 (19060306)	0.27436 (19060306)	0.27524 (19060306)
3836935.5	0.28161 (19060306)	0.28161 (19060306)	0.28166 (19060306)	0.28175 (19060306)	0.28216 (19060306)
3836916.1	0.29148 (19060306)	0.29137 (19060306)	0.29119 (19060306)	0.29096 (19060306)	0.29102 (19060306)
3836896.8	0.30304 (19060306)	0.30273 (19060306)	0.30242 (19060306)	0.30220 (19060306)	0.30206 (19060306)
3836877.4	0.31621 (19060306)	0.31579 (19060306)	0.31543 (19060306)	0.31528 (19060306)	0.31496

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(19060306)
3836858.1 | 0.33140 (19060306) 0.33099 (19060306) 0.33058 (19060306) 0.33043 (19060306) 0.33009 (19060306)
3836838.7 | 0.34959 (19060306) 0.34924 (19060306) 0.34872 (19060306) 0.34827 (19060306) 0.34783 (19060306)
3836819.4 | 0.36301 (19060306) 0.36234 (19060306) 0.36125 (19060306) 0.35976 (19060306) 0.35932 (19060306)
3836800.0 | 0.38525 (19060306) 0.38433 (19060306) 0.38390 (19060306) 0.38296 (19060306) 0.38300 (19060306)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD | X-COORD (METERS)
(METERS) | 395228.07

3837187.0 | 0.27871 (19060306)
3837167.7 | 0.27673 (19060306)
3837148.3 | 0.27472 (19060306)
3837129.0 | 0.27270 (19060306)
3837109.6 | 0.27078 (19060306)
3837090.3 | 0.26904 (19060306)
3837070.9 | 0.26761 (19060306)
3837051.6 | 0.26664 (19060306)
3837032.2 | 0.26634 (19060306)
3837012.9 | 0.26693 (19060306)
3836993.5 | 0.26865 (19060306)
3836974.2 | 0.27180 (19060306)
3836954.8 | 0.27646 (19060306)
3836935.5 | 0.28295 (19060306)
3836916.1 | 0.29140 (19060306)
3836896.8 | 0.30200 (19060306)
3836877.4 | 0.31457 (19060306)
3836858.1 | 0.32957 (19060306)
3836838.7 | 0.34746 (19060306)
3836819.4 | 0.36025 (19060306)
3836800.0 | 0.38348 (19060306)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 394853.55	394899.98	394946.41	394992.84	395039.27
3837951.4	0.19994 (19060306)	0.20642 (19060306)	0.21243 (19060306)	0.21751 (19060306)	0.22087 (19060306)
3837933.8	0.20015 (19060306)	0.20700 (19060306)	0.21355 (19060306)	0.21936 (19060306)	0.22404 (19060306)
3837916.1	0.20030 (19060306)	0.20748 (19060306)	0.21451 (19060306)	0.22097 (19060306)	0.22660 (19060306)
3837898.5	0.20037 (19060306)	0.20788 (19060306)	0.21524 (19060306)	0.22222 (19060306)	0.22873 (19060306)
3837880.9	0.20031 (19060306)	0.20800 (19060306)	0.21565 (19060306)	0.22319 (19060306)	0.23053 (19060306)
3837863.2	0.20011 (19060306)	0.20792 (19060306)	0.21589 (19060306)	0.22386 (19060306)	0.23201 (19060306)
3837845.6	0.19990 (19060306)	0.20798 (19060306)	0.21618 (19060306)	0.22450 (19060306)	0.23313 (19060306)
3837827.9	0.19964 (19060306)	0.20791 (19060306)	0.21637 (19060306)	0.22496 (19060306)	0.23396 (19060306)
3837810.3	0.19928 (19060306)	0.20771 (19060306)	0.21637 (19060306)	0.22520 (19060306)	0.23459 (19060306)
3837792.7	0.19883 (19060306)	0.20734 (19060306)	0.21612 (19060306)	0.22526 (19060306)	0.23505 (19060306)
3837775.0	0.19840 (19060306)	0.20706 (19060306)	0.21604 (19060306)	0.22536 (19060306)	0.23535 (19060306)
3837757.4	0.19785 (19060306)	0.20672 (19060306)	0.21585 (19060306)	0.22536 (19060306)	0.23554 (19060306)
3837739.7	0.19725 (19060306)	0.20626 (19060306)	0.21559 (19060306)	0.22523 (19060306)	0.23546 (19060306)
3837722.1	0.19662 (19060306)	0.20569 (19060306)	0.21520 (19060306)	0.22507 (19060306)	0.23548 (19060306)
3837704.5	0.19595 (19060306)	0.20515 (19060306)	0.21482 (19060306)	0.22485 (19060306)	0.23552 (19060306)
3837686.8	0.19524 (19060306)	0.20457 (19060306)	0.21438 (19060306)	0.22462 (19060306)	0.23541 (19060306)
3837669.2	0.19447 (19060306)	0.20393 (19060306)	0.21400 (19060306)	0.22444 (19060306)	0.23520 (19060306)
3837651.5	0.19368 (19060306)	0.20323 (19060306)	0.21345 (19060306)	0.22405 (19060306)	0.23500 (19060306)
3837633.9	0.19287 (19060306)	0.20245 (19060306)	0.21277 (19060306)	0.22351 (19060306)	0.23470 (19060306)
3837616.3	0.19202 (19060306)	0.20161 (19060306)	0.21201 (19060306)	0.22292 (19060306)	0.23433 (19060306)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837598.6 | 0.19115 (19060306) 0.20074 (19060306) 0.21112 (19060306) 0.22219 (19060306) 0.23388 (19060306)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS)				
	395085.70	395132.13	395178.56	395224.99	395271.42
3837951.4	0.22197 (19060306)	0.22385 (20071606)	0.23300 (19120703)	0.24458 (19012902)	0.25840 (17062206)
3837933.8	0.22618 (19060306)	0.22759 (20071606)	0.23425 (19120703)	0.24657 (19012902)	0.25855 (17062206)
3837916.1	0.23004 (19060306)	0.23100 (19060306)	0.23505 (19120703)	0.24823 (19012902)	0.25836 (17062206)
3837898.5	0.23346 (19060306)	0.23597 (19060306)	0.23722 (20071606)	0.24953 (19012902)	0.26134 (19012902)
3837880.9	0.23638 (19060306)	0.24044 (19060306)	0.24131 (20071606)	0.25049 (19012902)	0.26423 (19012902)
3837863.2	0.23889 (19060306)	0.24442 (19060306)	0.24649 (19060306)	0.25116 (19120703)	0.26673 (19012902)
3837845.6	0.24098 (19060306)	0.24788 (19060306)	0.25181 (19060306)	0.25272 (20071606)	0.26885 (19012902)
3837827.9	0.24264 (19060306)	0.25085 (19060306)	0.25658 (19060306)	0.25844 (19060306)	0.27060 (19012902)
3837810.3	0.24393 (19060306)	0.25326 (19060306)	0.26078 (19060306)	0.26490 (19060306)	0.27190 (19012902)
3837792.7	0.24491 (19060306)	0.25518 (19060306)	0.26432 (19060306)	0.27079 (19060306)	0.27275 (19012902)
3837775.0	0.24563 (19060306)	0.25666 (19060306)	0.26720 (19060306)	0.27597 (19060306)	0.27999 (19060306)
3837757.4	0.24618 (19060306)	0.25774 (19060306)	0.26940 (19060306)	0.28025 (19060306)	0.28749 (19060306)
3837739.7	0.24645 (19060306)	0.25829 (19060306)	0.27090 (19060306)	0.28357 (19060306)	0.29400 (19060306)
3837722.1	0.24667 (19060306)	0.25925 (19060306)	0.27258 (19060306)	0.28655 (19060306)	0.29956 (19060306)
3837704.5	0.24677 (19060306)	0.25961 (19060306)	0.27339 (19060306)	0.28855 (19060306)	0.30399 (19060306)
3837686.8	0.24684 (19060306)	0.25980 (19060306)	0.27386 (19060306)	0.28981 (19060306)	0.30725 (19060306)
3837669.2	0.24687 (19060306)	0.25993 (19060306)	0.27427 (19060306)	0.29069 (19060306)	0.30948

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(19060306)
3837651.5 | 0.24685 (19060306) 0.25999 (19060306) 0.27457 (19060306) 0.29117 (19060306) 0.31084 (19060306)
3837633.9 | 0.24679 (19060306) 0.26012 (19060306) 0.27475 (19060306) 0.29158 (19060306) 0.31173 (19060306)
3837616.3 | 0.24662 (19060306) 0.26010 (19060306) 0.27492 (19060306) 0.29195 (19060306) 0.31216 (19060306)
3837598.6 | 0.24637 (19060306) 0.25993 (19060306) 0.27501 (19060306) 0.29222 (19060306) 0.31253 (19060306)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395317.85	395364.28	395410.71	395457.14	395503.57	
3837951.4	0.27807 (17062206)	0.28806 (17062206)	0.28994 (17062206)	0.28762 (17062206)	0.29582 (18013117)
3837933.8	0.28011 (17062206)	0.29198 (17062206)	0.29430 (17062206)	0.29278 (17062206)	0.30022 (18013117)
3837916.1	0.28205 (17062206)	0.29603 (17062206)	0.29909 (17062206)	0.29802 (17062206)	0.30491 (18013117)
3837898.5	0.28368 (17062206)	0.29997 (17062206)	0.30403 (17062206)	0.30335 (17062206)	0.30955 (18013117)
3837880.9	0.28504 (17062206)	0.30359 (17062206)	0.30912 (17062206)	0.30877 (17062206)	0.31441 (18013117)
3837863.2	0.28618 (17062206)	0.30724 (17062206)	0.31427 (17062206)	0.31440 (17062206)	0.31932 (18013117)
3837845.6	0.28700 (17062206)	0.31078 (17062206)	0.31972 (17062206)	0.32039 (17062206)	0.32505 (18013117)
3837827.9	0.28735 (17062206)	0.31430 (17062206)	0.32534 (17062206)	0.32666 (17062206)	0.33099 (18013117)
3837810.3	0.28815 (19012902)	0.31758 (17062206)	0.33102 (17062206)	0.33311 (17062206)	0.33731 (18013117)
3837792.7	0.29154 (19012902)	0.32047 (17062206)	0.33704 (17062206)	0.34004 (17062206)	0.34389 (18013117)
3837775.0	0.29452 (19012902)	0.32322 (17062206)	0.34308 (17062206)	0.34738 (17062206)	0.35017 (18013117)
3837757.4	0.29696 (19012902)	0.32539 (17062206)	0.34944 (17062206)	0.35534 (17062206)	0.35832 (18013117)
3837739.7	0.29877 (19012902)	0.32685 (17062206)	0.35576 (17062206)	0.36336 (17062206)	0.36644 (18013117)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837722.1 | 0.30685 (19060306) 0.32778 (17062206) 0.36231 (17062206) 0.37231 (17062206) 0.37599 (18013117)
3837704.5 | 0.31562 (19060306) 0.32965 (19012902) 0.36879 (17062206) 0.38200 (17062206) 0.38544 (18013117)
3837686.8 | 0.32314 (19060306) 0.33328 (19012902) 0.37482 (17062206) 0.39257 (17062206) 0.39553 (18013117)
3837669.2 | 0.32895 (19060306) 0.34378 (19060306) 0.38051 (17062206) 0.40396 (17062206) 0.40821 (18013117)
3837651.5 | 0.33313 (19060306) 0.35497 (19060306) 0.38522 (17062206) 0.41716 (17062206) 0.42222 (18013117)
3837633.9 | 0.33563 (19060306) 0.36365 (19060306) 0.38842 (17062206) 0.43242 (17062206) 0.43955 (18013117)
3837616.3 | 0.33710 (19060306) 0.36905 (19060306) 0.39858 (19060306) 0.44926 (17062206) 0.45749 (18013117)
3837598.6 | 0.33803 (19060306) 0.37173 (19060306) 0.41524 (19060306) 0.46692 (17062206) 0.47655 (18013117)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD (METERS)	X-COORD (METERS) 395550.00	395596.43	395642.86	395689.29	395735.72
3837951.4	0.30369 (18013117)	0.30628 (18013117)	0.30702 (18013117)	0.30677 (18013117)	0.30639 (18013117)
3837933.8	0.30833 (18013117)	0.31084 (18013117)	0.31158 (18013117)	0.31098 (18013117)	0.31108 (18013117)
3837916.1	0.31318 (18013117)	0.31578 (18013117)	0.31643 (18013117)	0.31564 (18013117)	0.31605 (18013117)
3837898.5	0.31818 (18013117)	0.32076 (18013117)	0.32151 (18013117)	0.32051 (18013117)	0.32099 (18013117)
3837880.9	0.32321 (18013117)	0.32580 (18013117)	0.32646 (18013117)	0.32551 (18013117)	0.32616 (18013117)
3837863.2	0.32818 (18013117)	0.33066 (18013117)	0.33154 (18013117)	0.33098 (18013117)	0.33169 (18013117)
3837845.6	0.33407 (18013117)	0.33664 (18013117)	0.33741 (18013117)	0.33740 (18013117)	0.33741 (18013117)
3837827.9	0.34018 (18013117)	0.34273 (18013117)	0.34350 (18013117)	0.34351 (18013117)	0.34367 (18013117)
3837810.3	0.34687 (18013117)	0.34929 (18013117)	0.35007 (18013117)	0.34998 (18013117)	0.35019 (18013117)
3837792.7	0.35335 (18013117)	0.35576 (18013117)	0.35657 (18013117)	0.35674 (18013117)	0.35701

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(18013117)
3837775.0 | 0.35963 (18013117) 0.36218 (18013117) 0.36318 (18013117) 0.36381 (18013117) 0.36415 (18013117)
3837757.4 | 0.36772 (18013117) 0.37042 (18013117) 0.37128 (18013117) 0.37210 (18013117) 0.37179 (18013117)
3837739.7 | 0.37644 (18013117) 0.37897 (18013117) 0.37986 (18013117) 0.38044 (18013117) 0.38089 (18013117)
3837722.1 | 0.38608 (18013117) 0.38892 (18013117) 0.38983 (18013117) 0.38963 (18013117) 0.38985 (18013117)
3837704.5 | 0.39544 (18013117) 0.39817 (18013117) 0.39915 (18013117) 0.39985 (18013117) 0.39978 (18013117)
3837686.8 | 0.40540 (18013117) 0.40798 (18013117) 0.40904 (18013117) 0.41111 (18013117) 0.41109 (18013117)
3837669.2 | 0.41813 (18013117) 0.42074 (18013117) 0.42184 (18013117) 0.42301 (18013117) 0.42371 (18013117)
3837651.5 | 0.43191 (18013117) 0.43487 (18013117) 0.43605 (18013117) 0.43712 (18013117) 0.43747 (18013117)
3837633.9 | 0.44931 (18013117) 0.45354 (18013117) 0.45474 (18013117) 0.45392 (18013117) 0.45346 (18013117)
3837616.3 | 0.46696 (18013117) 0.47109 (18013117) 0.47216 (18013117) 0.47254 (18013117) 0.47199 (18013117)
3837598.6 | 0.48663 (18013117) 0.48988 (18013117) 0.49120 (18013117) 0.49282 (18013117) 0.49321 (18013117)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

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

Y-COORD | X-COORD (METERS)
(METERS) | 395782.15

3837951.4 | 0.30582 (18013117)
3837933.8 | 0.31013 (18013117)
3837916.1 | 0.31489 (18013117)
3837898.5 | 0.31985 (18013117)
3837880.9 | 0.32495 (18013117)
3837863.2 | 0.33028 (18013117)
3837845.6 | 0.33687 (18013117)
3837827.9 | 0.34317 (18013117)
3837810.3 | 0.35006 (18013117)
3837792.7 | 0.35683 (18013117)
3837775.0 | 0.36392 (18013117)
3837757.4 | 0.37190 (18013117)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837739.7 | 0.38034 (18013117)
3837722.1 | 0.38965 (18013117)
3837704.5 | 0.39983 (18013117)
3837686.8 | 0.41123 (18013117)
3837669.2 | 0.42373 (18013117)
3837651.5 | 0.43784 (18013117)
3837633.9 | 0.45401 (18013117)
3837616.3 | 0.47242 (18013117)
3837598.6 | 0.49342 (18013117)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 394846.05	394858.89	394871.73	394884.57	394897.41
3836115.5	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836109.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836103.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836097.3	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836091.2	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836085.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836079.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836073.0	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836066.9	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836060.9	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836054.8	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836048.7	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836042.7	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836036.6 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836030.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836024.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836018.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836012.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836006.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836000.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3835994.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 394910.25	394923.09	394935.93	394948.77	394961.61
3836115.5	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836109.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836103.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836097.3	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836091.2	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836085.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836079.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836073.0	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836066.9	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836060.9	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(19021405)
3836054.8 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836048.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836042.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836036.6 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836030.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836024.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836018.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836012.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836006.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836000.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3835994.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	394974.45	394987.29	395000.13	395012.97	395025.81
3836115.5	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836109.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836103.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836097.3	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836091.2	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836085.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836079.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836073.0 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836066.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836060.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836054.8 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836048.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836042.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836036.6 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836030.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836024.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836018.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836012.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836006.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836000.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3835994.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395038.65	395051.49	395064.33	395077.17	395090.01
3836115.5	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (17092908)
3836109.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836103.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(19021405)
3836097.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836091.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836085.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836079.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836073.0 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836066.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836060.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836054.8 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836048.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836042.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836036.6 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836030.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836024.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836018.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836012.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836006.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836000.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3835994.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD | X-COORD (METERS)
(METERS) | 395102.85

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -

3836115.5 |    0.00001 (17092908)
3836109.4 |    0.00001 (17092908)
3836103.4 |    0.00001 (17092908)
3836097.3 |    0.00001 (17092908)
3836091.2 |    0.00001 (17092908)
3836085.1 |    0.00001 (17092908)
3836079.1 |    0.00001 (17092908)
3836073.0 |    0.00001 (17092908)
3836066.9 |    0.00001 (17092908)
3836060.9 |    0.00001 (17092908)
3836054.8 |    0.00001 (17092908)
3836048.7 |    0.00001 (17092908)
3836042.7 |    0.00001 (17092908)
3836036.6 |    0.00001 (17092908)
3836030.5 |    0.00001 (17092908)
3836024.5 |    0.00001 (17092908)
3836018.4 |    0.00001 (19021405)
3836012.3 |    0.00001 (19021405)
3836006.2 |    0.00001 (19021405)
3836000.2 |    0.00001 (19021405)
3835994.1 |    0.00001 (19021405)
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                                ***      08:45:15
                                                                    PAGE 109
*** MODELOPTs:  NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

                *** THE  1ST HIGHEST  1-HR  TOTAL DEPOSITION     VALUES FOR SOURCE GROUP:
ALL    ***
                  INCLUDING SOURCE(S):    PAREA1     ,

                  *** NETWORK ID: UCART2   ;  NETWORK TYPE: GRIDCART ***

                    ** DEPO OF DPM      IN GRAMS/M**2                    **

 Y-COORD |                          X-COORD (METERS)
 (METERS) |    395240.46          395250.52          395260.58          395270.64          395280.70
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -

 3837580.0 |    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001
(20040607)
 3837540.7 |    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001
(20040607)
 3837501.4 |    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001
(20040607)
 3837462.1 |    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001
(20040607)
 3837422.8 |    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001
(20040607)
 3837383.5 |    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001 (20040607)    0.00001
(20040607)
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837344.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837304.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837265.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837226.3 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837186.9 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (20040607)
3837147.6 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837108.3 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837069.0 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837029.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836990.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836951.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836911.8 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836872.5 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836833.2 | 0.00001 (18120608) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836793.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395290.76	395300.82	395310.88	395320.94	395331.00
3837580.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837540.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837501.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(20040607)
3837462.1 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837422.8 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837383.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837344.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837304.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837265.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837226.3 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837186.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837147.6 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837108.3 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837069.0 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837029.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836990.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836951.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836911.8 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (17121509) 0.00001 (17121509)
3836872.5 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (17121509) 0.00001 (17121509)
3836833.2 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836793.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395341.06	395351.12	395361.18	395371.24	395381.30

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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3837580.0 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837540.7 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837501.4 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837462.1 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837422.8 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837383.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837344.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837304.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837265.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837226.3 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837186.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837147.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837108.3 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837069.0 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (20040607) 0.00001 (20040607)
3837029.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836990.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836951.1 | 0.00001 (18120608) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (18120608)
3836911.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (17121509)
3836872.5 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836833.2 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836793.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 112
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

file:///C/...roject%20338%20-%20ABJC%20-%20Parkway%20Village%20DEIR/Parkway%20Village%20EIR%20Construction%20ADO.txt[10/31/2025 1:12:53 PM]

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395391.36	395401.42	395411.48	395421.54	395431.60
3837580.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837540.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837501.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837462.1	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837422.8	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837383.5	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837344.2	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837304.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837265.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837226.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837186.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837147.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837108.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837069.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837029.7	0.00001 (18120608)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3836990.4	0.00001 (18120608)	0.00001 (17021719)	0.00001 (17021719)	0.00001 (17021719)	0.00001 (17121509)
3836951.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (19021405)	0.00001 (19021405)
3836911.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (19021405)	0.00001 (19021405)
3836872.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836833.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836793.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

*** AERMET - VERSION 21112 *** *** *** 08:45:15

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395441.66
3837580.0	0.00001 (20040607)
3837540.7	0.00001 (20040607)
3837501.4	0.00001 (20040607)
3837462.1	0.00001 (20040607)
3837422.8	0.00001 (20040607)
3837383.5	0.00001 (20040607)
3837344.2	0.00001 (20040607)
3837304.9	0.00001 (20040607)
3837265.6	0.00001 (20040607)
3837226.3	0.00001 (20040607)
3837186.9	0.00001 (20040607)
3837147.6	0.00001 (20040607)
3837108.3	0.00001 (20040607)
3837069.0	0.00001 (20040607)
3837029.7	0.00001 (17121509)
3836990.4	0.00001 (17121509)
3836951.1	0.00001 (19021405)
3836911.8	0.00001 (17121509)
3836872.5	0.00001 (17121509)
3836833.2	0.00001 (17121509)
3836793.8	0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

PAGE 114
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395039.27	395048.71	395058.15	395067.59	395077.03

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

- -

3837187.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837167.7 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837148.3 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837129.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837109.6 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837090.3 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837070.9 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837051.6 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837032.2 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837012.9 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836993.5 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836974.2 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836954.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836935.5 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836916.1 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836896.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836877.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836858.1 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836838.7 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836819.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836800.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

file:///C/...roject%20338%20-%20ABJC%20-%20Parkway%20Village%20DEIR/Parkway%20Village%20EIR%20Construction%20ADO.txt[10/31/2025 1:12:53 PM]

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395086.47	395095.91	395105.35	395114.79	395124.23
3837187.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837167.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837148.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837129.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837109.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837090.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837070.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18120608)	0.00001 (18120608)
3837051.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837032.2	0.00001 (17121509)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837012.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836993.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836974.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836954.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836935.5	0.00001 (17121509)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836916.1	0.00001 (17121509)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836896.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18120608)	0.00001 (18120608)
3836877.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18120608)
3836858.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836838.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836819.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836800.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

*** AERMET - VERSION 21112 *** *** *** 08:45:15

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395133.67	395143.11	395152.55	395161.99	395171.43
3837187.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837167.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837148.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837129.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837109.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837090.3	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837070.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837051.6	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837032.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837012.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836993.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836974.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836954.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836935.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836916.1	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836896.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836877.4	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836858.1	0.00001 (17121509)	0.00001 (18120608)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836838.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18120608)	0.00001 (18120608)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836819.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836800.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395180.87	395190.31	395199.75	395209.19	395218.63
3837187.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837167.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837148.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837129.0	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837109.6	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837090.3	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837070.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837051.6	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837032.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837012.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836993.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836974.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836954.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836935.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836916.1	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836896.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(18120608)
3836877.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001
(18120608)
3836858.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001
(18120608)
3836838.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001
(18120608)
3836819.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001
(17121509)
3836800.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001
(17121509)
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 118
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD | X-COORD (METERS)
(METERS) | 395228.07

3837187.0 | 0.00001 (17121509)
3837167.7 | 0.00001 (17121509)
3837148.3 | 0.00001 (18120608)
3837129.0 | 0.00001 (18120608)
3837109.6 | 0.00001 (18120608)
3837090.3 | 0.00001 (18120608)
3837070.9 | 0.00001 (18120608)
3837051.6 | 0.00001 (18120608)
3837032.2 | 0.00001 (18120608)
3837012.9 | 0.00001 (18120608)
3836993.5 | 0.00001 (18120608)
3836974.2 | 0.00001 (18120608)
3836954.8 | 0.00001 (18120608)
3836935.5 | 0.00001 (18120608)
3836916.1 | 0.00001 (18120608)
3836896.8 | 0.00001 (18120608)
3836877.4 | 0.00001 (18120608)
3836858.1 | 0.00001 (18120608)
3836838.7 | 0.00001 (18120608)
3836819.4 | 0.00001 (17121509)
3836800.0 | 0.00001 (17121509)
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 394853.55	394899.98	394946.41	394992.84	395039.27
3837951.4	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837933.8	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837916.1	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837898.5	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837880.9	0.00000 (20040607)	0.00000 (20040607)	0.0000I (20040607)	0.0000I (20040607)	0.0000I (20040607)
3837863.2	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837845.6	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837827.9	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837810.3	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837792.7	0.00000 (17121509)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837775.0	0.00000 (17121509)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837757.4	0.00000 (17121509)	0.00000 (17121509)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837739.7	0.00000 (17121509)	0.00000 (17121509)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837722.1	0.00000 (17121509)	0.00000 (17121509)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837704.5	0.00000 (17121509)	0.00000 (17121509)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837686.8	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (20040607)	0.00001 (20040607)
3837669.2	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (20040607)	0.00001 (20040607)
3837651.5	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (20040607)	0.00001 (20040607)
3837633.9	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (20040607)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837616.3 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (20040607)
3837598.6 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (20040607)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395085.70	395132.13	395178.56	395224.99	395271.42
3837951.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837933.8	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837916.1	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837898.5	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837880.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837863.2	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837845.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837827.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837810.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837792.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837775.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837757.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837739.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837722.1	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837704.5	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837686.8	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(20040607)
3837669.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837651.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837633.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837616.3 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837598.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395317.85	395364.28	395410.71	395457.14	395503.57
3837951.4	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837933.8	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837916.1	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837898.5	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837880.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837863.2	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837845.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837827.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837810.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837792.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837775.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837757.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837739.7 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004) 0.00001 (21123004)
3837722.1 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837704.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837686.8 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837669.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837651.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837633.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837616.3 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837598.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395550.00	395596.43	395642.86	395689.29	395735.72
3837951.4	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837933.8	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837916.1	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837898.5	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837880.9	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837863.2	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837845.6	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837827.9	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837810.3	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(18120608)
3837792.7 | 0.00001 (21123004) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837775.0 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837757.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837739.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837722.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837704.5 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837686.8 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837669.2 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837651.5 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837633.9 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837616.3 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837598.6 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR TOTAL DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD | X-COORD (METERS)
(METERS) | 395782.15

3837951.4 | 0.00001 (18120608)
3837933.8 | 0.00001 (18120608)
3837916.1 | 0.00001 (18120608)
3837898.5 | 0.00001 (18120608)
3837880.9 | 0.00001 (18120608)
3837863.2 | 0.00001 (18120608)
3837845.6 | 0.00001 (18120608)
3837827.9 | 0.00001 (18120608)
3837810.3 | 0.00001 (18120608)
3837792.7 | 0.00001 (18120608)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837775.0 | 0.00001 (18120608)
3837757.4 | 0.00001 (18120608)
3837739.7 | 0.00001 (18120608)
3837722.1 | 0.00001 (18120608)
3837704.5 | 0.00001 (18120608)
3837686.8 | 0.00001 (18120608)
3837669.2 | 0.00001 (18120608)
3837651.5 | 0.00001 (18120608)
3837633.9 | 0.00001 (18120608)
3837616.3 | 0.00001 (18120608)
3837598.6 | 0.00001 (18120608)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 394846.05	394858.89	394871.73	394884.57	394897.41
3836115.5	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836109.4	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836103.4	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836097.3	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836091.2	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836085.1	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836079.1	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836073.0	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836066.9	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836060.9	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836054.8	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836048.7	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836042.7 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836036.6 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836030.5 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836024.5 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836018.4 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836012.3 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836006.2 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836000.2 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3835994.1 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	394910.25	394923.09	394935.93	394948.77	394961.61
3836115.5	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836109.4	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17092908)
3836103.4	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836097.3	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836091.2	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836085.1	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836079.1	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836073.0	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)
3836066.9	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17122709)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(17122709)
3836060.9 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836054.8 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836048.7 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836042.7 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836036.6 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836030.5 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836024.5 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836018.4 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836012.3 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836006.2 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836000.2 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3835994.1 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	394974.45	394987.29	395000.13	395012.97	395025.81
3836115.5	0.00001 (17122709)	0.00001 (17122709)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)
3836109.4	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)
3836103.4	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)
3836097.3	0.00001 (17122709)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)
3836091.2	0.00001 (17122709)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836085.1 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17092908)
3836079.1 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836073.0 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836066.9 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836060.9 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836054.8 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836048.7 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836042.7 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836036.6 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836030.5 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836024.5 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836018.4 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836012.3 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836006.2 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836000.2 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3835994.1 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395038.65	395051.49	395064.33	395077.17	395090.01
3836115.5	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)
3836109.4	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001 (17092908)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(17092908)
3836103.4 | 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17122709)
3836097.3 | 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17122709) 0.00001 (17122709)
3836091.2 | 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836085.1 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836079.1 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836073.0 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836066.9 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836060.9 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836054.8 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836048.7 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836042.7 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836036.6 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836030.5 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836024.5 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836018.4 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709)
3836012.3 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17092908)
3836006.2 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17092908) 0.00001 (17092908)
3836000.2 | 0.00001 (17122709) 0.00001 (17122709) 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17092908)
3835994.1 | 0.00001 (17122709) 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17092908) 0.00001 (17092908)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Y-COORD | X-COORD (METERS)
(METERS) | 395102.85

3836115.5 | 0.00001 (17092908)
3836109.4 | 0.00001 (17092908)
3836103.4 | 0.00001 (17092908)
3836097.3 | 0.00001 (17092908)
3836091.2 | 0.00001 (17092908)
3836085.1 | 0.00001 (17092908)
3836079.1 | 0.00001 (17092908)
3836073.0 | 0.00001 (17092908)
3836066.9 | 0.00001 (17092908)
3836060.9 | 0.00001 (17092908)
3836054.8 | 0.00001 (17092908)
3836048.7 | 0.00001 (17092908)
3836042.7 | 0.00001 (17092908)
3836036.6 | 0.00001 (17092908)
3836030.5 | 0.00001 (17092908)
3836024.5 | 0.00001 (17092908)
3836018.4 | 0.00001 (17092908)
3836012.3 | 0.00001 (17092908)
3836006.2 | 0.00001 (17092908)
3836000.2 | 0.00001 (17092908)
3835994.1 | 0.00001 (17092908)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395240.46	395250.52	395260.58	395270.64	395280.70
3837580.0	0.00000 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837540.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837501.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837462.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837422.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837383.5 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837344.2 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837304.9 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837265.6 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837226.3 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837186.9 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837147.6 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837108.3 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837069.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837029.7 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836990.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836951.1 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836911.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836872.5 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836833.2 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836793.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395290.76	395300.82	395310.88	395320.94	395331.00
3837580.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837540.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(18030708)
3837501.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837462.1 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837422.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837383.5 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837344.2 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837304.9 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837265.6 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837226.3 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837186.9 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837147.6 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837108.3 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837069.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3837029.7 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836990.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836951.1 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836911.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836872.5 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836833.2 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836793.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Y-COORD (METERS)	X-COORD (METERS) 395341.06	395351.12	395361.18	395371.24	395381.30	
3837580.0	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	
3837540.7	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	
3837501.4	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	
3837462.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	
3837422.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (18030708)	0.00001 (18030708)	
3837383.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837344.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837304.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837265.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837226.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837186.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837147.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837108.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837069.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3837029.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3836990.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3836951.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3836911.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3836872.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3836833.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	
3836793.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395391.36	395401.42	395411.48	395421.54	395431.60
3837580.0	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837540.7	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837501.4	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837462.1	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837422.8	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837383.5	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837344.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837304.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837265.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837226.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837186.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837147.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837108.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837069.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837029.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836990.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836951.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836911.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836872.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836833.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836793.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395441.66
3837580.0	0.00001 (18030708)
3837540.7	0.00001 (18030708)
3837501.4	0.00001 (18030708)
3837462.1	0.00001 (18030708)
3837422.8	0.00001 (18030708)
3837383.5	0.00001 (17121509)
3837344.2	0.00001 (17121509)
3837304.9	0.00001 (17121509)
3837265.6	0.00001 (17121509)
3837226.3	0.00001 (17121509)
3837186.9	0.00001 (17121509)
3837147.6	0.00001 (17121509)
3837108.3	0.00001 (17121509)
3837069.0	0.00001 (17121509)
3837029.7	0.00001 (17121509)
3836990.4	0.00001 (17121509)
3836951.1	0.00001 (17121509)
3836911.8	0.00001 (17121509)
3836872.5	0.00001 (17121509)
3836833.2	0.00001 (17121509)
3836793.8	0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Y-COORD (METERS)	X-COORD (METERS) 395039.27	395048.71	395058.15	395067.59	395077.03
3837187.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837167.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837148.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837129.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837109.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837090.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837070.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837051.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837032.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837012.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836993.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836974.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836954.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836935.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836916.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836896.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836877.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836858.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836838.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836819.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836800.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395086.47	395095.91	395105.35	395114.79	395124.23
3837187.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837167.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837148.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837129.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837109.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837090.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837070.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837051.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837032.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837012.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836993.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836974.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836954.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836935.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836916.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836896.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836877.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836858.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836838.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836819.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836800.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395133.67	395143.11	395152.55	395161.99	395171.43
3837187.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837167.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837148.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837129.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837109.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837090.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837070.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837051.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837032.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837012.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836993.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836974.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836954.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836935.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836916.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836896.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836877.4	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836858.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836838.7 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836819.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836800.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395180.87	395190.31	395199.75	395209.19	395218.63
3837187.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837167.7	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837148.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837129.0	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837109.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837090.3	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837070.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837051.6	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837032.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3837012.9	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836993.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836974.2	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836954.8	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836935.5	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)
3836916.1	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001 (17121509)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(17121509)
3836896.8 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836877.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836858.1 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836838.7 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836819.4 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)
3836800.0 | 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509) 0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD | X-COORD (METERS)
(METERS) | 395228.07

3837187.0 | 0.00001 (17121509)
3837167.7 | 0.00001 (17121509)
3837148.3 | 0.00001 (17121509)
3837129.0 | 0.00001 (17121509)
3837109.6 | 0.00001 (17121509)
3837090.3 | 0.00001 (17121509)
3837070.9 | 0.00001 (17121509)
3837051.6 | 0.00001 (17121509)
3837032.2 | 0.00001 (17121509)
3837012.9 | 0.00001 (17121509)
3836993.5 | 0.00001 (17121509)
3836974.2 | 0.00001 (17121509)
3836954.8 | 0.00001 (17121509)
3836935.5 | 0.00001 (17121509)
3836916.1 | 0.00001 (17121509)
3836896.8 | 0.00001 (17121509)
3836877.4 | 0.00001 (17121509)
3836858.1 | 0.00001 (17121509)
3836838.7 | 0.00001 (17121509)
3836819.4 | 0.00001 (17121509)
3836800.0 | 0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 394853.55	394899.98	394946.41	394992.84	395039.27
3837951.4	0.00000 (19010310)	0.00000 (19010310)	0.00000 (19010310)	0.00000 (19010310)	0.00000 (19010310)
3837933.8	0.00000 (17121509)	0.00000 (19010310)	0.00000 (19010310)	0.00000 (19010310)	0.00000 (19010310)
3837916.1	0.00000 (17121509)	0.00000 (19010310)	0.00000 (19010310)	0.00000 (19010310)	0.00000 (19010310)
3837898.5	0.00000 (17121509)	0.00000 (17121509)	0.00000 (19010310)	0.00000 (19010310)	0.00000 (19010310)
3837880.9	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (19010310)	0.00000 (19010310)
3837863.2	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (19010310)
3837845.6	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837827.9	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837810.3	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837792.7	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837775.0	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837757.4	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837739.7	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837722.1	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837704.5	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837686.8	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837669.2	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)
3837651.5	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837633.9 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509)
3837616.3 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509)
3837598.6 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395085.70	395132.13	395178.56	395224.99	395271.42
3837951.4	0.00000 (18030708)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837933.8	0.00000 (19010310)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837916.1	0.00000 (19010310)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837898.5	0.00000 (19010310)	0.00000 (18030708)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)
3837880.9	0.00000 (19010310)	0.00000 (18030708)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)
3837863.2	0.00000 (19010310)	0.00000 (18030708)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)
3837845.6	0.00000 (19010310)	0.00000 (19010310)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)
3837827.9	0.00000 (19010310)	0.00000 (19010310)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)
3837810.3	0.00000 (17121509)	0.00000 (19010310)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)
3837792.7	0.00000 (17121509)	0.00000 (17121509)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)
3837775.0	0.00000 (17121509)	0.00000 (17121509)	0.00000 (18030708)	0.00000 (18030708)	0.00001 (18030708)
3837757.4	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (18030708)	0.00001 (18030708)
3837739.7	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (18030708)	0.00001 (18030708)
3837722.1	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (18030708)	0.00001 (18030708)
3837704.5	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00000 (17121509)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(18030708)
3837686.8 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (18030708)
3837669.2 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (18030708)
3837651.5 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (18030708)
3837633.9 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509)
3837616.3 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509)
3837598.6 | 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00000 (17121509) 0.00001 (17121509)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395317.85	395364.28	395410.71	395457.14	395503.57
3837951.4	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837933.8	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837916.1	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837898.5	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837880.9	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837863.2	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837845.6	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (I8030708)
3837827.9	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837810.3	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837792.7	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)
3837775.0	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)	0.00001 (18030708)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837757.4 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837739.7 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837722.1 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837704.5 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837686.8 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837669.2 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837651.5 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837633.9 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837616.3 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)
3837598.6 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395550.00	395596.43	395642.86	395689.29	395735.72	
3837951.4	0.00001 (18030708)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	
3837933.8	0.00001 (18030708)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	
3837916.1	0.00001 (18030708)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	
3837898.5	0.00001 (18030708)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	
3837880.9	0.00001 (18030708)	0.00001 (18030708)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	
3837863.2	0.00001 (18030708)	0.00001 (18030708)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	
3837845.6	0.00001 (18030708)	0.00001 (18030708)	0.00001 (17101608)	0.00001 (17101608)	0.00001 (17101608)	
3837827.9	0.00001 (18030708)	0.00001 (18030708)	0.00001 (17101608)	0.00001 (17101608)	0.00001	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(17101608)
3837810.3 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837792.7 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837775.0 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837757.4 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837739.7 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837722.1 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837704.5 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837686.8 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837669.2 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)
3837651.5 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608)
3837633.9 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608)
3837616.3 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608)
3837598.6 | 0.00001 (18030708) 0.00001 (18030708) 0.00001 (17101608) 0.00001 (17101608) 0.00001 (17101608)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR DRY DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD | X-COORD (METERS)
(METERS) | 395782.15

3837951.4 | 0.00001 (17101608)
3837933.8 | 0.00001 (17101608)
3837916.1 | 0.00001 (17101608)
3837898.5 | 0.00001 (17101608)
3837880.9 | 0.00001 (17101608)
3837863.2 | 0.00001 (17101608)
3837845.6 | 0.00001 (17101608)
3837827.9 | 0.00001 (17101608)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837810.3 | 0.00001 (17101608)
3837792.7 | 0.00001 (17101608)
3837775.0 | 0.00001 (17101608)
3837757.4 | 0.00001 (17101608)
3837739.7 | 0.00001 (17101608)
3837722.1 | 0.00001 (17101608)
3837704.5 | 0.00001 (17101608)
3837686.8 | 0.00001 (17101608)
3837669.2 | 0.00001 (17101608)
3837651.5 | 0.00001 (17101608)
3837633.9 | 0.00001 (17101608)
3837616.3 | 0.00001 (17101608)
3837598.6 | 0.00001 (17101608)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 394846.05	394858.89	394871.73	394884.57	394897.41
3836115.5	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836109.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836103.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836097.3	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836091.2	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836085.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836079.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836073.0	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836066.9	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836060.9	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836054.8	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836048.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836042.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836036.6 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836030.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836024.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836018.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836012.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836006.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836000.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3835994.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 394910.25	394923.09	394935.93	394948.77	394961.61
3836115.5	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836109.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836103.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836097.3	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836091.2	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836085.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836079.1	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836073.0	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(19021405)
3836066.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836060.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836054.8 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836048.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836042.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836036.6 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836030.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836024.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836018.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836012.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836006.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836000.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3835994.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	394974.45	394987.29	395000.13	395012.97	395025.81
3836115.5	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836109.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836103.4	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836097.3	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836091.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836085.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836079.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836073.0 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836066.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836060.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836054.8 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836048.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836042.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836036.6 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836030.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836024.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836018.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836012.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836006.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836000.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3835994.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395038.65	395051.49	395064.33	395077.17	395090.01
3836115.5	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(19021405)
3836109.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836103.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836097.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836091.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836085.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836079.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836073.0 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836066.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836060.9 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836054.8 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836048.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836042.7 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836036.6 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836030.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836024.5 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836018.4 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836012.3 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836006.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3836000.2 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)
3835994.1 | 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405) 0.00001 (19021405)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,
*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395102.85
3836115.5	0.00001 (19021405)
3836109.4	0.00001 (19021405)
3836103.4	0.00001 (19021405)
3836097.3	0.00001 (19021405)
3836091.2	0.00001 (19021405)
3836085.1	0.00001 (19021405)
3836079.1	0.00001 (19021405)
3836073.0	0.00001 (19021405)
3836066.9	0.00001 (19021405)
3836060.9	0.00001 (19021405)
3836054.8	0.00001 (19021405)
3836048.7	0.00001 (19021405)
3836042.7	0.00001 (19021405)
3836036.6	0.00001 (19021405)
3836030.5	0.00001 (19021405)
3836024.5	0.00001 (19021405)
3836018.4	0.00001 (19021405)
3836012.3	0.00001 (19021405)
3836006.2	0.00001 (19021405)
3836000.2	0.00001 (19021405)
3835994.1	0.00001 (19021405)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395240.46	395250.52	395260.58	395270.64	395280.70
3837580.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837540.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837501.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837462.1	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837422.8 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837383.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837344.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837304.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837265.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837226.3 | 0.00000 (18120608) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837186.9 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837147.6 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837108.3 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837069.0 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837029.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836990.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836951.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836911.8 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836872.5 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836833.2 | 0.00001 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608)
3836793.8 | 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395290.76	395300.82	395310.88	395320.94	395331.00
3837580.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(20040607)
3837540.7 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837501.4 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837462.1 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837422.8 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837383.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837344.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837304.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837265.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837226.3 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837186.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837147.6 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (20040607) 0.00001 (20040607)
3837108.3 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837069.0 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837029.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836990.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836951.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836911.8 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00000 (18120608) 0.00000 (18120608)
3836872.5 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00000 (18120608) 0.00000 (18120608)
3836833.2 | 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608)
3836793.8 | 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,
*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395341.06	395351.12	395361.18	395371.24	395381.30
3837580.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837540.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837501.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837462.1	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837422.8	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837383.5	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837344.2	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837304.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837265.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837226.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837186.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837147.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837108.3	0.00001 (18120608)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837069.0	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (20040607)
3837029.7	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836990.4	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836951.1	0.00001 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)
3836911.8	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00000 (18120608)
3836872.5	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)
3836833.2	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (19021405)	0.00001 (19021405)
3836793.8	0.00000 (18120608)	0.00000 (18120608)	0.00000 (19021405)	0.00001 (19021405)	0.00001 (19021405)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395391.36	395401.42	395411.48	395421.54	395431.60
3837580.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837540.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837501.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837462.1	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837422.8	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837383.5	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837344.2	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837304.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837265.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837226.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837186.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837147.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837108.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837069.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837029.7	0.00001 (18120608)	0.00001 (18120608)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3836990.4	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (19021405)
3836951.1	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00001 (19021405)	0.00001 (19021405)
3836911.8	0.00000 (18120608)	0.00000 (18120608)	0.00000 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836872.5	0.00000 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836833.2	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)
3836793.8	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001 (19021405)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(19021405)
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395441.66
3837580.0	0.00001 (20040607)
3837540.7	0.00001 (20040607)
3837501.4	0.00001 (20040607)
3837462.1	0.00001 (20040607)
3837422.8	0.00001 (20040607)
3837383.5	0.00001 (20040607)
3837344.2	0.00001 (20040607)
3837304.9	0.00001 (20040607)
3837265.6	0.00001 (20040607)
3837226.3	0.00001 (20040607)
3837186.9	0.00001 (20040607)
3837147.6	0.00001 (20040607)
3837108.3	0.00001 (20040607)
3837069.0	0.00001 (20040607)
3837029.7	0.00001 (20040607)
3836990.4	0.00001 (19021405)
3836951.1	0.00001 (19021405)
3836911.8	0.00001 (19021405)
3836872.5	0.00001 (19021405)
3836833.2	0.00001 (19021405)
3836793.8	0.00001 (19021405)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395039.27	395048.71	395058.15	395067.59	395077.03
3837187.0	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)
3837167.7	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)
3837148.3	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (18120608)
3837129.0	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (18120608)
3837109.6	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (18120608)	0.00000 (18120608)
3837090.3	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (18120608)	0.00000 (18120608)
3837070.9	0.00000 (20040607)	0.00000 (20040607)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)
3837051.6	0.00000 (20040607)	0.00000 (20040607)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)
3837032.2	0.00000 (20040607)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)
3837012.9	0.00000 (20040607)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)
3836993.5	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)
3836974.2	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836954.8	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836935.5	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836916.1	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836896.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836877.4	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836858.1	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836838.7	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836819.4	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836800.0	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395086.47	395095.91	395105.35	395114.79	395124.23	
3837187.0	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000	(18120608)
3837167.7	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000	(18120608)
3837148.3	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000	(18120608)
3837129.0	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000	(18120608)
3837109.6	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000	(18120608)
3837090.3	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000	(18120608)
3837070.9	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00001	(18120608)
3837051.6	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3837032.2	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3837012.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836993.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836974.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836954.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836935.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836916.1	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836896.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836877.4	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836858.1	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836838.7	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836819.4	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001	(18120608)
3836800.0	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00000 (18120608)	0.00000	

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(18120608)
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395133.67	395143.11	395152.55	395161.99	395171.43
3837187.0	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)
3837167.7	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)
3837148.3	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)
3837129.0	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)
3837109.6	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837090.3	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837070.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837051.6	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837032.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837012.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836993.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836974.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836954.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836935.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836916.1	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836896.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836877.4	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836858.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608)
3836838.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836819.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836800.0 | 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00001 (18120608) 0.00000 (18120608)

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395180.87	395190.31	395199.75	395209.19	395218.63
3837187.0	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)
3837167.7	0.00000 (18120608)	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837148.3	0.00000 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837129.0	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837109.6	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837090.3	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837070.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837051.6	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837032.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837012.9	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836993.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836974.2	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836954.8	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3836935.5	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(18120608)
3836916.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836896.8 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836877.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836858.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836838.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3836819.4 | 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608)
3836800.0 | 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608) 0.00000 (18120608)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART3 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD | X-COORD (METERS)
(METERS) | 395228.07

3837187.0 | 0.00001 (18120608)
3837167.7 | 0.00001 (18120608)
3837148.3 | 0.00001 (18120608)
3837129.0 | 0.00001 (18120608)
3837109.6 | 0.00001 (18120608)
3837090.3 | 0.00001 (18120608)
3837070.9 | 0.00001 (18120608)
3837051.6 | 0.00001 (18120608)
3837032.2 | 0.00001 (18120608)
3837012.9 | 0.00001 (18120608)
3836993.5 | 0.00001 (18120608)
3836974.2 | 0.00001 (18120608)
3836954.8 | 0.00001 (18120608)
3836935.5 | 0.00001 (18120608)
3836916.1 | 0.00001 (18120608)
3836896.8 | 0.00001 (18120608)
3836877.4 | 0.00001 (18120608)
3836858.1 | 0.00001 (18120608)
3836838.7 | 0.00001 (18120608)
3836819.4 | 0.00000 (18120608)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3836800.0 | 0.00000 (18120608)
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 394853.55	394899.98	394946.41	394992.84	395039.27
3837951.4	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837933.8	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837916.1	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837898.5	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837880.9	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837863.2	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837845.6	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837827.9	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837810.3	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837792.7	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837775.0	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837757.4	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837739.7	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837722.1	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837704.5	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837686.8	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00001 (20040607)
3837669.2	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)	0.00000 (20040607)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837651.5 | 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607)
3837633.9 | 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607)
3837616.3 | 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607)
3837598.6 | 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607) 0.00000 (20040607)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS) 395085.70	395132.13	395178.56	395224.99	395271.42
3837951.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837933.8	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837916.1	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837898.5	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837880.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837863.2	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837845.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837827.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837810.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837792.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837775.0	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837757.4	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837739.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)
3837722.1	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001 (20040607)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(20040607)
3837704.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837686.8 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837669.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837651.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837633.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837616.3 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)
3837598.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395317.85	395364.28	395410.71	395457.14	395503.57
3837951.4	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837933.8	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837916.1	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837898.5	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837880.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837863.2	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837845.6	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837827.9	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837810.3	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)
3837792.7	0.00001 (20040607)	0.00001 (20040607)	0.00001 (21123004)	0.00001 (21123004)	0.00001 (21123004)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3837775.0 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004) 0.00001 (21123004)
3837757.4 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004) 0.00001 (21123004)
3837739.7 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004) 0.00001 (21123004)
3837722.1 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837704.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837686.8 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837669.2 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837651.5 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837633.9 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837616.3 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)
3837598.6 | 0.00001 (20040607) 0.00001 (20040607) 0.00001 (20040607) 0.00001 (21123004) 0.00001 (21123004)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD (METERS)	X-COORD (METERS)				
	395550.00	395596.43	395642.86	395689.29	395735.72
3837951.4	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837933.8	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837916.1	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837898.5	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837880.9	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837863.2	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)
3837845.6	0.00001 (21123004)	0.00001 (18120608)	0.00001 (18120608)	0.00001 (18120608)	0.00001

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

(18120608)
3837827.9 | 0.00001 (21123004) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837810.3 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837792.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837775.0 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837757.4 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837739.7 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837722.1 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837704.5 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837686.8 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837669.2 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837651.5 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837633.9 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837616.3 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)
3837598.6 | 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608) 0.00001 (18120608)

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR WET DEPOSITION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): PAREA1 ,

*** NETWORK ID: UCART4 ; NETWORK TYPE: GRIDCART ***

** DEPO OF DPM IN GRAMS/M**2 **

Y-COORD | X-COORD (METERS)
(METERS) | 395782.15

3837951.4 | 0.0000I (18120608)
3837933.8 | 0.00001 (18120608)
3837916.1 | 0.00001 (18120608)
3837898.5 | 0.00001 (18120608)
3837880.9 | 0.00001 (18120608)
3837863.2 | 0.00001 (18120608)

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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3837845.6 |    0.00001 (18120608)
3837827.9 |    0.00001 (18120608)
3837810.3 |    0.00001 (18120608)
3837792.7 |    0.00001 (18120608)
3837775.0 |    0.00001 (18120608)
3837757.4 |    0.00001 (18120608)
3837739.7 |    0.00001 (18120608)
3837722.1 |    0.00001 (18120608)
3837704.5 |    0.00001 (18120608)
3837686.8 |    0.00001 (18120608)
3837669.2 |    0.00001 (18120608)
3837651.5 |    0.00001 (18120608)
3837633.9 |    0.00001 (18120608)
3837616.3 |    0.00001 (18120608)
3837598.6 |    0.00001 (18120608)
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                          ***       08:45:15
                                                                  PAGE 164
*** MODELOPTs:  NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

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


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

                                                          NETWORK
GROUP ID                AVERAGE CONC          RECEPTOR  (XR, YR, ZELEV, ZHILL, ZFLAG)  OF TYPE
GRID-ID
------------------------------------------------------------------

ALL     1ST HIGHEST VALUE IS     0.03225 AT (  395441.66,  3836793.85,   744.90,   744.90,    0.00)  GC
UCART2
      2ND HIGHEST VALUE IS     0.03136 AT (  395431.60,  3836793.85,   744.90,   744.90,    0.00)  GC  UCART2
      3RD HIGHEST VALUE IS     0.03068 AT (  395421.54,  3836793.85,   744.80,   744.80,    0.00)  GC  UCART2
      4TH HIGHEST VALUE IS     0.02999 AT (  395411.48,  3836793.85,   744.80,   744.80,    0.00)  GC  UCART2
      5TH HIGHEST VALUE IS     0.02936 AT (  395401.42,  3836793.85,   744.80,   744.80,    0.00)  GC  UCART2
      6TH HIGHEST VALUE IS     0.02886 AT (  395391.36,  3836793.85,   744.70,   744.70,    0.00)  GC  UCART2
      7TH HIGHEST VALUE IS     0.02847 AT (  395381.30,  3836793.85,   744.50,   744.50,    0.00)  GC  UCART2
      8TH HIGHEST VALUE IS     0.02817 AT (  395371.24,  3836793.85,   744.20,   744.20,    0.00)  GC  UCART2
      9TH HIGHEST VALUE IS     0.02760 AT (  395441.66,  3836833.16,   744.30,   744.30,    0.00)  GC  UCART2
     10TH HIGHEST VALUE IS     0.02752 AT (  395361.18,  3836793.85,   744.40,   744.40,    0.00)  GC  UCART2


*** RECEPTOR TYPES:  GC = GRIDCART
                     GP = GRIDPOLR
                     DC = DISCCART
                     DP = DISCPOLR
  *** AERMOD - VERSION 24142  ***  *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***  ***                                          ***       08:45:15
                                                                  PAGE 165
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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

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

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	NETWORK RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE	GRID-ID
ALL	1ST HIGH VALUE IS	0.49907	ON 19060306: AT (395441.66, 3837304.88, 738.70, 738.70, 0.00) GC	UCART2

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15

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*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

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

** DEPO OF DPM IN GRAMS/M**2/YR **

GROUP ID	TOTAL DEPO	NETWORK RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE	GRID-ID
ALL	1ST HIGHEST VALUE IS	0.00257 AT (395441.66, 3836793.85, 744.90, 744.90, 0.00) GC	UCART2
	2ND HIGHEST VALUE IS	0.00242 AT (395431.60, 3836793.85, 744.90, 744.90, 0.00) GC	UCART2
	3RD HIGHEST VALUE IS	0.00232 AT (395441.66, 3836833.16, 744.30, 744.30, 0.00) GC	UCART2
	4TH HIGHEST VALUE IS	0.00231 AT (395421.54, 3836793.85, 744.80, 744.80, 0.00) GC	UCART2
	5TH HIGHEST VALUE IS	0.00221 AT (395411.48, 3836793.85, 744.80, 744.80, 0.00) GC	UCART2
	6TH HIGHEST VALUE IS	0.00217 AT (395441.66, 3836872.47, 743.80, 743.80, 0.00) GC	UCART2
	7TH HIGHEST VALUE IS	0.00216 AT (395431.60, 3836833.16, 744.00, 744.00, 0.00) GC	UCART2
	8TH HIGHEST VALUE IS	0.00213 AT (395401.42, 3836793.85, 744.80, 744.80, 0.00) GC	UCART2
	9TH HIGHEST VALUE IS	0.00208 AT (395102.85, 3836115.50, 748.90, 748.90, 0.00) GC	UCART1
	10TH HIGHEST VALUE IS	0.00207 AT (395441.66, 3836911.78, 743.40, 743.40, 0.00) GC	UCART2

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

DC = DISCCART
DP = DISCPOLR
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 167
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** DEPO OF DPM IN GRAMS/M**2 **

GROUP ID	TOTAL DEPO	DATE (YYMMDDHH)	NETWORK RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	GRID-ID
ALL	HIGH 1ST HIGH VALUE IS	0.00001	ON 18120608: AT (395782.15, 3837598.62, 737.00, 737.00, 0.00)	GC	UCART4

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 168
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

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

** DEPO OF DPM IN GRAMS/M**2/YR **

GROUP ID	DRY DEPO	NETWORK RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	GRID-ID
ALL	1ST HIGHEST VALUE IS	0.00254 AT (395441.66, 3836793.85, 744.90, 744.90, 0.00)	GC	UCART2
	2ND HIGHEST VALUE IS	0.00239 AT (395431.60, 3836793.85, 744.90, 744.90, 0.00)	GC	UCART2
	3RD HIGHEST VALUE IS	0.00228 AT (395441.66, 3836833.16, 744.30, 744.30, 0.00)	GC	UCART2
	4TH HIGHEST VALUE IS	0.00227 AT (395421.54, 3836793.85, 744.80, 744.80, 0.00)	GC	UCART2
	5TH HIGHEST VALUE IS	0.00218 AT (395411.48, 3836793.85, 744.80, 744.80, 0.00)	GC	UCART2
	6TH HIGHEST VALUE IS	0.00214 AT (395441.66, 3836872.47, 743.80, 743.80, 0.00)	GC	UCART2
	7TH HIGHEST VALUE IS	0.00212 AT (395431.60, 3836833.16, 744.00, 744.00, 0.00)	GC	UCART2
	8TH HIGHEST VALUE IS	0.00210 AT (395401.42, 3836793.85, 744.80, 744.80, 0.00)	GC	UCART2

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

9TH HIGHEST VALUE IS 0.00206 AT (395102.85, 3836115.50, 748.90, 748.90, 0.00) GC UCART1
10TH HIGHEST VALUE IS 0.00204 AT (395441.66, 3836911.78, 743.40, 743.40, 0.00) GC UCART2

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 169
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** DEPO OF DPM IN GRAMS/M**2 **

GROUP ID	DRY DEPO	DATE (YYMMDDHH)	NETWORK RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE GRID-ID
ALL	HIGH 1ST HIGH VALUE IS	0.00001 ON 17122709:	AT (394858.89, 3836115.50, 748.60, 748.60, 0.00) GC UCART1

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR Construction\ *** 10/31/25
*** AERMET - VERSION 21112 *** *** *** 08:45:15
PAGE 170
*** MODELOPTs: NonDFAULT CONC DEPOS DDEP WDEP ELEV DRYDPLT WETDPLT ALPHA URBAN ADJ_U*

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

** DEPO OF DPM IN GRAMS/M**2/YR **

GROUP ID	WET DEPO	NETWORK RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE GRID-ID
ALL	1ST HIGHEST VALUE IS	0.00004 AT (395431.60, 3836911.78, 742.90, 742.90, 0.00) GC UCART2
	2ND HIGHEST VALUE IS	0.00004 AT (395441.66, 3836951.09, 742.90, 742.90, 0.00) GC UCART2

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

```
3RD HIGHEST VALUE IS     0.00004 AT (  395421.54,  3836911.78,   743.10,   743.10,    0.00)  GC  UCART2
4TH HIGHEST VALUE IS     0.00004 AT (  395431.60,  3836951.09,   742.60,   742.60,    0.00)  GC  UCART2
5TH HIGHEST VALUE IS     0.00004 AT (  395441.66,  3836990.40,   742.60,   742.60,    0.00)  GC  UCART2
6TH HIGHEST VALUE IS     0.00004 AT (  395421.54,  3836951.09,   742.90,   742.90,    0.00)  GC  UCART2
7TH HIGHEST VALUE IS     0.00003 AT (  395431.60,  3836990.40,   742.40,   742.40,    0.00)  GC  UCART2
8TH HIGHEST VALUE IS     0.00003 AT (  395441.66,  3837029.71,   742.20,   742.20,    0.00)  GC  UCART2
9TH HIGHEST VALUE IS     0.00003 AT (  395421.54,  3836990.40,   742.30,   742.30,    0.00)  GC  UCART2
10TH HIGHEST VALUE IS    0.00003 AT (  395371.24,  3836911.78,   742.90,   742.90,    0.00)  GC  UCART2


*** RECEPTOR TYPES:  GC = GRIDCART
                     GP = GRIDPOLR
                     DC = DISCCART
                     DP = DISCPOLR
  *** AERMOD - VERSION 24142  ***   *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***   ***                                                ***       08:45:15
                                                                    PAGE 171
*** MODELOPTs:   NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

                                *** THE SUMMARY OF HIGHEST  1-HR RESULTS ***


                          ** DEPO OF DPM      IN GRAMS/M**2                    **

                                    DATE                                        NETWORK
GROUP ID                      WET DEPO    (YYMMDDHH)          RECEPTOR  (XR, YR, ZELEV, ZHILL,
ZFLAG)   OF TYPE  GRID-ID
-----------------------------------------------------------------------------

ALL     HIGH   1ST HIGH VALUE IS      0.00001  ON 18120608: AT (  395782.15,  3837598.62,   737.00,   737.00,
0.00)  GC  UCART4


*** RECEPTOR TYPES:  GC = GRIDCART
                     GP = GRIDPOLR
                     DC = DISCCART
                     DP = DISCPOLR
  *** AERMOD - VERSION 24142  ***   *** C:\Lakes\AERMOD View\15605 HRA Con\Parkway Village EIR
Construction\ ***       10/31/25
*** AERMET - VERSION  21112 ***   ***                                                ***       08:45:15
                                                                    PAGE 172
*** MODELOPTs:   NonDFAULT  CONC  DEPOS  DDEP  WDEP  ELEV  DRYDPLT  WETDPLT  ALPHA
URBAN  ADJ_U*

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

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

A Total of         0 Fatal Error Message(s)
A Total of         3 Warning Message(s)
A Total of      1556 Informational Message(s)
```

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

A Total of 43824 Hours Were Processed

A Total of 854 Calm Hours Identified

A Total of 702 Missing Hours Identified (1.60 Percent)

Met Data File Includes 752.40 Millimeters (29.622 Inches) of Precipitation

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

******** WARNING MESSAGES ********
CO W320 24 URBOPT: Input Parameter May Be Out-of-Range for Parameter URB-POP
ME W186 99 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
ME W187 99 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

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

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

HARP2 - HRACalc (dated 22118) 10/31/2025 1:05:10 PM - Output Log

GLCs loaded successfully
Pollutants loaded successfully
****
RISK SCENARIO SETTINGS

Receptor Type: Resident
Scenario: All
Calculation Method: Derived

****
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: -0.25
Total Exposure Duration: 3

Exposure Duration Bin Distribution
3rd Trimester Bin: 0.25
0<2 Years Bin: 2
2<9 Years Bin: 1
2<16 Years Bin: 0
16<30 Years Bin: 0
16 to 70 Years Bin: 0

****
PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments. The remaining pathways are only used for cancer and noncancer chronic assessments.

Inhalation: True
Soil: False
Dermal: False
Mother's milk: False
Water: False
Fish: False
Homegrown crops: False
Beef: False
Dairy: False
Pig: False
Chicken: False
Egg: False

****
INHALATION

Daily breathing rate: LongTerm24HR

Worker Adjustment Factors
Worker adjustment factors enabled: NO

Fraction at time at home

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

3rd Trimester to 16 years: OFF
16 years to 70 years: ON

****
TIER 2 SETTINGS

Tier2 adjustments were used in this assessment. Please see the input file for details.
Tier2 - What was changed: ED or start age changed|
Calculating cancer risk
Cancer risk saved to: C:\Users\jclar\OneDrive\Clark and Associates\Project 338 - ABJC - Parkway Village DEIR\Parkway Village 3 year RiskCancerRisk.csv
Calculating chronic risk
Chronic risk saved to: C:\Users\jclar\OneDrive\Clark and Associates\Project 338 - ABJC - Parkway Village DEIR\Parkway Village 3 year RiskNCChronicRisk.csv
Calculating acute risk
Acute risk saved to: C:\Users\jclar\OneDrive\Clark and Associates\Project 338 - ABJC - Parkway Village DEIR\Parkway Village 3 year RiskNCAcuteRisk.csv
HRA ran successfully

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

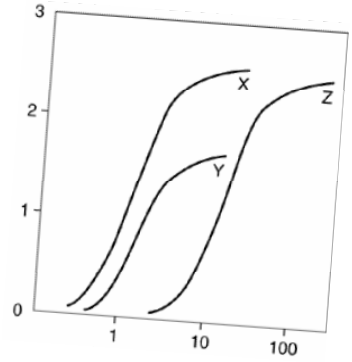
*HARP - HRACalc v22118 10/31/2025 1:05:10 PM - Cancer Risk - Input File: C:\Users\jclar\OneDrive\Clark and Associates\Project 338 - ABJC - Parkway Village DEIR\Parkway Village 3 year RiskHRAInput.hra

INDEX	GRP1	GRP2	POLID	POLABBREV	CONC	RISK_SUM	SCENARIO
1			9901	DieselExhPM	0.03225	1.2288e-05	3YrCancerDerived_Inh_FAH16to70

DETAILS	INH_RISK	SOIL_RISK	DERMAL_RISK	MMILK_RISK	WATER_RISK	FISH_RISK	CROP_RISK	BEEF_RISK	DAIRY_RISK
*	1.2288e-05	0.0e+00	0.0e+00	0.0e+00	0.0e+00	0.0e+00	0.0e+00	0.0e+00	0.0e+00

PIG_RISK	CHICKEN_RISK	EGG_RISK	1ST_DRIVER	2ND_DRIVER	PASTURE_CONC	FISH_CONC	WATER_CONC
0.0e+00	0.0e+00	0.0e+00	INHALATION		0.0e+00	0.0e+00	0.0e+00

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995
M.S., Environmental Health Science, University of California, 1993
B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litgation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Immanent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (M*t*BE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of M*t*BE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of M*t*BE, and is suspected to be the primary cause of M*t*BE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been were used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client –Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)
Association for Environmental Health and Sciences (AEHS)
American Chemical Society (ACS)
California Redevelopment Association (CRA)
International Society of Environmental Forensics (ISEF)
Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

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

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research.* 105:194-199.

Rosenfeld, P.E., **Clark, J. J.,** Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" Water Science & Technology. 55(5): 345-357.

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

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EXHIBIT B

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION
CALIFORNIA
WASHINGTON
NEW YORK

WI #25-001.48

November 10, 2025

Mr. Aidan P. Marshall
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

SUBJECT: Parkway Village Specific Plan DEIR
Lancaster, CA
Review and Comments on the Noise Impact Assessment

Dear Mr. Marshall,

Per your request, I have reviewed the subject matter documents for the Parkway Village Specific Plan Project (Project) Draft Environmental Impact Report (DEIR) in the City of Lancaster, California. The DEIR includes a noise analysis as Appendix D (Noise Technical Report). The project is a plan developed by the City of Lancaster to guide future development of 434.7 acres that will include development of residential neighborhoods, parks and recreational facilities, a school site, open space, and medical, office, and commercial uses. The DEIR and Noise Impact Assessment contain several errors and lack several items. These items are explored in more detail below.

Wilson Ihrig, Acoustical Consultants, has practiced exclusively in the field of acoustics since 1966. During our 59 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 utilize industry-standard acoustical programs such as Roadway Construction Noise Model (RCNM), SoundPLAN, and CadnaA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

Adverse Effects of Noise[1]

Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive.

Noise-Induced Hearing Loss. If a person is repeatedly exposed to loud noises, he or she may experience noise-induced hearing impairment or loss. In the United States, both the Occupational Health and Safety Administration (OSHA) and the National Institute for Occupational Safety and

[1] More information on these and other adverse effects of noise may be found in *Guidelines for Community Noise*, eds B Berglund, T Lindvall, and D Schwela, World Health Organization, Geneva, Switzerland, 1999. (https://iris.who.int/handle/10665/66217)

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Health (NIOSH) promote standards and regulations to protect the hearing of people exposed to high levels of industrial noise.

Speech Interference. Another common problem associated with noise is speech interference. In addition to the obvious issues that may arise from misunderstandings, speech interference also leads to problems with concentration fatigue, irritation, decreased working capacity, and automatic stress reactions. For complete speech intelligibility, the sound level of the speech should be 15 to 18 dBA higher than the background noise. Typical indoor speech levels are 45 to 50 dBA at 1 meter, so any noise above 30 dBA begins to interfere with speech intelligibility. The common reaction to higher background noise levels is to raise one's voice. If this is required persistently for long periods of time, stress reactions and irritation will likely result.

Sleep Disturbance. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as cognitive decline, increased fatigue, depressed mood, and decreased work performance.

Cardiovascular and Physiological Effects. Human's bodily reactions to noise are rooted in the "fight or flight" response that evolved when many noises signaled imminent danger. These include increased blood pressure, elevated heart rate, and vasoconstriction. Prolonged exposure to acute noises can result in permanent effects such as hypertension and heart disease.

Impaired Cognitive Performance. Studies have established that noise exposure impairs people's abilities to perform complex tasks (tasks that require attention to detail or analytical processes) and it makes reading, paying attention, solving problems, and memorizing more difficult. This is why there are standards for classroom background noise levels and why offices and libraries are designed to provide quiet work environments.

Baseline Noise is Not Properly Established

B03-65

Under the California Environmental Quality Act (CEQA), establishing baseline noise conditions is a critical step in evaluating the potential environmental impacts of a project. Baseline noise levels define the existing acoustic environment against which project-related noise impacts are measured. This baseline is typically determined through long-term noise monitoring, often expressed as the Community Noise Equivalent Level (CNEL) or the Day-Night Average Noise Level (Ldn). These metrics account for varying noise levels over a 24-hour period, with additional weighting applied to nighttime hours to reflect increased sensitivity to noise during those times. Without a comprehensive and representative set of noise measurements, it is impossible to accurately define the baseline noise conditions, which are essential for evaluating whether a project would result in a significant noise impact under CEQA guidelines.

The manner by which the DEIR determined the existing noise environment relies on seven short-term measurements conducted on a single weekday during the middle of the day. There is no discussion of how representative the noise results are at that time compared to a morning or evening period.

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The duration of noise measurements at each location ranged from 10 to 20 minutes, with the majority of measurements conducted over a 15-minute period. A single 15-minute measurement is not sufficient to establish a reasonable baseline, since daytime noise can vary by as much as 10 dBA throughout a day based on traffic patterns. **B03-65 (cont'd)**

Furthermore, the DEIR provides no evidence supporting the statement "Nighttime noise levels are typically 5-10 dBA lower than daytime noise levels." [pg. 9][2].

The omission of continuous, 24-hour noise data means that the baseline noise conditions for the Project remain undefined. Without establishing a reliable baseline for all times of the day and for 24-hour noise level descriptors such as CNEL, it is not possible to set an appropriate significance threshold or accurately assess potential noise impacts related to the project. This lack of data undermines the ability to make informed decisions regarding noise mitigation measures or to determine compliance with CEQA requirements, leaving the environmental review process incomplete and flawed.

To accurately assess baseline noise levels, the City must conduct properly documented ambient measurements near sensitive receptors that fully capture the current baseline conditions during full daytime and nighttime hours.

Potentially Significant and Unmitigated Construction Noise Impacts **B03-66**

The DEIR provides a table of typical construction equipment and compares the Lmax level of individual equipment at 50 feet to an 80 dBA Lmax limit at nearby residential land uses. The DEIR states that impacts from noise would be significant if construction-generated instantaneous noise levels exceed 15 dBA above the exterior noise objectives outlined in the City's Noise Compatible Land Use Objectives (e.g., 65 dBA for residential). The DEIR's significance threshold for "substantial increase" for Project construction noise is incomplete. CEQA Guidelines cited in the DEIR state that impacts to noise would be significant if the proposed project would result in "generation of a substantial temporary or permanent increase in ambient noise levels" [pg. 16]. Comparing noise generated by the Project to a fixed threshold (e.g. 65 dBA for residential) does not establish whether there is an increase over existing ambient noise levels. A relevant construction noise threshold to establish the increase over ambient levels would be based on the quietest daytime hour recorded within the anticipated hours of construction. The DEIR would then evaluate the increase over that level during Project construction. As noted above, if the baseline conditions are not adequately documented, the true magnitude of noise increases are not accurately assessed.

The DEIR also does not adequately quantify the noise reductions that would be achieved by proposed construction mitigation measures for potentially significant noise impacts from construction. The DEIR's mitigated construction noise levels assume "10 dB reduction for mufflers" as shown in the noise modeling and support documentation [Noise Technical Report Appendix A], and Mitigation Measure MM-NOI-1 of the DEIR requires all equipment be equipped with mufflers. While this is appropriate and standard practice, this will not reduce the noise levels relative to the unmitigated levels calculated for the DEIR because the calculations utilize the Federal Highway Administration's (FHWA) Roadway Construction Noise Model ("RCNM"), which accounts for mufflers. The bulk of the sound data in this model was obtained during the 1990s and 2000s during the Central Artery Tunnel

[2] Unless otherwise specified, all page numbers refer to Appendix D (Noise Technical Report).

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B03-66 (cont'd)

project in Boston ("The Big Dig"). By the 1990s, virtually all construction equipment was fit with mufflers, so the reference sound levels in the model already reflect noise reduction provided by those components. Prior to the RCNM, the most widely-disseminated data on construction equipment was published by the Environmental Protection Agency (EPA) in 1971. When that data was gathered in the late 1960s, mufflers were not in widespread use, so requiring a muffler as a mitigation measure in the 1970s could result in a substantial reduction in noise levels. Today, requiring that equipment be muffled simply ensures that noise levels are not unduly high because of faulty or missing components, but does not result in additional noise reductions on functioning equipment, as the DEIR assumes.

The DEIR underestimates the severity of construction noise levels. Short-term ambient levels used by the DEIR are 49 to 68 dBA at the project perimeter locations ST2, ST3, and ST4 near residential land uses [pg. 11]. As shown in Table 6, noise levels associated with the single loudest piece of construction equipment could reach up to 82 dBA Leq,1-hour at 50 feet, which is 33 dB higher than the existing noise measured at ST2, resulting in a significant increase over ambient levels. As shown in Figure 3-6 of the FTA Manual[3] (reproduced below), community reaction to newly introduced noise gets stronger as noise above existing levels increases. Reactions to increases between 5 to 10 dB varied from "widespread complaints" to "threats of legal action" and increases above 15 dB consistently result in "vigorous action." A 33-dB increase would likely result in "vigorous action."

Furthermore, construction noise is underestimated in the analysis since it does not consider the cumulative effect from simultaneous equipment operation. The total noise generated from operation of the two loudest pieces of equipment in any given hour would result in 85 dBA Leq,1-hour at 50 feet, an increase of 36 dB above the existing noise measured at ST2. If one were to apply +15 dB increase above ambient noise levels as a significance threshold (i.e. 64 dBA for ST2), the noise generated from both individual and combined construction equipment would result in significant impacts that would not be feasible to mitigate to less than significant levels.

The City must properly evaluate construction noise impacts for all anticipated activities, including the noise increase over ambient levels at sensitive receptor locations and the combined effects of multiple pieces of equipment operating simultaneously. If the increase is significant the Project must properly demonstrate mitigation measures to reduce the impacts to less than significant.

[3] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

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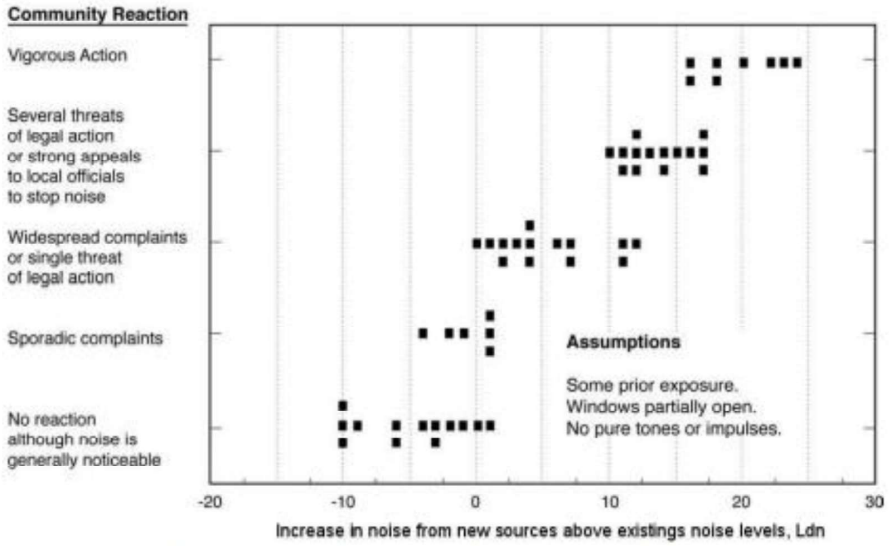


Figure 3-6 Community Reaction to New Noise, Relative to Existing Noise in a Residential Urban Environment

Figure 1 FTA Manual (FTA page 18)

B03-66 (cont'd)

Air Conditioning Noise Analysis Omissions

B03-67

For operational noise generated by the project from stationary sources, the DEIR's significance threshold is not based on existing ambient noise levels but rather based on Noise Compatible Land Use Objectives contained in the City of Lancaster's general plan. A more appropriate significance threshold would be based on within the anticipated 24-hours of operation.

The DEIR indicates typical residential air conditioning equipment would generate 60-65 dBA Leq, 1-hour at 3 feet [pg. 19]. According to the Specific Plan Public Review Draft, the minimum rear setback distance is 15 feet for residential Neighborhood (N) planning areas. At this minimum setback of 15 feet, a single residential air conditioning equipment would generate 51 dBA Leq, 1-hour at the nearest property line, which is higher than the existing midday noise of 49 dBA measured at ST2. If one were to assume nighttime ambient noise levels were 5-10 dBA lower than daytime noise levels, as the DEIR states [pg. 9], then a single residential air conditioning unit would exceed ambient nighttime noise levels by 7 to 12 dBA at the property line. This underscores why a more appropriate threshold would be based on the quietest nighttime hour, which better reflects the potential for sleep disturbance and community annoyance caused by elevated nighttime noise.

Furthermore, air conditioning and mechanical noise is underestimated in the analysis since it does not consider combined noise from multiple units. The DEIR uses a reference level of 65 dBA Leq at 3 feet for the residential-use air conditioners, and a reference level of 88 dBA Leq at 3 feet for commercial units, but implies that nearby receptors will be exposed to a single unit from the entire Parkway Village, which includes up to 3,462 residential units and 750,000+ square feet of commercial development.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

MM-NOI-2 of the DEIR requires an acoustical analysis to be prepared to evaluate commercial land use noise sources. Even if noise-reduction measures can reduce operational noise by 5 dB, as claimed by the DEIR, the noise analysis fails to demonstrate how noise will be mitigated to less than significant noise levels during nighttime conditions when ambient noise levels are lower and nearby residents would be more sensitive to noise. **B03-67 (cont'd)**

Potentially Unmitigated Significant Construction Vibration Impacts

Ground-borne vibration from construction equipment is calculated to exceed thresholds for human annoyance for structures located within 13 feet of onsite construction activities. MM-NOI-1 of the DEIR requires construction equipment and material staging areas to be located at the furthest distance possible from nearby residential land uses. Unless the DEIR can demonstrate that highest vibration-generating construction equipment will not be required within 13 feet of all nearby sensitive land uses, this mitigation measure is inadequate. **B03-68**

Traffic Analysis Missing Validation

The Environmental Noise Assessment relies on an old traffic noise model from the 1970s, FHWA RD-77-108, that has since been replaced by FHWA TNM v2.5 or v3.2. Common Caltrans practice accepts models that could be +/- 3 dBA off from actual conditions when used *with* validation measurements. The FHWA considers validation an important part of the noise model process[4] for correct use of the software. Such a program requires traffic inputs in the model to obtain noise levels. A typical approach is to build the model, validate that noise levels taken from a physical measurement match modeled levels taken from traffic counts obtained from a period as close as possible to the measurement date, and then use this validated model to predict noise levels for different traffic conditions. Caltrans requires measured and modeled locations to validate within 3 dB for highway projects to validate a noise model for this reason.[5] **B03-69**

No results of validation are presented. As such, there is no confirmation that the model is accurate and the conclusions regarding noise impacts in the DEIR are unsupported. Additionally, the omission of noise data over a 24-hour period means there is no reliable baseline for the CNEL, and it is not possible to validate the traffic noise analysis.

The Construction Assessment Does Not Consider the Use of Pile Driving

The DEIR states that "The use of major groundborne vibration-generating construction equipment/processes (i.e., blasting, pile driving) is not anticipated to be required for construction of future on-site land uses." [pg. 26] Pile driving, which has higher noise source levels than other pieces of equipment presented in Table 6, and higher vibration source levels than any other piece of equipment presented in Table 10, is not studied. Pile driving is only sometimes used in projects such as this one. However, that is not a guarantee that it wouldn't be. **B03-70**

According to the Specific Plan Public Review Draft, the Kaiser Permanente Expansion (Planning Area O) is planned for the development of medical offices, labs, or research institutions. Building that house these functions require special design considerations. One such design approach is the use of

[4] https://www.fhwa.dot.gov/Environment/noise/resources/reviewing_noise_analysis/#toc494123470, section 2.8
[5] https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/traffic-noise-protocol-april-2020-a11y.pdf Page E-1

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

B03-70 (cont'd)

foundations supported on piles or caissons to provide a stiff support and the required vibration performance for medical imaging equipment and research laboratory environments.

Based on our review, it is clear that the DEIR does not provide support for its assertion that no pile driving will be used. To support this finding, the City must provide more detailed information on what kind of foundation is anticipated for the medical use buildings. To ensure an accurate vibration assessment, the use of pile driving should either be prohibited as a condition of approval, or, if a pile driver is necessary for the construction of the Project, pile driving should be included in the construction noise and vibration impact evaluation at nearby receptors.

Conclusions

The DEIR fails to adequately document baseline ambient noise measurements, resulting in an incomplete evaluation of significant noise increases relative to existing conditions. The impact analysis appears to underestimate both construction-related noise and vibration levels, as well as operational noise impacts, due to the use of overly simplistic and unsubstantiated assumptions. Furthermore, the DEIR does not provide sufficient documentation to demonstrate that the proposed mitigation measures would effectively reduce all potential noise impacts to a level of less than significant. These deficiencies should be addressed and corrected in a revised DEIR.

Very truly yours,
WILSON IHRIG

Digitally signed by Silas J. Bensing
DN: C=US, E=sbensing@wilsonihrig.com, CN=Silas J. Bensing
Date: 2025.11.10 17:45:59-05'00'

Silas Bensing, INCE Bd. Cert.
Associate Principal

wilson ihrig comments on the parkway village deir noise analysis.docx

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION



SILAS BENSING, INCE Bd. Cert.

Associate Principal

Silas has been with Wilson Ihrig since 2008, specializing in projects related to construction noise and vibration, building vibration, environmental noise, and architectural/HVAC noise control. Silas has extensive experience in noise and vibration field measurements, including ground vibration propagation testing and modal analysis. He utilizes Finite Element Analysis (FEA) to predict vibration levels in soils and structures. He is skilled in S and environmental and transportation noise modeling using SoundPLAN, CadnaA, and TNM. e is an approved noise consultant under the NYC DEP noise code and a board-certified member of the Institute of Noise Control Engineering (NCE).

Education

- B.A., Audio Arts and Acoustics, Columbia College, Chicago, IL (2008)

Professional Memberships

• Acoustical Society of America (ASA)	Full Member
• nstitute of Noise Control Engineering (NCE)	Board Certified Member
• National Council of Acoustical Consultants (NCAC)	Board Member/Individual Member

Project Experience

California High-Speed Rail (CAHSR) EIR/EIS Caltrain Corridor: San Francisco to San Jose, CA
Prepared the noise analysis for the project's environmental impact assessment. Conducted existing ambient noise characterization, performed wayside noise prediction and evaluated noise impacts and mitigation. GIS and SoundPLAN operation.

Caltrain Electrification, San Mateo County Transit District, CA
Prepared the noise and vibration analysis for the project's environmental impact assessment. Tasks included characterizing the existing noise and vibration conditions and assessing noise and vibration from transit operations and construction-related activities.

Caltrans D7 and LACMTA State Route 710 North Environmental Study, Pasadena, CA
GIS work to support ground-borne noise and vibration screening analysis for tunnel alignments.

Bayview Waterfront DEIR San Francisco 49ers Stadium Operational Noise Study, CA
Developed SoundPLAN model to analyze noise impacts on the surrounding community.

New York MTA East Side Access / Long Island Railroad, NY
Consultation on multiple contracts. Work included review of the construction schedule and methods, estimates of noise levels from construction equipment, and preparation of site-specific construction noise plans outlining the control methods required to comply with project noise limits. Work also included monitoring plans and equipment noise emission certification testing.

PANYNJ World Trade Center Vehicle Security Facility, New York, NY
Prepared noise control plan, including noise calculations from construction equipment. Responsible for long-term noise compliance monitoring and preparation of weekly noise monitoring reports.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Kaiser Vallejo Building E Demolition, Vallejo, CA
Demolition of a building adjacent to a remaining hospital building. Made estimates of noise and vibration levels due to planned demolition work, and recommended practices for contractor to minimize noise and vibration-related disruptions on hospital occupants within the adjacent hospital building.

Stanford University Sports Facilities Public Address Noise Study, Palo Alto, CA
Assessment of noise ordinance compliance to closest residential receptors due to planned modernization of athletic facilities. Work included a review of conceptual design updates for sound amplification systems at a softball stadium and tennis center, calculations of noise levels from sound systems, and evaluation of local noise ordinance compliance taking into consideration the current existing ambient noise levels.

Bay Park Conveyance Noise Monitoring Plan, Nassau, NY
Prepared noise control and monitoring plan for construction work associated with microtunneling along an 11-mile-long corridor and construction of two pump stations. Identified noise-sensitive receivers within 500 feet of work and reviewed noise ordinances for five municipalities to identify site-specific noise limitations for each work site.

Fulton Municipal Manufactured Gas Plant Environment Remediation, Brooklyn, NY
Conducted a baseline noise and vibration study in the vicinity of planned Gowanus Canal remediation for the former MGP site, including long-term unattended and short-term noise and vibration measurements.

Gowanus Canal 4th Street Basin Dredging and Capping Pilot Study, Brooklyn, NY
Conducted pre-construction noise and vibration measurements and developed a monitoring plan with recommended noise and vibration thresholds. During pile driving and dredging activities, managed a continuous noise and vibration monitoring system with real-time alerts and weekly reports.

New York City Council Proposed Noise Code Amendment for Noise Monitoring Near Schools, NY
Reviewed and provided recommendations to attorney regarding Int. No. 420-2014, the proposed New York City Council amendment for construction noise monitoring near schools. The amendment would limit noise from construction activities inside classrooms and require monitoring of construction noise levels for construction sites within 75 feet of any public or private preschool, primary school, or secondary school.

PANYNJ Lincoln Tunnel Helix Structural Rehabilitation, NJ
Assisted in preparation of construction noise control and mitigation plan and implementing a remote long-term noise monitoring program at three locations. Performed noise measurements of nighttime construction activities in vicinity of sensitive receivers.

Queens-Midtown Tunnel Manhattan Exit Plaza Rehabilitation, New York, NY
Prepared a construction noise control plan for Contractor. Calculated noise from construction equipment and developed site-specific noise control measures.

San Rafael High School Construction Noise Plan, CA
Prepared construction noise reduction plan for a new two-story building. Tasks included noise calculations from equipment and report preparation.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Shri Guru Ravidas Sabha Construction Noise Plan, Union City, CA
Prepare construction noise and vibration control plan for new building. Tasks included noise and vibration calculations and report preparation.

Stanford University Construction Noise, Palo Alto, CA
Assisted Stanford planning department evaluate construction noise from planned projects.

State University of New York at Albany, Rehabilitation of Water Tower and Foundations, NY
Developed a noise and vibration control program for rehabilitation of the campus water tower and main fountain with recommended noise and vibration controls for surrounding academic buildings during construction. Installed a remote continuous noise monitoring system.

Jordan Ranch Residential Project, Dublin, CA
Prepared noise study report as required by California Code of Regulations Title 24 for two neighborhoods of the proposed residential project. Tasks included modeling future traffic noise levels using FHWA TNM and evaluating exterior-to-interior noise control.

Colorado State University Advanced Technology Lasers for Applications and Science (ATLAS) Facility, Fort Collins, CO
Acoustics and vibration design consultant of new laser research facility for ultrahigh power lasers, related laboratory spaces, and offices. Conducted vibration measurements at existing lab facilities and on the ground surface of future building. Developed finite element models to evaluate vibration performance of the pile-supported slab below the laser and target bays.

Cornell University New Experimental Hall, Ithaca, NY
Performed vibration measurements to characterize existing vibration conditions in current lab and synchrotron ring. Performed finite element modeling to evaluate the vibration response from the soil and foundations, and develop recommendations for foundation design to meet low vibration requirements for x-ray beamline experiments.

JFK Airport New Terminal One Phase B, New York, NY
Developed MEP system noise and vibration criteria and acoustical basis of design. Planned and conducted detailed environmental noise survey of existing conditions, including long-term and short-term noise measurements around the existing terminal.

Union City Sanitation District Admin Building / New Headquarters, CA
Acoustical design of new headquarters building. Issues addressed included acoustical isolation between spaces, interior acoustics of offices and conference rooms, interior HVAC noise control, and exterior noise control for rooftop HVAC equipment and emergency generator.

7-Eleven, New York, NY
Worked on multiple 7-Eleven projects in Manhattan (Avenue A, 1st Avenue, 23rd Street) involving the store's outdoor mechanical equipment and HVAC louvers near neighboring residences. Reviewed installed mechanical equipment and conducted field noise measurements to evaluate compliance with NYC noise code. Analyzed data, developed noise control options, and prepared a report of recommendations.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

St. Mary's Medical Center, San Francisco, CA
Developed 3D computer model using SoundPLAN to model noise from planned outdoor mechanical equipment. The model was used to predict noise levels in the surrounding neighborhood and develop options for noise control.

TYCO Electronics Mechanical Updates, Menlo Park CA
Developed 3D computer model using CadnaA to model noise from existing outdoor mechanical equipment, predict effects on noise levels from planned equipment upgrades and additions, and evaluate compliance with local noise legislation.

Research Papers

- "Surface construction vibration impacts on underground tunnels: Approaches for using measurements and finite-element modeling to predict vibration in the frequency and time domain" NOISE-CON24, New Orleans, LA, Pages 995 - 1435, pp. 1005-1018(14)
- "Transit-oriented development: A case study of exterior-to-interior noise control for buildings near transit and highway noise sources" J. Acoust. Soc. Am. 1 March 2024; 155 (3_Supplement): A130.
- "Vibration Modeling of Buildings with Composite Floors" NoiseCon23, Grand Rapids, MI, Pages 1-1097, pp.915-920(6).
- "Rail Transportation Passby Noise and Impact Evaluation, An Historical Perspective". Co-authored conference paper, NoiseCon19, San Diego, CA, pages 1-912, pp. 573-580(8).
- "GIS-Based Analysis of Track Mitigation". Presentation given at American Public Transportation Association (APTA) Track / Noise & Vibration technical forum meeting on 24 October 2019, Philadelphia, PA
- "Site Selection for Rail Vehicle Noise and Vibration Qualification Testing". Presentation given at American Public Transportation Association (APTA) Track / Noise & Vibration technical forum meeting on 27 April 2018, Chicago, IL
- "Speech Intelligibility Testing of Rail Transit Vehicle Passenger Information Systems". Presentation given at InterNoise15, San Francisco, CA, pages 5300-6257, pp. 5378-5385(8).
- "Modeling Wayside Noise from Transit Vehicles using 3-D Acoustical Software". Presentation given at American Public Transportation Association (APTA) 2015 Rail Conference in Salt Lake City, UT
- "Evaluation of the Effect of High-Speed Train Noise Source Heights on the Effectiveness of Wayside Noise Barriers and their Heights". Presentation given at InterNoise12, New York, NY, pages 7967-8958, pp. 8143-8153(11).
- "Application of GIS to Rail Transit Noise and Vibration Prediction". Presentation given at Esri User Conference, San Diego, CA, July 2012
- "Characterizing Ambient Noise and Vibration in Facilities Designed for Laboratory Animal Research" Co-authored conference paper, NoiseCon11, Portland, OR, pp. 1164-1173(10)
- "An Examination of Trackbed Sound Absorptive Panels for Minimizing Wayside Noise from Rail Transit". Co-authored conference paper, NoiseCon11, Portland, OR, pp. 139-150(12)
- "Potential Noise Impacts Associated with Concert Sound from a Proposed Football Stadium". Co-authored conference paper, ASA 161st meeting, 2011
- "Investigation of Traffic Noise from Additional Tolling Lanes at Portage Toll Plaza." A poster session presented at Acoustics '08 Paris, Paris, France 4 July 2008.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

EXHIBIT C

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

From: Swain, Jocelyn
To: Aidan P. Marshall; Garibay, Patti; Planning
Cc: Lorrie J. LeLe; Sheila M. Sannadan; Stenback, Kathleen
Subject: RE: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (8051)
Date: Thursday, October 30, 2025 4:30:42 PM
Attachments: [redacted].png
[redacted].png
[redacted].png
[redacted].png
[redacted].png
Preliminary [redacted]nalysis.pdf
Refer[redacted]List.pdf
Hazardous [redacted]nformation.pdf
Importance: High

Aidan,

Attached is the reference list from the Draft EIR. Most of the references already had the links included. I added links for other references and indicated which Appendices to the Draft EIR contained other references. I have also attached the preliminary traffic report and the hazardous materials information to this email. The City does not have access to the other references.

The City is willing to extend the comment period on the Draft EIR until November 10, 2025, but cannot extend it beyond that date.

Jocelyn

Jocelyn Swain
Senior Planner - Community Development

City of Lancaster
44933 Fern Ave. | Lancaster, CA 93534
T 661.723.6249
jswain@cityoflancasterca.gov | cityoflancasterca.gov

Creating a better tomorrow. Together.

From: Aidan P. Marshall <amarshall@adamsbroadwell.com>
Sent: Wednesday, October 29, 2025 4:36 PM
To: Garibay, Patti <pgaribay@cityoflancasterca.gov>; Planning <Planning@cityoflancasterca.gov>; Swain, Jocelyn <jswain@cityoflancasterca.gov>
Subject: RE: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (8051)

Some people who received this message don't often get email from amarshall@adamsbroadwell.com. Learn why this is important

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Good afternoon,

Please find attached correspondence regarding our request for immediate access to documents referenced in the Draft EIR. As the November 3rd comment deadline is soon approaching, we would appreciate a response to this letter as soon as possible. Please let me know if you have any questions.

Best,
Aidan

Aidan P. Marshall
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660
amarshall@adamsbroadwell.com

From: Aidan P. Marshall <amarshall@adamsbroadwell.com>
Sent: Tuesday, October 28, 2025 11:30 AM
To: Garibay, Patti <pgaribay@cityoflancasterca.gov>; Planning <planning@cityoflancasterca.gov>; Swain, Jocelyn <jswain@cityoflancasterca.gov>
Subject: RE: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (8051)

Good morning,

On behalf of CREED LA, I am following up on a request for immediate access to documents referenced in the Draft EIR regarding the Parkway Village Specific Plan, submitted on October 27, 9:50 AM. Per our letter, CEQA requires that all DEIR reference documents be made publicly available for the entire comment period. Public Resources Code § 21092(b)(1). Many documents referenced in the DEIR are currently unavailable, including the Project's transportation study, referenced in the DEIR as "Garland and Associates. 2024 (October). Traffic/Transportation Impact Analysis for the Proposed Parkway Village Specific Plan. City of Lancaster." Can you please advise how we can gain immediate access to all DEIR reference documents?

Thank you,
Aidan

Aidan P. Marshall
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

South San Francisco, CA 94080
(650) 589-1660
amarshall@adamsbroadwell.com

From: Lorrie J. LeLe
Sent: Monday, October 27, 2025 9:50 AM
To: pgaribay@cityoflancasterca.gov; planning@cityoflancasterca.gov; kstenback@cityoflancasterca.org; jswain@cityoflancasterca.gov
Cc: Ssannadan@adamsbroadwell.com
Subject: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (8051)

On behalf of Coalition for Responsible Equitable Economic Development Los Angeles, we submit the attached request for immediate access to documents referenced in the Draft EIR regarding the Parkway Village Specific Plan.

Please respond to Sheila Sannadan – ssannadan@adamsbroadwell.com

Thank you,

Lorrie J. Lele
Legal Assistant
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814
ljlele@adamsbroadwell.com | Phone: 916.444.6201 Ext. 10 | Fax: 916.444.6209|

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

EXHIBIT D

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

ADAMS BROADWELL JOSEPH & CARDOZO
A PROFESSIONAL CORPORATION
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KEVIN T. CARMICHAEL
CHRISTINA M. CARO
THOMAS A. ENSLOW
KELILAH D. FEDERMAN
RICHARD M. FRANCO
ANDREW J. GRAF
TANYA A. GULESSERIAN
DARION N. JOHNSTON
RACHAEL E. KOSS
AIDAN P. MARSHALL
ALAURA R. McGUIRE
ISABEL TAHIR

Of Counsel
DANIEL L. CARDOZO
MARC D. JOSEPH

October 29, 2025

VIA EMAIL AND OVERNIGHT MAIL
Patti Garibay, Director of Community Development
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534
Email: pgaribay@cityoflancasterca.gov;
planning@cityoflancasterca.gov

VIA EMAIL ONLY
Jocelyn Swain, Senior Planner
Email: jswain@cityoflancasterca.gov

Re: Request to Extend the Public Review and Comment Period for the Draft Environmental Impact Report - Parkway Village Specific Plan (SCH No. 2024020979)

Dear Ms. Garibay and Ms. Swain:

On behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"), we respectfully request that the City of Lancaster ("City") extend the public review and comment period on the Draft Environmental Impact Report ("DEIR") prepared for the Parkway Village Specific Plan (SCH No. 2024020979) ("Plan"). The current public comment period ends on November 3, 2025.[1] **CREED LA requests an extension of at least 30 days, the minimum public review period[2] set out in the California Environmental Quality Act ("CEQA")[3] due to the City's failure to provide access to DEIR reference documents during the entire public comment period.**

[1] City of Lancaster, Notice Of Availability, SCH No. 2024020979, September 19, 2025.
[2] Pub. Resources Code § 21091(a).
[3] Pub. Resources Code §21000 et seq.; California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 et seq.
8051-004

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

A. The City Has Not Made DEIR Reference Documents Available Throughout the Public Review Period, Necessitating an Extension of the Public Comment Period

The City has not made the DEIR's transportation/traffic study available for public review on CEQAnet or the City's website.[4] The study is referenced in the DEIR as "*Garland and Associates. 2024 (October). Traffic/Transportation Impact Analysis for the Proposed Parkway Village Specific Plan. City of Lancaster. [Available from the Lancaster City Community Development Department].*" Also unavailable are reference documents listed in the "References" sections of Appendices B and C. Several weblinks to reference documents are nonfunctional, including:

- "Rheem. 2019. RP15 Technical Specifications. Available at website URL: https://budgetheating.com/v/vspfiles/downloadables/RP15%20Technical%20Specifications.pdf"
- Marathon. 2022. Self-Contained Compactors RJ-250SC. Available at website URL: https://www.marathonequipment.com/wp-content/uploads/2022/09/Marathon-RJ-250SC-self-containedcompactor-brochure.pdf

On October 27, 2025, 9:50 A.M., CREED LA submitted a letter to the City ("DEIR References Request"), pursuant to CEQA section 21092(b)(1) and CEQA Guidelines section 15087(c)(5), requesting "immediate access to any and all documents referenced, incorporated by reference, and relied upon" in the DEIR.[5] On October 28, 2024, CREED LA emailed the City to follow up on the DEIR References Request and request immediate access to the transportation study.[6] As of the date of this letter, the City has not responded to the DEIR References Request or

[4] https://ceqanet.lci.ca.gov/2024020979/2 (last visited October 28, 2025); https://www.cityoflancasterca.org/our-city/departments-services/development-services/planning/environmental-review/environmental-impact-reports-eirs (last visited October 28, 2025). Screenshots attached as **Exhibit A**.
[5] **Exhibit B:** Letter from Adams, Broadwell, Joseph & Cardozo ("ABJC") to City re Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (SCH No. 2024020979) (October 27, 2025).
[6] **Exhibit C**: Email from ABJC to City re Request for Immediate Access to Documents Referenced in the Draft Environmental Impact (October 28, 2025, 11:30 A.M.).

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

CREED LA's email, and the transportation study has not been posted on CEQAnet or the City's website.

CEQA requires that "all documents referenced" – and the CEQA Guidelines require that "all documents incorporated by reference" – in a draft environmental impact report ("EIR") shall be "readily accessible to the public during the lead agency's normal working hours" during the entire public comment period.[7] Further, an EIR may not rely on hidden studies or documents that are not provided to the public.[8]

The courts have held that the failure to provide even a few pages of a CEQA documents for a portion of the CEQA review period invalidates the entire CEQA process, and that such a failure must be remedied by permitting additional public comment.[9] In *Ultramar v. South Coast Air Quality Management District*, the lead agency circulated an environmental assessment ("EA") for a 30-day public review period, mailing out copies of the draft EA to interested parties. However, the lead agency failed to include a single chapter of the EA in the copies distributed by mail.[10] The court stated that because the *complete* EA was not available for the full 30 days, "[t]he net effect of [the lead agency's] action was to deprive the public of the full 30-day comment period on the EA."[11] The court held that the lead agency's action violated Public Resources Code section 21091, subdivision (a), which mandates a minimum 30-day public review period.[12]

The City is in violation of these legal mandates because the DEIR makes key significance determinations based on studies that have not yet been made available for public review. For example, the DEIR's transportation analysis states "[t]his section is primarily based on the preliminary Traffic/Transportation Impact Analysis (TIA) for the PVSP, prepared by Garland Associates in October 2024."[13] The noise analysis states that "[e]xisting roadway traffic noise levels were

[7] Pub. Resources Code § 21092(b)(1); 14 Cal. Code Reg. § 15087(c)(5); *see Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.
[8] *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 ("Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.").
[9] *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.
[10] *Id.* at 697.
[11] *Id.* at 701.
[12] *Id.* at 702.
[13] DEIR, pg. 3.14-1.

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

calculated using the Federal Highway Administration (FHWA) Roadway Noise Prediction Model (FHWA RD-77-108) based, in part, on traffic data obtained from the traffic analysis prepared for this project (Garland, 2024)."[14] Failure to make the transportation study available during the comment period violates CEQA's requirement that all reference documents be readily accessible to the public throughout the comment period.

Accordingly, we respectfully request that the City extend the public review and comment period on the DEIR for at least 30 days from the date on which the City releases all reference documents for public review.

Sincerely,



Aidan P. Marshall

[14] DEIR, pg. 3.11-7.

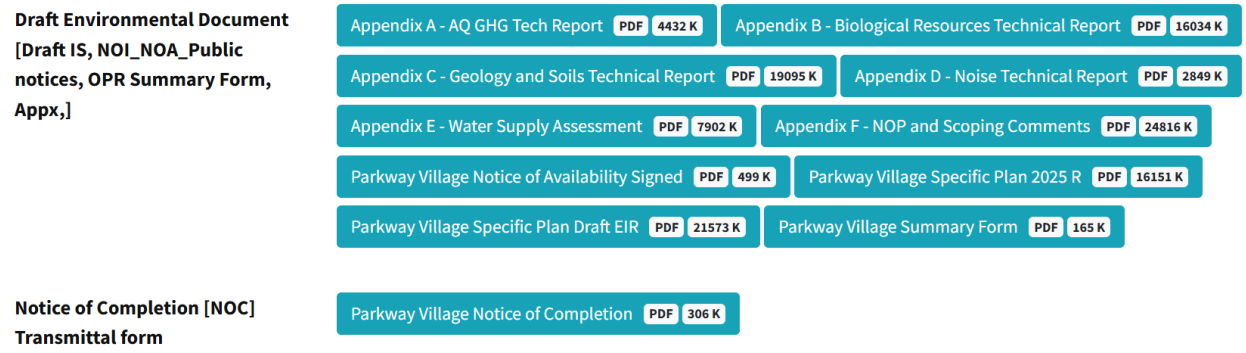
8051-004

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

EXHIBIT A

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Screenshot from https://ceqanet.lci.ca.gov/2024020979/2 (last visited October 29, 2025):



Screenshot from https://www.cityoflancasterca.org/our-city/departments-services/development-services/planning/environmental-review/environmental-impact-reports-eirs (last visited October 29, 2025):



Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

EXHIBIT B

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

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October 27, 2025

VIA EMAIL AND U.S. MAIL

Patti Garibay
Director of Community Development
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534
Email: pgaribay@cityoflancasterca.gov; planning@cityoflancasterca.gov

Kathleen Stenback, City Clerk
City of Lancaster
44933 Fern Avenue
Lancaster, California 93534
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VIA EMAIL ONLY

Jocelyn Swain, Senior Planner
Email: jswain@cityoflancasterca.gov

Re: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (SCH No. 2024020979)

Dear Ms. Garibay, Ms. Stenback, and Ms. Swain:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") to request ***immediate access*** to any and all documents referenced, incorporated by reference, and relied upon in the Draft Environmental Impact Report ("DEIR") prepared for the Parkway Village Specific Plan (SCH No. 2024020979) ("Plan"), proposed by the City of Lancaster ("Applicant"). *This request excludes a copy of the DEIR and any documents that are currently available on the City of Lancaster website, as of today's date*.[1]

The Plan site consists of approximately 435 acres in the central portion of the City of Lancaster, Los Angeles County, California. The Plan site is generally bound by Avenue K, Sierra Highway, 10th Street West, Avenue K-8, and the eastern side of the apartment complexes at approximately 6th Street West. The specific assessor parcel numbers (APNs) included within the Plan site include the following: 3128-001-005, -008, -009, - 015 thru -019, -021, -022; 3128-002-001 thru -005, -014, -17

[1] Accessed https://www.cityoflancasterca.org/our-city/departments-services/development-services/planning/environmental-review/environmental-impact-reports-eirs on October 27, 2025.

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

thru -020, -900, -901; 3128-004-011, -013, -17, -024, -025, -900, -902, -903; 3128-005-001 thru -038; 3128-006-001 thru -007, -009, -010, -017 thru -025, -027 thru -029, -031, -032, -046, -049 thru -052, -054 thru -060, -062, and -900 thru -906. The Montecito Apartment Complex at the northeast corner of Avenue L and 10th Street West and the gas station at the southeast corner of Avenue K-8 and 10th Street West are not part of the project site.

The Plan proposes land use and circulation plans for the area and presents development standards and regulations to guide future development of the land within the Plan area. The Plan includes 3,462 residential units, 130 hotel rooms in one or more hotels, 150,000 square feet (SF) of commercial uses in areas designated Town Center, 415,000 SF of office, medical office, assisted/supportive living, and uses supportive of office including restaurants, financial institutions, professional services, etc., in areas designated Business, 185,000 SF of commercial uses including indoor technical schools, fitness centers and gymnasiums in areas designated Workshop, 8.7 acres for school uses, 27.8 acres for parks of varying sizes, a 200-bed hospital and up to 500,000 SF of medical-related uses including skilled nursing and assisted living, and a 10.2 acre aquatic center.

Our request for ***immediate access*** to all documents referenced in the DEIR is made pursuant to the California Environmental Quality Act ("CEQA"), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire comment period.[2]

Please use the following contact information for all correspondence:

U.S. Mail
Sheila M. Sannadan Adams
Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
ssannadan@adamsbroadwell.com

[2] *See* Public Resources Code § 21092(b)(1) (stating that "all documents referenced in the draft environmental impact report" shall be made "available for review"); 14 Cal. Code Reg. § 15087(c)(5) (stating that all documents incorporated by reference in the EIR . . . shall be readily accessible to the public"); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007) (EIR must transparently incorporate and describe the reference materials relied on in its analysis); *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 ("[W]hatever is required to be considered in an EIR must be in that formal report. . ."), internal citations omitted.

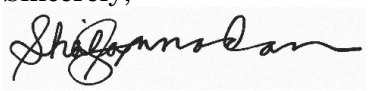
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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:ljl

8051-003j

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Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

EXHIBIT C

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

From: Aidan P. Marshall
To: Garibay, Patti; Planning; Swain, Jocelyn
Subject: RE: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (8051)
Date: Tuesday, October 28, 2025 11:29:00 AM

Good morning,

On behalf of CREED LA, I am following up on a request for immediate access to documents referenced in the Draft EIR regarding the Parkway Village Specific Plan, submitted on October 27, 9:50 AM. Per our letter, CEQA requires that all DEIR reference documents be made publicly available for the entire comment period. Public Resources Code § 21092(b)(1). Many documents referenced in the DEIR are currently unavailable, including the Project's transportation study, referenced in the DEIR as "Garland and Associates. 2024 (October). Traffic/Transportation Impact Analysis for the Proposed Parkway Village Specific Plan. City of Lancaster." Can you please advise how we can gain immediate access to all DEIR reference documents?

Thank you,
Aidan

Aidan P. Marshall
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South San Francisco, CA 94080
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amarshall@adamsbroadwell.com

From: Lorrie J. LeLe
Sent: Monday, October 27, 2025 9:50 AM
To: pgaribay@cityoflancasterca.gov; planning@cityoflancasterca.gov; kstenback@cityoflancasterca.org; jswain@cityoflancasterca.gov
Cc: Ssannadan@adamsbroadwell.com
Subject: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - Parkway Village Specific Plan (8051)

On behalf of Coalition for Responsible Equitable Economic Development Los Angeles, we submit the attached request for immediate access to documents referenced in the Draft EIR regarding the Parkway Village Specific Plan.

Please respond to Sheila Sannadan – ssannadan@adamsbroadwell.com

Thank you,

Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles (continued)

Lorrie J. Lele
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Responses to Comment Letter B03: Adams Broadwell Joseph & Cardoza representing Coalition for Responsible Equitable Economic Development (CREED) Los Angeles

B03-01 The commenter claims that the Draft EIR finds that the proposed Plan would result in significant air quality impacts, but that it fails to require all feasible mitigation. It also claims the construction of developments within the Plan area would generate significant amounts of toxic air contaminants (TACs) but does not analyze and mitigate nearby receptors exposure to TACs. The commenter also notes they conducted a quantitative health risk assessment (HRA), which concluded a cancer risk of 12.3 in one million, exceeding the City's threshold of 10 in one million.

As the lead agency, the City of Lancaster has the discretion to select significance thresholds to be used in the Draft EIR. The City utilizes the AVAQMD 2016 thresholds for air quality emissions (DEIR Table 3.3-3), and these thresholds are based on health risk data, scientific research, regulatory standards, and regionally relevant analysis. The AVAQMD, consistent with CEQA requirements, provides specific significance thresholds for criteria pollutants, greenhouse gases (GHGs), and toxic air contaminants (AVAQMD, 2016). The City's use of the AVAQMD thresholds is therefore supported by substantial evidence and represent a legally defensible benchmark for air quality impact review in the AVAQMD jurisdiction.

Further comments state that since diesel particulate matter (DPM) will be emitted during the construction phase, it should be evaluated whether those emissions pose a health risk to residents, and that since TAC may be emitted from diesel trucks and emergency generators, an HRA is required to quantify risks at the closest receptor to the project site. To bolster this assertion, the commenter completed their own health risk analysis of TAC emissions using the construction phase of the project as currently outlined in the Draft EIR Air Quality and GHG Technical Report. As noted in the Air Quality and GHG Technical Report, since the individual projects are not yet defined, nor are their timelines known, air quality and GHG emissions calculated were estimated broadly. As such, in order to gather a potential worst-day scenario, the typical phases of a normal construction project were analyzed, but rather than during a short, defined period, as a project-level EIR would do, each phase was considered over many years in order to also gather a reasonable GHG estimate. As such, the HRA conducted by the commenter, which used these calculations, lacks reasonability. The actual buildout of the Plan area would not include 20 years of constant construction across the entire 434.7 acres, as was assumed in the HRA. For clarity, the nearest receptor, by which the 12.3 in one million cancer risk was determined, would only be impacted by those projects near that portion of the site. The actual TAC exposure by that receptor would likely only be for a few years and would vary spatiotemporally from the estimated emissions in the Draft EIR appendix.

It should be noted that the proposed Plan includes a 20-year buildout period, during which the 434.7-acre site would be built out by numerous developers to include residential neighborhoods, parks and other recreational facilities, a school site, open space, medical, office, and commercial uses. The site would not be built all at once, but rather separate individual projects, subject to their own project-level CEQA review as needed, would be developed over the 20-year period. As outlined in the Air Quality and GHG Technical Report and Draft EIR, there is not enough known information to accurately or reasonably perform a quantitative HRA for the entire proposed Plan. Each project itself will be subject to CEQA, and as such, will be required to consider the exposure of sensitive receptors to TACs. If two projects near each other overlap in time, they will need to include the assessment of the cumulative impacts therein.

The details of this comment are also further discussed in Response to Comments (RTCs) B03-08, and B03-10 through B03-15.

B03-02 The commenter claims the Draft EIR does not disclose the health risk from exposure to Valley Fever spores. Additionally, the commenter expressed concern that the included Valley Fever mitigation in the Draft EIR is insufficient to protect nearby residences (B03-60).

The Draft EIR discusses Valley Fever in numerous instances, including page 19 of the Air Quality and GHG Technical Report, and pages 3.3-2, 3.3-3, 3.3-10, 3.3-11, and 3.3-12 of the Draft EIR. Additionally, Mitigation Measure MM AQ-3 Valley Fever Awareness and Prevention, includes almost two pages of mitigation related to Valley Fever before and during ground disturbance activities. This measure includes development of a "Valley Fever Training Handout", which the commenter mentions in a later comment. This measure was developed in conjunction with Los Angeles County Public Health to address Valley Fever in the Antelope Valley, specifically Lancaster, and adopted by the City of Lancaster Planning Commission. The commenter claims this is the only mitigation provided. However, the Draft EIR identifies the AVAQMD rules for prohibiting visible emissions (Rule 401) and for controlling fugitive dust (Rule 403), and these rules primarily ensure that dust is minimized, and soil does not become airborne. MM AQ-3 also includes a requirement that the project operator consult with the Los Angeles County Department of Public Health to develop a Valley Fever Dust Management Plan. This would be required to address the potential presence of the Coccidioides spores, and how to mitigate the potential of Coccidioidomycosis. As stated in MM AQ-3, prior to the issuance of any project level permits, the operator must submit the aforementioned plan to the County Department of Public Health to review and comment. As mentioned, this plan shall include construction-related mitigation to mitigate exposure both to the personnel, as well as the public. In regard to specific mitigation related only to public exposure, the mitigation measure includes installing equipment inspection stations at all access and egress points to examine vehicles and equipment for soil material prior to the equipment being moved offsite. It also includes a requirement that project operators work with a medical professional, in consultation with the County Department of Public Health, to develop an educational handout for on-site workers and surrounding residents up to three miles of the project site, and include the following information on Valley Fever: what are the potential sources/causes, what are the common symptoms, what are the options or remedies available should someone be experiencing these symptoms, and where testing for exposure is available.

AVAQMD Rule 403 and other dust control regulations are effective at decreasing exposure to Valley Fever by reducing PM10 and PM2.5 emissions and concentrations. While dust control regulations effectively reduce coarse particles from becoming airborne, fine particulate emissions via fugitive dust are also decreased by provisions such as pre-watering sites, applying water or soil stabilizers or constructing wind barriers to limit visible dust emissions.

B03-03 The commenter claims the Draft EIR incorrectly concludes that GHG impacts are "less than significant or non-existent." The Draft EIR impact statement of "less than significant" is not equivalent to a "non-existent" impact, and the Draft EIR does not assert the project would have a "non-existent" impact with regards to GHG emissions.

The comment references further comments (B03-19) that claim the project would be inconsistent with the Scoping Plan's attribute that guides development and land use policy toward developing on infill areas, and to refrain from converting "greenfield" land to urban uses (e.g., green belts and strategic conservation easements). The Draft EIR clearly shows that the Plan area is within the City limits, near the urban city core, and within the area covered by the Lancaster General Plan that is designed for the City's future growth. The proposed Plan would provide infill development opportunities for medical offices, and various commercial and residential usages. While the site may have previously been used for agricultural purposes, it no longer is an agricultural site, nor is it a greenbelt, nor a conservation plot. As such, the

proposed plan is not in conflict with this attribute of the Scoping Plan, and no further response is required.

B03-04 The commenter claims the Draft EIR does not analyze the proposed project's construction and operational energy consumption, and that there is insufficient investigation into energy conservation measures. Future comments further claim that the Draft EIR's energy analysis is incomplete and unsupported by substantial evidence (B03-27 – B03-34), conclusions regarding energy impacts are unsupported by substantial evidence (B03-35 – B03-36) and fails to include sufficient investigation into energy conservation measures (B03-37 – B03-43).

Energy consumption for the proposed project construction and operation would be highly estimated, as there is not enough information at this time to adequately determine energy consumption from area sources. However, energy consumption from estimated vehicle trips and construction offroad sources has been added to the EIR for informational purposes. In regard to energy conservation measures, MM AQ-1 Operational Area Source Emission Reduction Plan, which states that the Specific Plan shall implement energy efficient heating and cooling systems to decrease reliance on natural gas.

The following edits to Section 3.6, page 3.6-12 are included in the FEIR:

The short-term use of fuels by off-road equipment and motor vehicle trips during construction of each project within the Plan would be necessary to install new buildings and facilities. After full build-out, fuels would continue to be used for motor vehicle trips. As discussed in depth in EIR Section 3.3, Air Quality and Greenhouse Gases, total construction emissions would be 7,433 $MTCO_2e$, amortized over 20 years to 372 $MTCO_2e$ per year. Mitigated operational phase GHG emissions associated with mobile sources were estimated to be approximately 27,700 $MTCO_2e$ for the entire Plan area, including vehicle trips, at full build out. Combined, the total maximum annual GHG emissions were estimated to be 28,071 $MTCO_2e$. The volume of diesel consumed during construction and operation of the ~~PVSP~~Plan area can be estimated by using a general emission factor for diesel of 10.2 kilograms of CO_2 per gallon. Based on the mass of CO_2e emissions, implementation of the proposed Plan would result in the consumption of approximately 2.8 million gallons per year or 65,526 barrels per year of diesel fuel. To put these volumes into perspective, data from the California Energy Commission (CEC) indicates that California's refineries normally produce around 1.5 million barrels per week of diesel, 6.2 million barrels per week of gasoline, and 1.7 million gallons per week of jet fuel (CEC, 2025).

B03-05 The commenter claims the Draft EIR does not adequately analyze or mitigate noise impacts from both construction and operation of the proposed Plan. The commenter later claims the baseline noise levels reported in the Draft EIR are insufficient (Comments B03-44 – B03-47, B03-65), and the thresholds for construction and operation phase noise are not supported by evidence (B03-48 and B03-49). The commenter claims construction noise and vibration impacts are underestimated (B03-50, B03-51, B03-66, B03-69 – traffic analysis, B03-70 – pile driving), and that operation noise impacts are underestimated (B03-52, B03-67 – air conditioners). Lastly, the commenter states the mitigation for construction and operation noise impacts is insufficient (B03-53 - B03-55, B03-68, B03-56, B03-57).

The Draft EIR notes that the future-year buildout conditions could potentially exceed the City's noise standards for land use compatibility, and as such, the impact is considered significant. Mitigation Measure MM NOI-3 was suggested and requires that prior to a building permit being issued an acoustical analysis must be prepared to evaluate the compatibility of proposed residential land uses within the 65 dBA CNEL noise contour of the airport and other commercial land uses within the 70 dBA CNEL noise contour. Additionally, noise-reduction measures shall

be incorporated sufficiently to ensure that operational noise levels would not exceed applicable City noise standards at primarily affected existing land uses.

The commenter expresses concern that the baseline noise levels are insufficient due to the temporal nature of the short-term measurements made. The results of short-term noise measurements are clearly presented (Draft EIR Table 3.11-4) and supported by additional evidence on existing roadway traffic noise (Draft EIR Table 3.11-5), including baseline "existing year 2024" traffic noise levels shown for conditions without the project (Draft EIR Table 3.11-11). Additional details appear in the Noise Technical Report contained within Draft EIR Appendix D. Furthermore, the southeastern portion of the Plan area is located within the Palmdale Regional Airport/USAF Plant 42 Airport 65 dBA CNEL influence area (DEIR Figure 3.11-2). Accordingly, the Draft EIR clearly relies on evidence beyond short-term measurements. Collectively, this evidence adequately signifies that the baseline noise levels of the area are elevated.

The Draft EIR calculates existing roadway traffic noise levels using the Federal Highway Administration (FHWA) Roadway Noise Prediction Model (FHWA RD-77-108). The commenter claims this is an outdated traffic model. However, the Draft EIR uses the FHWA approach with California vehicle reference noise levels, and the City of Lancaster uses this noise prediction method in the General Plan EIR. Use of FHWA RD-77-108 with California vehicle reference noise levels is suitable for local jurisdictions where federal aid is not involved, and in the CEQA process the approach is widely used and has been accepted as standard for many years. No additional analysis of traffic noise would be necessary.

In regard to the construction vibration assessment, as noted in the Draft EIR, no existing historic or fragile structures were identified in the Plan area, and separate thresholds are used for evaluating the human response (Draft EIR Table 3.11-9). Groundborne vibration levels were considered to have a significant impact in terms of human annoyance if predicted levels would exceed 0.2 in/sec peak particle velocity (ppv). The threshold for human annoyance is much lower than the threshold of 0.5 in/sec ppv for structural damage (Draft EIR p. 3.11-16). Consistent with the impact statement, the analysis focuses on whether excessive levels of vibration could occur (Impact NOI-2). Excessive levels are avoidable, primarily by providing the greatest feasible distance in separating sources of vibration from residential receptors as required by the mitigation (MM NOI-1). While annoyance could still occur at some locations, depending on the sequencing of projects and the final site design, protections provided in the mitigation ensure that levels experienced by sensitive residential receptors would not be excessive. No additional analysis of construction vibration would be necessary.

Regarding the range of construction equipment analyzed, the Draft EIR analyzed the potential use of small and large bulldozers, loaded trucks, and jackhammers. As noted by the commenter, "pile driving is only sometimes used in projects such as this one", and as noted in the Draft EIR, blasting and pile driving are not anticipated to be required for the construction of future on-site land uses. The Draft EIR considers the possibility of soils in the area to be unstable or become unstable and concludes that soils of most of the area have low potential for liquefaction (Draft EIR p. 3.7-16). Additionally, compliance with the City Building Code includes provisions for soil testing, and implementation of MM GEO-1 would require a geotechnical investigation and compliance with geotechnical recommendations for each development within the Plan area. If geotechnical considerations dictate that an individual project must use pile driving or blasting, that individual project would need to consider the effects during the CEQA review process of that project, as applicable. As noted in the Draft EIR, this is not expected or anticipated, and as such was not included in the Specific Plan level Draft EIR.

B03-06 The commenter states the City did not provide timely access to the project transportation study nor a 30-day extension after receipt of the transportation study.

The review period for the Draft EIR was from September 19, 2025, through November 3, 2025. Late in the review period Adams Broadwell requested the transportation study (October 27, 2025) and the City provided the transportation study within three business days of receipt of the request, on October 30, 2025. In addition, the City extended the comment period to November 10th to allow additional time for review of the material. This created a 56-day review period. No other parties requested information from the City during the EIR review process. The time extension was considered adequate to accommodate review and comment and it was not necessary to add an additional 30 days to the review process. Additionally, the preliminary traffic study was not utilized to determine transportation impacts in the Draft EIR as traffic impacts are now based on VMT not Level of Service (LOS).

B03-07 The commenter states the Draft EIR does not include an accurate and complete project description and thus renders the entire analysis inadequate.

The commenter provides no information regarding how the project description is inadequate in their opinion. The Draft EIR provides a complete description of the proposed Specific Plan and the consequences of implementation of the Plan. The Specific Plan allows for a maximum amount of development within the Plan area and establishes development standards for individual types of uses and planning area. The Draft EIR is programmatic in nature as no individual projects have been proposed within the Plan area.

B03-08 The comment claims that components of the project could include emergency engines for fire water pump systems and emergency backup generators for planned medical and possibly some commercial projects. The commenter states that the Draft EIR's CalEEMod analysis of criteria air pollutants did not include emissions from backup generators. The commenter notes that due to the type of development in the Specific Plan, backup generators are a reasonably foreseeable activity that must be quantified.

Diesel backup generators emit criteria pollutants and DPM when they are powered on for qualified emergency events and during annual testing and maintenance. All diesel backup generators are required to be permitted by the AVAQMD which would impose limits on testing and require Tier 4 engines on all generators. The plan level does not provide enough detail to determine how many backup generators may be installed within the plan site as no development projects have been proposed at this time. Each individual project would be required to analyze the use of any generators via the individual project-level CEQA process (as applicable), and at the time of each project's build-out, would then be required to obtain a permit for each emergency backup generator. For these reasons, generator usage was not estimated in the Draft EIR.

However, estimated criteria pollutant emissions from potential generator usage have been added to the Final EIR for informational purposes. See RTC B03-64 for further discussion and edits.

B03-09 The commenter states that an EIR must fully disclose all potentially significant impacts and implement all feasible mitigation to reduce impacts to less than significant levels.

The commenter does not point to any undisclosed potentially significant impacts nor to any specific deficiency in mitigation measures. The Draft EIR discloses the potential impacts of implementing the Specific Plan and provides mitigation measures to reduce impacts to less than significant levels. No further response is necessary.

B03-10 The commenter notes that operational emissions for the proposed plan would be above thresholds for PM_{10}, CO, and VOC, and with the implementation of MM AQ-1, PM_{10} emissions would be mitigated to below applicable thresholds, however, VOC and CO would remain significant. The commenter claims the Draft EIR does not propose all feasible mitigation to minimize significant emissions. This comment is further discussed in RTC B03-59.

B03-11 The comment claims MM AQ-1 is vague and non-binding. MM AQ-1 has been edited as follows:

MM AQ-1 Operational Area Source Emission Reduction Plan. The PVSP ~~may~~ shall implement energy-efficient heating and cooling systems to decrease reliance on natural gas. This ~~may~~ shall include using electric alternatives in residences, including installing electric hearths and stoves instead of natural gas or wood stoves and hearths. Additionally, the project owner ~~may~~ shall utilize low VOC paints and cleaning supplies, as defined by the AVAQMD, where applicable.

B03-12 The commenter claims the Draft EIR insufficiently discloses health risks from project construction and operation. The comment indicates that operation of planned land uses could emit TACs and these emissions could cause health risks that were not quantified in the Draft EIR. This concern is addressed in EIR Appendix A. As a planned community, implementation of the Plan would not include industrial activities that would substantially contribute to HAP/TAC emissions. Specific Plan operation would not cause substantial HAP/TAC to be emitted from the types of stationary source facilities that involve industrial processes such as petroleum refining and chrome plating, or commercial operations such as gasoline stations or dry cleaners utilizing specific chemical processes that would be likely to trigger a site specific HRA. Industrial uses are not a permitted use within the Plan area. While not foreseeable or consistent with the project description, if these facilities are proposed, they would be subject to AVAQMD Rule 1401, which includes HRA requirements and the control of TAC emissions to ensure that substantial health risks are avoided. The following text has been added to Section 3-03, page 3.3-9.

Operation

PVSP operation would not cause substantial hazardous air pollutants (HAP) or toxic air contaminants (TAC) to be emitted from the types of stationary source facilities that involve industrial processes such as petroleum refining and chrome plating, or commercial operations such as gasoline stations or dry cleaners utilizing specific chemical processes that would be likely to trigger a site specific HRA. Industrial uses are not a permitted use within the Plan area. While not foreseeable or consistent with the project description, if these facilities are proposed, they would be subject to AVAQMD Rule 1401, which includes HRA requirements and the control of TAC emissions to ensure that substantial health risks are avoided.

As discussed in Impact AQ-2, the main contributor to threshold exceedances during operations is mobile sources. The Specific Plan would generate emissions from area, energy, and mobile sources, though the source of concern for exposing sensitive receptors to substantial pollutant concentrations would be mobile sources, and more specifically CO, VOC, and PM_{10} (Fugitive Dust) emissions. Impacts would be significant and unavoidable.

No further analysis of health risks from project construction or operation would be required.

B03-13 The commenter claims the Draft EIR should quantitatively disclose health risks from project construction and operation. In Draft EIR Appendix A Table AQ-4, a schedule for construction is estimated for the purpose of determining maximum potential daily and annual emissions. To conservatively estimate maximum annual emissions, the estimated schedule presumes that construction activities could occur across the entire Plan area, with site preparation and

grading within the first two calendar years (Table AQ-4 of Draft EIR Appendix A). This approach aligns with standard emissions estimating practices and ensures that the maximum annual rates of emissions are conservatively overpredicted. While these emissions estimates are appropriate for regional forecasting, the City does not anticipate that site preparation and grading of the entire Plan area could reasonably occur in the first two calendar years. Individual projects in the Specific Plan development would begin and complete construction throughout the 20-year period, with no current schedule. The timing of specific projects developed under the Specific Plan is unknown and depends on future actions by individual project developers (Draft EIR p. 3.1-2).

Because of the uncertain sequencing of the phases, the geographic distribution, duration of use, and rates of emissions from individual sources of DPM emissions are uncertain and not foreseeable. Because individual projects would occur throughout the Plan period and across the Plan area, quantitative analysis of health risks from one single construction effort would lead to misrepresentation of impacts. For these reasons, the EIR qualitatively addresses health risks from construction and operation. No further analysis of health risks from project construction or operation would be required.

See also the response to comment B03-01.

B03-14 The commenter claims the efficacy of MM AQ-2, which reduces engine exhaust emissions, is not substantiated by evidence due to the lack of a quantified HRA.

These claims are addressed in RTC B03-01.

B03-15 The comment refers to a quantitative health risk analysis that was prepared by a third-party specialist and submitted with the comment. The City did not independently verify the accuracy of the third-party analysis.

These claims are addressed in RTC B03-01 and B03-63.

B03-16 This comment is similar in nature and scope to comment B03-02.

Please see RTC B03-02.

B03-17 The comment states the Draft EIR fails to adequately analyze and mitigate greenhouse gas impacts.

This comment is addressed in comments B03-18 through B03-26.

B03-18 The comment claims the proposed Plan is inconsistent with the 2022 CARB Scoping Plan since the Draft EIR does not require electric vehicle charging infrastructure that meets the most ambitious voluntary standard in the California Green Building Standards Code.

Voluntary tiers in the California Green Building Standards Code may be adopted by local agencies, and after adoption, enforced by those agencies. Future development within the Plan area would be required to follow current standards and may implement voluntary standards as feasible. No revisions to the Draft EIR are necessary.

B03-19 The comment claims the proposed Plan would be inconsistent with the 2022 CARB Scoping Plan since it does not provide evidence that the proposed Plan is adequately served by existing utilities and claims as such it is inconsistent with the Scoping Plan attribute "providing: 'located on infill sites … presently served by existing utilities ….'"

As stated in the Draft EIR, and noted by the commenter, it is possible the development associated with the buildout of the Plan would potentially increase water demand and may result in the need for new or improved water and wastewater facilities. The proposed Plan

includes a 20-year buildout of a community of multiple land uses on a site surrounded by existing development. A Water Supply Assessment was also prepared for the project and determined that water would be available during normal, single-year, and multiple-dry year scenarios. Additionally, the Scoping Plan attribute partially quoted in the comment is located in Appendix D of the Scoping Plan which "includes recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." The Scoping Plan Appendix D is "not regulatory but is instead intended to provide clarification on specific topics requested by planners, CEQA practitioners, and community groups in response to challenges local jurisdictions face when implementing GHG reduction strategies or approving much-needed housing projects." The focus on utilizing infill housing developments is multi-beneficial, with Appendix D of the Scoping Plan noting that infill housing development "alleviates pressure to develop on the urban periphery, preserving natural and working lands and areas often at risk of wildfire." It additionally notes that land use strategies utilizing more compact development in these infill areas have the greatest potential to reduce VMT emissions and reduce combined housing, transportation, and infrastructure costs for residents and local governments. The more complete key project attribute quoted in the comment is suggested specifically for reduction of GHGs, primarily via VMT reduction, and is as follows: "Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)." The proposed Plan is not inconsistent with this attribute, which is in itself not regulatory in nature. The proposed Plan would provide infill development opportunities for medical offices, and various commercial and storage usages. No revisions to the Draft EIR are necessary.

B03-20 The comment states the proposed Plan would be inconsistent with the 2022 CARB Scoping Plan attribute to reduced GHG emissions by preserving natural and working lands by implementing policies that guide development toward infill areas and do not convert "greenfield" land to urban uses.

As noted by the comment, "greenfield" land includes land such as green belts and strategic conservation easements, of which the project site is neither, nor a related use. The comment states since the site was used agriculturally for less than 30 years over 50 years ago, and would be rezoned, it is inconsistent with this attribute. As the comment notes, this site is no longer used for agricultural purposes, is not a green belt nor conservation easement, and is located on a larger lot that includes urban development. Additionally, the Plan area is currently zoned for the Amargosa Creek Specific Plan (commercial and medical uses), Mixed Use – Employment and Mixed Use – Neighborhood. It is being rezoned to allow for similarly types of uses with specific development standards. The Draft EIR appropriately characterizes the site, and it is not inconsistent with this Scoping Plan attribute. No revisions to the Draft EIR are necessary.

B03-21 The comment claims the proposed Plan would be inconsistent with "transit-supportive densities" targeted in Appendix D of the Scoping Plan. The full attribute partially quoted in the comment is as follows: "Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS."

As noted in the Draft EIR Transportation Section 3.14, "Public transportation in the project area is provided by the Antelope Valley Transit Authority (AVTA). This agency operates several bus routes on the streets that run adjacent to the Plan area, and it has a transit center/park-

and-ride facility at Owen Memorial Park on the southwest corner of 10th Street West and Avenue K-8." This is directly across 10th Street West from the proposed Plan area. Additionally, the Plan allows for residential densities of up to 40 units to the acre and allows for the transfer of unused density from one planning area to another. This satisfies the attribute for proximity to existing transit stops, and as such the Plan is not inconsistent with this Scoping Plan attribute. No revisions to the Draft EIR are necessary.

B03-22 The comment claims the proposed Plan would be inconsistent with the Scoping Plan Appendix D attribute to reduce parking requirements.

As noted by the comment, the Draft EIR does not implement parking requirements. This attribute is intended to be adopted by local governments in order to reduce VMTs. The Plan area is located within a low VMT area (15% or more below the established threshold) and screens out of a detailed VMT analysis. (Draft EIR Transportation Section 3.14). No minimum parking standards were established for land uses within the Plan area as it is located within a half mile of high-quality transit and State law prohibits the establishment of minimum parking standards in these areas. The Draft EIR is not inconsistent with this attribute of the Scoping Plan. No revisions to the Draft EIR are necessary.

B03-23 The comment claims the proposed Plan would be inconsistent with Scoping Plan attributes regarding affordable units.

As noted by the comment, the Draft EIR does not implement affordable unit requirements. This attribute is intended to be adopted by local governments in order to reduce VMTs. The proposed Plan would not implement income-based housing requirements, and future development would be required to follow State and local laws and regulations regarding affordable housing units. Additionally, any property within the Plan area that is currently owned by the Lancaster Housing Authority would be required to comply with State law and a minimum of 25% of housing developed on said property would be required to be affordable. However, at this time no projects have been proposed within the Plan area. As such, the Draft EIR is not inconsistent with this attribute of the Scoping Plan. No revisions to the Draft EIR are necessary.

B03-24 The comment claims the proposed Plan would be inconsistent with the Scoping Plan attribute for using all-electric appliances.

The Draft EIR includes MM AQ-1, which, as the comment notes, states the Plan shall implement energy-efficient heating and cooling systems, for the intended purpose of decreasing natural gas reliance. The Scoping Plan attribute is intended to be adopted by local governments in order to increase building decarbonization, rather than to be applied on a project or plan-level. Future development within the proposed Plan area would be required to follow State and local laws and regulations regarding building electrification. The Draft EIR is not inconsistent with this attribute of the Scoping Plan. No revisions to the Draft EIR are necessary.

B03-25 The comment claims the Specific Plan would be inconsistent with the City of Lancaster Climate Action Plan and suggests that development in the Plan area should exceed energy efficiency standards.

The Draft EIR (Section 3.3, Air Quality and Greenhouse Gases, and Section 3.6, Energy) identifies the applicability of Title 24 California Building Code and Green Building Standards, and the analysis of Impact GHG-2 identifies applicable measures from the City's Climate Action Plan. The energy efficiency standards applicable in 2017 when the City adopted the Climate Action Plan would not apply to the Specific Plan, and current standards applicable to individual projects in the Plan area would achieve greater energy efficiency, which ensures that

development within the Plan area would be in alignment with the City's Climate Action Plan (Draft EIR p. 3.6-12). Measures for "transit-oriented" development would not apply to the Plan; however, the Plan area is located across 10th Street West from the City's transit center and park and ride allowing for easy access to transit options. No revisions to the Draft EIR are necessary.

B03-26 This comment concerns the consistency with the Climate Action Plan and whether a significant impact on the environment would occur with the generation of GHG emissions.

The Draft EIR (Section 3.3, Air Quality and Greenhouse Gases) addresses these concerns separately. The analysis of Impact GHG-2 identifies applicable measures from the Climate Action Plan, and no impact would occur (Impact GHG-2). This discussion is separate from the quantity of GHG emissions, which would not exceed the applicable threshold, and impacts on the environment would not be significant (Impact GHG-1). For both concerns, no mitigation would be required.

B03-27 The comment states the Draft EIR analysis in Section 3.6, Energy, is incomplete due to length and lack of quantitative analysis.

This comment is addressed in B03-04.

B03-28 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-29 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-30 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-31 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-32 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-33 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-34 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-35 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-36 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-37 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-38 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-39 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-40 The comment states the Draft EIR should analyze the feasibility of requiring future development at the plan site to meet numerous nonresidential CALGreen voluntary standards requiring specific EV charging parking requirements, roof deck insulation, and other measures associated with reducing energy consumption.

Future development within the proposed Plan area would be required to follow current standards and may implement voluntary standards as feasible. No revisions to the Draft EIR are necessary.

B03-41 The comment states the Draft EIR does not fully analyze the feasibility of onsite solar facilities.

As noted in the comment, the Draft EIR states development within the Plan would be required to comply with the City's Zero Net Energy Ordinance, mandating installation of solar system for each new home built, or payment of in lieu fees. Additionally, all development is required

to comply with the latest version of the CalGreen Building Code. Accordingly, the Plan would be in compliance with the applicable City ordinances, and no further response is required.

B03-42 The comment states the Draft EIR notes the Plan area would obtain electricity from Lancaster Energy/Lancaster Choice Energy, which provides electricity for residential and non-residential customers to opt in to purchasing up to 100% renewable energy, but that the Draft EIR does not require individual projects to opt into this program.

This assessment of the Lancaster Energy/Lancaster Choice Energy is not entirely accurate. All new uses are automatically enrolled in Lancaster Choice Energy, and there is an option for users to opt out of the program. In addition, projects in the Plan area would be required to comply with federal, State, and local rules and regulations as applicable at the time of construction. No revisions to the Draft EIR are necessary.

B03-43 This comment is similar in nature and scope to comment B03-04. Please see RTC B03-04.

B03-44 The comment claims the Draft EIR is inadequate in the analysis and mitigation of noise impacts in Section 3.11, Noise and Vibration.

This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-45 This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-46 This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-47 This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-48 This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-49 This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-50 This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-51 This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-52 The comment notes that operational noise from air conditioning units are estimated in the Draft EIR, which uses a reference level of 65 dBA Leq at 3 feet for residential air conditioning units, and 88 dBA Leq at 3 feet for commercial air conditioning units.

The effects of these types of noise sources are specifically considered, and the Draft EIR concludes air conditioning units associated with individual projects in the Plan area would not exceed the City's minimum exterior noise standard of 65 dBA (Impact NOI-1b). Implementation of the Plan with mitigation would require acoustical assessments for proposed land uses located within areas that could potentially exceed applicable City noise standards (MM NOI-2). No further analysis is necessary.

B03-53 The comment notes that the Draft EIR shows the construction phase of the build-out of the proposed Plan would generate noise levels that exceed the 80 dBA thresholds. The comment combines this assertion with concerns about portrayal of the baseline (addressed in RTC B03-05).

The Draft EIR identifies steps to reduce the impact to less than significant through MM-NOI-1 that provides feasible means of reducing the effects of construction noise. MM NOI-1 includes measures beyond only implementing exhaust mufflers. See RTC B03-54 for edits to MM NOI-1.

B03-54 This comment concerns the effectiveness of using mufflers with construction equipment and requiring noise barriers. The comment suggests analyzing the effectiveness and feasibility of requiring noise barriers between construction activities and receptors where feasible.

As noted in the Draft EIR, page 3.11-18 "Implementation of MM NOI-1 would reduce the potential for noise exposure, including the use of alternatively powered equipment, exhaust mufflers, and engine shrouds. Implementation of these noise-reduction features can reduce construction noise levels by approximately 10 dBA, or more (FHWA, 2017)." This comment is similar in nature and scope to comment B03-05 and B03-54. Please see RTC B03-05. No further analysis is necessary. The following edits have been made.

Edits to MM NOI-1, Section 3-11:

MM NOI-1 Reduce Short-Term Construction Noise. The following measures shall be implemented to reduce short-term construction noise impacts:

(a) The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.

(b) Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.

(c) Material stockpiles and mobile equipment staging, parking and maintenance areas shall be located as far away as practicable from noise-sensitive receptors.

(d) The use of noise producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.

(e) No project-related public address or music system shall be audible at any adjacent receptor.

(f) All noise producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specifications. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors, etc.) shall be equipped with shrouds and noise control features that are readily available for the type of equipment.

(g) Construction equipment shall be properly maintained and equipped with exhaust mufflers and engine shrouds in accordance with manufacturers' recommendations.

(h) When not in use, all construction equipment shall be turned off and shall not be allowed to idle. Provide clear signage that posts this requirement for workers at the entrances to the site.

(i) <u>Where feasible, noise barriers such as walls, berms, or a combination thereof, shall be used to reduce construction noise. Noise barriers must be large enough to prevent significant noise transmission and shield the receiver when possible.</u>

B03-55 This comment is similar in nature and scope to comment B03-05. Please see RTC B03-05.

B03-56 This comment concerns the operational noise of equipment that could be associated with individual projects in the Plan area (Impact NOI-1b).

The Draft EIR identifies mitigation (MM NOI-2) to ensure this impact would not exceed the applicable City standards. No further analysis is necessary.

B03-57 The comment suggests adding further mitigation to MM NOI-2 with regards to shielding noise-sensitive receptors from air conditioning units. The following edits have been made to Draft EIR Section 3-11.

MM NOI-2 Reduce Long-Term Noise Exposure from Stationary Equipment. Prior to the issuance of a building permit, an acoustical analysis shall be prepared to evaluate potential noise impacts associated with proposed commercial land uses. The analysis shall be performed by an individual with experience related to the assessment of noise-related impacts. The analysis shall, at a minimum, include an evaluation of commercial parking areas, commercial mechanical equipment (e.g., compactors, generators), air conditioning equipment, and material loading/unloading areas. Noise-reduction measures shall be incorporated sufficiently to ensure that operational noise levels would not exceed applicable City noise standards at primarily affected existing land uses (refer to Table 3.11-6). Such measures may include, but are not limited to, the installation of noise barriers, setbacks, ~~and~~ site design features, placing residential and non-residential air condition units shielded from nearby noise-sensitive receptors where feasible, and locating commercial air conditioning units on building rooftop areas shielded by rooftop parapets.

B03-58 The commenter states that the project (i.e., Plan) fails to provide affordable housing, in conflict General Plan Policies. The commenter cites various GP policy statements he feels the Specific Plan is not consistent with.

The Specific Plan is not intended to satisfy all aspects of the City's housing policies enumerated in the General Plan. It does provide for well over nearly 4,200 new residential units of various types. The number, type, and affordability of units would be determined at the time a development proposal is presented to the City. Additionally, any development proposed on parcels owned by the Lancaster Housing Authority would be required to provide at least 25% of the units as affordable in accordance with State law. Approximately 25 acres of the Parkway Village Specific Plan area are identified in the Housing Element towards meeting the as Regional Housing Needs Assessment (RHNA) at an assumed density of eight dwelling units per acre, thus the additional units provided for in the Parkway Village Specific Plan would be surplus. The Plan's goal is to develop a "village" atmosphere with a mix of uses, including a rich mix of housing types available to a broad spectrum of the City's population. In this regard, the plan is consistent with the General Plan and with local and state objectives regarding providing a range of housing, including affordable units.

B03-59 The comment states that MM AQ-1 is insufficient and the Plan does not require all feasible mitigation measures to reduce CO and VOC emissions from the operation phase.

After mitigation, VOC emissions would exceed the 25 ton per year threshold by 8.67 tons, and CO would exceed the 100 ton per year threshold by 9.39 tons. The comment suggests mitigation measures that focus on the use of low-VOC supplies, and low- or zero-emission landscaping equipment. Effective, April 2027, all landscaping equipment utilized by landscaping contractors would be required to be electric per the Lancaster Municipal Code. As it pertains to mobile source emissions, the comment suggests mitigation measures requiring specific electric vehicle charging infrastructure and preparation of a Transportation Demand Management Plan with the goal of reducing single occupant vehicles from employees. Most of the Plan area is designated for residential uses. Commercial uses within the Plan area and multi-family development would be required to install EV charging as required by the CalGreen Building Code. No modifications to mitigation measures are required.

B03-60 This comment is similar in nature and scope to comment B03-02. Please see RTC B03-02.

B03-61 The comment claims that a health risk assessment would be necessary to identify the potential health risks of DPM during construction. Please see RTC B03-12 and B03-13.

B03-62 The comment claims that a multi-step, quantitative, health risk analysis would be necessary to identify the potential health risks of HAP/TAC during construction and operation. Please see RTC B03-12 and B03-13.

B03-63 This comment provides the results of a third-party quantitative health risk analysis to determine that a maximum annual concentration of 0.03225 micrograms per cubic meter ($\mu g/m^3$) of DPM could occur at the residences to the west of the Plan area along West Avenue K-8 during the first three years of construction.

The City did not independently verify the accuracy of the third-party analysis. As noted in RTC B03-13, the DPM concentrations and health risks presented in the comment are likely to be an overprediction because, according to the comment, the results are based on conservatively high DPM emission rates from Draft EIR Appendix A. The DPM emission rates in Draft EIR Appendix A assume that the entire Plan area would be subject to site preparation and grading in the first two calendar years, or analysis years 2030 and 2031 (Table AQ-4 of EIR Appendix A). While these emissions estimates are appropriate for regional forecasting, the City does not anticipate that site preparation and grading of the entire 434.7-acre area could reasonably occur in the first two calendar years. Accordingly, actual DPM emission rates would be distributed at different rates and locations within the Plan area over the 25-year buildout schedule, with no current projects scheduled. The most foreseeable outcome of the project is that portions of the Plan area would undergo development in a phased sequence. As such, the quantitative analysis of construction phase health risks provided by the comment is an overprediction and a misrepresentation of project impacts. For these reasons, the Draft EIR qualitatively addresses health risks from construction, and no further analysis is required.

B03-64 This comment expresses concern that the Draft EIR notes the Plan buildout will include uses that are commercial, medial, educational, and residential, and as such, it could include emergency engines for fire water pump systems and emergency backup generators for medical and possibly some commercial projects. The comment states the air district may allow up to 100 operating hours per year for maintenance and testing purposes, and that the Draft EIR should quantify potential emissions associated with backup generators and fire water pumps.

As discussed in RTC B03-01, fire water pumps and backup generators would be analyzed at a project level when applicable, and at this stage, there is no specific proposal to install or use these types of emergency engines. Each project would undergo its own CEQA analysis and would be required to obtain a permit and estimate emissions associated with maintenance and testing of the engines for backup generators and fire pumps. For this reason, they were not included in the Plan level Draft EIR. However, for informational purposes, the EIR has been revised to include emissions for a high-level estimate of potential generator usage throughout the Plan site. Appendix A: Air Quality and GHG Technical Report, Attachment 1 has been revised. Page 1 is revised, and additional information is provided. These changes are indicated below.

Please also see RTC B03-08.

Edits to Air Quality and GHG Technical Report:

Operations-related emissions would be caused by area sources, energy use, and mobile sources from increased traffic. After the 20-year development of the site, there would be area sources and energy use from newly developed residences, offices, schools, parks, medical centers and more. Additionally, emissions would stem from increased traffic associated with new housing, offices, schools and retail.

Development of the PVSP would occur through implementation of individual projects. Each of which would contribute to the overall operational emissions of the PVSP, commencing when

each individual project starts operations. For this analysis, the estimated emissions from complete buildout and operation of the entire PVSP area were compared against the AVAQMD thresholds for individual projects. While the total number of diesel backup generators for the P~~p~~lan area are unknown, and each individual project would need to obtain a permit and quantify the emissions associated with the testing and maintenance of each generator, 5 diesel generators being tested for 100 hours per year were included for informational purposes and compared against the applicable annual threshold to be conservative. Operational emissions of PVSP development in year 2050 would exceed some of the thresholds. These thresholds are recommended by AVAQMD for use in project level evaluations and are shown here because AVAQMD does not have quantitative recommended thresholds for plan level evaluation. Table AQ-8 summarizes the maximum annual emissions rates anticipated after the proposed plan is fully built out.

Table AQ-8.Parkway Village Specific Plan: Operation, Annual Emissions without Mitigation

	Maximum Annual Emissions (tons/year)					
Source Type	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Mobile	17.70	12.51	115.00	0.32	14.70	3.91
Area	21.17	0.95	24.64	0.01	0.08	0.07
Energy	0.61	5.36	3.24	0.03	0.42	0.42
Generators	0.05	0.14	0.13	0.00	0.01	0.01
Maximum Total Emissions	39.54~~**39.49**~~	18.96~~**18.82**~~	143.01~~**142.88**~~	0.35~~**0.35**~~	15.21~~**15.20**~~	4.41~~**4.40**~~
AVAQMD Yearly Thresholds (Operation)	**25**	**25**	**100**	**25**	**15**	**12**
Exceedance (Y/N)	**Y**	**N**	**Y**	**N**	**Y**	**N**

Source: Attachment 1, AQ/GHG Calculations.[1]

Table AQ-9.Parkway Village Specific Plan: Operation, Annual Emissions with Mitigation

	Maximum Annual Emissions (tons/year)					
Source Type	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Mobile	16.54	11.69	107.45	0.29	13.74	3.65
Area	16.88	0.00	0.00	0.00	0.00	0.00
Energy	0.25	2.31	1.94	0.01	0.18	0.18
Generators	0.05	0.14	0.13	0.00	0.01	0.01
Maximum Total Emissions	33.72~~33.67~~	14.14~~14.00~~	109.51~~109.3~~	0.31~~0.31~~	13.92~~13.91~~	3.83~~3.82~~
AVAQMD Yearly Thresholds (Operation)	25	25	100	25	15	12
Exceedance (Y/N)	Y	N	Y	N	N	N

Source: Attachment 1, AQ/GHG Calculations.[1]

Edits to DEIR Section 3-03:

Development of the PVSP would occur through implementation of individual projects, each of which would contribute to the overall operational emissions of the PVSP, commencing when each individual project starts operations. For this analysis, the estimated emissions from complete buildout and operation of the entire PVSP site were compared against the AVAQMD thresholds for individual projects. While the total number of diesel backup generators for the

P~~p~~lan area are unknown, and each individual project would need to obtain a permit and quantify the emissions associated with the testing and maintenance of each generator, 5 diesel generators being tested for 100 hours per year were included for informational purposes and compared against the applicable annual threshold to be conservative. Operational emissions of PVSP development in year 2050 would exceed some of the thresholds. These thresholds are recommended by AVAQMD for use in project-level evaluations and are shown here because AVAQMD does not have quantitative recommended thresholds for plan-level evaluation. Table 3.3-6 summarizes the maximum annual emissions rates anticipated after the proposed plan is fully built out.

Table 3.3-6. Parkway Village Specific Plan: Operation, Annual Emissions without Mitigation

	Maximum Annual Emissions (tons/year)					
Source Type	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Mobile	17.70	12.51	115.00	0.32	14.70	3.91
Area	21.17	0.95	24.64	0.01	0.08	0.07
Energy	0.61	5.36	3.24	0.03	0.42	0.42
Generators	0.05	0.14	0.13	0.00	0.01	0.01
Maximum Total Emissions~~Maximum Total Emissions~~	39.54~~39.49~~	18.96~~18.82~~	143.01~~142.88~~	0.35~~0.35~~	15.21~~15.20~~	4.41~~4.40~~
AVAQMD Yearly Thresholds (Operation)	**25**	**25**	**100**	**25**	**15**	**12**
Exceedance (Y/N)	**Y**	**N**	**Y**	**N**	**Y**	**N**

Source: Appendix A, AQ/GHG Calculations.

Table 3.3-6 shows that the maximum annual emissions during operation would exceed the AVAQMD annual thresholds for VOCs, CO, and PM_{10}. The large increase in vehicular traffic attributed to population growth in the Plan area is mostly responsible for CO and PM_{10} exceedances, while area sources and transportation contribute to the VOC exceedance.

To reduce emissions associated with area sources, this analysis recommends Mitigation Measure AQ-1. Additionally, the project includes non-vehicular circulation, encouraging pedestrian circulation via sidewalks and bicycling through bike lanes. There will be sidewalks along all public streets, and bike lanes in street with classifications of collector and higher.

Table 3.3-7. Parkway Village Specific Plan: Operation, Annual Emissions with Mitigation

	Maximum Annual Emissions (tons/year)					
Source Type	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Mobile	16.54	11.69	107.45	0.29	13.74	3.65
Area	16.88	0.00	0.00	0.00	0.00	0.00
Energy	0.25	2.31	1.94	0.01	0.18	0.18
Generators	0.05	0.14	0.13	0.00	0.01	0.01
Maximum Total Emissions~~Maximum Total Emissions~~	33.72~~33.67~~	14.14~~14.00~~	109.51~~109.39~~	0.31~~0.31~~	13.92~~13.91~~	3.83~~3.82~~
AVAQMD Yearly Thresholds (Operation)	**25**	**25**	**100**	**25**	**15**	**12**

	Maximum Annual Emissions (tons/year)					
Source Type	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Exceedance (Y/N)	**Y**	**N**	**Y**	**N**	**N**	**N**

Source: Appendix A, AQ/GHG Calculations.

Edits to DEIR Section 3:

After a full build out of the project area, operational emissions including area, energy, and mobile sources would be approximately 45,623 MTCO2e/yr. When added to the amortized construction emissions, the total yearly GHG emissions would be approximately 45,995 MTCO2e which is below the AVAQMD threshold of 100,000 MTCO2e/yr, and as such, impacts would not be significant. *For informational purposes, CO2 emissions associated with potential backup generator testing and maintenance was estimated, and tabulated to be approximately 25 MTCO2e per year. While this estimate is for informational purposes, the addition of these emissions would not bring the unmitigated estimated PVSP GHG emissions above the AVAQMD threshold. Impacts would be less than significant.*

Edits to DEIR Appendix A:

Together, the unmitigated estimated PVSP GHG emissions would be 45,995 MTCO2e/yr. This would be below the AVAQMD threshold of 100,000 tons of CO2e (90,719 MT CO2e) per year. *For informational purposes, CO2 emissions associated with potential backup generator testing and maintenance was estimated and tabulated to be approximately 25 MTCO2e per year. While this estimate is for informational purposes, the addition of these emissions would not bring the unmitigated estimated PVSP GHG emissions above the AVAQMD threshold.*

Edits to DEIR Appendix A, Attachment 1 are provided below.

Air Pollutant Emissions

Maximum Construction Emissions						
Daily	VOC	NOx	CO	SOx	PM10	PM2.5
	lbs/day					
	23.62	**26.44**	**31.71**	**0.07**	**80.41**	**17.17**
Annual	VOC	NOx	CO	SOx	PM10	PM2.5
	tons/year					
	3.08	**3.26**	**3.95**	**0.01**	**9.62**	**1.84**

Maximum Operation Emissions Unmitigated						
Daily	VOC	NOx	CO	SOx	PM10	PM2.5
	lbs/day					
Mobile	117.22	70.89	809.04	2.05	89.95	23.88
Area	133.54	20.32	277.96	0.13	1.67	1.62
Energy	3.35	29.37	17.75	0.18	2.31	2.31
Generators	0.97	2.75	2.51	0.00	0.14	0.14
Total	**255.07**	**123.34**	**1107.27**	**2.37**	**94.08**	**27.96**
Annual	VOC	NOx	CO	SOx	PM10	PM2.5
	tons/year					
Mobile	17.70	12.51	115.00	0.32	14.70	3.91
Area	21.17	0.95	24.64	0.01	0.08	0.07
Energy	0.61	5.36	3.24	0.03	0.42	0.42
Generators	0.05	0.14	0.13	0.00	0.01	0.01
Total	**39.54**	**18.96**	**143.01**	**0.35**	**15.21**	**4.41**

Maximum Operation Emissions Mitigated						
Daily	VOC	NOx	CO	SOx	PM10	PM2.5
	lbs/day					
Mobile	109.52	66.24	755.93	1.92	84.04	22.32
Area	92.47	0.00	0.00	0.00	0.00	0.00
Energy	1.39	12.67	10.64	0.08	0.96	0.96
Generators	0.97	2.75	2.51	0.00	0.14	0.14
Total	**204.35**	**81.66**	**769.08**	**2.00**	**85.15**	**23.42**
Annual	VOC	NOx	CO	SOx	PM10	PM2.5
	tons/year					
Mobile	16.54	11.69	107.45	0.29	13.74	3.65
Area	16.88	0.00	0.00	0.00	0.00	0.00
Energy	0.25	2.31	1.94	0.01	0.18	0.18
Generators	0.05	0.14	0.13	0.00	0.01	0.01
Total	**33.72**	**14.14**	**109.51**	**0.31**	**13.92**	**3.83**

Operational - Stationary Sources

Stationary Sources: Proposed Emergency Backup Generator Engine

Diesel, emergency use only
Sponsor 3/8/2019: new diesel generator @ 450 kW with a diesel particulate filter; offroad CI generator engine.

450 kW, genset
5 number of engines
600 hp
100 hours/year
Emergency Use only (ATCM compliant) 0.73 load factor, CalEEMod default

	(g/hp-hr)		Hourly (lb/hr)		Annual (ton/yr)
NMHC	1	ROG (as NMHC)	0.966	ROG	0.048
NOx	2.85	NOx	2.752	NOx	0.138
CO	2.6	CO	2.511	CO	0.126
SOx	0.005	SOx	0.005	SOx	0.000
PM	0.15	PM10/PM2.5	0.145	PM10/PM2.5	0.007
CO2	522	CO2	504.048	CO2	25.202

B03-65 This comment concerns baseline noise levels. Please see RTC B03-05.

B03-66 This comment concerns construction noise sources.

The Draft EIR analysis for construction noise (Impact NOI-1a) includes the full range of construction equipment that could potentially generate noise during development of individual projects. This impact also anticipates the potential for increased levels of annoyance to receptors in close proximity of construction, which depends on the sequencing of projects and the final site design. Noise-reduction measures (MM NOI-1) would be incorporated to demonstrate consistency with the City's ordinances and noise standards for land use compatibility. Please also see RTC B03-05.

B03-67 This comment concerns operational noise levels resulting from air conditioning. The analysis (Impact NOI-1b) specifically analyzes the impacts from this category of potential noise sources. Implementation of the Specific Plan with mitigation would require acoustical assessments for proposed land uses located within areas that could potentially exceed applicable City noise standards (MM NOI-2). Additionally, all ground mounted and rooftop equipment, including HVAC units, are required to be screened from view per the City of Lancaster's Municipal Code.

B03-68 This comment concerns the potential for human annoyance due to construction vibration. Please see RTC B03-05.

B03-69 This comment concerns the approach taken by the Draft EIR in consideration of potential traffic noise levels.

The City of Lancaster uses FHWA RD-77-108 with California vehicle reference noise levels as the noise prediction method in the General Plan EIR, and use of this approach is suitable for local jurisdictions where federal aid is not involved. Please also see RTC B03-05.

B03-70 This comment concerns the potential for pile driving as a means of foundation construction. Please see RTC B03-05.

Comment Letter C01: Charles Fricke

From:	Charles Fricke
To:	Swain, Jocelyn
Subject:	Comment and Support for Parkway Village Specific Plan Friday,
Date:	October 3, 2025 6:37:42 PM

To Jocelyn Swain, Senior Planner and the City of Lancaster,

As a nearby resident of this proposed development, and as a regular voter, I am in **support** of the Parkway Village Specific Plan.

A recommendation would be to increase the maximum amount of residential units of allowable by increasing housing density and number of residential units the Parkway Village Specific Plan (SCH#2024020979) from 4,246 to 5,000 at minimum, with increasing density of the parcels or rezoning some of the commercial space to residential space. Increasing housing density lessens environmental impact of human activities, including GHG emissions, residential and transportation energy usage, and encourages transportation usages that are not car-centric. Increasing housing density would also encourage use and development of the Sierra highway bike corridor and support active movement to improve health equity in the city of Lancaster. Finally, more housing would allow for more use of the available commercial amenities and malls present on Avenue K and on 10th street. **C01-1**

Thank you,

Charles Fricke

43223 Gadsden Ave APT 65

Lancaster, CA 93534

Responses to Comment Letter C01: Charles Fricke

C01-1 The commenter supports the Specific Plan and recommends increasing the maximum number of residential units allowed under the Specific Plan from 4,246 to 5,000 at a minimum.

The City is appreciative of the support of the Specific Plan and the increase in the amount of residential units permitted. The Specific Plan allows for residential densities varying by planning area up to 40 units per acre. This exceeds the City's current zoning which allows for maximum of 30 units to the acre in the High Density Residential (HDR) zone although the City's Municipal Code does have a provision in which multi-family developments in the HDR can go up to 50 units to the acre with a conditional use permit.

To date, no development project has neared a 30-unit to the acre density, nor have they requested the provision to go up to 50 units to the acre. Additionally, the average residential density for multi-family developments within the City has been 22 units per acre. These densities are exclusive of density bonus provisions which can still be requested. The Plan is taking an incremental step of increasing the City's land use efficiencies while maintaining a plan that is desirable for builders and residents alike.

Additionally, the Plan contains provisions that would allow a developer to shift unused density from one planning area to another in exchange for developing additional amenities within the Plan area beyond what is required for their specific project.

2.3. Errata

All changes to Draft EIR text and mitigation measures are noted in Section 2.2 Response to Comments, above, with one exception. The Water Supply Assessment (WSA) provided in the Draft EIR as Appendix E has been updated and is undergoing review by the Los Angeles County Board of Supervisors. The updated WSA does not change any conclusions in the Draft EIR and no revisions to EIR text or mitigation measures are required. The updated WSA is provided in the Final EIR as Appendix A.