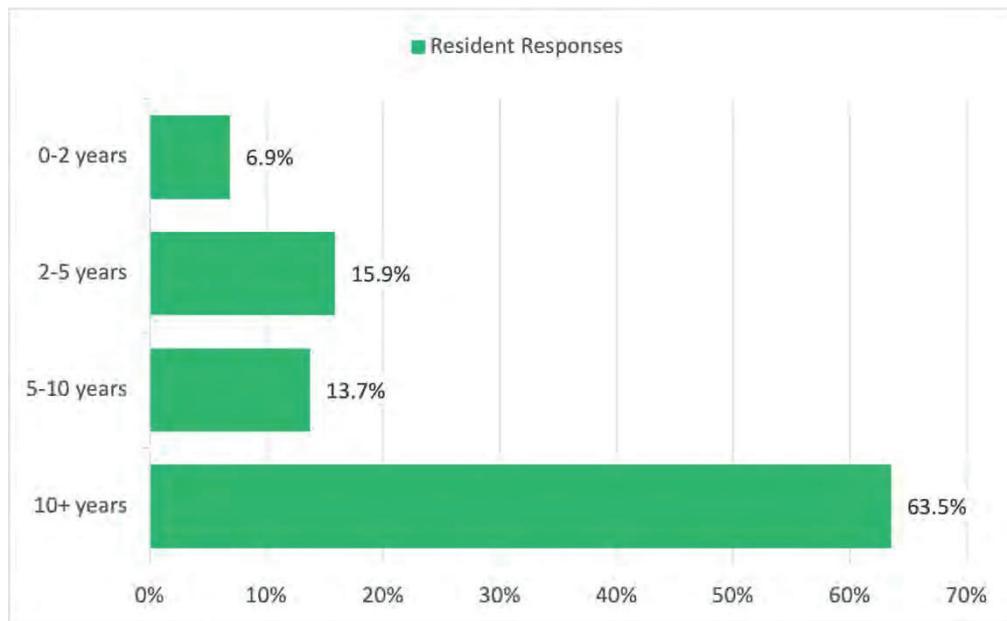


Figure 1: How long have you lived in Glendale? (Residents Only)



- Most of the respondents rent their home (49%) followed closely (47%) by respondents who own their home. Of remaining respondents, 3% neither own nor rent and 1% are currently without permanent shelter.³
 - Of resident responses, the majority (53%) rent their home, followed by 44% who own their home, 3% who neither own nor rent, and 1% currently without permanent shelter.
 - Of worker responses, most (68%) own their home, with 26% of respondents renting and 6% neither owning nor renting.
 - Of other responses, most (57%) rent their home, while 43% own their home.
- Most of the respondents (55%) live in a single-family home, with the next highest category being multi-family homes (33%), followed by duplex/attached homes (8%). A small percentage (2%) live in accessory dwelling units, with 1% (each) currently without permanent shelter or living in other types of units.⁴
 - Of resident responses, the majority (53%) live in a single-family home, with the next highest category being multi-family homes (36%), followed by duplex/attached homes (8%). A few (2%) live in accessory dwelling units, with 1% currently without permanent shelter.

³ Question 4: Do you currently own or rent your home?

⁴ Question 6: Select the type of housing that best describes your current home.

-
- Of worker responses, the majority (71%) live in a single-family home, with the next highest category being multi-family homes (15%), followed by duplex/attached homes (9%). The remaining 6% live in accessory dwelling units.
 - Of other responses, most (43% each) live in a single-family home or multi-family home.
 - Of all the respondents surveyed, the most common types of households include couples (27%) and couples with children younger than 18 (25%), followed by single-person households (19%). The remainder of responses showed a considerable range in household types including 9% (each) who identified as a multi-generational household or a young adult living with parents.⁵
 - Of resident responses, the most common types of households include couples (29%) and couples with children younger than 18 (24%), followed by single-person households (19%) and young adults living with parents (10%). The remainder of resident responses showed a considerable range in household types including 7% who identified as a multi-generational household, 6% as single person living with roommates, and 3% as single parent with children under 18.
 - Of worker responses, the most common types of households include couples with children younger than 18 (33%), followed by couples and multi-generational households (20% each). The remainder of worker responses showed a considerable range in household types including 10% who identified as single and 7% young adults living with parents.
 - Of other responses, the most common types of households include single person households and couple with children under 18 (40% each), followed by multi-generational household (20%).
 - The respondents were primarily between the ages of 24-39 years old (38%), followed by 40-55 years old (29%), and 56-74 years old (25%).⁶
 - Of resident responses, respondents were primarily between the ages of 24-39 years old (39%), followed by 40-55 years old (28%), and 56-74 years old (25%).
 - Of worker responses, respondents were primarily 40-55 years old (40%), followed by 24-39 years old (33%), and the remainder 56-74 years old (27%).
 - Of other responses, respondents were primarily 24-39 years old and 40-55 years old (40% each), followed by 56-74 years old (20%).

⁵ Question 24: Which of the following best describes your household type?

⁶ Question 28: What age range most accurately describes you?

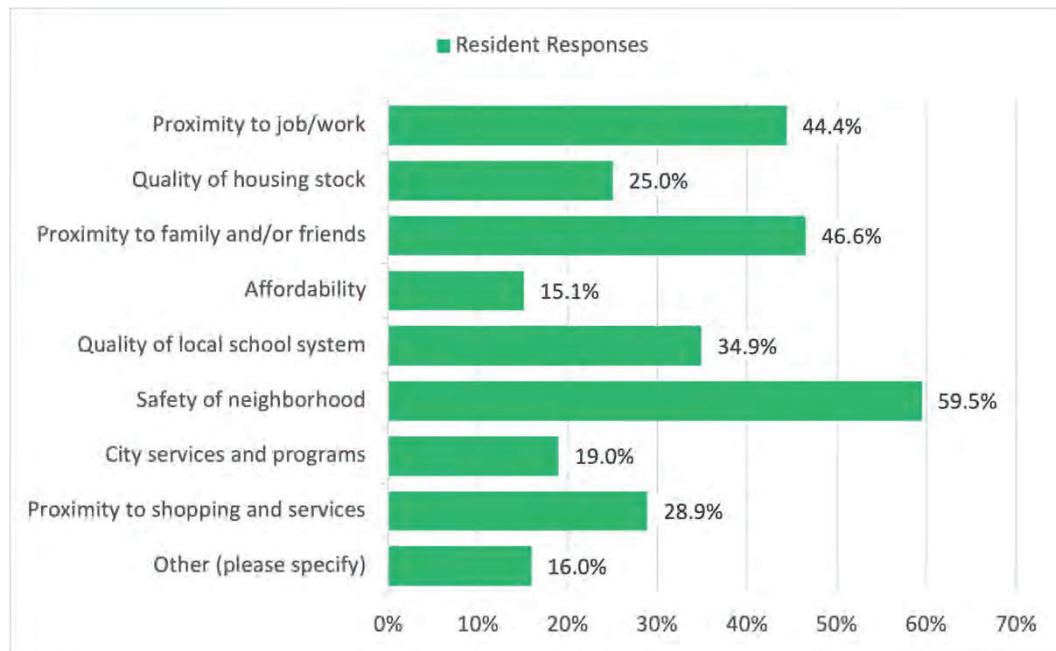
Values and Priorities

When resident respondents were asked, “What made you decide to live here? (Select all that apply)”⁷ the most common answers were:

- Safety of neighborhood (59%)
- Proximity of family and/or friends (46%)
- Proximity to job/work (44%)
- Quality of local school system (35%)
- Proximity to shopping and services (29%)
- Quality of housing stock (25%)
- Proximity to family and/or friends (21%)
- City services and programs (19%)
- Other (17%)
- Affordability (15%)

It should be noted that this question was only answered by those respondents who live in Glendale. Those who do not live in Glendale were not asked this question.

Figure 1: What made you decide to live here? (Residents Only)



⁷ Question 3: What made you decide to live here? (Select all that apply)

Housing Affordability

When respondents were asked, “If you wish to own a home in Glendale but do not currently own one, what issues are preventing you from owning a home at this time? (Select all that apply)”⁸ those who do not already own a home responded as summarized below.

Resident Responses:

Of resident responses, 41% who responded to this question already owned a home in Glendale. Fewer than 3% of residents expressed the opinion that they currently do not wish to own or rent in Glendale. Other responses included:

- I cannot find a home within my target price range in Glendale (44%)
- I do not currently have the financial resources for an appropriate down payment (34%)
- I do not currently have the financial resources for an adequate monthly mortgage payment (26%)
- I cannot currently find a home that suits my quality standards in Glendale (8%)
- I cannot find a home that suits my living needs in Glendale (housing size, disability accommodations) (6%)

Worker responses:

Of worker responses, 38% expressed the opinion that they currently do not wish to own or rent in Glendale. The majority (53%) of workers responded that they cannot find a home within their target price range in Glendale. Other responses included:

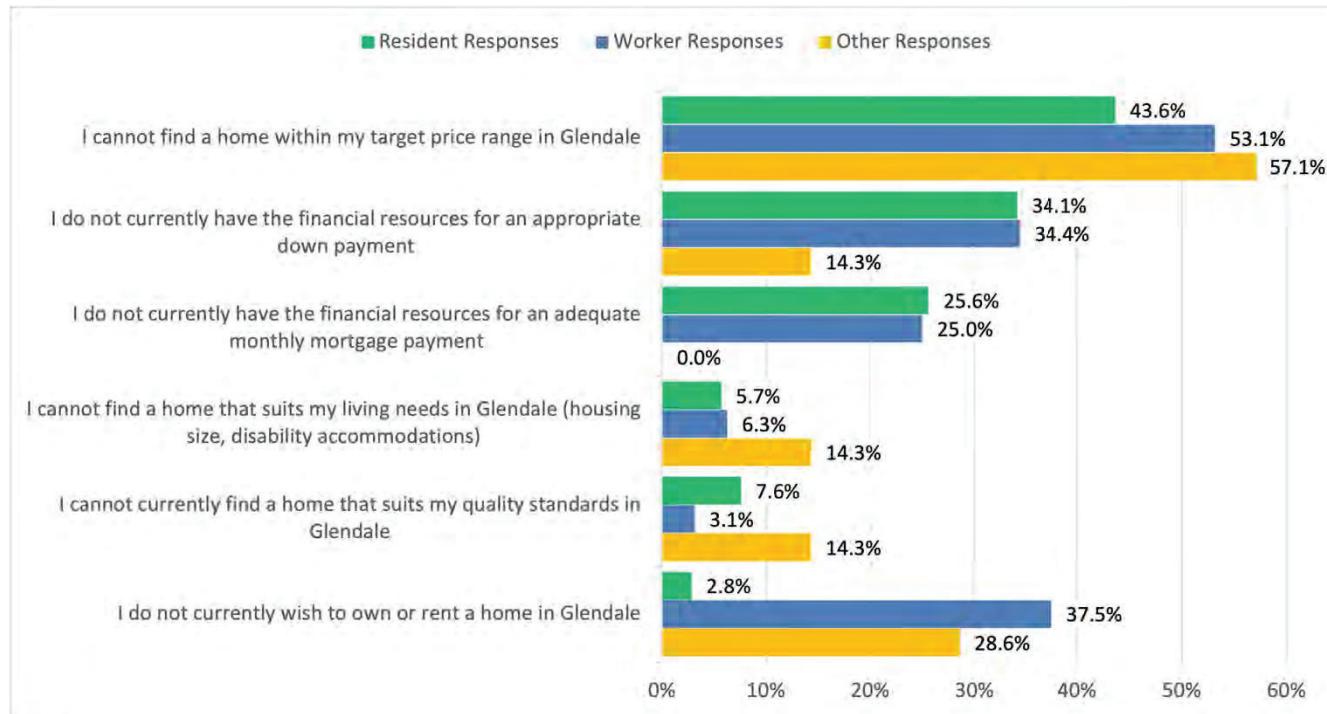
- I do not currently have the financial resources for an appropriate down payment (34%)
- I do not currently have the financial resources for an adequate monthly mortgage payment (25%)
- I cannot find a home that suits my living needs in Glendale (housing size, disability accommodations) (6%)
- I cannot currently find a home that suits my quality standards in Glendale (e.g., interior maintenance, finishes, landscaping) (3%)

Other responses:

Of other responses, the majority (57%) cannot find a home within their target price range in Glendale.

⁸ Question 5: If you wish to own a home in Glendale but do not currently own one, what issues are preventing you from owning a home at this time? Select all that apply.

Figure 2: If you wish to own a home in Glendale but do not currently own one, what issues are preventing you from owning a home at this time?



When asked what percentage of their income they spend on housing⁹, about 42% of residents and 41% of workers spent less than 30% of their income on housing. However, a much higher percentage of residents than non-residents spend more than half of their income on housing (18% for residents versus 6% for workers). Responses broken down by group were:

Resident responses:

- Less than 30% of income spent on housing (42%)
- Between 30%-50% of income spent on housing (40%)
- More than 50% of income spent on housing (18%)

Worker responses:

- Less than 30% of income spent on housing (41%)
- Between 30%-50% of income spent on housing (53%)
- More than 50% of income spent on housing (6%)

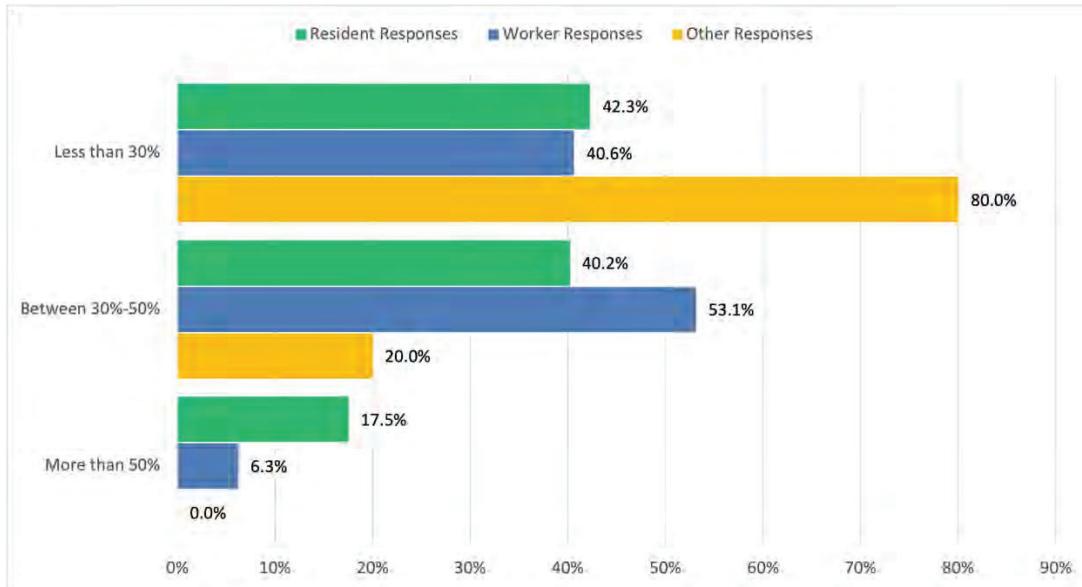
Other responses:

- Less than 30% of income spent on housing (80%)

⁹ Question 13: Based on your monthly income before taxes, how much of your monthly income do you spend on housing?

- Between 30%-50% of income spent on housing (20%)
- More than 50% of income spent on housing (0%)

Figure 3: What percentage of your income do you spend on housing?



Housing Maintenance

When respondents were asked, “How would you rate the physical condition of the residence you live in?”¹⁰ most respondents answered positively, with the response “excellent condition” receiving 43% of resident responses, 41% of worker responses, and 29% of other responses.

Resident responses:

Of resident responses, approximately 31% of respondents answered that their residence showed signs of minor deferred maintenance such as peeling paint or chipped stucco. Approximately 24% of residents indicated that their home needed one or more major systems upgrades such as a new roof or windows.

Worker responses:

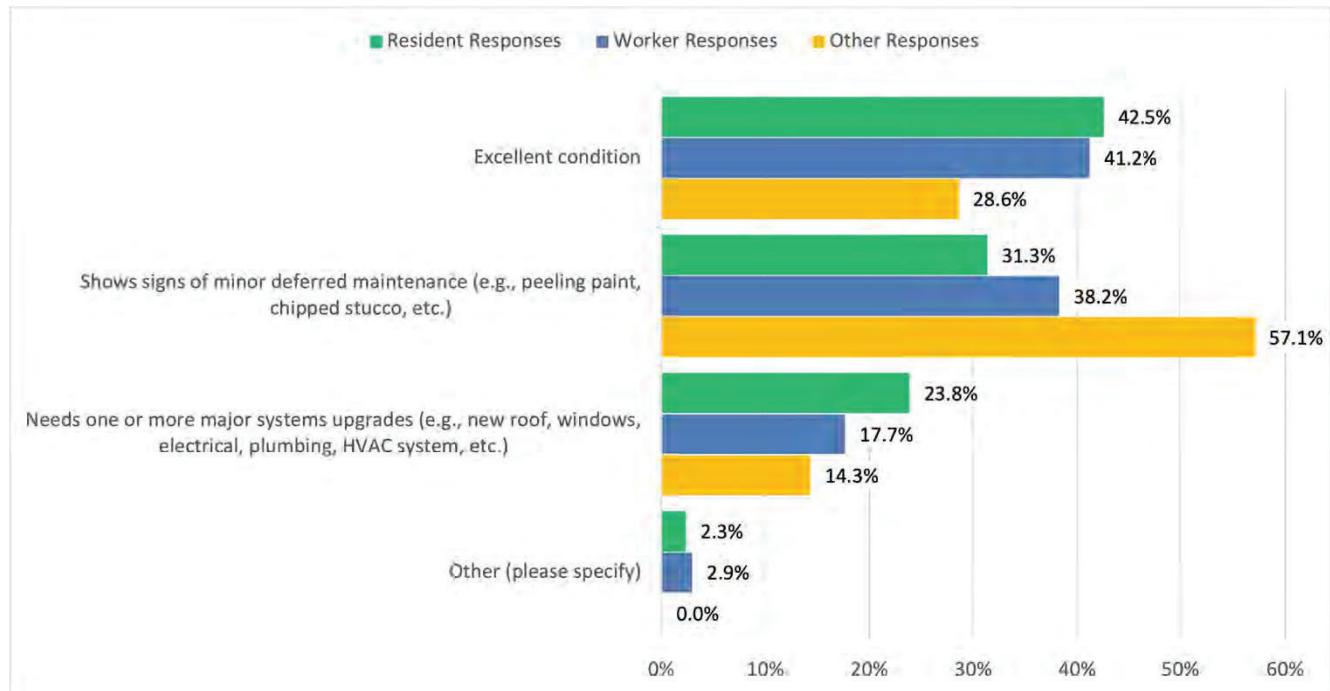
Of worker responses, approximately 38% of respondents answered that their residence showed signs of minor deferred maintenance such as peeling paint or chipped stucco. Approximately 18% of workers indicated that their home needed one or more major systems upgrades such as a new roof or windows.

Other responses:

¹⁰ Question 11: How would you rate the physical condition of the residence you live in?

Of other responses, approximately 57% of respondents answered that their residence showed signs of minor deferred maintenance such as peeling paint or chipped stucco. Approximately 14% indicated that their home needed one or more major systems upgrades such as a new roof or windows.

Figure 5: How would you rate the physical condition of the residence you live in?



When asked, “Which of the following housing upgrades or expansions have you considered making on your home?”¹¹ the top responses included:

Resident responses:

- Kitchen or bathroom remodels (37%)
- None (36%)
- Painting (31%)
- Solar (21%)
- Roofing (16%)
- Other (14%)
- Room addition (14%)

Worker responses:

- Painting (44%)

¹¹ Question 12: Which of the following housing upgrades or expansions have you considered making on your home?

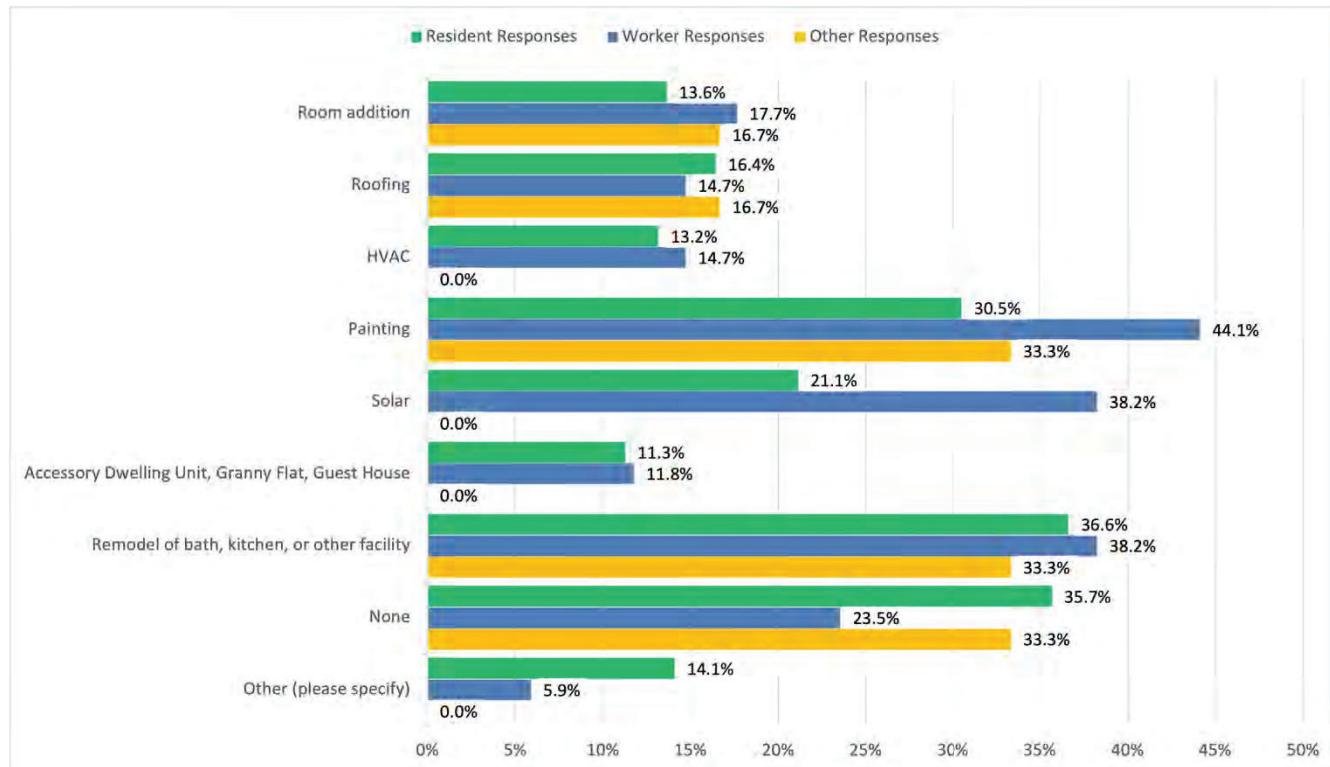
- Kitchen or bathroom remodels (38%)
- Solar (38%)
- None (24%)
- Room addition (18%)
- Roofing (15%)
- HVAC (15%)

Other responses:

- Kitchen or bathroom remodels (33%)
- Painting (33%)
- None (33%)
- Room addition (17%)
- Roofing (17%)

The other responses included landscaping and other maintenance related to the interior of the home. Some respondents answered they were not able to make improvements to their rented property.

Figure 6: Which of the following housing upgrades or expansions have you considered making on your home?



Housing Fit

When asked, “How satisfied are you with your current housing situation?”¹², over 75% of all groups indicated that they were very satisfied or somewhat satisfied with their current housing. The top responses broken down by group were:

Resident responses:

- I am very satisfied (39%)
- I am somewhat satisfied (35%)
- I am somewhat dissatisfied (15%)
- I am dissatisfied (11%)

Worker responses:

- I am very satisfied (62%)
- I am somewhat satisfied (29%)
- I am somewhat dissatisfied (3%)
- I am dissatisfied (6%)

Other responses:

- I am very satisfied (43%)
- I am somewhat satisfied (43%)
- I am somewhat dissatisfied (14%)

When asked, “Do you think that the range of housing options currently available in the City of Glendale meets your needs?”¹³ most respondents thought it did not. Responses broken down by group were:

Resident responses:

- Yes (46%)
- No (54%)

Worker responses:

- Yes (42%)
- No (58%)

¹² Question 7: How satisfied are you with your current housing situation?

¹³ Question 9: Do you think that the range of housing options currently available in the City of Glendale meets your needs?

Other responses:

- Yes (29%)
- No (71%)

When asked, “What types of housing are most needed in the City of Glendale? (Select all that apply)”¹⁴ all groups responded that single-family (detached) were most needed. Responses broken down by group were:

Resident responses:

- Single-family (detached) (54%)
- Condominiums (multi-family ownership homes) (35%)
- Apartments (multi-family rental homes) (32%)
- Duplex/Attached Housing (31%)
- Senior Housing (27%)
- Other (21%)
- Accessory Dwelling Unit (ADU) (14%)
- Housing for people with disabilities (11%)

Worker responses:

- Single-family (detached) (67%)
- Senior Housing (39%)
- Apartments (multi-family rental homes) (36%)
- Duplex/Attached Housing (36%)
- Condominiums (multi-family ownership homes) (30%)
- Housing for people with disabilities (27%)
- Accessory Dwelling Unit (ADU) (18%)
- Other (15%)

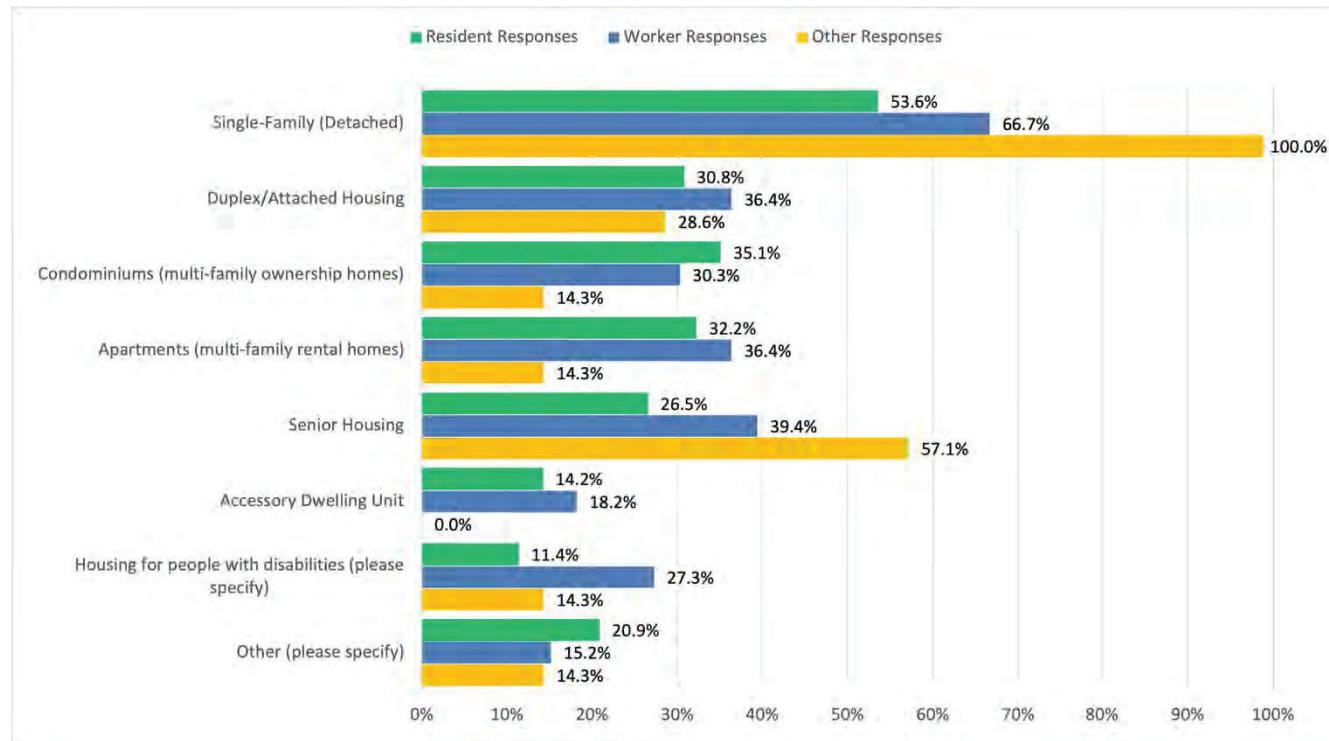
Other responses:

- Single-family (detached) (100%)
- Senior Housing (57%)
- Duplex/Attached Housing (29%)
- Apartments (multi-family rental homes) (14%)

¹⁴ Question 10: What types of housing are most needed in the City of Glendale? (Select all that apply).

- Condominiums (multi-family ownership homes) (14%)
- Housing for people with disabilities (14%)
- Other (14%)
- Accessory Dwelling Unit (ADU) (0%)

Figure 7: What types of housing are most needed in the City of Glendale?



Some of the other responses included:

- No additional housing needed
- Affordable housing at a range of income levels
- Homeless housing

When asked, “If you are currently employed, approximately how long is your one-way commute to work?”¹⁵ respondents showed considerable range. Responses broken down by group were:

Resident responses:

- 5-10 miles (22%)
- Less than 5 miles (21%)

¹⁵ Question 26: If you are currently employed, approximately how long is your one-way commute to work?

-
- 10-25 miles (21%)
 - I am not currently employed (17%)
 - I am employed but work from home (12%)
 - 25-40 miles (6%)
 - More than 40 miles (2%)

Worker responses:

- 5-10 miles (33%)
- 10-25 miles (23%)
- 25-40 miles (23%)
- I am employed but work from home (7%)
- More than 40 miles (7%)
- Less than 5 miles (3%)
- I am not currently employed (3%)

Other responses:

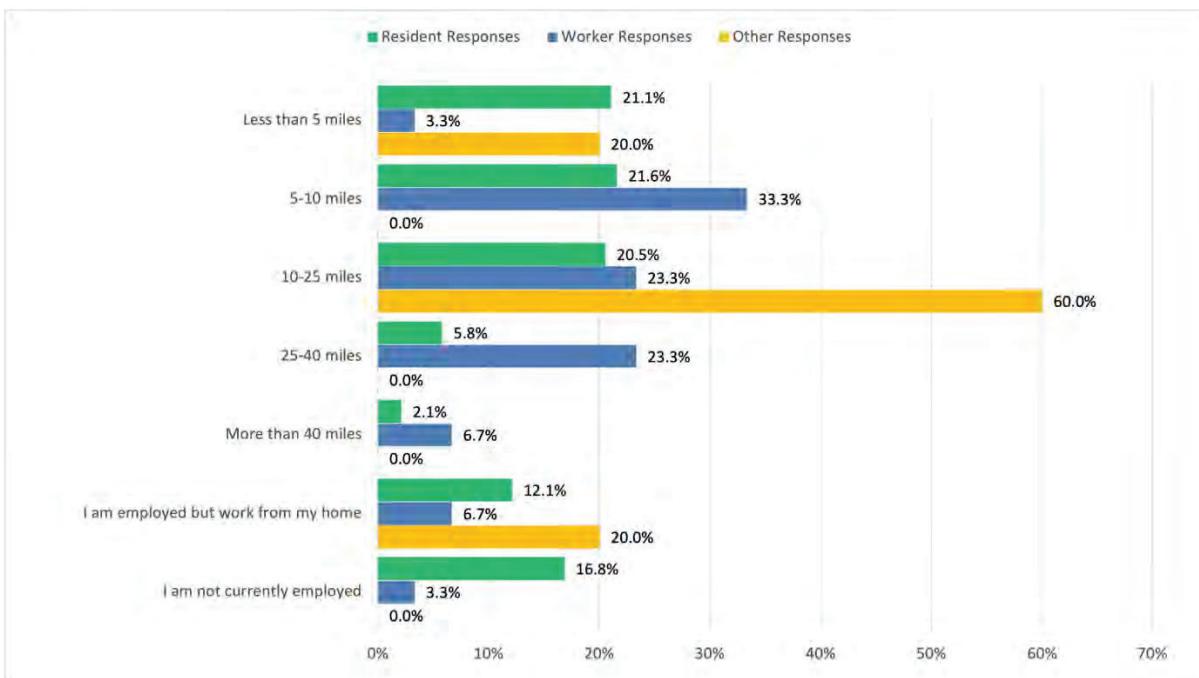
- 10-25 miles (60%)
- I am employed, but work from home (20%)
- Less than 5 miles (20%)

The range of responses amongst residents suggests that while there is great diversity in commute distances, the majority of residents live and work in Glendale or neighboring jurisdictions. Of those not currently employed, the age group of respondents suggests that a portion may be retired.

The responses amongst the worker group indicate that the majority of non-residents who work in Glendale commute less than 25 miles (over 60%) and that almost a third (30%) live over 25 miles away. This suggests that most non-resident workers live in nearby jurisdictions but a significant portion commute from long distances.

It should be noted that answers are based on commute distance prior to the Coronavirus pandemic, which may have had an impact on travel patterns.

Figure 4: If you are currently employed, approximately how long is your one-way commute to work?



When asked “If you work outside the house, how do you get to work? If you use different modes of transportation, select all that apply”¹⁶ the majority of all respondents indicated that they used an automobile and drove alone (84%). Responses broken down by group were:

Resident responses:

- Automobile (drive alone) (82%)
- Other (please specify) (9%)
- Walk (8%)
- Bus (7%)
- Bike (5%)
- Train (5%)
- Rideshare such as Uber or Lyft (5%)
- Automobile (carpool) (4%)

Worker responses:

- Automobile (drive alone) (96%)
- Walk (4%)

¹⁶ Question 27: If you work outside the house, how do you get to work? If you use different modes of transportation, select all that apply.

- Bus (4%)
- Train (4%)
- Rideshare such as Uber or Lyft (4%)
- Automobile (carpool) (4%)

Of worker responses, nobody indicated that they got to work by biking or other modes of transportation.

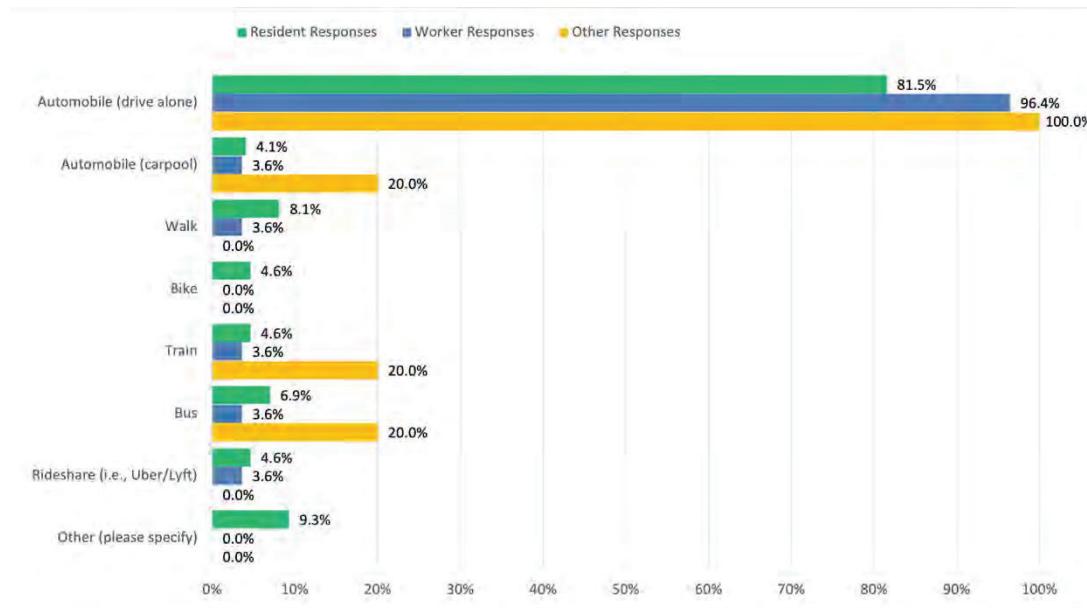
Other responses:

- Automobile (drive alone) (100%)
- Bus (20%)
- Train (20%)
- Automobile (carpool) (20%)

Of other responses, nobody indicated that they got to work by walking, biking, rideshare, or other modes of transportation.

Of those that selected “other (please specify)” modes of transportation included motorcycle and airplane.

Figure 9: If you work outside the house, how do you get to work? (select all that apply)



When asked if Coronavirus had impacted their housing situation¹⁷, the majority of all respondents answered “No.” Responses broken down by group were:

Resident responses:

- Yes (27%)
- No (73%)

Worker responses:

- Yes (20%)
- No (80%)

Other responses:

- Yes (0%)
- No (100%)

For respondents who answered “Yes,” some of the following reasons were given:

- Family members such as adult children moving into the home
- Converting bedrooms to offices to allow work from home or virtual schooling
- Unable to pay rent due to reduced income or loss of job
- Forced to move

Fair Housing

In basic terms, "fair housing" means the right to choose a home free from unlawful discrimination. The City is required to consider issues of fair housing as part of its Housing Element update.

When asked, “How important are the following factors in your housing choice?”¹⁸ respondents were most likely to identify the following factors as being very important or somewhat important:

Resident responses:

- Housing I can afford (95%)
 - Housing was available in the neighborhood I chose at the time I needed it (89%)
 - Housing large enough for my household (84%)
 - The amount of money I have/had for deposit (77%)
 - My credit history and/or credit score (59%)
-

¹⁷ Question 25: Has the Coronavirus impacted your housing situation?

¹⁸ Question 14: How important are the following factors in your housing choice?

Worker responses:

- Housing I can afford (94%)
- Housing was available in the neighborhood I chose at the time I needed it (87%)
- Housing large enough for my household (78%)
- The amount of money I have/had for deposit (77%)
- My credit history and/or credit score (46%)

Other responses:

- Housing I can afford (100%)
- Housing large enough for my household (100%)
- Housing was available in the neighborhood I chose at the time I needed it (80%)
- The amount of money I have/had for deposit (60%)
- My credit history and/or credit score (60%)

While still important for some individuals, respondents of all groups were less likely to identify the following factors as being very important or somewhat important:

- Concern that I would not be welcome in that neighborhood
- Housing that accommodates disability of household member

When asked, “How important are the following housing priorities to you and your household?”¹⁹ respondents were most likely to identify the following factors as being very important or somewhat important:

Resident responses:

- Rehabilitate existing housing (88%)
- Promote affordable housing for working families (87%)
- Ensure that children who grow up in Glendale can afford to live in Glendale as adults (86%)
- Support fair/equitable housing opportunities (82%)
- Support programs to help neighborhoods that have suffered foreclosures (76%)
- Providing more housing for all income levels (76%)
- Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs (74%)
- Encourage more senior housing (67%)

¹⁹ Question 15: How important are the following housing priorities to you and your household?

-
- Build more single-family housing (67%)
 - Integrate affordable housing throughout the community to create mixed-income neighborhoods (66%)
 - Provide housing for the homeless (66%)
 - Build more multi-family housing such as apartments and condos (63%)
 - Provide ADA-accessible housing (61%)

While still important for some individuals, resident respondents were less likely to identify the following factor as being very important or somewhat important:

- Create mixed-use projects to bring different land uses closer together (56%)

Worker responses:

- Support fair/equitable housing opportunities (91%)
- Support programs to help neighborhoods that have suffered foreclosures (91%)
- Rehabilitate existing housing (90%)
- Promote affordable housing for working families (90%)
- Providing more housing for all income levels (84%)
- Ensure that children who grow up in Glendale can afford to live in Glendale as adults (84%)
- Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs (81%)
- Build more single-family housing (78%)
- Provide housing for the homeless (77%)
- Integrate affordable housing throughout the community to create mixed-income neighborhoods (74%)
- Encourage more senior housing (68%)
- Build more multi-family housing such as apartments and condos (67%)
- Provide ADA-accessible housing (67%)

While still important for some individuals, worker respondents were less likely to identify the following factor as being very important or somewhat important:

- Create mixed-use projects to bring different land uses closer together (43%)

Other responses:

- Rehabilitate existing housing (100%)
- Promote affordable housing for working families (100%)
- Build more single-family housing (100%)

-
- Encourage more senior housing (100%)
 - Support programs to help neighborhoods that have suffered foreclosures (80%)
 - Ensure that children who grow up in Glendale can afford to live in Glendale as adults (80%)
 - Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs (80%)
 - Provide housing for the homeless (80%)
 - Provide ADA-accessible housing (80%)
 - Support fair/equitable housing opportunities (60%)
 - Provide more housing for all income levels (60%)
 - Build more multi-family housing such as apartments and condos (60%)
 - Create mixed-use projects to bring different land uses closer together (60%)

While still important for some individuals, other respondents were less likely to identify the following factor as being very important or somewhat important:

- Integrate affordable housing throughout the community to create mixed-income neighborhoods (40%)

When asked to indicate their level of agreement or disagreement with a series of affirmative statements²⁰ respondents were most likely to strongly agree or somewhat agree with the following statements:

Resident responses:

- There are grocery stores close to my neighborhood (92%)
- There are banks and credit unions near where I live (84%)
- There is a public library close to my house (84%)
- There is a pharmacy close to my house (82%)
- The condition of the homes in my neighborhood are acceptable (82%)
- The streets and sidewalks near my home are well kept (72%)
- There are plenty of parks, playgrounds, or green space near me (68%)
- The streets and sidewalks in my neighborhood have adequate lighting (65%)
- There is access to public transit close to my neighborhood (63%)
- I am satisfied with the schools in my area (61%)

²⁰ Question 16: Please respond to each statement

Resident respondents were less likely to agree with the following statements:

- There are plenty of other public spaces near my home (56%)
- There is enough parking in my area of town (50%)
- There are quality jobs in my neighborhood (47%)

Worker responses:

- There are grocery stores close to my neighborhood (87%)
- There are banks and credit unions near where I live (87%)
- There is a pharmacy close to my house (87%)
- There is a public library close to my house (87%)
- The condition of the homes in my neighborhood are acceptable (81%)
- There are plenty of parks, playgrounds, or green space near me (68%)
- There is enough parking in my area of town (65%)
- The streets and sidewalks near my home are well kept (61%)
- The streets and sidewalks in my neighborhood have adequate lighting (61%)

Worker respondents were less likely to agree with the following statements:

- There are plenty of other public spaces near my home (58%)
- There is access to public transit close to my neighborhood (57%)
- There are quality jobs in my neighborhood (55%)
- I am satisfied with the schools in my area (52%)

Other responses:

- There is a pharmacy close to my house (100%)
- The streets and sidewalks near my home are well kept (100%)
- There are quality jobs in my neighborhood (100%)
- There are grocery stores close to my neighborhood (80%)
- There are banks and credit unions near where I live (80%)
- There is a public library close to my house (80%)
- The condition of the homes in my neighborhood are acceptable (80%)
- The streets and sidewalks in my neighborhood have adequate lighting (80%)
- There are plenty of parks, playgrounds, or green space near me (80%)
- I am satisfied with the schools in my area (80%)
- There are plenty of other public spaces near my home (60%)

-
- There is enough parking in my area of town (60%)
 - There is access to public transit close to my neighborhood (60%)

When asked to identify what they thought the biggest problem with housing discrimination is in Glendale and the surrounding area,²¹ the majority of all respondents identified race as the most prevalent factor. The responses broken down by group were:

Resident responses:

- Race/Ethnicity (39%)
- Other (please specify) (21%)
- National Origin (15%)
- Familial status (9%)
- Color (physical appearance) (8%)
- Disability (6%)
- Sex (2%)
- Religion (0%)

Worker responses:

- Race/Ethnicity (42%)
- National Origin (23%)
- Other (please specify) (10%)
- Familial status (10%)
- Color (physical appearance) (10%)
- Disability (6%)
- Sex (0%)
- Religion (0%)

Other responses:

- Race/Ethnicity (60%)
- Other (please specify) (20%)
- Color (physical appearance) (20%)

²¹ Question 17: The federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Of those, which do you think is the most prevalent factor in housing discrimination in our region?

Of other responses, nobody indicated housing discrimination was due to national origin, religion, sex, familial status, or disability.

Of all respondents who selected “Other (please specify)” about half specified that no problems with housing discrimination existed or that they are unaware of any problem. Other common responses included discrimination based on financial factors or sexual preference/gender expression.

When asked whether they had experienced or witnessed housing discrimination in Glendale²² the majority of respondents answered “No.” The responses broken down by group were:

Resident responses:

- Yes (20% or 39 responses)
- No (56% or 110 responses)
- I don’t know (24% or 46 responses)

Of those respondents that answered “yes” to the prior question, the discriminatory factors identified²³ (in order of affirmative responses) were:

- Race/Ethnicity (43%)
- Color (physical appearance) (10%)
- Level/source of Income (8%)
- Sex/gender/gender identity (5%)
- National Origin (5%)
- Language spoken (5%)
- Not applicable (N/A) (3%)
- Age (3%)
- Marital status (3%)
- Religion (3%)
- Familial status (3%)
- Disability (3%)
- Political Ideas (3%)
- Citizenship status (3%)
- Use of Housing Choice Voucher or other assistance (3%)

²² Question 18: Have you ever experienced or witnessed housing discrimination in the City of Glendale?

²³ Question 19: On what grounds do you believe you witnessed housing discrimination?

-
- Other (3%)

Worker responses:

- Yes (13% or 4 responses)
- No (66% or 21 responses)
- I don't know (22% or 7 responses)

Of those respondents that answered “yes” to the prior question, the discriminatory factors identified (in order of affirmative responses) were:

- Race/Ethnicity (25%)
- National origin (25%)
- Marital status (25%)
- Religion (25%)

Other responses:

- Yes (20% or 1 response)
- No (60% or 4 responses)
- I don't know (0% or no responses)

Of other responses for the prior question, the only discriminatory factor identified was race/ethnicity (100%).

When asked whether they knew of anyone in Glendale who experienced unfair real estate or lending practices²⁴ respondents provided the following responses:

Resident responses:

- The majority (74%) didn't know of anyone who had encountered these unfair practices
- 13% knew of someone who was unfairly refused a rental or sale agreement
- 10% reported knowing someone who was not shown all housing options
- 9% reported knowing someone who was falsely denied available housing options
- 7% knew of someone who was unfairly directed to a certain neighborhood or location
- 5% (each) indicated they knew of someone who was offered unfair terms when buying or selling, or was not given reasonable accommodation for a disability
- 4% reported knowing someone who was unfairly denied a mortgage

Worker responses:

²⁴ Question 20: Do you know of anyone in Glendale who has faced the following: (select all that apply)

-
- The majority (62%) didn't know of anyone who had encountered these unfair practices
 - 10% (each) knew of someone who was unfairly refused a rental or sale agreement, was not shown all housing options, was not given reasonable accommodation for a disability, or was unfairly denied a mortgage
 - 7% (each) reported knowing someone who was falsely denied available housing options, or was offered unfair terms when buying or selling

Other responses:

- The majority (80%) didn't know of anyone who had encountered these unfair practices
- 20% knew of someone who was unfairly refused a rental or sales agreement

Many respondents (37% of residents, 23% of workers, and 40% of other) would not know where to refer someone (or themselves) if they felt that their fair housing rights were violated²⁵. Of those who responded that they might know where to go, most would refer someone to the local, state or federal government or the California Department of Housing and Community Development.

Familiarity with Fair Housing Laws varied amongst and between groups. A large proportion (43% of residents, 32% of workers, and 60% of other) were not familiar with Fair Housing Laws²⁶. Workers were more likely than other groups to be somewhat familiar or very familiar with fair housing laws (68%), while just over half (56%) of residents and only 40% of workers felt the same. Additionally, the majority of all groups (74% of residents, 81% of workers, and 60% of other) responded "Yes" or "I don't know" when asked if Federal and/or State Fair Housing Laws are difficult to understand or follow²⁷.

²⁵ Question 21: Where would you refer someone if they felt their fair housing rights had been violated?

²⁶ Question 22: How familiar are you with Fair Housing Laws?

²⁷ Question 23: Do you think Federal and/or State Fair Housing Laws are difficult to understand or follow?

Appendices

A: Survey Questions

B: Survey Responses

CITY OF GLENDALE



Land Use and Mobility Update

Glendale 2021-2029 Housing Element Update Survey

As required by State law, the City is in the process of updating the Housing Element of the General Plan for the 2021-2029 period. The Housing Element must be updated every 8 years. The Housing Element establishes policies and programs to address Glendale's existing and projected housing needs, including the City's "fair share" of the regional housing need (or "RHNA"). If you currently live in Glendale, your feedback will help us understand existing opportunities in our City. However, even if you live somewhere else, we still want to learn about your housing conditions and experiences so the City can do its part in planning to meet our region's housing needs.

Part 1 of this survey focuses on questions related to existing housing conditions and will help the City better understand the characteristics of households in Glendale and identify the community's housing needs and priorities.

Part 2 of this survey focuses on issues related to fair housing in order to understand real or perceived fair housing concerns in Glendale. In basic terms, "fair housing" means the right to choose a home free from unlawful discrimination.

This is an early step in the process. There will be additional opportunities for the community to comment on the Housing Element Update, including on the goals, policies, and implementation actions to be included in the Housing Element.

Your input will be used to inform preparation of the Housing Element so that it reflects our local priorities and objectives.

For additional information about the Housing Element Update, process, and timeline, please visit the project website: <https://www.glendaleplan.com/>

CITY OF GLENDALE



Land Use and Mobility Update

Glendale 2021-2029 Housing Element Update Survey

Part 1: Existing Conditions

The first part of this survey will assist us in better understanding existing housing conditions in Glendale.

1. Do you live and/or work in Glendale?

- I live in Glendale but my job is located somewhere else (pre-pandemic conditions)
- My job is in Glendale (pre-pandemic conditions) but I live somewhere else
- I live and work in Glendale (pre-pandemic conditions)
- I do not live or work in Glendale

CITY OF GLENDALE



Land Use and Mobility Update

Glendale 2021-2029 Housing Element Update Survey

Questions for Glendale Residents

2. How long have you lived in the City?

- 0-2 years
- 2-5 years
- 5-10 years
- 10+ years

3. What made you decide to live here? (Select all that apply)

- Proximity to job/work
- Quality of housing stock
- Proximity to family and/or friends
- Affordability
- Quality of local school system
- Safety of neighborhood
- City services and programs
- Proximity to shopping and services
- Other (please specify)

CITY OF GLENDALE



Land Use and Mobility Update

Glendale 2021-2029 Housing Element Update Survey

Questions for all Respondents

4. Do you currently own or rent your home?

- I own my home
- I rent my home
- I live with another household (neither own nor rent)
- I am currently without permanent shelter

5. If you wish to own a home in Glendale but do not currently own one, what issues are preventing you from owning a home at this time? Select all that apply.

- I cannot find a home within my target price range in Glendale
- I do not currently have the financial resources for an appropriate down payment
- I do not currently have the financial resources for an adequate monthly mortgage payment
- I cannot find a home that suits my living needs in Glendale (housing size, disability accommodations)
- I cannot currently find a home that suits my quality standards in Glendale
- I do not currently wish to own or rent a home in Glendale
- I already own a home in Glendale

6. Select the type of housing that best describes your current home.

- Single-Family Home (Detached)
- Duplex/Townhome
- Multi-Family Home (Apartment/Condominium)
- Accessory Dwelling Unit, Granny Flat, Guest House
- Mobile Home
- Currently without permanent shelter
- Other (please specify)

7. How satisfied are you with your current housing situation?

- I am very satisfied
- I am somewhat satisfied
- I am somewhat dissatisfied
- I am dissatisfied

8. If you answered dissatisfied or somewhat dissatisfied to the prior question, please provide a reason below. (If you did not, please skip).

9. Do you think that the range of housing options currently available in the City of Glendale meet your needs?

- Yes
- No

10. What types of housing are most needed in the City of Glendale? (Select all that apply)

- Single-Family (Detached)
- Duplex/Attached Housing
- Condominiums (multi-family ownership homes)
- Apartments (multi-family rental homes)
- Senior Housing
- Accessory Dwelling Unit
- Housing for people with disabilities (please specify in comment field below)
- Other (please specify)

11. How would you rate the physical condition of the residence you live in?

- Excellent condition
- Shows signs of minor deferred maintenance (e.g., peeling paint, chipped stucco, etc.)
- Needs one or more major systems upgrades (e.g., new roof, windows, electrical, plumbing, HVAC system, etc.)
- Other (please specify)

12. Which of the following housing upgrades or expansions have you considered making on your home?

- Room addition
- Roofing
- HVAC
- Painting
- Solar
- Accessory Dwelling Unit, Granny Flat, Guest House
- Remodel of bath, kitchen, or other facility
- None
- Other (please specify)

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Land Use and Mobility Update

Glendale 2021-2029 Housing Element Update Survey

Part 2: Fair Housing

The second part of this survey is designed to help us understand fair housing issues facing our community.

Questions for All Respondents (Residents and Nonresidents)

13. Based on your monthly income before taxes, how much of your monthly income do you spend on housing?

- Less than 30%
- Between 30%-50%
- More than 50%

14. How important are the following factors in your housing choice? (If a statement does not pertain to you, please leave blank.) (1-5 scale)

	Very Important	Somewhat Important	Neutral	Somewhat Unimportant	Unimportant
I could afford to pay for housing	<input type="radio"/>				
Housing that accommodates disability of household member	<input type="radio"/>				
Housing large enough for my household	<input type="radio"/>				
My credit history and/or credit score	<input type="radio"/>				
The amount of money I had for deposit	<input type="radio"/>				
Housing was available in the neighborhood I chose	<input type="radio"/>				
Concern that I would not be welcome in that neighborhood	<input type="radio"/>				
Other (please specify)	<input type="text"/>				

15. How important are the following housing priorities to you and your family?

	Very important	Somewhat important	Not Important	Don't know
Provide more housing for all income levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote housing affordable to working families	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Very important	Somewhat important	Not Important	Don't know
Build more single-family housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Build more multi-family housing (apartments, condos, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rehabilitate existing housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage more senior housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide ADA-accessible housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide housing for homeless	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure that children who grow up in Glendale can afford to live in Glendale as adults	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Create mixed-use (commercial/office and residential) projects to bring different land uses closer together	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Integrate affordable housing throughout the community to create mixed-income neighborhoods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support fair/equitable housing opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Very important	Somewhat important	Not Important	Don't know	
Support programs to help maintain and secure neighborhoods that have suffered foreclosures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
16. Please respond to each statement: (1-5 scale)					
	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree
I am satisfied with the schools in my area	<input type="radio"/>				
There are quality jobs in my neighborhood	<input type="radio"/>				
There is access to public transit close to my neighborhood	<input type="radio"/>				
There is enough parking in my area of town	<input type="radio"/>				
There are plenty of parks, playgrounds, or green space near me	<input type="radio"/>				
There is a pharmacy close to my house	<input type="radio"/>				
There is a public library close to my house	<input type="radio"/>				
There are grocery stores close to my neighborhood	<input type="radio"/>				

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree
There are banks and credit unions near where I live	<input type="radio"/>				
The conditions of the homes in my neighborhood are acceptable	<input type="radio"/>				
The streets and sidewalks near my home are well kept	<input type="radio"/>				
There are plenty of other public spaces near my home	<input type="radio"/>				
The streets and sidewalks in my neighborhood have adequate lighting	<input type="radio"/>				

17. The federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Of those, which do you think is the most prevalent factor in housing discrimination in our region?

- Race
- Color
- National Origin
- Religion
- Sex
- Familial Status
- Disability
- Other (please specify) _____

18. Have you ever experienced or witnessed housing discrimination in the City of Glendale?

- Yes
- No
- I don't know

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Land Use and Mobility Update

Glendale 2021-2029 Housing Element Update Survey

19. On what grounds do you believe you witnessed housing discrimination?

- Race/Ethnicity (i.e., Caucasian, Asian, Latino, etc.)
- Color (physical appearance)
- Age
- Marital Status
- Religion
- Sex/Gender/Gender Identity
- National Origin (the country where a person was born)
- Familial Status (Families with Children)
- Disability
- Political Ideas
- English Spoken as a Second Language
- Citizenship Status
- Level/Source of Income
- Use of Housing Choice Voucher or other assistance
- Criminal Background
- Other (please specify)
- Not applicable

CITY OF GLENDALE



Land Use and Mobility Update

Glendale 2021-2029 Housing Element Update Survey

20. Do you know of anyone in Glendale who has faced the following: (select all that apply)

- Unfairly refused a rental or sale agreement
- Unfairly denied a mortgage
- Falsely denied available housing options
- Unfairly directed to a certain neighborhood and/or locations
- Not shown all housing options
- Not given reasonable accommodate for a disability
- Offered unfair terms when buying or selling
- Not applicable

21. Where would you refer someone if they felt their fair housing rights had been violated?

- I wouldn't know what to do
- Complain to the individual/organization discriminating
- A local nonprofit
- Local, state, or federal government
- The California Office of Housing and Community Development
- The U.S. Department of Housing and Urban Development
- A private attorney
- Other (please specify)

22. How familiar are you with Fair Housing Laws?

- Not familiar
- Somewhat familiar
- Very familiar

23. Do you think Federal and/or State Fair Housing Laws are difficult to understand or follow?

- Yes
- No
- I don't know

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Land Use and Mobility Update

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24. Which of the following best describes your household type?

- Single person household
- Couple
- Couple with children under 18
- Single parent with children under 18
- Adult head of household (non-parent) with children under 18
- Young adult living with parents
- Multi-generational family household (grandparents, children, and/or grandchildren all under the same roof)
- Single person living with roommates
- Couple living with roommates
- Other (please specify)

25. Has the Coronavirus impacted your housing situation?

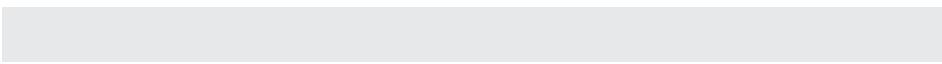
- Yes
- No

If yes, how?

26. If you are currently employed, approximately how long is your one-way commute to work? (If your commute has changed due to the Coronavirus, please answer this question based on your commute before the pandemic's impact on your travel patterns).

- Less than 5 miles
- 5-10 miles
- 10-25 miles
- 25-40 miles
- More than 40 miles
- I am employed but work from my home
- I am not currently employed

27. If you work outside the house, how do you get to work? If you use different modes of transportation, select all that apply.

- Automobile (drive alone)
- Automobile (carpool)
- Walk
- Bike
- Train
- Bus
- Rideshare (i.e., Uber/Lyft)
- Other (please specify)


28. What age range most accurately describes you?

- Gen Z (0-23 years old)
- Millennial (24-39 years old)
- Generation X (40-55 years old)
- Baby Boomers (56-74 years old)
- Silent Generation (75+ years old)

29. If you would like to be notified of upcoming community events and public hearings, please register your name and email address below.

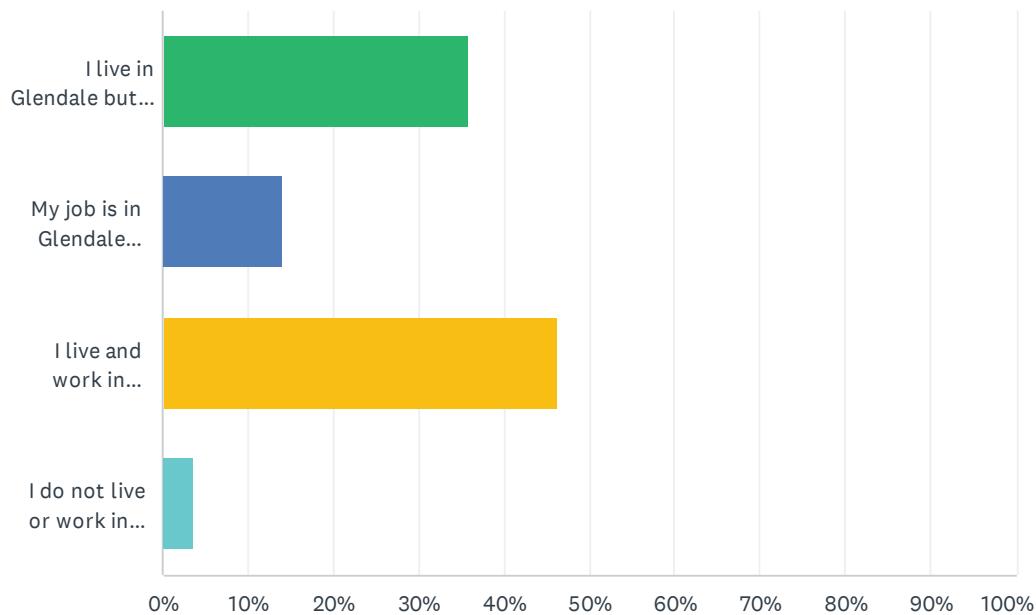
Name

ZIP/Postal Code

Email Address

Q1 Do you live and/or work in Glendale?

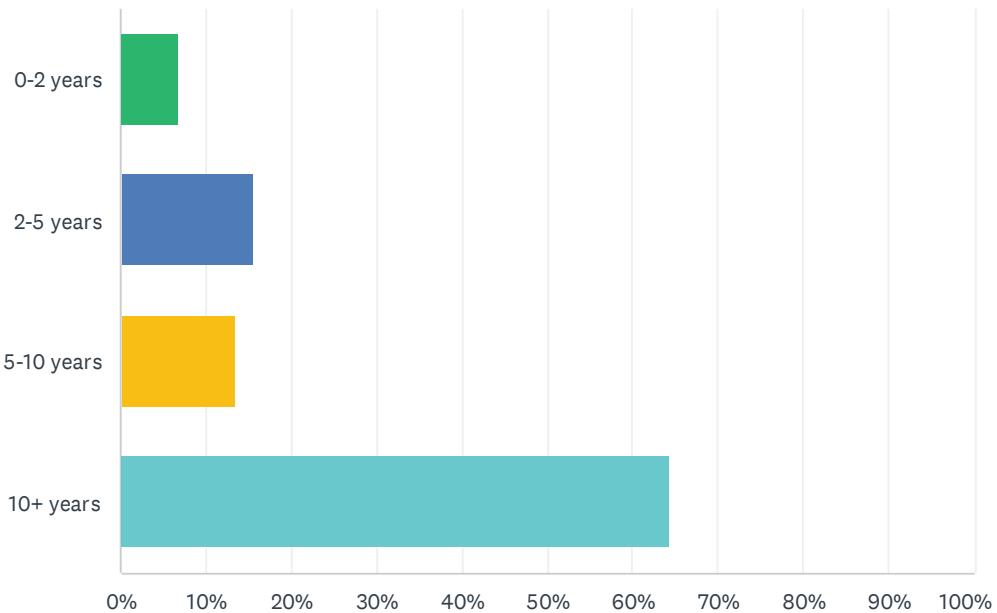
Answered: 298 Skipped: 3



ANSWER CHOICES	RESPONSES	
I live in Glendale but my job is located somewhere else (pre-pandemic conditions)	35.91%	107
My job is in Glendale (pre-pandemic conditions) but I live somewhere else	14.09%	42
I live and work in Glendale (pre-pandemic conditions)	46.31%	138
I do not live or work in Glendale	3.69%	11
TOTAL		298

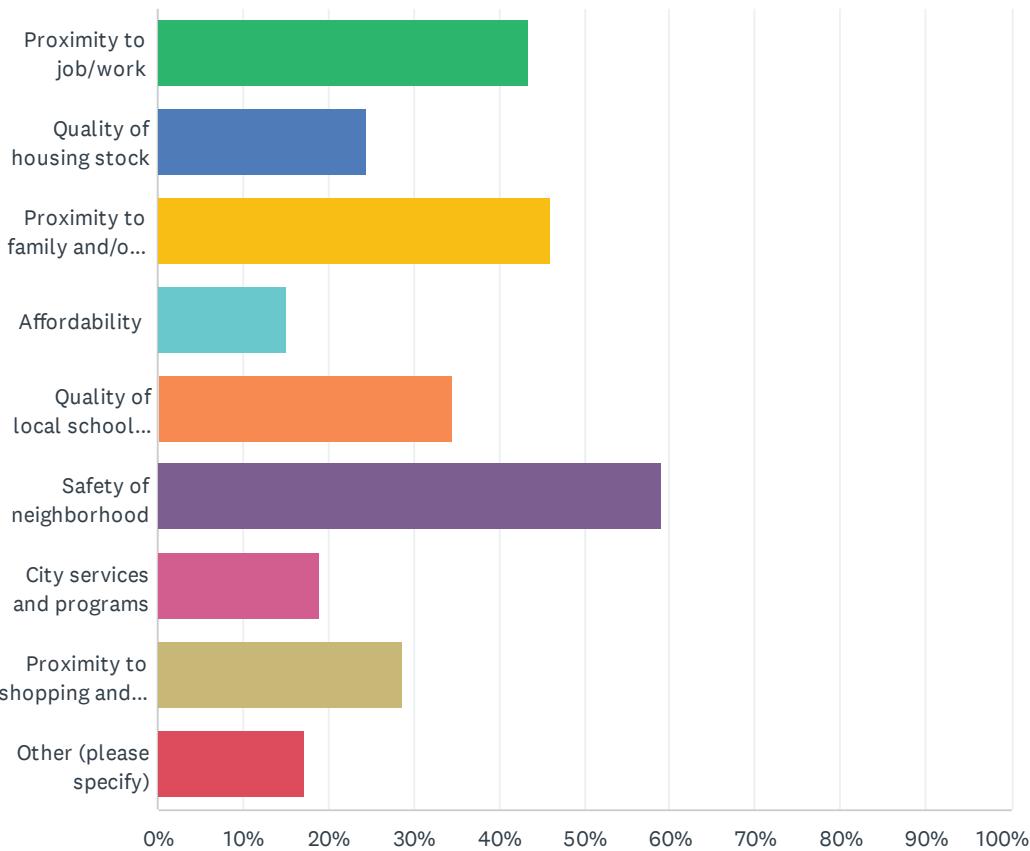
Q2 How long have you lived in the City?

Answered: 238 Skipped: 63



Q3 What made you decide to live here? (Select all that apply)

Answered: 237 Skipped: 64



ANSWER CHOICES		RESPONSES
Proximity to job/work		43.46% 103
Quality of housing stock		24.47% 58
Proximity to family and/or friends		45.99% 109
Affordability		15.19% 36
Quality of local school system		34.60% 82
Safety of neighborhood		59.07% 140
City services and programs		18.99% 45
Proximity to shopping and services		28.69% 68
Other (please specify)		17.30% 41
Total Respondents: 237		

#	OTHER (PLEASE SPECIFY)	DATE
1	Born and raised	5/2/2021 9:23 PM
2	At the time housing affordability and interesting central location in LA County. Now, not so	4/30/2021 7:29 PM

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affordable.

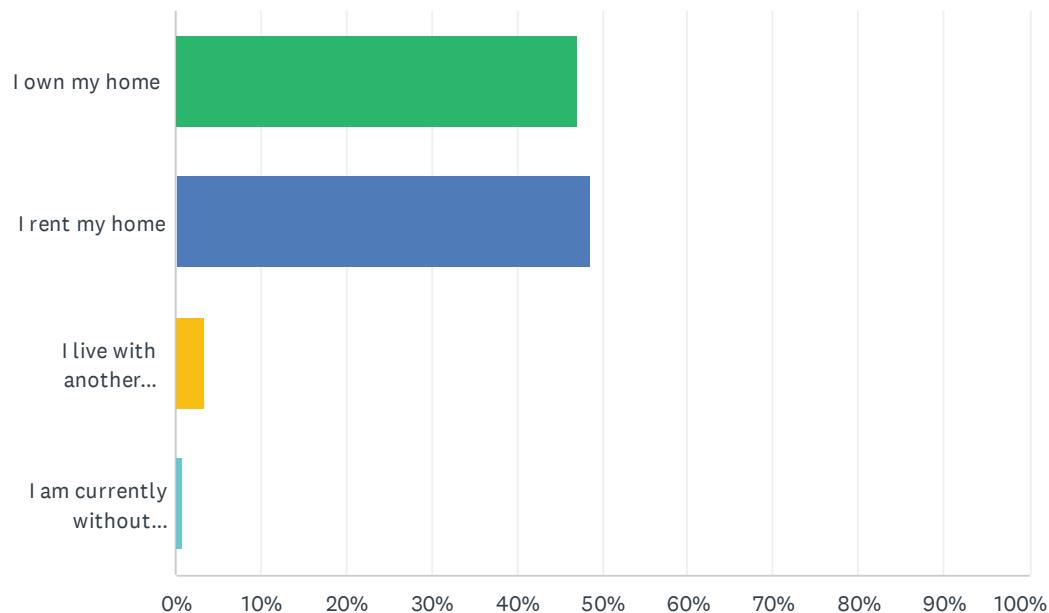
3	Grew up here. It used to be a good place to live.	4/23/2021 3:57 PM
4	At the time, affordability & safety but neither are true now.	4/23/2021 12:40 PM
5	Born and raised in La Crescenta 68 years	4/23/2021 8:24 AM
6	Glendale Annex, b/c we LOVE the small community feel of La Crescenta & low-profile buildings	4/22/2021 8:45 PM
7	Small town feel	4/22/2021 8:44 PM
8	born here	4/22/2021 4:29 PM
9	Was a child when I began living here	4/19/2021 1:04 PM
10	It looked nice.	4/19/2021 10:24 AM
11	Armenian community	4/19/2021 7:47 AM
12	I am 80 years old I worked in Glendale and live there I am disable ,I am retired with pension and receive SSA but the total of my income is too low.	4/18/2021 11:36 AM
13	proximity to my spouse's job	4/17/2021 8:22 PM
14	Born here	4/16/2021 8:41 PM
15	Unique neighborhood of the Verdugo Woodlands	4/16/2021 7:08 PM
16	Moved here as a child in the 40's	4/16/2021 4:28 PM
17	We enjoy a quiet neighborhood with beautiful trees, ie, the Verdugo Woodlands	4/16/2021 1:38 PM
18	The charm of neighbor hood original 1920s 30 s smaller homes original not remodeled	4/16/2021 12:41 PM
19	born here	4/15/2021 10:17 PM
20	Born and raised here and always have lived here.	4/15/2021 3:52 PM
21	Historic neighborhoods	4/15/2021 2:53 PM
22	Lived here since a child; father bought home.	4/15/2021 2:09 PM
23	Immigration from other country	4/15/2021 12:08 PM
24	Schools!	4/15/2021 11:27 AM
25	Family	4/14/2021 10:15 PM
26	Trees, access to nature, green space. We live in Verdugo Woodlands.	4/14/2021 10:05 PM
27	Proximity to open spaces (trails)	4/14/2021 9:13 PM
28	found a house I loved	4/14/2021 8:55 PM
29	Like the culture and character of the City. Nice balance of taking care of people and business needs.	4/14/2021 6:26 PM
30	family ties	4/14/2021 5:09 PM
31	My parents settled here when we immigrated. Would love to afford my own home here also.	4/14/2021 1:39 PM
32	South Glendale is near basically everything on the east side - the studios, downtown, parks, etc	4/13/2021 9:57 AM
33	Efficient & prompt in city maintenance, safety, police response, exceptional Fire Department & more	4/11/2021 6:31 PM
34	At the time, no rent control (I was looking to buy a duplex or triplex to help with my mortgage as I couldn't afford a single family home)	4/10/2021 9:49 AM
35	Near hills and trails & wife already owned home	4/10/2021 7:45 AM
36	Used to have a good school district used to be a nice place to live	4/9/2021 5:32 PM

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37	Grew up here	4/9/2021 5:22 PM
38	personal reasons.	4/9/2021 4:59 PM
39	I was born here	4/8/2021 5:55 PM
40	Born and Raised	4/7/2021 2:46 AM
41	The Armenian Community	4/6/2021 2:11 PM

Q4 Do you currently own or rent your home?

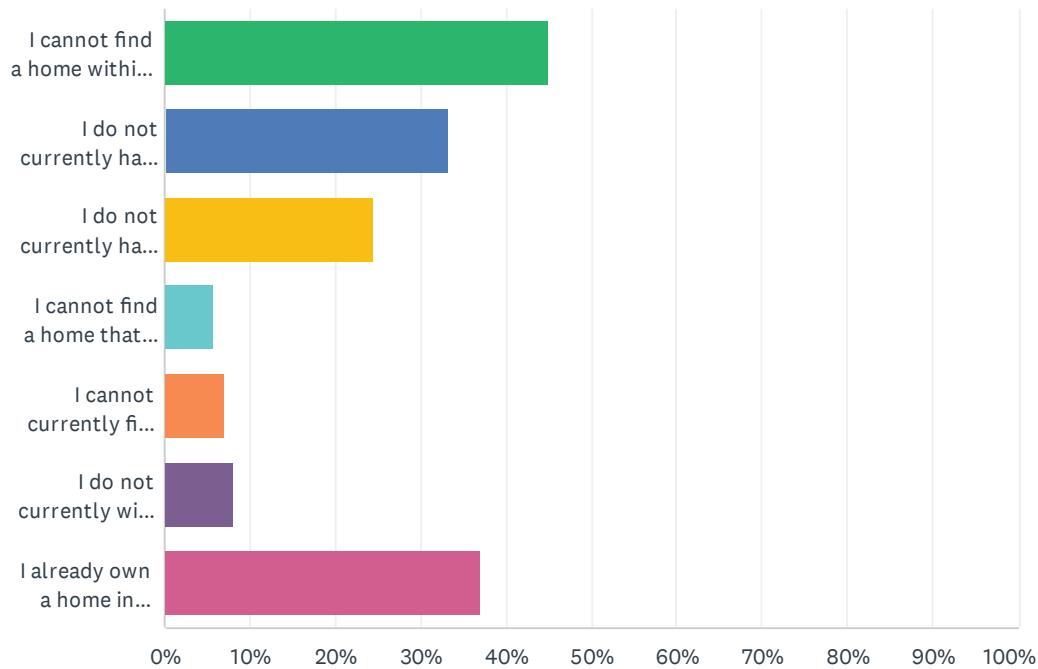
Answered: 263 Skipped: 38



ANSWER CHOICES	RESPONSES	
I own my home	47.15%	124
I rent my home	48.67%	128
I live with another household (neither own nor rent)	3.42%	9
I am currently without permanent shelter	0.76%	2
TOTAL		263

Q5 If you wish to own a home in Glendale but do not currently own one, what issues are preventing you from owning a home at this time? Select all that apply.

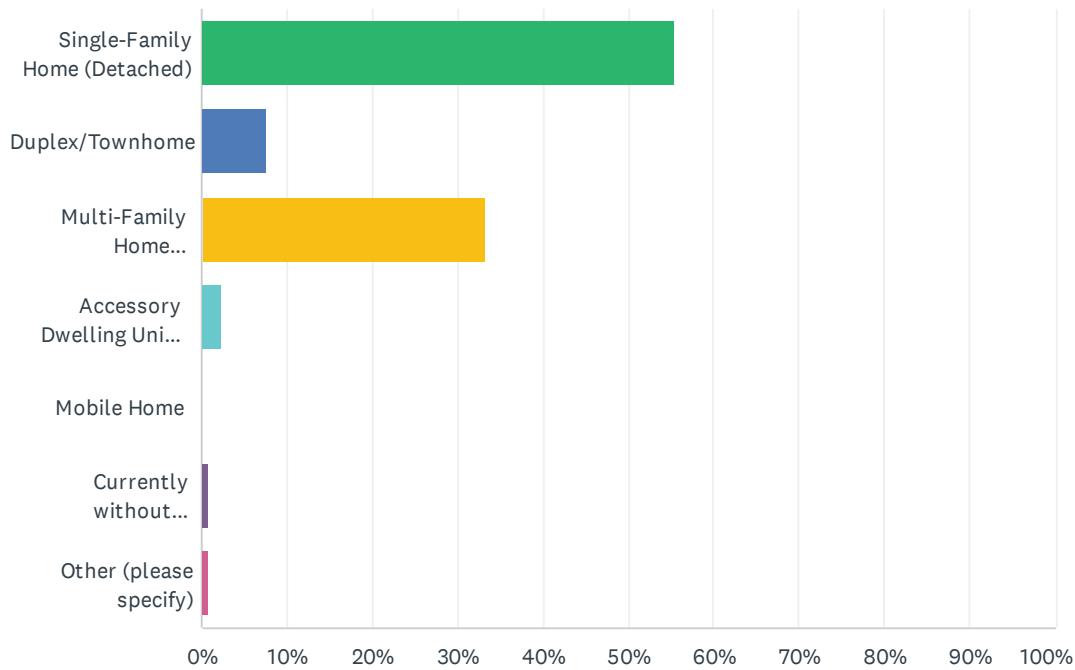
Answered: 256 Skipped: 45



ANSWER CHOICES	RESPONSES	
I cannot find a home within my target price range in Glendale	44.92%	115
I do not currently have the financial resources for an appropriate down payment	33.20%	85
I do not currently have the financial resources for an adequate monthly mortgage payment	24.61%	63
I cannot find a home that suits my living needs in Glendale (housing size, disability accommodations)	5.86%	15
I cannot currently find a home that suits my quality standards in Glendale	7.03%	18
I do not currently wish to own or rent a home in Glendale	8.20%	21
I already own a home in Glendale	37.11%	95
Total Respondents: 256		

Q6 Select the type of housing that best describes your current home.

Answered: 262 Skipped: 39

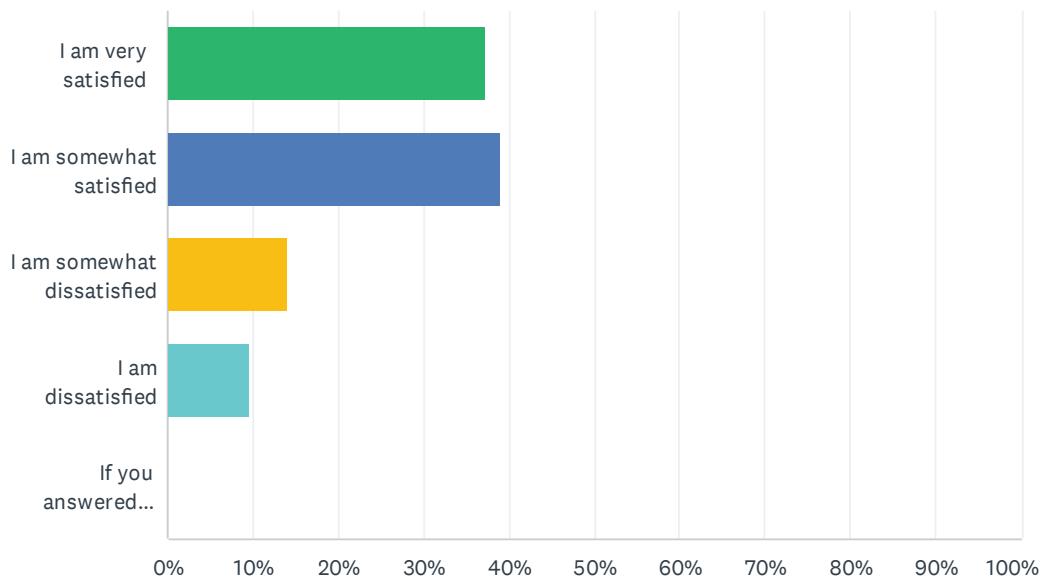


ANSWER CHOICES	RESPONSES
Single-Family Home (Detached)	55.34% 145
Duplex/Townhome	7.63% 20
Multi-Family Home (Apartment/Condominium)	33.21% 87
Accessory Dwelling Unit, Granny Flat, Guest House	2.29% 6
Mobile Home	0.00% 0
Currently without permanent shelter	0.76% 2
Other (please specify)	0.76% 2
TOTAL	262

#	OTHER (PLEASE SPECIFY)	DATE
1	1	4/29/2021 10:07 PM
2	Single bedroom apartment	4/14/2021 2:06 PM

Q7 How satisfied are you with your current housing situation?

Answered: 262 Skipped: 39



ANSWER CHOICES	RESPONSES	
I am very satisfied	37.40%	98
I am somewhat satisfied	38.93%	102
I am somewhat dissatisfied	14.12%	37
I am dissatisfied	9.54%	25
If you answered somewhat dissatisfied or dissatisfied, please explain.	0.00%	0
TOTAL		262

#	IF YOU ANSWERED SOMEWHAT DISSATISFIED OR DISSATISFIED, PLEASE EXPLAIN.	DATE
There are no responses.		

Q8 If you answered dissatisfied or somewhat dissatisfied to the prior question, please provide a reason below. (If you did not, please skip).

Answered: 84 Skipped: 217

#	RESPONSES	DATE
1	Not my house.	5/2/2021 9:24 PM
2	Air quality issues, noise pollution, windows are old single pane, very hot, tenets above and below, leaks, no EV Charging.	4/30/2021 7:31 PM
3	0	4/29/2021 10:07 PM
4	Although I'm fortunate to be able to own a home in Glendale, all my family is being pushed out of Glendale for high housing prices and unfair housing practices. The city should look into serious rent control and fix unfair section 8 housing practices	4/28/2021 5:29 PM
5	Zonong that has allowed for atea businesses creating noise, traffic, and no regulations	4/27/2021 7:16 PM
6	Because the rent is too much	4/27/2021 4:06 PM
7	We need more laundry machines	4/27/2021 3:08 PM
8	I would love to own a home.	4/27/2021 1:35 PM
9	I share kitchen and bathroom with other people. I would love to be able to afford an apartment in Glendale where I work. Rent is far too expensive to live in Glendale.	4/26/2021 3:25 PM
10	Wasting money paying rent and not building equity	4/26/2021 12:20 PM
11	I prefer to own again. Rents are high.	4/24/2021 12:06 AM
12	Owning or renting is expensive in Glendale	4/23/2021 2:48 PM
13	Too much money fir an apartment that is substandard, heat and AC only in the living room. Cant afford anything better and i have a good jib! But im a single mom	4/23/2021 2:42 PM
14	I would like to improve my home but the permitting process is too cumbersome.	4/23/2021 2:08 PM
15	Skip	4/23/2021 1:28 PM
16	Old apartment, so many issues like roaches, windows doesn't open any more, too much rent etc.	4/23/2021 1:14 PM
17	The rent is too high in a city that cares about businesses but not residents. Crime is on the rise and the city council does nothing.	4/23/2021 12:43 PM
18	no pet policy in the apartment complex; lack of affordable homes/condos in the area	4/23/2021 12:40 PM
19	So much of my paycheck goes toward paying the mortgage that there isn't money to fix up our house, and we have to go without legitimate flooring (exposed plywood), and we should probably replace our windows but there isn't any money to do it... Affordability goes well beyond getting into a home (doesn't matter if it is single family detached, or a rental apartment, if you can't afford basic maintenance, medical care, and essentials like food, simply having a roof is only a start.)	4/23/2021 11:07 AM
20	Too long of a commute to Glendale	4/22/2021 11:51 PM
21	My house is very small and I can't afford a larger house. Even if I could afford a larger house, I probably can't afford the property taxes.	4/22/2021 9:45 PM
22	LOVE my house; horrified at the 4-story bldg planned for 1/2 block away	4/22/2021 8:50 PM
23	I am satisfied but not happy with what is coming down the pipeline in terms of building.	4/22/2021 8:49 PM
24	Ready for a new home and I would like to live in Glendale.	4/22/2021 6:10 PM

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25	living too far from work	4/22/2021 5:43 PM
26	The owners are Armenian and they only care about collecting and increasing the rent. The owners fired all the on-site managers and even though there are 24 units and the law says that there should be an on-site manager and we have complained we heard that they pay off the authorities to not fine them for not having an on-site manager. The place is filthy dirty especially the laundry room which they say the tenants should keep clean it's not the owners job. They don't enforce the smoking ban which Glendale is a smoke free city. They do no upgrades, they say if we are not happy move. The owners say Glendale city laws don't apply to them, they can do what they want.	4/20/2021 1:36 PM
27	Rent is too high, there are no laundry facilities in the building	4/19/2021 11:12 PM
28	Older house that has not been well maintained by landlords, last updated in the early 90s. Lots of street noise, bad windows that let in pollution, expensive to power/heat, nowhere for kids to play	4/19/2021 5:52 PM
29	Too many fast cars throughout the day and night speeding across residential.	4/19/2021 10:46 AM
30	I'm unsure how this condo passed sound requirements. The walls are miraculously thin & the amount of noise that can be heard through them is shocking. Glendale needs better sound codes for older buildings.	4/19/2021 10:27 AM
31	I would like to be able to afford to not live in a multi generational home.	4/17/2021 8:58 PM
32	Highly rent and utility bills also lack of parking at street because some people have a multiple cars even they do not use we need to be like in Europe people pay a fee to be parking on street and have own soace	4/17/2021 3:40 PM
33	Close to work	4/16/2021 11:24 PM
34	No	4/16/2021 8:42 PM
35	The manager is not doing anything about this place	4/16/2021 8:12 PM
36	City planted an oak tree in my front yard. I enjoy the old oak trees in the backyard, but did not want one in the front where cars park. t in the ss	4/16/2021 7:14 PM
37	traffic safety/noise	4/16/2021 1:46 PM
38	Too expensive and slightly run down	4/16/2021 10:46 AM
39	Run down condition, expensive rent for what we pay	4/16/2021 10:34 AM
40	The prices are ridiculously high in Glendale	4/16/2021 10:33 AM
41	No affordable housing options. Even apartments are high priced.	4/16/2021 9:23 AM
42	neighborhood services is not enforcing the city codes and the neighbors are letting their houses/yards turn to dead weeds	4/16/2021 9:12 AM
43	Rent is raising too often	4/16/2021 9:07 AM
44	Campbell street, and the city in general - needs more parking. Stop approving developments with parking variances	4/16/2021 12:34 AM
45	The upstairs neighbors consist of an old pedophile, a bald meth addict degenerate & a crossdressing gimp to start. There have been multiple leaks in multiple rooms/ parts of the ceiling. Blatant and inconsiderate noise. They invite their tweaker friends.	4/15/2021 10:23 PM
46	Speeding cars	4/15/2021 8:51 PM
47	Too small, inefficient windows, would like solar but can't really in multifamily	4/15/2021 8:30 PM
48	Owner is removing property from rental market to sell	4/15/2021 7:55 PM
49	I remain becasue it is low income housing without which I would be houseless. It suffers what all apartments suffer: neighbors.	4/15/2021 2:44 PM
50	lack of parking, lack of resources in the neighborhood (laundromat, markets, public transportation)	4/15/2021 2:39 PM

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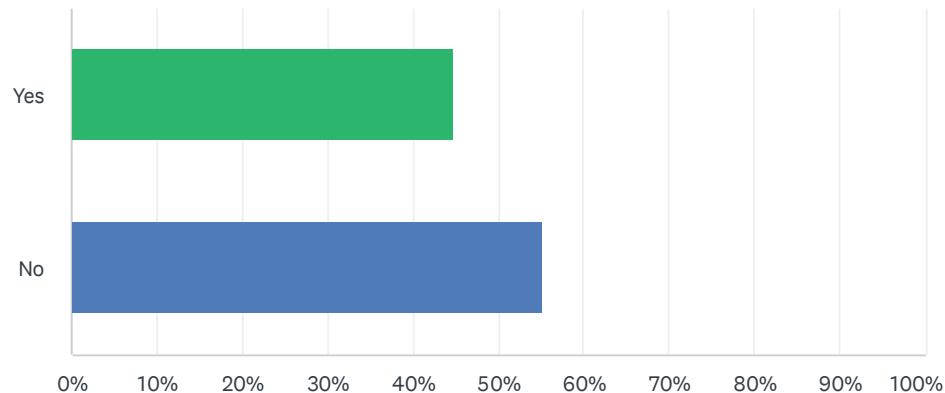
51	Slumlords. I would like my own property.	4/15/2021 2:26 PM
52	my 101yr old apt is pretty, but absolutely not energy efficient. Windows are original, single pane. There is no heat or AC in the bedroom. The only heater is a 60s gas one that doesn't work well enough to justify the cost of the gas. Also my apt has no parking and my car has been stripped for parts. The fire dept and police love driving down my residential st at least 3x/day, not to mention that on one in glendale knows what a four way stop is. People blast through these streets ALL THE TIME. Horribly noisy, sweltering in summer, freezing in winter. I can't recommend living even in this "residential" neighborhood. Too loud, dangerous and uncomfortable. I hope I can move back to Burbank.	4/15/2021 10:46 AM
53	Ever increasing traffic levels, fruit vendors on residential street corners	4/15/2021 10:40 AM
54	Rent is too high for the size of the apartment	4/15/2021 10:38 AM
55	While I feel steady in my housing situation, there are some many residents that are housing insecure, including students and the elderly. And if I were to try and purchase a house, the prices are just too high.	4/15/2021 10:20 AM
56	If Glendale had better prices, I would be able to live in Glendale	4/15/2021 8:01 AM
57	Am very frustrated with amount of unpermitted work and poor quality of residential design in the neighborhood	4/14/2021 8:59 PM
58	Price is too high, and there are no meaningful tenant rights in Glendale that support tenant stability	4/14/2021 8:42 PM
59	I want to buy own home	4/14/2021 8:31 PM
60	Too many boxed apartments built by out of state venture capitalists. It takes away from the City's quality of life.	4/14/2021 7:53 PM
61	Too many neighbors building ADU's which is making the neighborhood crowded and loud.	4/14/2021 6:25 PM
62	Housing prices are high while housing availability is scarce.	4/14/2021 5:11 PM
63	I do not appreciate the McMansions that are popping up around us. It's grotesque	4/14/2021 2:00 PM
64	The home is badly insulated with no central heat or air conditioning. We waste money and energy heating and cooling it.	4/14/2021 1:48 PM
65	Doesn't meet my expectations for how much I am paying	4/14/2021 1:32 PM
66	Would like to be able to buy a home and not rent.	4/14/2021 1:26 PM
67	AB 68 is the reason! Single family zoning is going down the drain!	4/13/2021 9:46 AM
68	Too many accessory dwelling units are being built on my street. There is now basically a triplex next door to me. The amount of extra people and parking is becoming overwhelming.	4/10/2021 10:02 AM
69	Living in a 2 bedroom house with my parents and my 2 teenage kids	4/9/2021 9:08 PM
70	Policies and City Council processes seek to keep Glendale the home of the upper middle class. There is no housing for average income family.	4/9/2021 7:43 PM
71	Rent is too high.	4/9/2021 7:15 PM
72	Not enough streets lightings and homeowners do not park in their garages and flood the streets with cars	4/9/2021 6:42 PM
73	You came in and butchered are single-family neighborhood with crappy shitty crowded filthy apartments	4/9/2021 5:34 PM
74	I would love to own a home or condo instead of paying such high rent	4/9/2021 5:33 PM
75	I want to own a home and have looked with a loan approved but houses prices are too high and when the few that are, companies buy them to then rent them. I see them a month after listed for rent.	4/9/2021 4:59 PM
76	Satisfied with the	4/9/2021 1:12 AM
77	Satisfied with the	4/9/2021 1:12 AM

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78	Too expensive	4/8/2021 5:56 PM
79	Rent is expensive. Apartment is old and small	4/8/2021 5:41 PM
80	window ac is not adequate in 100+ Summer temperature, square footage for price is low	4/8/2021 5:29 PM
81	It's next to Burger King, teenagers will park in parking lot until 2 AM with loud music. Every year the owner raises the rent \$100 bucks	4/8/2021 11:16 AM
82	Too dense, loud neighbors, dangerous streets	4/6/2021 10:18 PM
83	Glendale has inadequate tenant protections including having let the pandemic rent increase moratorium expire, unlike most of LA County	4/6/2021 8:51 PM
84	The lack of affordable housing	4/6/2021 2:14 PM

Q9 Do you think that the range of housing options currently available in the City of Glendale meet your needs?

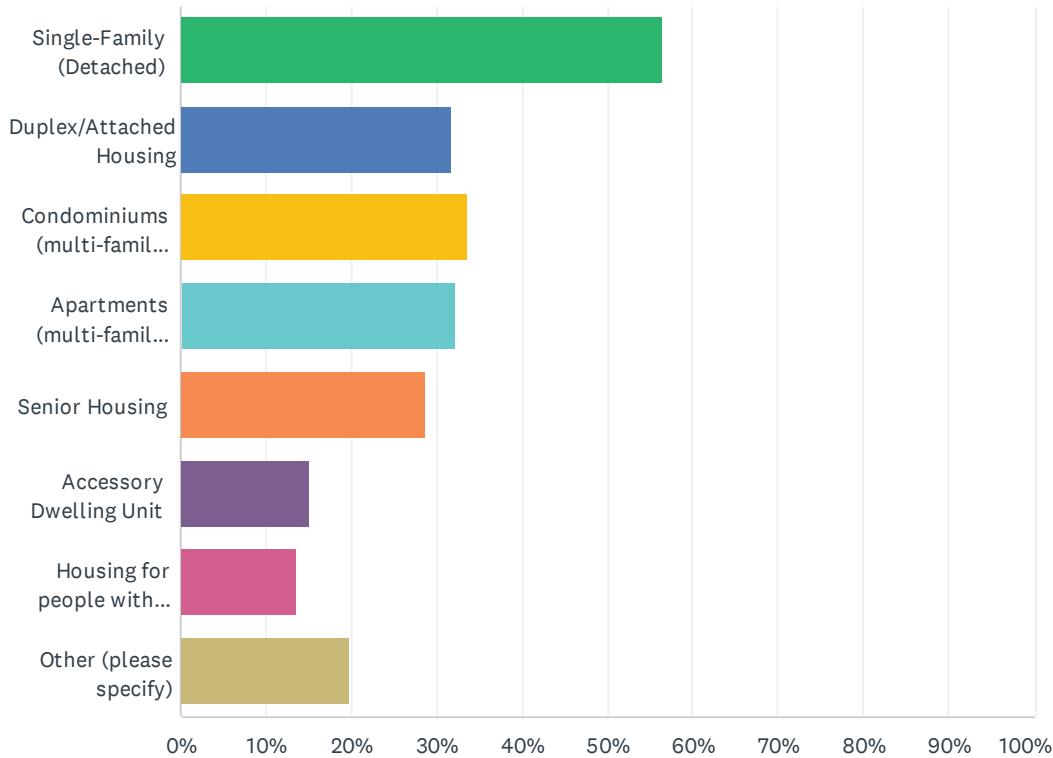
Answered: 250 Skipped: 51



ANSWER CHOICES	RESPONSES	
Yes	44.80%	112
No	55.20%	138
TOTAL		250

Q10 What types of housing are most needed in the City of Glendale? (Select all that apply)

Answered: 258 Skipped: 43



ANSWER CHOICES	RESPONSES
Single-Family (Detached)	56.59% 146
Duplex/Attached Housing	31.78% 82
Condominiums (multi-family ownership homes)	33.72% 87
Apartments (multi-family rental homes)	32.17% 83
Senior Housing	28.68% 74
Accessory Dwelling Unit	15.12% 39
Housing for people with disabilities (please specify in comment field below)	13.57% 35
Other (please specify)	19.77% 51
Total Respondents: 258	

#	OTHER (PLEASE SPECIFY)	DATE
1	Homeless Support	4/30/2021 10:39 AM
2	None	4/27/2021 7:16 PM
3	Affordable Rent	4/26/2021 3:25 PM

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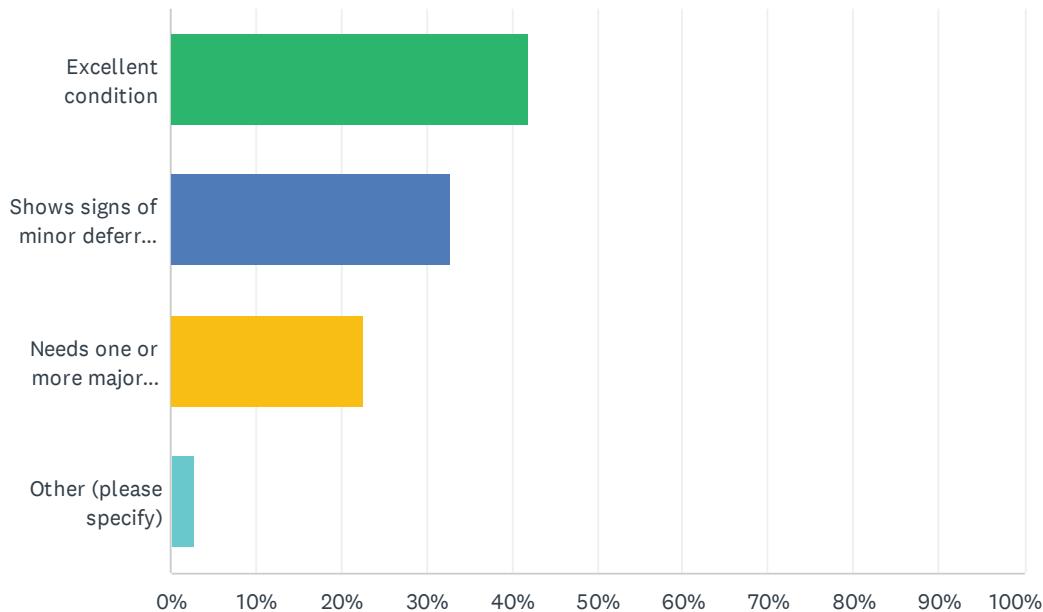
4	Affordable rental housing--keep rental rates reasonable!	4/25/2021 6:53 PM
5	We don't need any more housing. Shortage of services.	4/23/2021 4:00 PM
6	Accessible housing	4/23/2021 1:05 PM
7	Housing for middle class workers. There needs to be something between Section 8 and the overpriced cracker boxes springing up on Central Ave.	4/23/2021 12:43 PM
8	The key is affordable, doesn't have to be free, just affordable for the people who work within the confines of the City.	4/23/2021 11:07 AM
9	Currently at the mercy of family members and my disability does not allow for me to move elsewhere	4/23/2021 8:11 AM
10	ACTUAL Low-income, accessible housing for disabled	4/22/2021 8:50 PM
11	This is too hard to answer. You can't build anywhere unless you consider traffic and other infrastructure issues first. We need more units but not without thought.	4/22/2021 8:49 PM
12	Already crowded; no more building	4/22/2021 8:42 PM
13	Less people	4/22/2021 5:21 PM
14	More housing for non Armenian people, there is no housing assistance unless you are Armenian. The buildings owned by Armenians discriminate and ONLY want to rent to Armenians.	4/20/2021 1:36 PM
15	Tenant-owned co-ops	4/19/2021 11:12 PM
16	No idea!	4/19/2021 5:28 PM
17	Townhomes	4/19/2021 1:07 PM
18	affordable housing	4/17/2021 8:24 PM
19	AFFORDABLE 900.00 MONTH	4/17/2021 4:44 PM
20	none	4/16/2021 7:14 PM
21	more affordable housing. period.	4/16/2021 1:46 PM
22	Glendale already has too many homes	4/16/2021 12:46 PM
23	Low income housing in general and low income housing for people on dissiblity	4/16/2021 10:14 AM
24	Green wide space	4/15/2021 10:23 PM
25	None. There are too many apartments/condos!	4/15/2021 8:51 PM
26	Affordable housing—stop building new things and start enforcing caps on rent and property values	4/15/2021 8:48 PM
27	Wheelchair and double cain	4/15/2021 5:22 PM
28	Homeless housing	4/15/2021 2:54 PM
29	affordable options	4/15/2021 2:44 PM
30	Affordable and Market Rate Housing. More so, Affordable	4/15/2021 11:29 AM
31	Affordable homes for young people.	4/14/2021 10:08 PM
32	AFFORDABLE	4/14/2021 8:59 PM
33	housing protected by very strong rent control	4/14/2021 8:42 PM
34	Low income housing	4/14/2021 2:00 PM
35	Small lot single family detached homes (3 or 4 story)	4/13/2021 12:04 PM
36	We need homes for young working families. Two working parents still can't afford to purchase or rent a 3-bedroom home here	4/13/2021 10:00 AM
37	Housing in underdeveloped areas	4/10/2021 10:02 AM

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38	AFFORDABLE apartments. Stop green lighting luxury developments while pretending to care about the middle class by imposing rent control on owners of older housing.	4/10/2021 9:52 AM
39	Single family homes with large common yard	4/10/2021 7:48 AM
40	Mobility access is still a problem in many areas.	4/9/2021 7:43 PM
41	I am a single mom with a disabled daughter & the rents are too high and the newer apartments have too many units in them for us. We would like a smaller size building where the rents the units are spacious and the rents are affordable. It is difficult to get affordable housing/ apartment and the wait list is very long. There is no priority for disabled people.	4/9/2021 7:15 PM
42	Affordable Homes	4/9/2021 5:23 PM
43	None. Population density is already too high.	4/9/2021 5:00 PM
44	Condos and Townhouses you can buy. Everything here is leasing. That's wrong.	4/8/2021 5:41 PM
45	Not luxury	4/8/2021 5:29 PM
46	ELI, VLI and LI housing	4/8/2021 10:49 AM
47	affordable housing, not apartments that target young rich people but simple apartments that allow the families that currently being kicked out (due to new developments) to relocate to	4/7/2021 12:11 PM
48	Townhomes	4/7/2021 2:51 AM
49	Low-income affordable housing bad public housing	4/6/2021 8:51 PM
50	Affordable Housing	4/6/2021 4:18 PM
51	Specifically affordable apartments with access to public transit	4/6/2021 2:14 PM

Q11 How would you rate the physical condition of the residence you live in?

Answered: 262 Skipped: 39

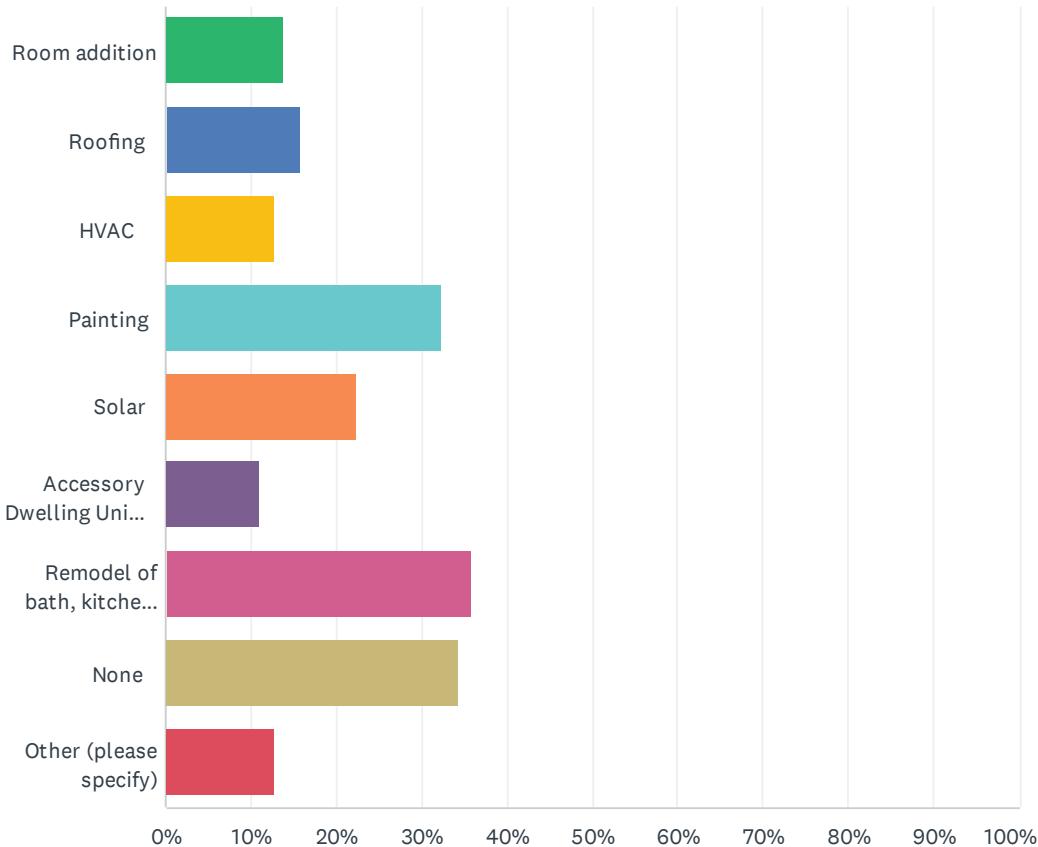


ANSWER CHOICES		RESPONSES	
Excellent condition		41.98%	110
Shows signs of minor deferred maintenance (e.g., peeling paint, chipped stucco, etc.)		32.82%	86
Needs one or more major systems upgrades (e.g., new roof, windows, electrical, plumbing, HVAC system, etc.)		22.52%	59
Other (please specify)		2.67%	7
TOTAL			262

#	OTHER (PLEASE SPECIFY)	DATE
1	Is the City going to help paint and repair?	4/23/2021 4:00 PM
2	Terrible, the owners DO nothing except collect and raise the after all Lamborghini's take a lot of gas.	4/20/2021 1:36 PM
3	Large cracks in stucco, possible major structural issues	4/16/2021 3:42 PM
4	Walls ceiling/roof are paper thin. Renters must go through a background check	4/15/2021 10:23 PM
5	It's just aging gracefully	4/9/2021 5:34 PM
6	Do not live in Glendale	4/8/2021 10:49 AM
7	Outdated	4/7/2021 2:51 AM

Q12 Which of the following housing upgrades or expansions have you considered making on your home?

Answered: 260 Skipped: 41



ANSWER CHOICES	RESPONSES
Room addition	13.85% 36
Roofing	15.77% 41
HVAC	12.69% 33
Painting	32.31% 84
Solar	22.31% 58
Accessory Dwelling Unit, Granny Flat, Guest House	11.15% 29
Remodel of bath, kitchen, or other facility	35.77% 93
None	34.23% 89
Other (please specify)	12.69% 33
Total Respondents: 260	

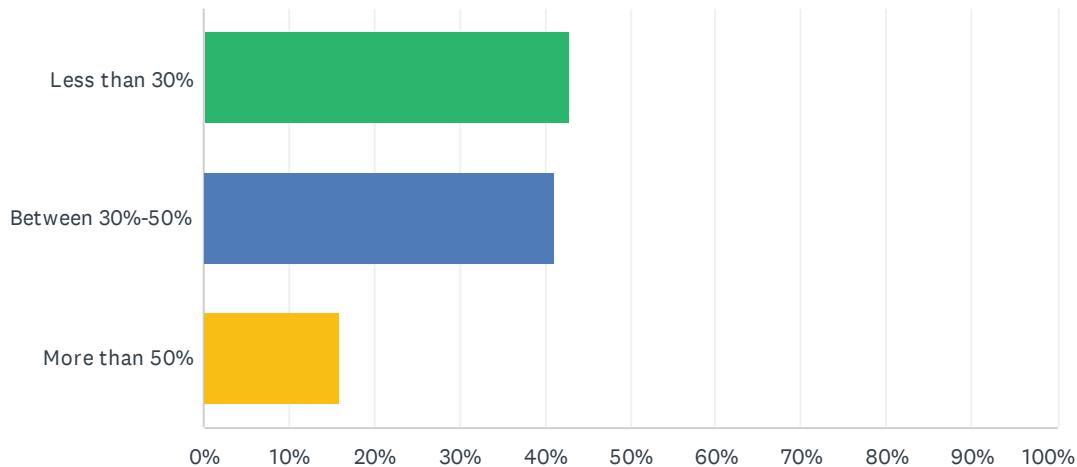
#	OTHER (PLEASE SPECIFY)	DATE
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1	I do not own, so would not / cannot make.	4/30/2021 7:31 PM
2	Plumbing electrical it's almost a 100 year old home	4/28/2021 5:29 PM
3	Window replacement	4/26/2021 8:00 AM
4	I don't own my home so I can't make changes to it	4/25/2021 6:53 PM
5	I replaced my hvac summer 2020	4/24/2021 9:00 PM
6	De	4/24/2021 3:38 PM
7	It's not my home! Its the landlord that leaves it in disrepair	4/23/2021 2:42 PM
8	Roaches	4/23/2021 1:14 PM
9	The upgrade I'm looking for is to get out of Glendale. The corruption and lack of regard for residents has beaten me down.	4/23/2021 12:43 PM
10	I rent, so I cannot make any improvements	4/23/2021 12:40 PM
11	Cant update as I rent	4/23/2021 10:22 AM
12	None now. It's too hard to get permits in a timely matter. And, why invest in our home when the neighborhood is on the verge of changing for the worst. Walkability, drivability, and safety will all be affected. Stop this madness. Think and plan before you move. What we moved here for 20 years ago is not what we see continuing in the future. Why invest in our home now?	4/22/2021 8:49 PM
13	None. I live in a new apartment buildings	4/22/2021 4:17 PM
14	I rent	4/20/2021 1:36 PM
15	Wood floor	4/19/2021 9:33 PM
16	Insulation & new carpets, despite being a renter	4/19/2021 1:07 PM
17	I do not own	4/17/2021 3:40 PM
18	I rent my place	4/16/2021 10:34 AM
19	I rent, so none	4/15/2021 11:02 PM
20	Walls are paperthin, renters must go through background check	4/15/2021 10:23 PM
21	Replace all carpeting and appliances	4/15/2021 5:22 PM
22	I rent so I cant do shit. But all the windows are 101yr old single pane, 6ft in length. The bedrooms have no heat or AC. Apt has no viable source of heat at all. No insulation. This building can and should be outfitted with central heat/ac. Back staircase for upstairs apts wraps around my bedroom walls and slams horribly into the walls when someone walks down them- even worse when theres an earthquake!	4/15/2021 10:46 AM
23	Exterior cladding	4/14/2021 4:34 PM
24	landscaping for shade and drought tolerance	4/14/2021 1:48 PM
25	I rent. All i can do is put potted plants outside	4/13/2021 10:00 AM
26	We rent	4/10/2021 11:49 AM
27	Plumbing and electrical	4/9/2021 9:08 PM
28	Repair damaged stucco	4/9/2021 7:43 PM
29	We rent, so there have been no upgrades.	4/9/2021 7:15 PM
30	Not my home	4/9/2021 4:59 PM
31	Window ac is not adequately weatherproofed but I don't own the place	4/8/2021 5:29 PM
32	O cannot make changes because I'm renting	4/8/2021 3:25 PM
33	rental	4/6/2021 10:44 PM

Q13 Based on your monthly income before taxes, how much of your monthly income do you spend on housing?

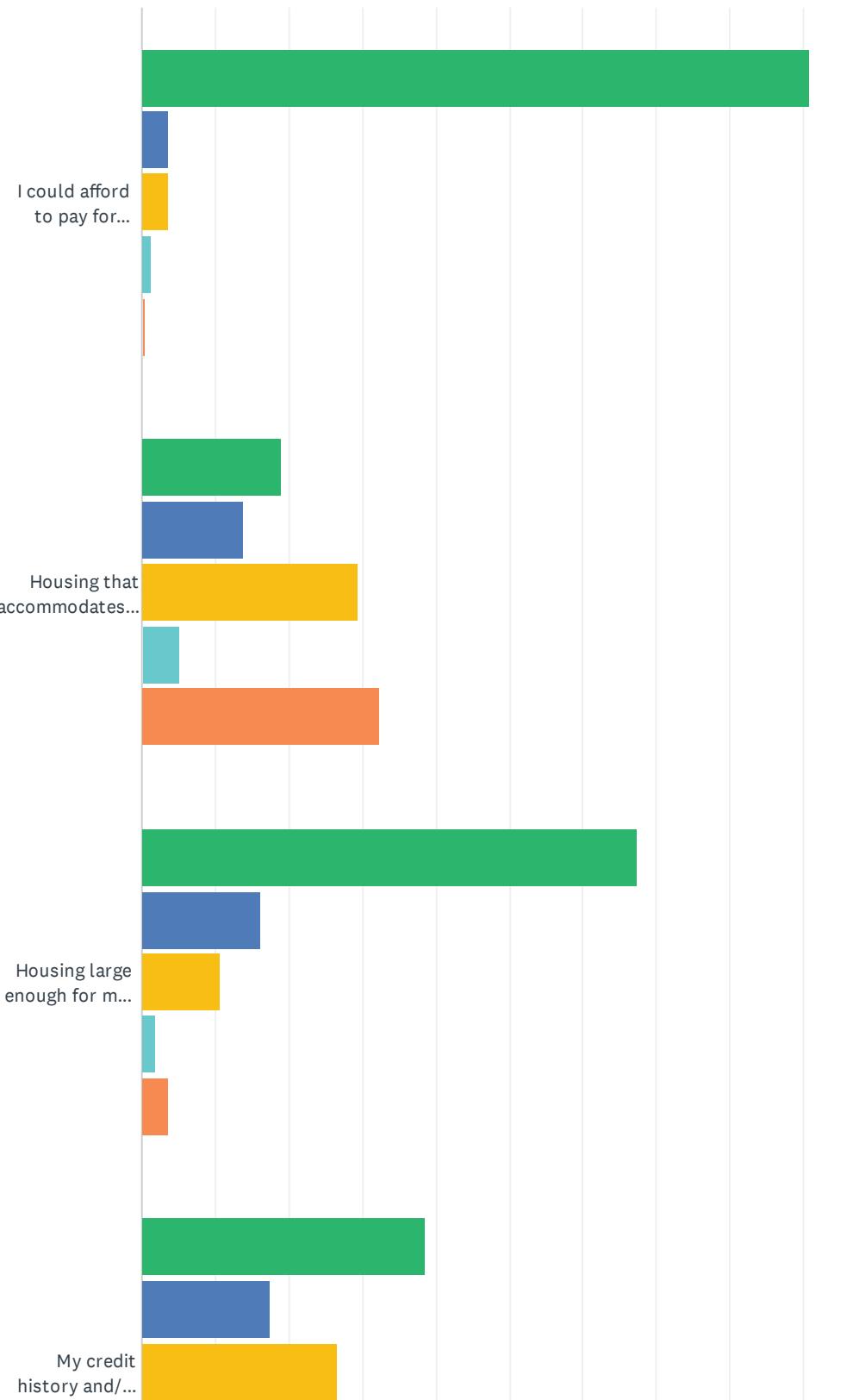
Answered: 238 Skipped: 63



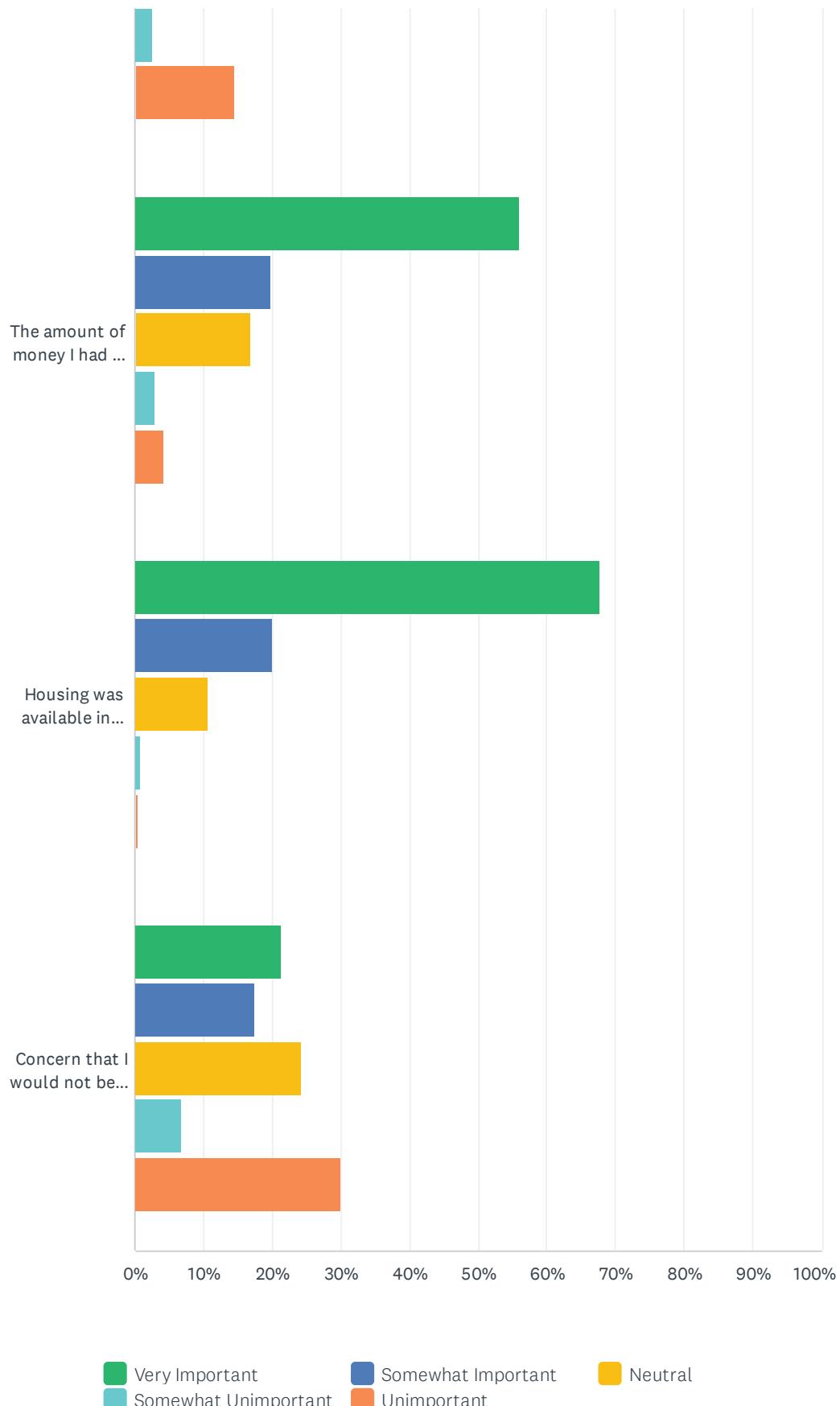
ANSWER CHOICES	RESPONSES	
Less than 30%	42.86%	102
Between 30%-50%	41.18%	98
More than 50%	15.97%	38
TOTAL		238

Q14 How important are the following factors in your housing choice? (If a statement does not pertain to you, please leave blank.) (1-5 scale)

Answered: 228 Skipped: 73



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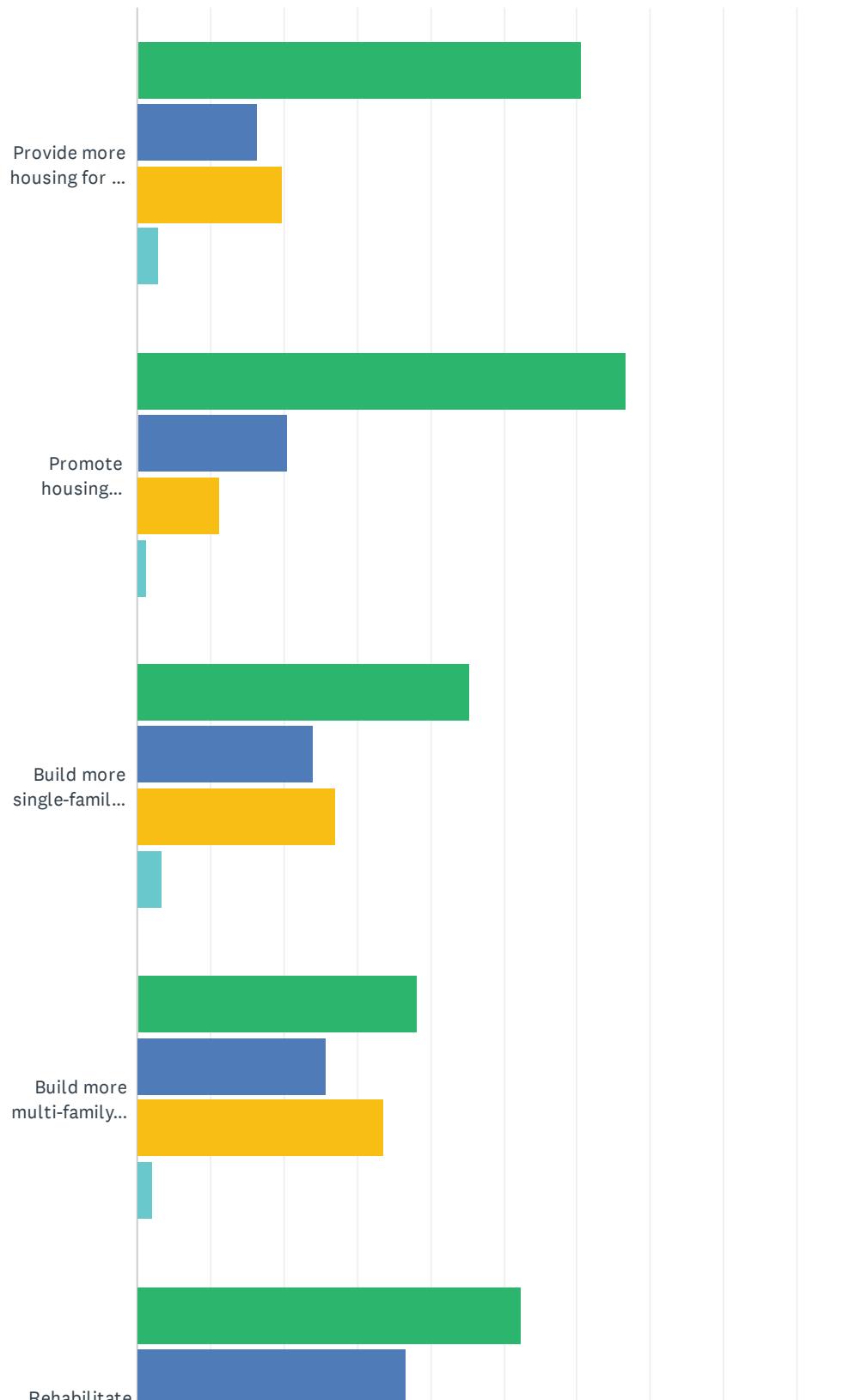
Glendale 2021-2029 Housing Element Update Survey

	VERY IMPORTANT	SOMEWHAT IMPORTANT	NEUTRAL	SOMEWHAT UNIMPORTANT	UNIMPORTANT	TOTAL	WEIGHTED AVERAGE
I could afford to pay for housing	90.87% 199	3.65% 8	3.65% 8	1.37% 3	0.46% 1	219	1.17
Housing that accommodates disability of household member	19.07% 37	13.92% 27	29.38% 57	5.15% 10	32.47% 63	194	3.18
Housing large enough for my household	67.44% 145	16.28% 35	10.70% 23	1.86% 4	3.72% 8	215	1.58
My credit history and/or credit score	38.69% 77	17.59% 35	26.63% 53	2.51% 5	14.57% 29	199	2.37
The amount of money I had for deposit	56.04% 116	19.81% 41	16.91% 35	2.90% 6	4.35% 9	207	1.80
Housing was available in the neighborhood I chose	67.76% 145	20.09% 43	10.75% 23	0.93% 2	0.47% 1	214	1.46
Concern that I would not be welcome in that neighborhood	21.36% 44	17.48% 36	24.27% 50	6.80% 14	30.10% 62	206	3.07

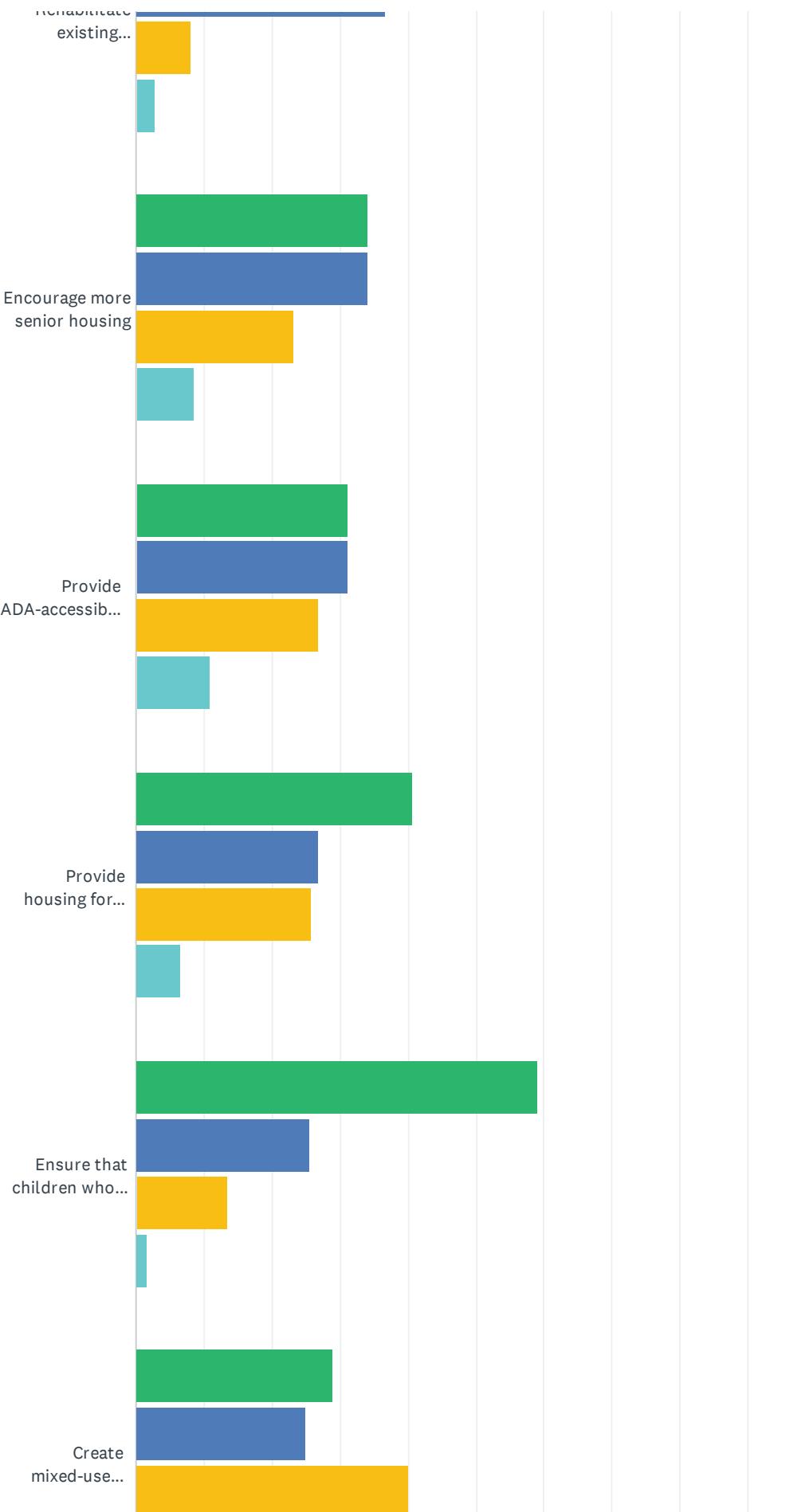
#	OTHER (PLEASE SPECIFY)	DATE
1	Location, relative to workplace and amenities. Quality of construction and maintenance. Availability of parking. Neighborhood safety.	5/2/2021 3:39 PM
2	Feeling safe ... not having mentally ill people wandering the streets.	4/23/2021 12:47 PM
3	MUST live in SFR neighborhood; DO NOT want to live near large multi-unit,mixed-use, or commercial	4/22/2021 10:28 PM
4	Being able to afford the taxes.	4/22/2021 9:49 PM
5	I experience a lot of discrimination from Armenians even though I have lived in Glendale for over 35 years. Armenian consider Glendale their town. If I had a penny for every time one of them told me if I don't like it move, I'd be rich.	4/20/2021 1:51 PM
6	The landlord's policies	4/19/2021 11:19 PM
7	quality and character of the neighborhood	4/14/2021 9:04 PM
8	This survey defines "fair housing" in discriminatory language, but our present-day constrained housing supply is both 'race-neutral' in its language and racialized in its impacts. I have money for a deposit, should i find a place; but because of the building constraints applied to deify the single family neighborhoods a "starter home" is almost a million dollars and a three bedroom rental starts at \$2300 a month. You can't keep exclusionary zoning forever because you will lose your working families.	4/13/2021 10:11 AM
9	Proximity to public transportation	4/8/2021 10:52 AM
10	Condition of Housing environment (Very Important)	4/7/2021 7:56 AM

Q15 How important are the following housing priorities to you and your family?

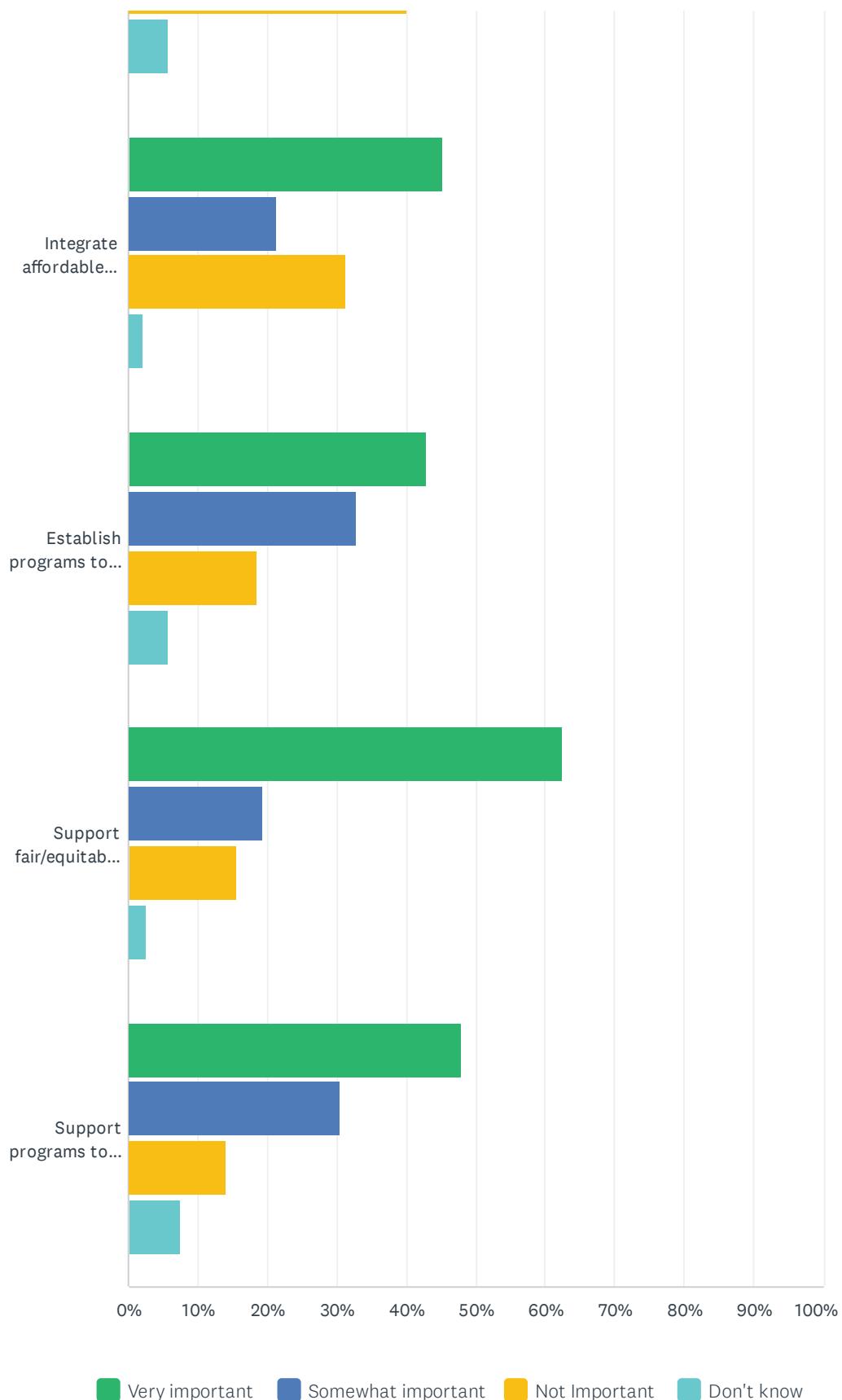
Answered: 241 Skipped: 60



Glendale 2021-2029 Housing Element Update Survey



Glendale 2021-2029 Housing Element Update Survey



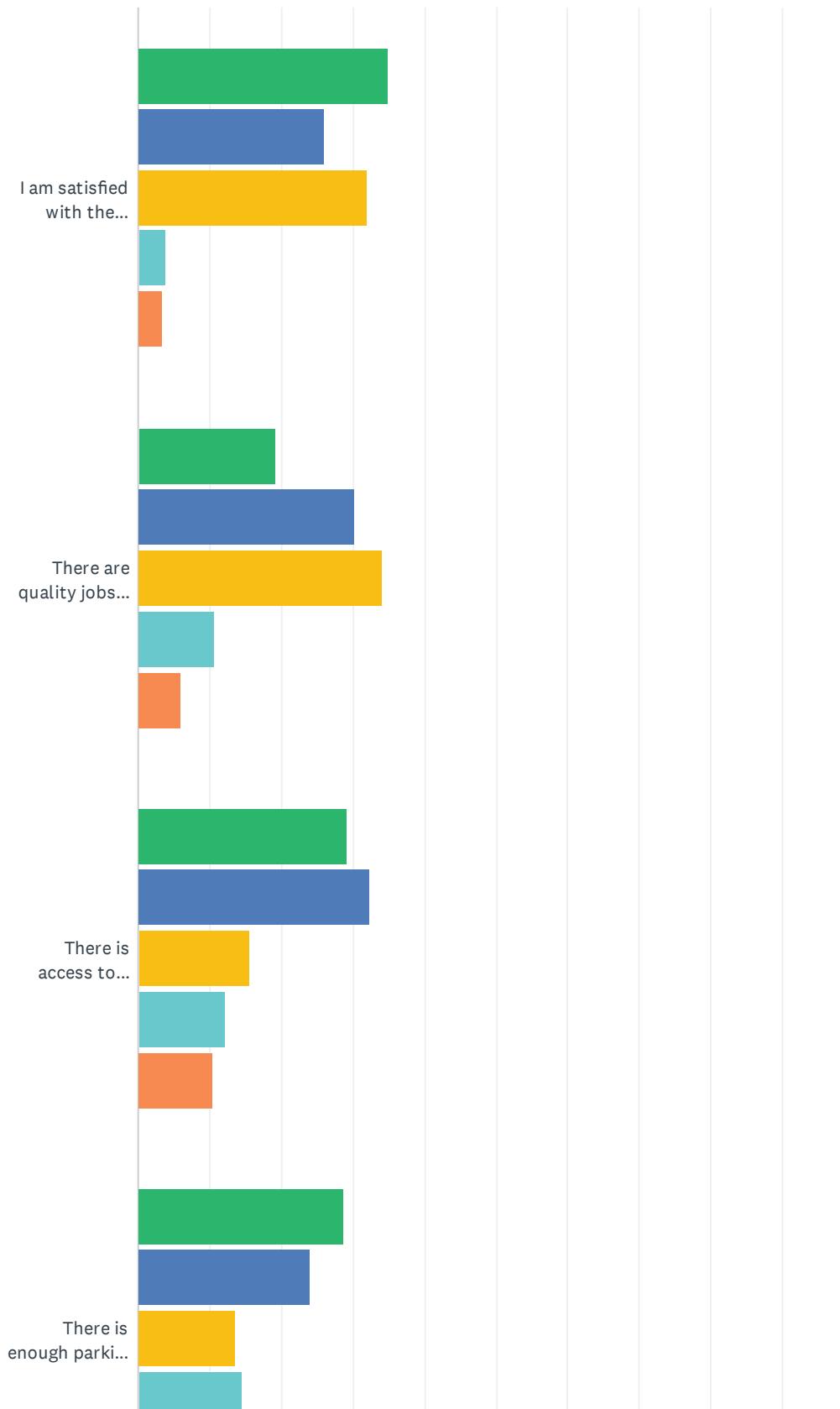
■ Very important ■ Somewhat important ■ Not Important ■ Don't know

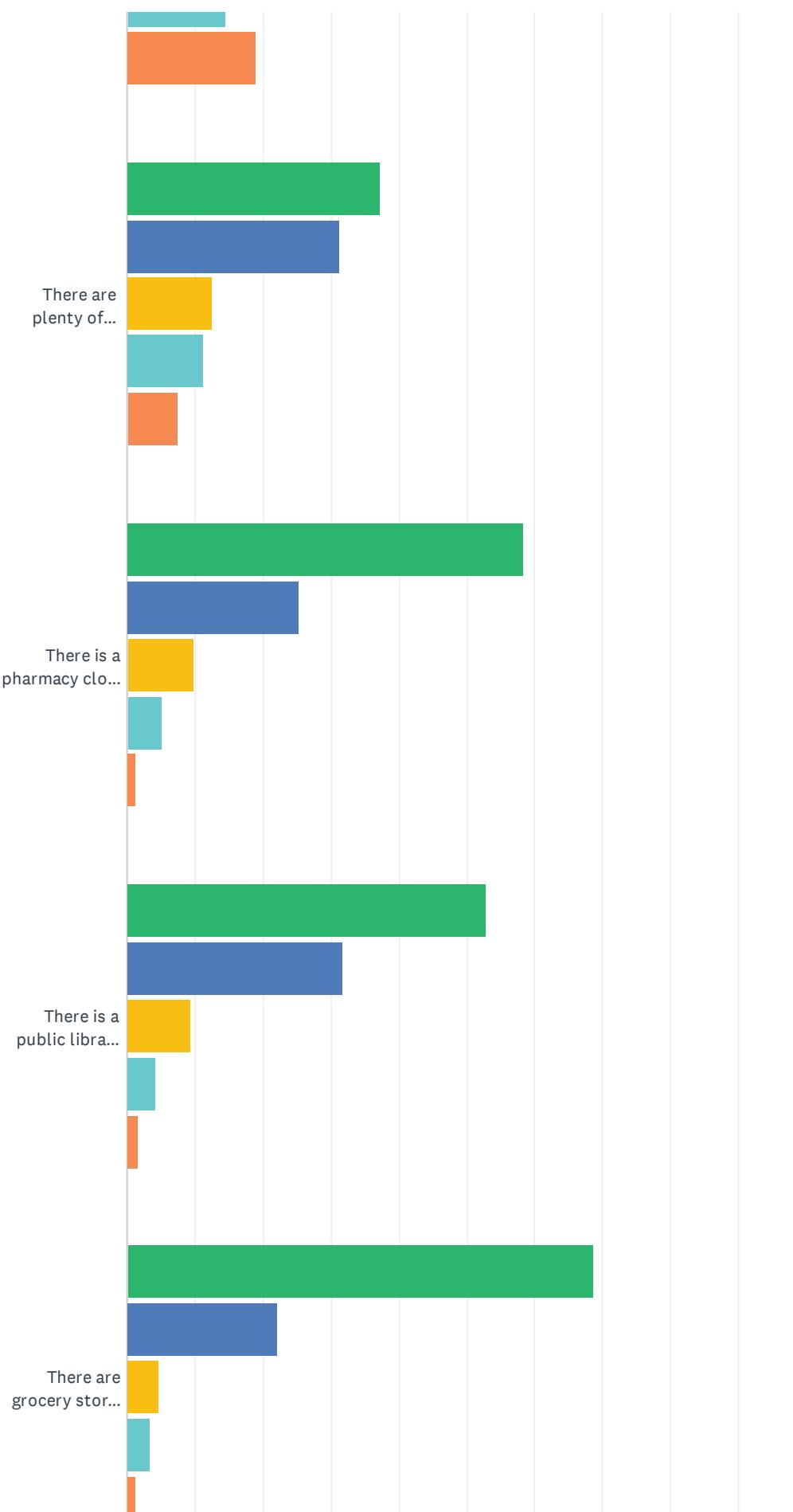
Glendale 2021-2029 Housing Element Update Survey

	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Provide more housing for all income levels	60.61% 140	16.45% 38	19.91% 46	3.03% 7	231	1.65
Promote housing affordable to working families	66.81% 153	20.52% 47	11.35% 26	1.31% 3	229	1.47
Build more single-family housing	45.49% 106	24.03% 56	27.04% 63	3.43% 8	233	1.88
Build more multi-family housing (apartments, condos, etc.)	38.22% 86	25.78% 58	33.78% 76	2.22% 5	225	2.00
Rehabilitate existing housing	52.47% 117	36.77% 82	8.07% 18	2.69% 6	223	1.61
Encourage more senior housing	34.05% 79	34.05% 79	23.28% 54	8.62% 20	232	2.06
Provide ADA-accessible housing	31.05% 68	31.05% 68	26.94% 59	10.96% 24	219	2.18
Provide housing for homeless	40.63% 91	26.79% 60	25.89% 58	6.70% 15	224	1.99
Ensure that children who grow up in Glendale can afford to live in Glendale as adults	59.13% 136	25.65% 59	13.48% 31	1.74% 4	230	1.58
Create mixed-use (commercial/office and residential) projects to bring different land uses closer together	29.02% 65	25.00% 56	40.18% 90	5.80% 13	224	2.23
Integrate affordable housing throughout the community to create mixed-income neighborhoods	45.13% 102	21.24% 48	31.42% 71	2.21% 5	226	1.91
Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs	42.92% 97	32.74% 74	18.58% 42	5.75% 13	226	1.87
Support fair/equitable housing opportunities	62.39% 141	19.47% 44	15.49% 35	2.65% 6	226	1.58
Support programs to help maintain and secure neighborhoods that have suffered foreclosures	48.02% 109	30.40% 69	14.10% 32	7.49% 17	227	1.81

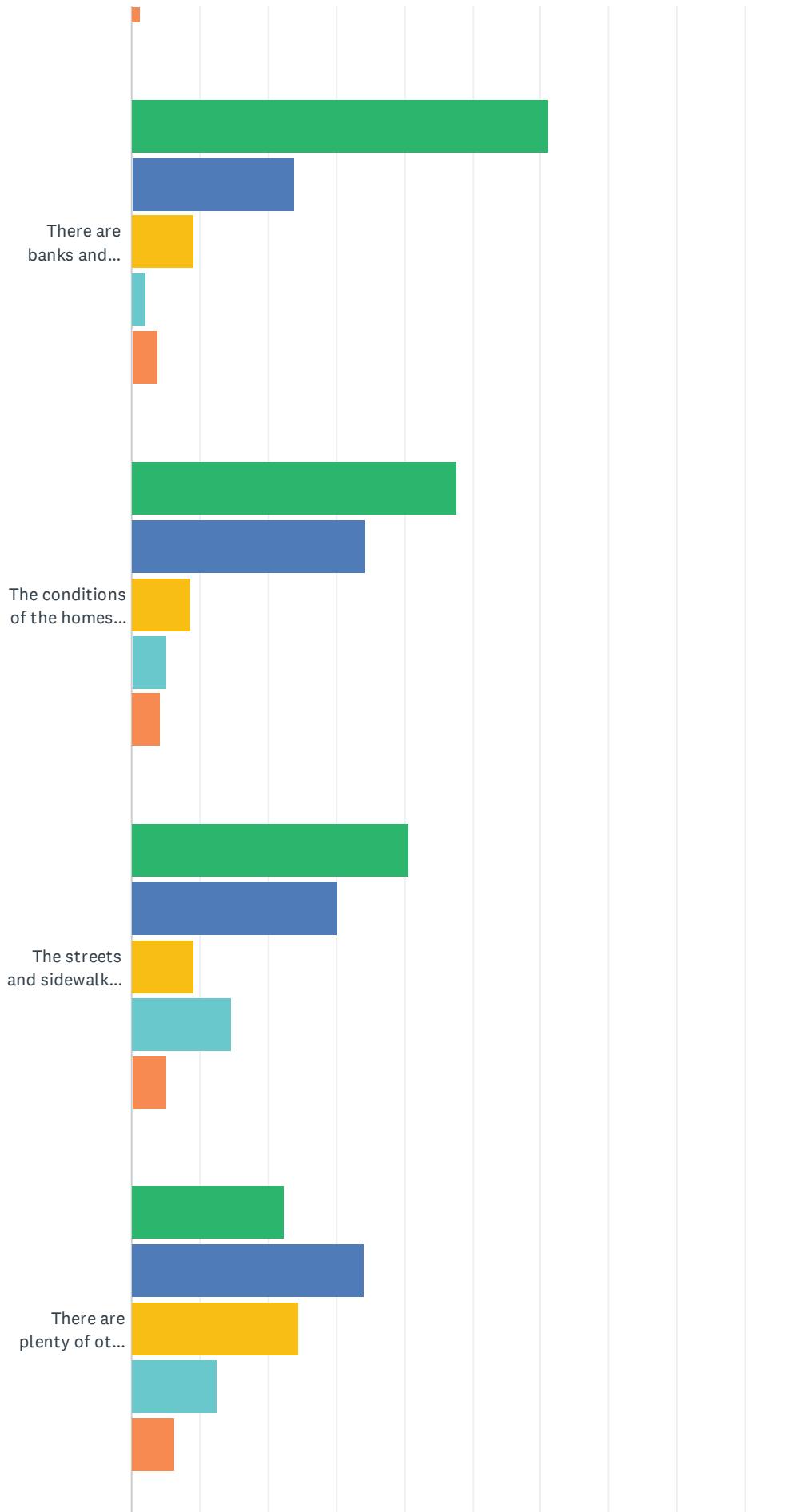
Q16 Please respond to each statement: (1-5 scale)

Answered: 240 Skipped: 61

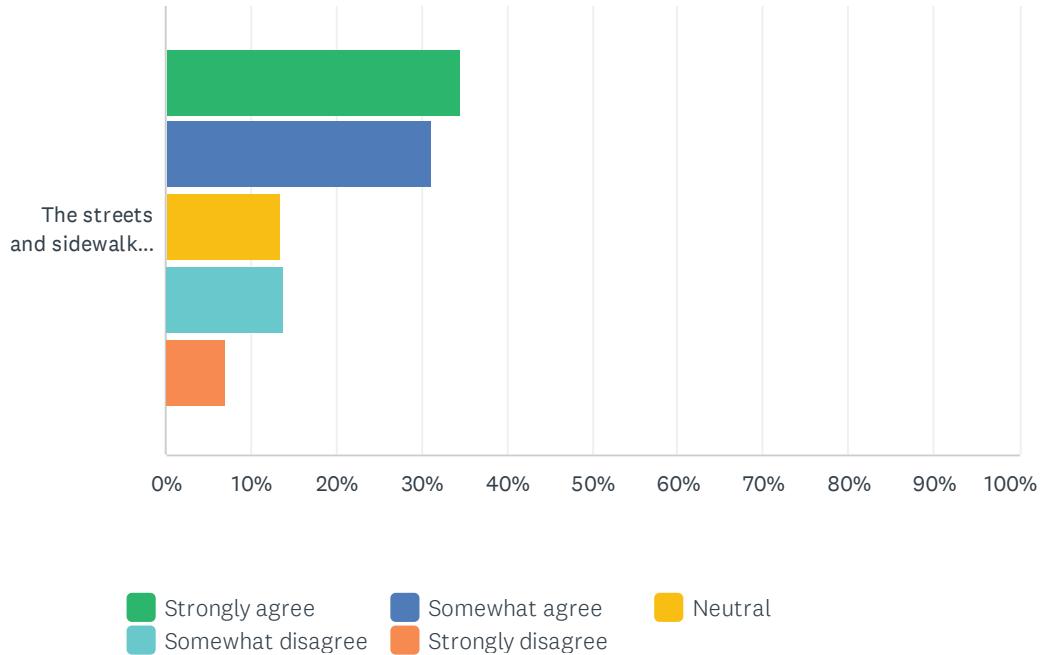




Glendale 2021-2029 Housing Element Update Survey



Glendale 2021-2029 Housing Element Update Survey

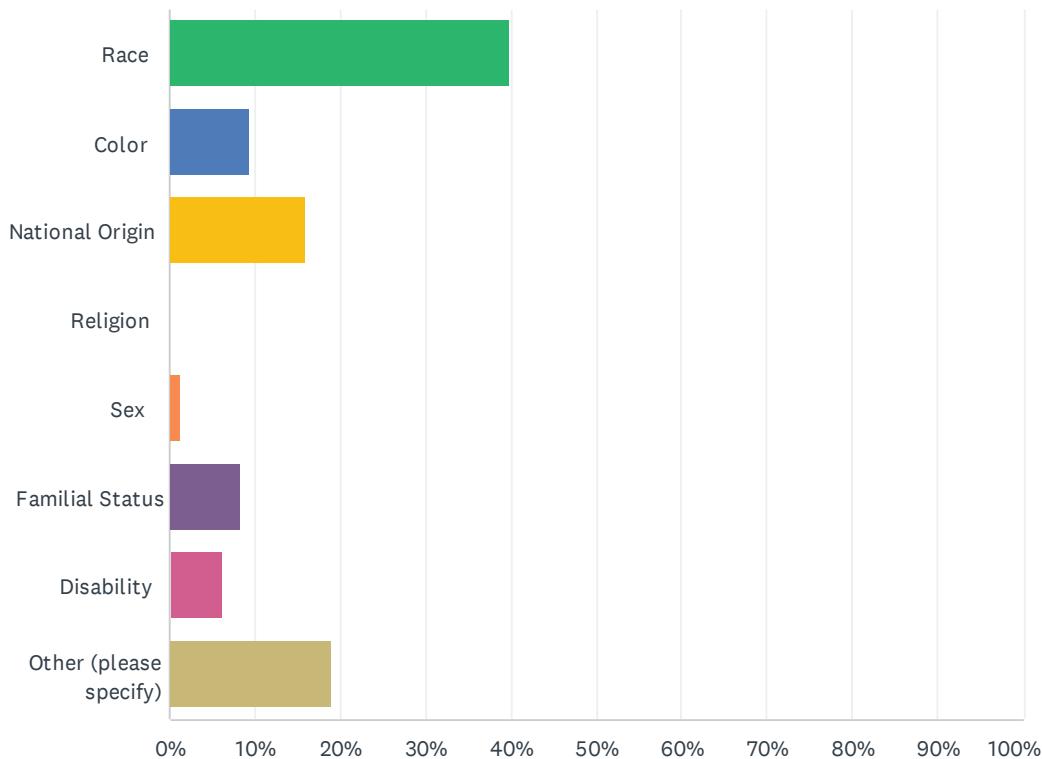


Glendale 2021-2029 Housing Element Update Survey

	STRONGLY AGREE	SOMEWHAT AGREE	NEUTRAL	SOMEWHAT DISAGREE	STRONGLY DISAGREE	TOTAL	WEIGHTED AVERAGE
I am satisfied with the schools in my area	34.89% 82	25.96% 61	31.91% 75	3.83% 9	3.40% 8	235	2.15
There are quality jobs in my neighborhood	19.15% 45	30.21% 71	34.04% 80	10.64% 25	5.96% 14	235	2.54
There is access to public transit close to my neighborhood	29.11% 69	32.49% 77	15.61% 37	12.24% 29	10.55% 25	237	2.43
There is enough parking in my area of town	28.81% 68	24.15% 57	13.56% 32	14.41% 34	19.07% 45	236	2.71
There are plenty of parks, playgrounds, or green space near me	37.24% 89	31.38% 75	12.55% 30	11.30% 27	7.53% 18	239	2.21
There is a pharmacy close to my house	58.47% 138	25.42% 60	9.75% 23	5.08% 12	1.27% 3	236	1.65
There is a public library close to my house	52.97% 125	31.78% 75	9.32% 22	4.24% 10	1.69% 4	236	1.70
There are grocery stores close to my neighborhood	68.62% 164	22.18% 53	4.60% 11	3.35% 8	1.26% 3	239	1.46
There are banks and credit unions near where I live	61.09% 146	23.85% 57	9.21% 22	2.09% 5	3.77% 9	239	1.64
The conditions of the homes in my neighborhood are acceptable	47.70% 114	34.31% 82	8.79% 21	5.02% 12	4.18% 10	239	1.84
The streets and sidewalks near my home are well kept	40.76% 97	30.25% 72	9.24% 22	14.71% 35	5.04% 12	238	2.13
There are plenty of other public spaces near my home	22.36% 53	34.18% 81	24.47% 58	12.66% 30	6.33% 15	237	2.46
The streets and sidewalks in my neighborhood have adequate lighting	34.45% 82	31.09% 74	13.45% 32	13.87% 33	7.14% 17	238	2.28

Q17 The federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Of those, which do you think is the most prevalent factor in housing discrimination in our region?

Answered: 226 Skipped: 75



ANSWER CHOICES		RESPONSES
Race		39.82% 90
Color		9.29% 21
National Origin		15.93% 36
Religion		0.00% 0
Sex		1.33% 3
Familial Status		8.41% 19
Disability		6.19% 14
Other (please specify)		19.03% 43
TOTAL		226

#	OTHER (PLEASE SPECIFY)	DATE
1	I am not aware of housing discrimination based on protected criteria.	5/2/2021 3:39 PM

Glendale 2021-2029 Housing Element Update Survey

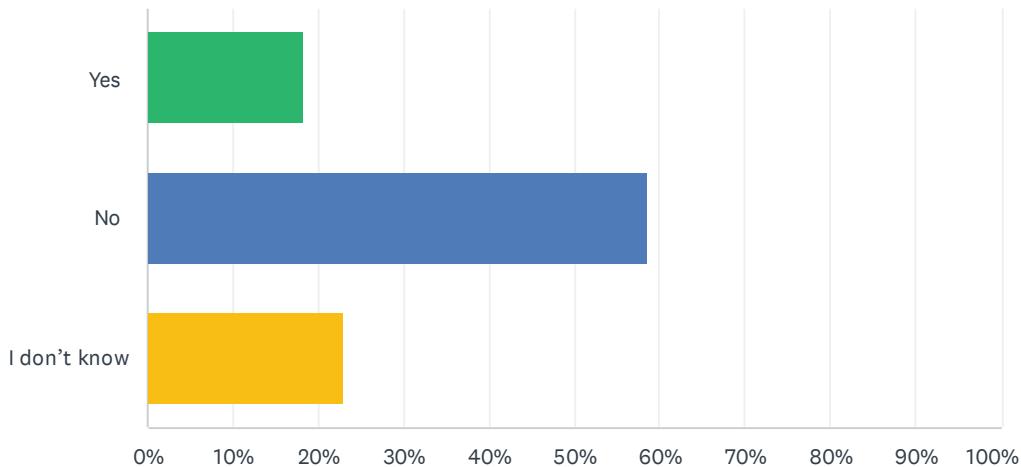
2	Income	4/27/2021 7:18 PM
3	I see no discrimination= NONE.	4/26/2021 5:03 PM
4	Not an issue	4/23/2021 2:14 PM
5	senior	4/23/2021 12:38 PM
6	Abiity to pay	4/22/2021 9:49 PM
7	financial	4/22/2021 8:46 PM
8	I don't know.	4/22/2021 6:18 PM
9	None	4/22/2021 5:29 PM
10	dont know	4/22/2021 4:35 PM
11	I don't know.	4/22/2021 4:19 PM
12	don't know.	4/22/2021 4:16 PM
13	Income	4/19/2021 9:41 PM
14	I have no idea	4/19/2021 5:55 PM
15	Gender identity	4/17/2021 8:50 AM
16	Fonancial	4/16/2021 8:36 PM
17	Income	4/16/2021 7:33 PM
18	don't know how to answer this. Am not aware of extreme discrimination	4/16/2021 4:34 PM
19	No opinion	4/16/2021 3:51 PM
20	Affordability	4/16/2021 3:11 PM
21	Financial	4/16/2021 2:36 PM
22	No problems here	4/16/2021 11:00 AM
23	Don't know	4/16/2021 10:39 AM
24	No idea and the wording of this question seems suspect	4/16/2021 10:26 AM
25	none	4/16/2021 9:14 AM
26	Ethnicity	4/16/2021 12:37 AM
27	where's sexual preference/gender expression?	4/15/2021 2:49 PM
28	money	4/15/2021 10:49 AM
29	Ethnicity	4/15/2021 10:46 AM
30	Size of family.	4/15/2021 8:17 AM
31	idk	4/14/2021 9:41 PM
32	Income	4/14/2021 6:32 PM
33	None	4/14/2021 6:28 PM
34	None	4/13/2021 12:09 PM
35	None of the above exist in my neighborhood	4/13/2021 9:52 AM
36	In my area, we have owners and renters from all of the above listed.	4/10/2021 10:10 AM
37	Not aware of any	4/9/2021 6:49 PM
38	Don't know. Not aware of any.	4/9/2021 5:03 PM
39	I don't feel there's discrimination based on those factors	4/8/2021 5:59 PM

Glendale 2021-2029 Housing Element Update Survey

40	I'm not sure	4/8/2021 3:33 PM
41	Not Sure	4/7/2021 3:00 AM
42	Sexual orientation	4/6/2021 10:21 PM
43	Income	4/6/2021 2:55 PM

Q18 Have you ever experienced or witnessed housing discrimination in the City of Glendale?

Answered: 239 Skipped: 62

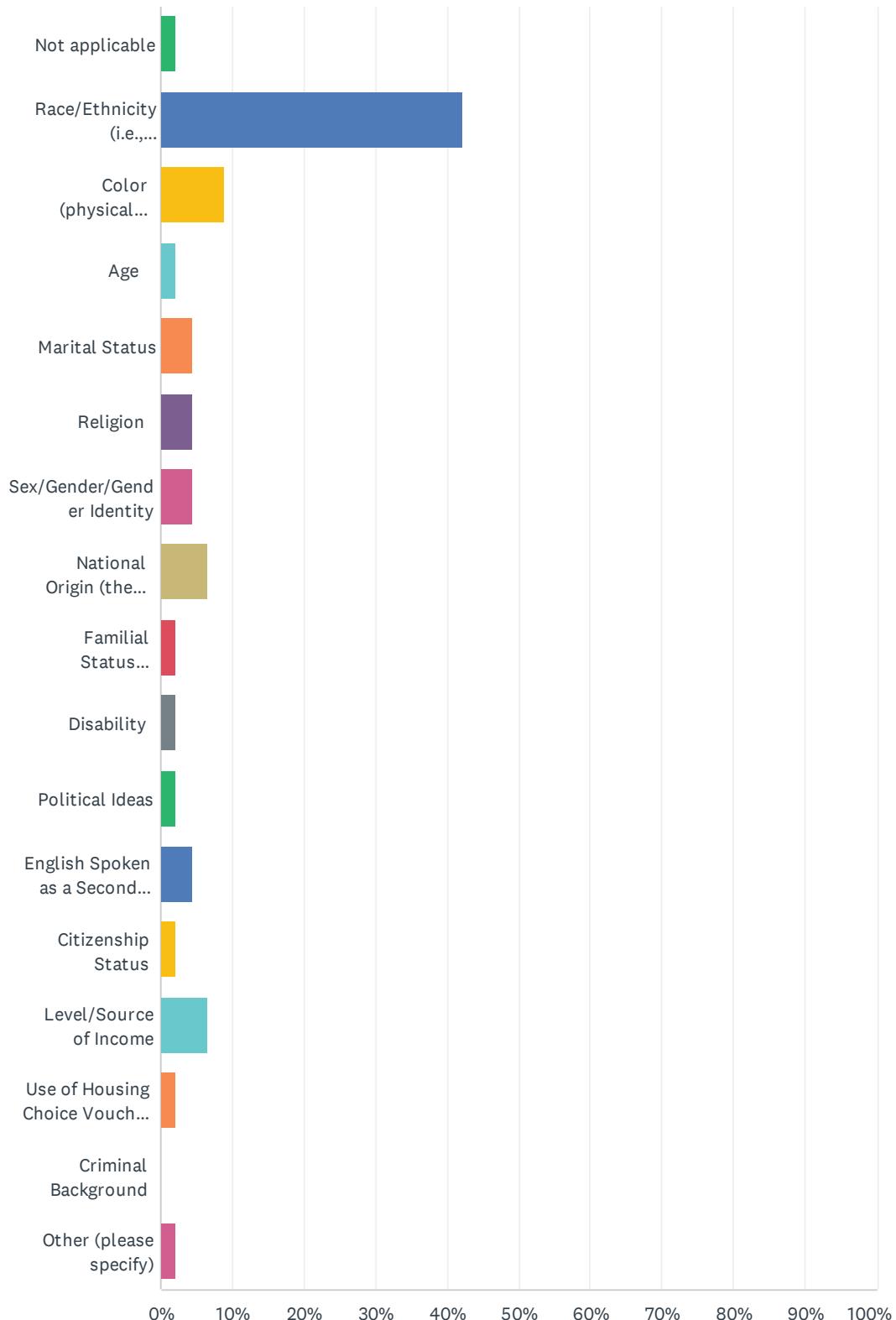


ANSWER CHOICES	RESPONSES	
Yes	18.41%	44
No	58.58%	140
I don't know	23.01%	55
TOTAL		239

Q19 On what grounds do you believe you witnessed housing discrimination?

Answered: 45 Skipped: 256

Glendale 2021-2029 Housing Element Update Survey



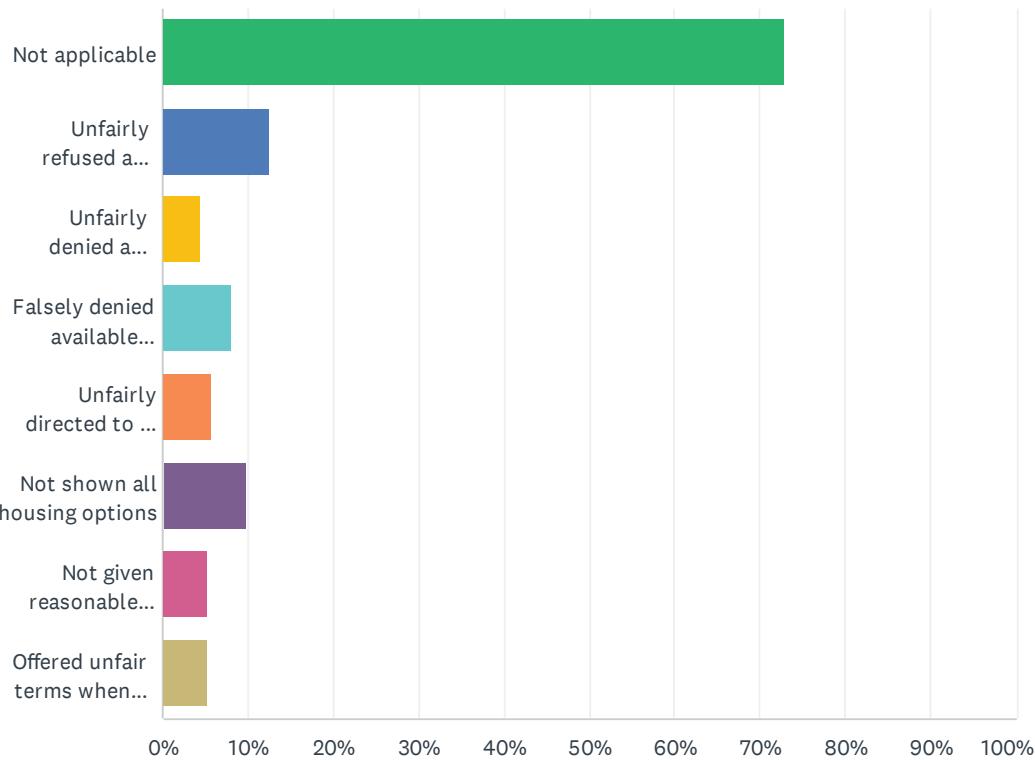
Glendale 2021-2029 Housing Element Update Survey

ANSWER CHOICES	RESPONSES
Not applicable	2.22% 1
Race/Ethnicity (i.e., Caucasian, Asian, Latino, etc.)	42.22% 19
Color (physical appearance)	8.89% 4
Age	2.22% 1
Marital Status	4.44% 2
Religion	4.44% 2
Sex/Gender/Gender Identity	4.44% 2
National Origin (the country where a person was born)	6.67% 3
Familial Status (Families with Children)	2.22% 1
Disability	2.22% 1
Political Ideas	2.22% 1
English Spoken as a Second Language	4.44% 2
Citizenship Status	2.22% 1
Level/Source of Income	6.67% 3
Use of Housing Choice Voucher or other assistance	2.22% 1
Criminal Background	0.00% 0
Other (please specify)	2.22% 1
TOTAL	45

#	OTHER (PLEASE SPECIFY)	DATE
1	You have to know someone to be able to get senior housing.	4/23/2021 12:39 PM

Q20 Do you know of anyone in Glendale who has faced the following: (select all that apply)

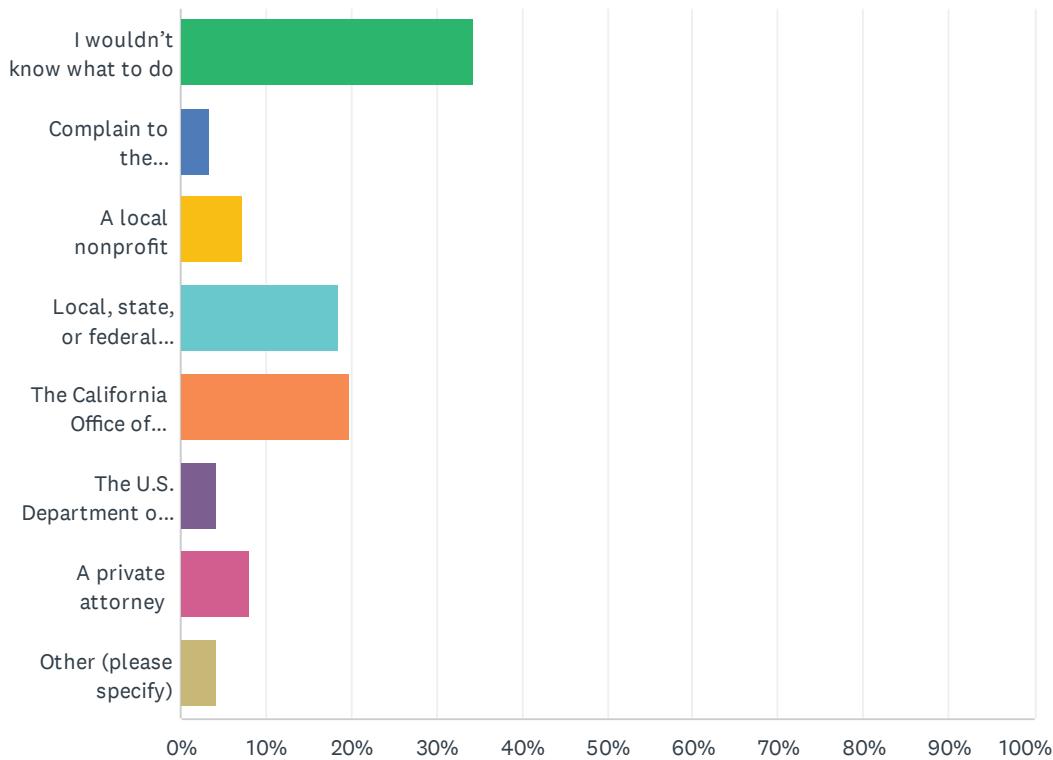
Answered: 222 Skipped: 79



ANSWER CHOICES	RESPONSES
Not applicable	72.97% 162
Unfairly refused a rental or sale agreement	12.61% 28
Unfairly denied a mortgage	4.50% 10
Falsely denied available housing options	8.11% 18
Unfairly directed to a certain neighborhood and/or locations	5.86% 13
Not shown all housing options	9.91% 22
Not given reasonable accommodate for a disability	5.41% 12
Offered unfair terms when buying or selling	5.41% 12
Total Respondents: 222	

Q21 Where would you refer someone if they felt their fair housing rights had been violated?

Answered: 233 Skipped: 68



ANSWER CHOICES	RESPONSES
I wouldn't know what to do	34.33% 80
Complain to the individual/organization discriminating	3.43% 8
A local nonprofit	7.30% 17
Local, state, or federal government	18.45% 43
The California Office of Housing and Community Development	19.74% 46
The U.S. Department of Housing and Urban Development	4.29% 10
A private attorney	8.15% 19
Other (please specify)	4.29% 10
TOTAL	233

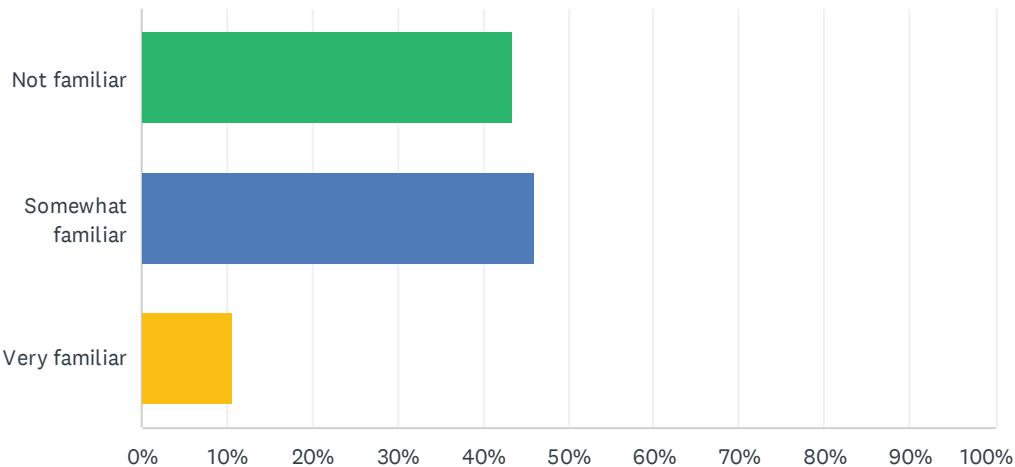
#	OTHER (PLEASE SPECIFY)	DATE
1	I would probably advise the person simply to look elsewhere. There are many landlords and real estate agents, most of whom are eager to serve anyone with the ability to pay. Making government complaints is unlikely to be useful, in terms of finding a good place to live at an affordable price.	5/2/2021 3:41 PM
2	Housing Rights Center	4/23/2021 7:03 PM

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3	Glendale Tenants Union	4/23/2021 12:47 PM
4	I fight back on my own because when i was try to get help in t was mañana excuses and nothing happened so i went to court with the help of pasadena center help unbelievable but it happened	4/17/2021 3:53 PM
5	California Dept. of Fair Employment and Housing	4/16/2021 5:02 PM
6	City of Glendale and DFEH (Dpt. of Fair Employment & Housing)	4/15/2021 11:38 AM
7	glendale tenants union	4/14/2021 8:49 PM
8	California Department of Fair Employment and Housing	4/10/2021 9:57 AM
9	I refer them to Gloria Allred because the city Council Glendale doesn't give a shit	4/9/2021 5:38 PM
10	Glendale Tenants Union, Neighborhood Legal Services of LA	4/6/2021 8:56 PM

Q22 How familiar are you with Fair Housing Laws?

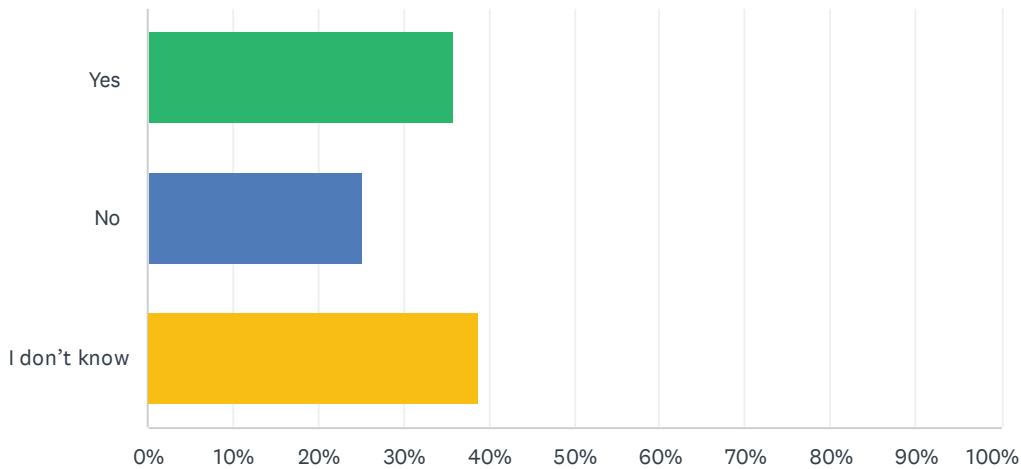
Answered: 235 Skipped: 66



ANSWER CHOICES	RESPONSES	
Not familiar	43.40%	102
Somewhat familiar	45.96%	108
Very familiar	10.64%	25
TOTAL		235

Q23 Do you think Federal and/or State Fair Housing Laws are difficult to understand or follow?

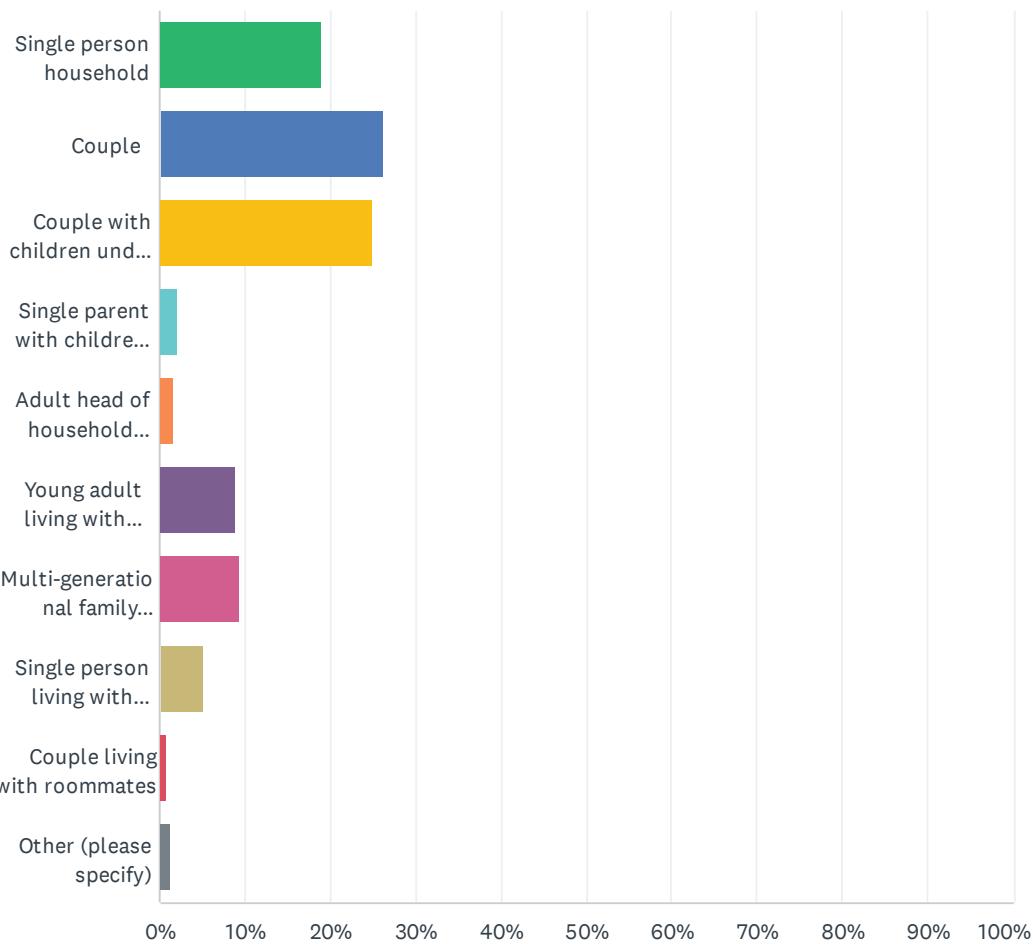
Answered: 234 Skipped: 67



ANSWER CHOICES	RESPONSES	
Yes	35.90%	84
No	25.21%	59
I don't know	38.89%	91
TOTAL		234

Q24 Which of the following best describes your household type?

Answered: 232 Skipped: 69



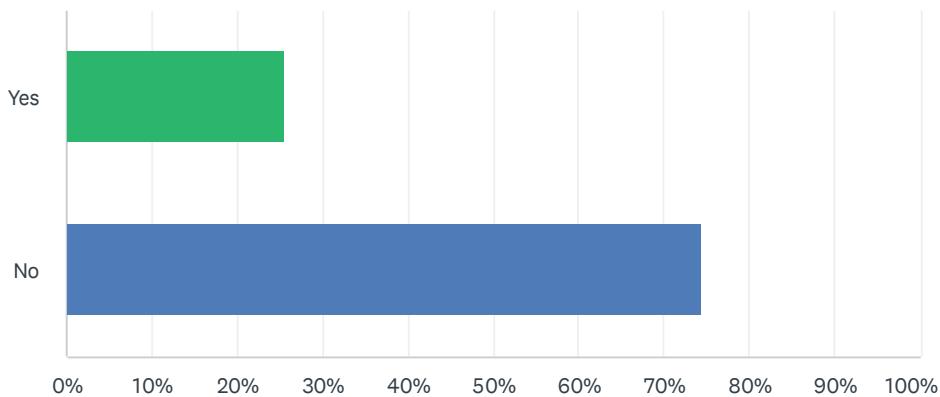
ANSWER CHOICES	RESPONSES	
Single person household	18.97%	44
Couple	26.29%	61
Couple with children under 18	25.00%	58
Single parent with children under 18	2.16%	5
Adult head of household (non-parent) with children under 18	1.72%	4
Young adult living with parents	9.05%	21
Multi-generational family household (grandparents, children, and/or grandchildren all under the same roof)	9.48%	22
Single person living with roommates	5.17%	12
Couple living with roommates	0.86%	2
Other (please specify)	1.29%	3
TOTAL	232	

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#	OTHER (PLEASE SPECIFY)	DATE
1	Couple with baby on the way.	4/30/2021 7:36 PM
2	Couple with minor and adult children	4/19/2021 9:45 PM
3	Decline to state.	4/9/2021 5:05 PM

Q25 Has the Coronavirus impacted your housing situation?

Answered: 231 Skipped: 70



ANSWER CHOICES		RESPONSES	
Yes		25.54%	59
No		74.46%	172
TOTAL			231

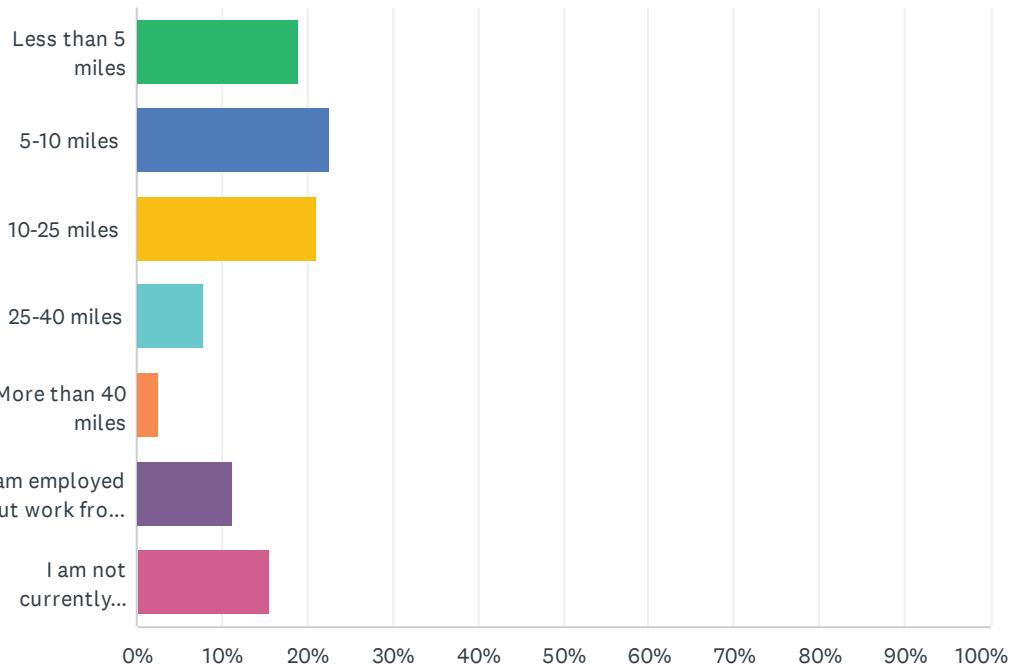
#	IF YES, HOW?	DATE
1	Loss of work / wages.	4/30/2021 7:36 PM
2	Our income was changed	4/27/2021 4:11 PM
3	My husband is layoffs	4/27/2021 2:04 PM
4	I have to stay home with my kids, cannot work	4/23/2021 1:11 PM
5	I now have a parking lot restaurant 12 feet from my window. Smoke pour into my house every night and I listen to people screaming until well past the time I'd like to sleep. I have respiratory infections and sleep deprivation and NO ONE in Glendale cares.	4/23/2021 12:49 PM
6	Husband lost job, was able to find another job, but the down time during the pandemic was devastating financially as we were already stretched.	4/23/2021 11:16 AM
7	Forced to move to larger place that allowed work from home	4/23/2021 10:27 AM
8	Forced us all to work and live on top of each other. Created tension.	4/23/2021 8:16 AM
9	Encouraged us to speed up single family home purchase.	4/23/2021 8:12 AM
10	i had to move in with my dad to help him during the pandemic	4/22/2021 5:46 PM
11	Lost job means that I'm uncertain if I can cover next month's rent	4/19/2021 11:25 PM
12	Available income towards rent.	4/19/2021 12:36 PM
13	I got covid and I had to quarantine in a hotel/airbnb so that my at risk parents wouldn't also contract it	4/17/2021 9:02 PM
14	No money for rent	4/16/2021 11:36 PM
15	Been locked down for over a year	4/16/2021 4:36 PM
16	all working from home (include child in distance learning)	4/16/2021 1:50 PM

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17	Lockdown	4/16/2021 12:56 PM
18	Had to move grandmother into home.	4/16/2021 11:06 AM
19	Loss of job	4/16/2021 10:53 AM
20	Made paying rent more difficult due to loss of income	4/16/2021 10:42 AM
21	I moved to Glendale because of the pandemic	4/16/2021 10:27 AM
22	reduced income	4/16/2021 9:00 AM
23	Isolation; grocery deliveries; more cost to stay home.	4/15/2021 9:03 PM
24	Working from home in tight quarters, one person in the kitchen and one in the bedroom	4/15/2021 8:37 PM
25	Isolated, alone over a year.	4/15/2021 2:18 PM
26	Loss of job	4/15/2021 10:43 AM
27	Everyone stays home all day, every day	4/15/2021 10:21 AM
28	rent	4/14/2021 8:50 PM
29	Working from home	4/14/2021 6:30 PM
30	Hairstylist and was not able to work	4/14/2021 2:43 PM
31	Family members laid off	4/14/2021 2:07 PM
32	It has made us want a yard for our child to play in	4/14/2021 1:56 PM
33	Roommate unable to pay her portion of rent	4/14/2021 1:36 PM
34	We were unemployed until fairly recently and had to get public assistance and help from family to cover rent	4/13/2021 10:14 AM
35	Now working from home, reduced hours. Harder to make rent	4/12/2021 10:54 AM
36	We moved into a bigger place with more space.	4/9/2021 5:29 PM
37	Lack of child care/unemployment	4/9/2021 5:28 PM
38	I need a bigger place, want to buy but too pricey or companies buy properties to rent.	4/9/2021 5:04 PM
39	Having to work from home (remote work) and living in a full house with no space	4/8/2021 5:46 PM
40	Both lost our jobs and now want to move but don't have 3x the income required for a lot of Apt buildings	4/8/2021 5:33 PM
41	loss of income therefore extremely hard to pay rent because we have received no rental assistance	4/7/2021 12:25 PM
42	Rents are too high	4/7/2021 3:06 AM
43	Was forced to move during early pandemic	4/6/2021 8:57 PM
44	Made it more difficult to find adequate long term meaningful employment	4/6/2021 2:57 PM

Q26 If you are currently employed, approximately how long is your one-way commute to work? (If your commute has changed due to the Coronavirus, please answer this question based on your commute before the pandemic's impact on your travel patterns).

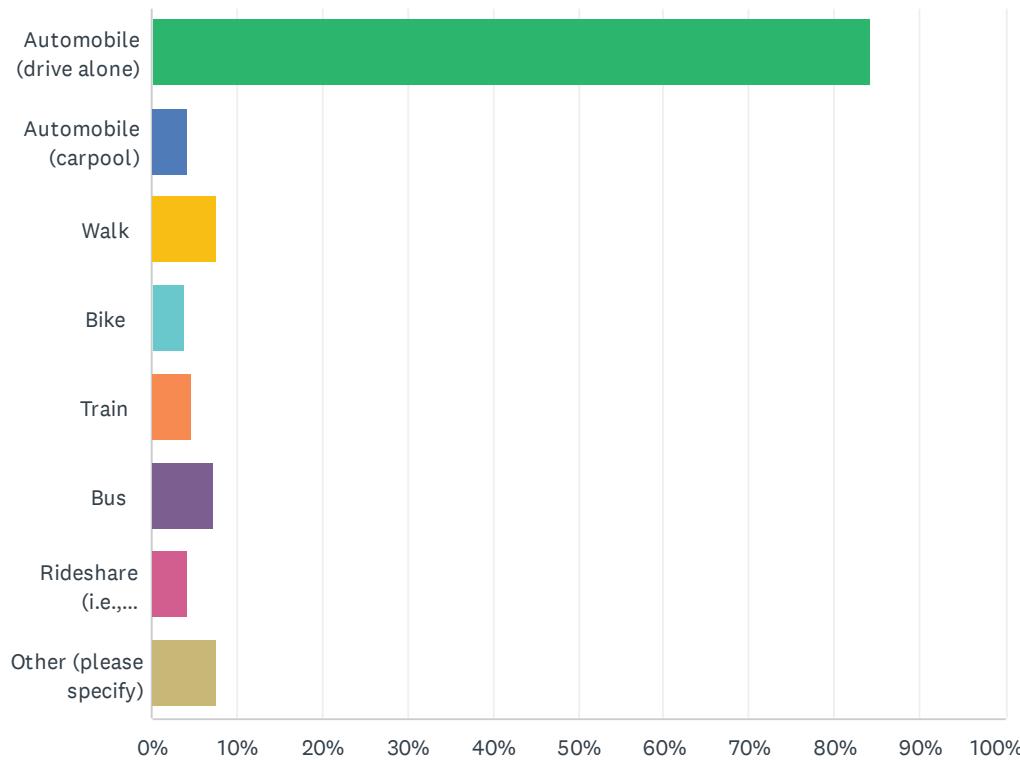
Answered: 231 Skipped: 70



ANSWER CHOICES	RESPONSES	
Less than 5 miles	19.05%	44
5-10 miles	22.51%	52
10-25 miles	21.21%	49
25-40 miles	7.79%	18
More than 40 miles	2.60%	6
I am employed but work from my home	11.26%	26
I am not currently employed	15.58%	36
TOTAL		231

Q27 If you work outside the house, how do you get to work? If you use different modes of transportation, select all that apply.

Answered: 209 Skipped: 92



ANSWER CHOICES	RESPONSES	
Automobile (drive alone)	84.21%	176
Automobile (carpool)	4.31%	9
Walk	7.66%	16
Bike	3.83%	8
Train	4.78%	10
Bus	7.18%	15
Rideshare (i.e., Uber/Lyft)	4.31%	9
Other (please specify)	7.66%	16
Total Respondents: 209		

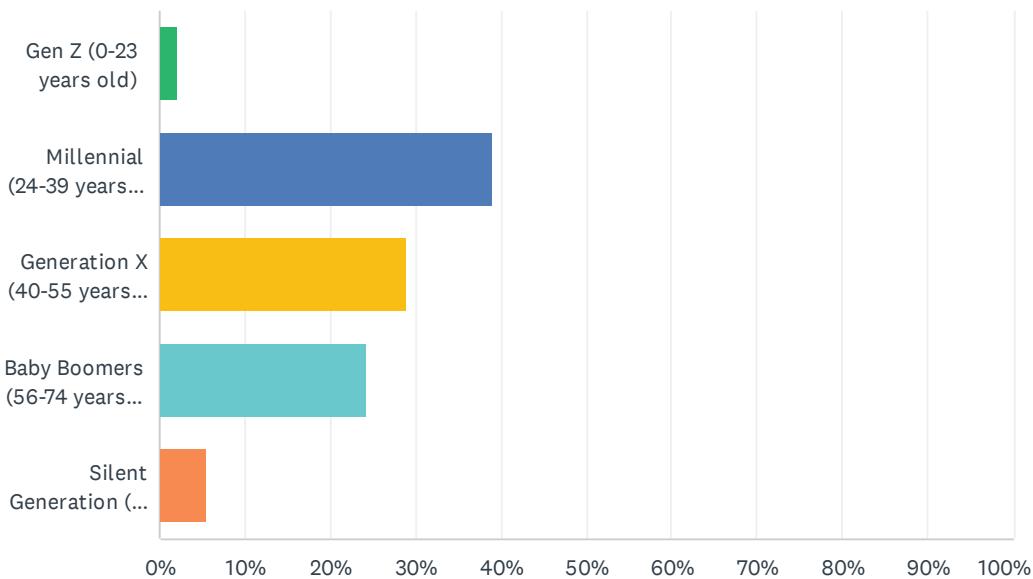
#	OTHER (PLEASE SPECIFY)	DATE
1	Work online	4/27/2021 7:23 PM
2	N/A Previously, automobile	4/26/2021 5:07 PM
3	Work remotely	4/20/2021 1:57 PM

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4	Retired, travel mostly by bike & automobile	4/20/2021 1:21 PM
5	I work inside the house	4/19/2021 5:57 PM
6	I am retired I don't work	4/18/2021 12:00 PM
7	I am not currently employed.	4/17/2021 8:48 PM
8	Motorcycle	4/17/2021 8:53 AM
9	have car but don't go out	4/16/2021 4:36 PM
10	Retired	4/16/2021 11:02 AM
11	Beeline to train station	4/16/2021 12:39 AM
12	Airport	4/14/2021 9:24 PM
13	Not applicable	4/14/2021 6:30 PM
14	Retired	4/10/2021 10:13 AM
15	Do not work now	4/9/2021 6:51 PM
16	I am unemployed	4/8/2021 3:36 PM

Q28 What age range most accurately describes you?

Answered: 231 Skipped: 70



ANSWER CHOICES	RESPONSES	
Gen Z (0-23 years old)	2.16%	5
Millennial (24-39 years old)	38.96%	90
Generation X (40-55 years old)	29.00%	67
Baby Boomers (56-74 years old)	24.24%	56
Silent Generation (75+ years old)	5.63%	13
TOTAL		231

Dear Mr. Krause,

Here are my comments on the City of Glendale's Housing Element draft for the Sixth cycle, 2021-2029.

Let's begin with the positive.

1) I appreciate the inclusion of Program 5B, "Tenant/Community Opportunity to Purchase" or TOPA/COPA. I have spent a good deal of time this year talking about TOPA, which is a tenant-led initiative.

However, the Program Goals section fails to mention that these purchases are happening already, with the assistance of community land trusts. It also fails to note that it would actually cost the city nothing to pass a TOPA ordinance, to inform tenants that their buildings have been offered for sale; funding sources to assist tenants with these purchases and converting them into tenant-led, limited equity co-ops can be explored separately. It also fails to mention critical reasons why this proposed ordinance is attractive to tenants—namely, that it would secure permanently affordable housing and enable us to build equity. Building equity would help reduce the racial wealth gap, because most household wealth in this country is in the form of housing. As of 2020, 75% of white people are homeowners, whereas the majority of Black people are renters.

And now for the disappointing elements.

2) Consider this extraordinary statement on pdf page 216:

"The City finds that there are no known historic patterns of segregation by race and ethnicity, persons with disabilities, familial status, age, or income."

As noted by Ms. Tara Peterson on November 15, this sentence completely contradicts the Sundown Town resolution passed by the City Council on September 15, 2020, which acknowledges the historical redlining and racist housing practices of this city. This resolution specifically noted realtors' ads on "Keeping Glendale 100% Caucasian."

The Programs 7A and 7C on Fair Housing make no mention of the fact that Black people are 2% of Glendale's population, compared to forming 8% of LA County. The absence of Black people in Glendale is a clear indicator of discrimination, especially in light of Glendale's Sundown Town resolution. In addition to investigating discrimination against residents who already live here, there should be an investigation of how Black people are kept out of the city in the first place. For example, national studies show that Black people are less likely to be shown apartments by landlords, and they are quoted higher prices for the apartments that are shown to them.

Although I appreciate the lack of local prejudices that an out-of-town consultant can bring to this subject, Glendale residents know exactly where income segregation occurs—the 134

highway. Although there are exceptions, "north Glendale" means rich (white) homeowners and "south Glendale" means poor renters (of color).

One wonders if the Planning Department staff have read the Sundown Town resolution, and whether this information was conveyed to the consultant from Orange County.

Also, the "race/ethnicity" section fails to recognize the large number of Armenian people in Glendale, who form approximately 40% of the population; surely, they can be separated from the general White category in the same way that the Hispanic population is often separated into "White Hispanic" and "Non-white Hispanic" groups. This fact might be unfamiliar to an out-of-town the consultant, but it is surely known to members of the Planning Dept. Armenian tenants I've talked to are motivated to stay in Glendale so that they can remain part of this significant community.

3) There is a wealth of data in the Background Report section, including the following facts:

- Tenants are 67% of the residents of Glendale
- 57% of tenants are rent-burdened, paying more than 30% of their income in rent
- 35% of tenants are paying more than 50% of their income in rent

This represents tens of thousands of people in economic pain. These numbers are substantially the same as in the 5th Cycle Housing Element, indicating zero progress in meeting their needs. And in spite of this abundant data, the meager programs offered in Part 1 of this 6th Cycle draft don't even acknowledge this great need, much less attempt to meet it.

May I also point out that the more money tenants spend on rent, the less money we have to spend at other businesses in the city. The interests of landlords and developers are, therefore, often in conflict with those of other area businesses. Perhaps this inherent conflict should be acknowledged by separating the Housing Dept from the rest of Economic/Community Development.

Goal 2 "A city with high quality residential neighborhoods that are attractive and well designed" is given prominence, however. Although rent-burdened tenants have no objection to good design, it is hardly in our top 10 list of priorities. My fellow tenants who sometimes watch Design Review Board cases with me regard them as "rich people problems," as in "So this is how people fill their time when their basic needs are met." "Good" design is a priority for affluent homeowners, who form a minority of this city. Also, in light of Glendale's historical racism, people of color have very different views on which elements of Glendale's neighborhoods should be retained and which need to be changed.

4) Review of the 5th Cycle Housing Element. Glendale built 4,493 units in 2014-2021, but 4,131, or 92%, of those were above-moderate, market-rate homes. Glendale did not even come close to meeting the need for housing at lower income levels (362 of 1,155 units, or 31%). This city is not building the right kinds of housing for the people who live here. The oversupply of above-moderate, market-rate housing shows wishful thinking along the lines of "If we build it, they will come"; considering that the need for lower-income housing has increased considerably since 2014, and that the median income of Glendale renters is \$50K, I would conclude that higher-income renters have largely chosen not to live in Glendale, perhaps because there are other, more attractive options in LA County for them.

The attitude of Glendale city officials toward lower-income people seems to be, "If you can't afford the rents here, you should just move out," rather than attempting to meet our needs. City officials clearly have extraordinary amounts of time to spend discussing the small design details of other people's private, single-family houses, however.

And here are the elements that are completely missing.

5) As I noted on November 15, Appendix B on Public Engagement lists over 260 developers as stakeholders but completely omits the Glendale Tenants Union (GTU), the sole group that represents the 67% of the residents of Glendale who are renters.

This is a curious omission because I have spent the better part of this year working with the Coalition for an Anti-Racist Glendale and GTU to lobby the City Council to create a Tenant-Landlord Committee, precisely because tenant voices routinely go unheard. The senior Housing Dept staff are also aware of GTU; Mr. Peter Zovak sent us an email about the Housing Element survey in April.

This leads me to wonder if the Planning Dept. spends much time talking to the Housing staff or to the City Council.

The message is clear, however, that the concerns of developers and affluent homeowners are given a great deal of attention by the city, while the concerns of renters are brushed aside or ignored entirely.

The City of Pasadena formed a task force for the Housing Element, with at least one tenant member who was appointed by the mayor. If the City of Glendale wanted to include diverse community voices in this draft, they could have found more effective ways to do so, beginning in the early stages.

I noticed that "Abundant Housing LA," formerly known as YIMBY, is listed as a stakeholder, although they do not operate in Glendale. I met a gentlemen from this group, and this homeowner in LA was surprised to hear that our range of tenant concerns went well beyond that of mere housing supply.

Here are some of the elements that tenants would like to see included in this report:

Rent Stabilization. From reading this 410-page document, one would have no idea that thousands of tenants spent years advocating for rent stabilization in Glendale. Although our ballot measures did not pass (yet), the wishes and efforts of thousands of residents should at least be acknowledged, instead of erased. This effort is well known to the Glendale City Council.

Right to Counsel. Tenants should be guaranteed a right to legal counsel in eviction cases, the same way the Sixth Amendment guarantees the right to counsel in criminal cases. In LA County, there are sufficient nonprofit lawyers to represent tenants in only 12% of eviction cases, and 98% of tenants who arrive in eviction court without a lawyer lose their cases. Therefore, the lack of tenant-side lawyers virtually guarantees that laws will not be enforced on landlords who break the law. Several cities have passed Right to Counsel laws, including New York City, which saw a decline in eviction cases after they passed this law. Landlords are filing fewer frivolous eviction cases, from the deterrent of knowing that tenants will have legal representation. This benefits the legal system in general, as well as tenants in particular.

Anti-Harassment Ordinance. During the pandemic, harassment against tenants in LA County soared by 300% or higher. The City of Los Angeles recently passed an anti-harassment ordinance and it would be fairly easy to adopt a similar measure for Glendale.

6) The pandemic is not discussed in this draft. Large segments of the population have been completely re-thinking their approach to housing and work, in light of changes made during the pandemic. Many people would prefer to work from home permanently, and many parents have felt the need for assistance with balancing working from home and educating their children. From pdf page 116: "The creation of innovative housing for female-headed households could include co-housing developments where childcare and meal preparation responsibilities can be shared."

We could begin studying different forms of social housing, because not everyone wants to live in an individual box, separate from other people. The goal of some people is to create an integrated community, as opposed to maximizing the amount of profit that can be made from each individual box.

Although we are still in the midst of seeing these pandemic-inspired changes, this shift should at least be noted and studied; otherwise, this report runs the risk of becoming obsolete almost immediately after it is approved.

Conclusion: Major Revisions Needed

In conclusion, my opinion as a professional editor is that this draft reads like a document that was cut and pasted from other housing elements, with small modifications to adapt to this particular time and city. It was written in a vacuum, by authors who sat studying maps and spreadsheets in an attempt to meet minimum requirements. It displays significant

errors and gaps in relevant knowledge, and very little effort to solve the serious problems of the people who live here.

To adopt a phrase from my many years in scientific publishing, I would return this draft to its authors for "Major Revision." That is, the draft requires not simply minor revisions to its organization and language, but a substantial re-thinking of its methodology, data, analysis, and conclusions.

Sincerely,
Karen Kwak
Glendale, CA

P.S. I am copying the City Council because policy decisions always rest with them. I would also like to thank Mr. Najarian for pointing out that this draft was prepared by a consultant from Orange County.

From: Brigid McNally <bmcnally1026@gmail.com>
Sent: Tuesday, November 30, 2021 4:04 PM
To: Krause, Erik <EKrause@Glendaleca.gov>
Cc: Najarian, Ara <ANajarian@Glendaleca.gov>; Kassakhian, Ardashes <AKassakhian@Glendaleca.gov>; Devine, Paula <PDevine@Glendaleca.gov>; Agajanian, Vrej <VAgajanian@Glendaleca.gov>; kathryn@bos.lacounty.gov; [Allison.RuffSchuurman@asm.ca.gov](mailto>Allison.RuffSchuurman@asm.ca.gov); Victoria.Dochoghlian@asm.ca.gov; Brotman, Daniel <dbrotman@Glendaleca.gov>
Subject: PUBLIC COMMENT: 6th Cycle Housing Element Draft for Glendale, CA

Dear Mr. Krause,

I am writing as a concerned resident of Glendale regarding the recent 6th Cycle Housing Element Draft.

I am curious and, quite frankly, concerned that the outreach efforts for this Housing Element Draft did not include Glendale Tenants Union considering that the draft itself states that renters comprise 67.8% of Glendale households. This makes renters the super-majority in Glendale and from all of my research appears to be the highest per capita renter city in all of California. So, why then was the only organization in Glendale dedicated to supporting and advocating for the renter population not consulted or flagged as "stakeholders" yet numerous developers were? With deliberate choices like this, it is not difficult to see the power that monied interests have over housing decisions in the City of Glendale.

I am duly concerned with the City of Glendale's intended actions and policies potentially arising from this Housing Element Cycle-- or the likely lack thereof. Glendale did not meet our lower income housing goals from the 5th Cycle Housing Element, yet we exceeded moderate-upper income housing, (essentially market rate housing) by 500%. That is preposterous and, once again, demonstrates that the City of Glendale's primary interest is appeasing wealthy developers.

I attended the "Housing Element Virtual Community Meetings" that was held via Zoom earlier in November. During the meeting, the presenters of the event were already engaging in dishonest manipulation of the data to hide the reality that Glendale has woefully under-supported our lower income communities. What assurances are we, as residents of Glendale, being afforded by the City of Glendale that this Housing Element Cycle will prove anything more than the lip service that the previous element proved to be?

These housing element updates are required by the State of California, not as a means of simply wasting taxpayer dollars to pay consultant firms that operate outside of the city or county itself to make 300-page reports and Powerpoint Zoom presentations, but rather so that the City is forced to consider whether it is meeting the needs of its residents. It is clearly not.

The only consideration put forth by this current draft that holds any weight or demonstrates any interest by the City of Glendale to properly support its super-majority renter population is the interest in exploring a Tenant Opportunity to Purchase (TOPA). I would like to highlight that the goal should be *implementation* rather than *exploration* of these policies. I would like to flag that studies regarding these TOPA policies already exist and robust policies have been developed for municipalities across LA County. I hope that the City of Glendale chooses to connect with currently existing Community Land Trust organizations when exploring the possibilities of TOPA policies here in Glendale rather than

privatized consultant firms based in Orange County or elsewhere. Here is a link for ease: <https://www.caclnetwork.org/>

I am CC'ing officials who represent the interests of Glendale residents at the local and state level in the hopes of directing their attention to the woeful inadequacy of the City of Glendale's approach to their constituents' housing needs.

Thank you.

Best,

Brigid McNally



Amanda Tropiano <atropiano@denovoplanning.com>

Public Comments on Glendale's 6th cycle HE draft

Mike Van Gorder <mike.vangorder@gmail.com>

Fri, Dec 3, 2021 at 1:28 PM

To: "Housing Elements@HCD" <housingelements@hcd.ca.gov>, Amanda Tropiano <atropiano@denovoplanning.com>, "Lanzafame, Philip" <PLanzafame@glendaleca.gov>, anajarian@glendaleca.gov, "Brotman, Daniel" <dbrotman@glendaleca.gov>, "Devine, Paula" <pdevine@glendaleca.gov>, VAgajanian@glendaleca.gov, akassakhian@glendaleca.gov, EKrause@glendaleca.gov, VZemaitaitis@glendaleca.gov

Hello Mr. Krause,

I'm providing you, the city council, and my fellow housing element reviewers my feedback on the Glendale 6th Cycle Housing Element Draft. In that I was not assigned the city's element in my official workload, I am free to provide this feedback from the perspective of a private citizen and concerned Glendale tenant, as somebody that wants to raise my family here but who sees virtually no options available should that family grow at all. I hope you will carefully consider them moving forward.

Quick notes:

- The draft claims that Glendale has 'no history of economic segregation', despite providing a map that shows such economic segregation
- It claims Glendale has no history of racial segregation, despite the city council's extraordinary acknowledgement by ordinance of Glendale's history as a 'Sundown Town'
- The draft claims that the city can *exclusively* produce affordable units in the downtown area, and that such an availability means their RHNA targets are all satisfied; however, considering realistic development reduces the projected yield of low-income sites from a surplus of 2,451 to a deficit of -2,940
- An analysis of the thirty three downtown sites claimed reveals only five sites that suggest developability, further reducing the low-income yield to a deficit of -3,580
- The draft misunderstands "Affirmatively Furthering Fair Housing" as 'responding to fair housing complaints', rather than "acknowledge a history of racist housing policy to create opportunities for underserved communities in both low-resource and high-resource areas"
- The draft claims to meet RHNA goals without needing to upzone anywhere, yet due to the above figures *it does not* meet the goals, and upzoning wealthier neighborhoods is a key part of Affirmatively Furthering Fair Housing
- The report acknowledges Racially Concentrated Areas of Affluence without analysis and without mention of an intent to create low-income opportunities therein
- Public participation occurred after the draft was submitted to the state in violation of HE requirements
- The Housing Element Draft is certainly noncompliant with state law and is, at its worst moments, a tone-deaf attempt to maintain a broken status quo

There is much deeper analysis of each of these elements in the document attached. Thank you kindly!

Glendale HE Response - Mike Van Gorder.docx
27K

Analysis of the 6th Cycle Glendale Housing Element Draft

Mike Van Gorder

Quick Notes

- The draft claims that Glendale has ‘no history of economic segregation’, despite providing a map that shows such economic segregation
- It claims Glendale has no history of racial segregation, despite the city council’s extraordinary acknowledgement by ordinance of Glendale’s history as a ‘Sundown Town’
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Analysis

The city housing department prides itself on being *more* productive than all its neighbors but falls into the exact same trap as it did in the 5th cycle – overproducing market rate units and failing to meet every other target below 120% Area Median Income. This Housing Element Draft will be noncompliant with state law.

The RHNA Shuffle – Core to the city’s comfort level with the draft element they’ve produced is the idea that they’ve found enough sites to accommodate their RHNA – and *without* the need for upzoning. The city notes 33 parcels in the Downtown Specific Plan as being “extremely feasible for redevelopment” but does not elaborate very well what criteria they use to determine this. [I have analyzed the sites in question and have determined that this is in bad faith, as some of these sites are recently built luxury apartments, some are long-serving faith institutions, and most show no signs of being “extremely feasible”. This analysis is at the end of my comments.] They then assign the entirety of “assumed capacity” of all such parcels to the production of lower-income units, thereby justifying their claim of 5,038 low-income unit sites in the RHNA, which then is used to defend a lack of RHNA siting for all other lower-income categories.

No project in the downtown area has been 100% affordable, and expecting thirty-three consecutive such projects is unrealistic and smacks of bad faith. Per AB 1397, a site chosen for the housing element must consider the “realistic development capacity for the site” and the “typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction”. The city failed to do this and claimed that every developable unit in every site in the downtown area *would* be developed *and* would be affordable. In reality, the only measure of affordable units in south Glendale has been inclusionary zoning. If we go off such inclusionary zoning measures, then the best we can expect is 15% of total produced units to be low income. Therefore, to reflect likelihood of development, the city must reduce the 5,038 units for its Low-income RHNA to 755. The assumed surplus of +2,451 low-income units in the RHNA will drop to a deficit of -1,832.

The city assumes that mixed use sites will only accommodate low-income units. Based on likelihood of development, this 1,303 number must in good faith be reduced to 195. The city assumes that “residential sites” – by which we are led to understand means single-family zoned areas – will only accommodate above moderate-income units. This lets them maintain the idea that no upzoning is necessary, because according to their misleading accounting of the downtown development capacity the city’s lower-income RHNA will have a 2,451 surplus. However, a far more honest (and legally compliant) number would incorporate likelihood of development – and be reduced to a deficit of -2,940.

The city claims that moderate and above moderate unit demand will be satisfied with the surplus from low-income category. Without considering the market distortion of offering units intended for low-income households to above-moderate income households (which the city should do if it intends to Affirmatively Further Fair Housing), accounting for the likelihood of development means that there will again be a massive surplus of above moderate-income sites and a huge gap for low- and moderate-income units. The city must find such sites elsewhere.

Furthermore, this 15% inclusionary-zoning estimate of affordable unit yield is charitable. The “proposed projects” section outlines housing projects currently under review, and gives us a far bleaker image of likelihood of development:

- o ELI/VI – 19 units, or 3.7% of its RHNA target
- o LI – 1 unit, or .05%
- o MI – 15%

While this bodes slightly better for the agonizing ‘missing middle’ that is dramatically pronounced in the city’s housing portfolio, it suggests that less than five percent of housing development will be affordable to lower-income households. Taking real-world expectations into account, this is a failure to meet RHNA obligations. The city must find more sites or upzone more areas. The presentation repeatedly mentioned that, “we didn’t have to upzone anywhere in order to meet our RHNA!” but this seems more like a desperate attempt to soothe twitchy homeowners than a wise or realistic goal.

Affirmatively Furthering Fair Housing – The legislative intent of AB 686, affirmatively furthering fair housing, is acknowledging that our housing systems were developed to protect and enrich some communities at the great expense of others. To affirmatively further fair housing, we need to see the physical development of our cities and neighborhoods as more than some inevitable force that

miraculously deposited older, whiter homeowners in the hills and everyone else scrunched together in between malls and auto dealerships. This draft housing element completely fails to affirmatively further fair housing because its concept of AFFH is “responding to housing discrimination complaints”. There is a difference between AFFH – which is acknowledging an ugly and lopsided economic history as essential toward creating opportunities for underserved communities – and housing discrimination, “fair housing” issues. This is mirrored in the city’s use of outdated Analysis of Impediments, and not the legally required Assessment of Fair Housing. The Analysis of Impediments as is provided is merely a laundry list of problems without any real analysis as how to resolve them. There is no calculation for goals, histories, or community participation. The housing department wants to identify poor areas and ‘replace segregated living patterns’, an empty quotation from AB 686. It does not mention wealthy areas, nor their role in maintaining segregative poverty.

The city cheerfully claims that there is not economic segregation in the community, referring to a chart (page 197) that *absolutely demonstrates* economic segregation in the community. Average income for a homeowner in Glendale is \$116K and average income for a renter is \$50K; there are virtually no opportunities to rent in the Kenneth Village, Sparr Heights, San Rafael, and other hilly R-1 neighborhoods. The lack of racial and economic analysis as to why this is the case – particularly after acknowledging without follow up that the city has Racially Concentrated Areas of Affluence – is a glaring failure toward the legislative intent of Affirmatively Furthering Fair Housing.

The draft bafflingly claims that there is no historic patterns of segregation by race and ethnicity. Glendale city council recently acknowledged via ordinance the city’s history as a Sundown Town, a deeply redlined, racially segregated whites-only community that endured only until the Fair Housing Act. The afterlife of all that segregation remains in the form of the R-1 neighborhood and the incomes of homeowners being 2.32 times higher than renters. This housing element does not acknowledge or analyze Glendale’s segregative and racist housing history and thus does not satisfy the requirements of AFFH.

This is physically borne out as the city continues to rely on its most modest areas to create any increase of density. I disagree that ‘affordable units are well dispersed throughout the community’, as is claimed under ‘Future growth need’. Any predominately single-family neighborhood will offer only such ADUs as are not inhabited by members of the primary homeowners’ families – this is not ‘well dispersed’, it is an abdication of responsibility.

In terms of displacement risk, new development may not have an immediate and quantifiable effect on displacement, as is claimed. Though, of course, the residents of the apartments that were recently bulldozed to make room for the college’s Garfield parking lot might disagree. But certainly failing to provide real low-income options – 0 units of ELI during the 5th cycle, half of what was needed for VI, two-thirds of what was needed for LI, and barely over 5% of what was needed for MI – means that any displacement is permanent. 31 affordable units were created under the city’s density bonus ordinance, and 18,414 applications came in for them. Low-income residents had a .16% chance of “winning” an affordable home! This, to the city council and the housing department, is ‘progress’.

Figure 6 shows where the RHNA allocation will go in relation to racial diversity, and claims that proposed lower-income RHNA sites are going into places of high diversity, with no sites going into areas of lower diversity. This is not integration. Our most diverse places are our more modest neighborhoods,

and Racially Concentrated Areas of Affluence are lower-diversity places that NEED racial and economic integration. That is the point.

Public input – This draft element was only made available to the public after it was submitted to HCD. But! Not before there was deep consultation with private housing developers. This flies directly against HCD requirements for public engagement. The take on access to opportunity in 7C is “we’ll try to find some poor people to serve on government boards” and then immediately undermines that with “*as positions are made available*”. Lower income folks do not have as much time! And why would “the community” participate in planning – like this – if their input is only solicited AFTER the draft has been submitted to the state? In keeping with AFFH, we need to recognize different communities. Older, whiter homeowners have far more ability to participate in local government and neighborhood-defining activity than others. That means adjusting the process to suit the more challenging schedules and elevated needs of the people who cannot as easily participate. We need to meet our working-class communities *where they are, on their terms* if we hope to benefit from their experience.

Weak Language – Goals are listed as being “considering” programs like tenant opportunity to purchase. Shouldn’t the goal be to *create* that kind of ordinance? In 3D the city vows to “continue to work with and identify”, which has no actionable goal. In 7C, “efforts *may include*”. In 2E “consider and implement other creative solutions”. 1F has “evaluate potential incentives”. These are weasel words. They are not goals, they’re feints.

Parking, still - what did the city do with the destruction of the Glendale College Naturally Occurring Affordable Housing-to-parking-lot units? Were “replacement” units provided at identical rents? What happened to those tenants? Adaptive reuse must include parking lots, and to address our glut of parking lots, we need to institute parking maximums. The city is overparked. In 3E, parking is blamed for the lack of development in commercial zones in the city. Why is parking required at all?

Siting Problems – The downtown specific plan sites form the core of the city’s argument that the RHNA is satisfied. They list 33 sites and claim that they are ‘extremely feasible’ for redevelopment. According to AB 1397, if the city relies on non-vacant sites to meet 50% or more of its lower-income RHNA targets, it must supply substantial evidence that the present uses will end during the eight-year housing cycle. It does not provide this evidence.

And anyway, the account of thirty-three “good” sites is simply not true. I count five sites that are good candidates for development and eighteen that are absolutely not. Five out of thirty three sites drops our downtown RHNA unit potential to 15% of what was initially projected – 736 units, from 5,038. If we calculate inclusionary zoning as being the sole reliable means of developing affordable housing on these sites, then we get 115 units of affordable housing. Adding this to our other demonstrated gap gives the city a -3,580 deficit in low-income units.

First, the good choices.

- 406 E Colorado is a small commercial building that is home to a medical center. It is underutilized, sandwiched between two habitually empty parking lot strips, and seems likely for renovation.

- 503 E Colorado is a pet grooming store, one of two active units on an underutilized strip mall, the other two units of which have been empty for years. I'm not sure why this address is on the list and not the other three.
- 124 Maryland – now Artsakh Ave – is part of a massive commercial complex with a huge dine-in movie theater. I believe 124 is the theatre, which just reopened under another brand name after being shut down by the pandemic. There are a half-dozen businesses and restaurants here. It's in a less-traversed part of the downtown commercial strip – the backside – but I'd estimate likelihood of development is middling.
- 116 W Doran is the vestigial single-floor commercial extension of a massive office building, currently housing a Wells Fargo. As offices start to go the way of the buffalo, turning this building into housing makes a lot of sense, though it would have to contend with the north-facing windows in the aforementioned office building (535 N Brand). Likelihood of development is middling.
- 340 N Orange is a two-story parking structure that feeds the Bank of America "Financial Center". I can't speak to its being over or underutilized, but I've never used it and google maps images of the structure show it as being nearly empty.

Now, the bad ones.

- 322 Americana Way is a theater that just very publicly signed a 15-year lease with AMC. There is no likelihood of development.
- 320 S Central is a *very* recent mixed-use building, the Lex on Orange, that advertises an available studio at \$2,332 and an available 2-bedroom at \$4,207. It is a dense, four-story luxury complex that appears to be nearly leased up. It is unclear as to how more housing can be fit on it, nor how this fits into the city's plan for affordable housing.
 - The city folds the same complex in its sites under the address 321 N Orange. Both addresses are completely built up and leased.
- 300 S Central is another recent luxury apartment building, the Legendary. The same story as 320 S Central applies here.
- 120 W Colorado is the site of a proposed hotel – the AC Hotel - that the city council has fast-tracked, despite this author's opposition to the site being used for something *other* than housing. It is deeply aggravating to see it on this list, currying credit for potential housing while the city council is blasting past housing advocates to help turn it into another unneeded hotel.
- 326 E Colorado is the Hotel Xilo, which is active and enjoys a 4.6 rating on google.
- 500 E Colorado is a medical and commercial center that JUST opened. There's no way this is going to turn into housing within the next eight years.
- 305 E Colorado is the parking lot of the United Community Church. I would, admittedly, love to see housing here, but I don't know what the church plans to do with the lot.
- 300 W Colorado is a Robbins Brothers engagement ring store. I know that diamonds are going out of fashion because young people aren't buying them for the same reasons that they're not buying housing, but this building must be demolished to make new housing and it is unclear if the jeweler will be going out of business any time soon.
- 352 W Colorado is part of a large faith center (The Foundation of Niscience) that has existed in the same spot since 1953 and it is highly unlikely to leave.

- 200 W Broadway is the Dick's Sporting Goods in the Glendale Galleria, a huge sports store that plugs directly into the indoor mall in two places. I would love to see this turn into housing but I cannot imagine it happening before 2030.
- 225 W Broadway is the Glendale Financial Square, a massive commercial lot where at least the Nurses' Union (CNA) have a lease. The emblem on the outside of the building says "Social Security", an institution that strikes me as being a sound long-term lease.
- 313 E Broadway is the United States Post Office, which might be a historical landmark, because it certainly looks like it. No way does this get developed into housing.
- 305 E Harvard is three accessory buildings to the Glendale Presbyterian Church. The side of the building says, "Children's Ministries" and I'd be interested to see if the church would sell all three buildings. Nonetheless, I'd put likelihood as low.
- 134 N Kenwood is the First Methodist Church of Glendale. I attended a community event here a while back. I don't think it's being bulldozed any time soon.
- 233 S Kenwood Street is the Lighthouse Bible Church Los Angeles. It's manicured. Likelihood is low.
- 900 N Central is the Crab Avenue restaurant, which is, at the time of this writing, in business. While the restaurant across the street has shuttered, the city needs to produce proof that the restaurant's lease will expire during the 6th cycle.
- 232 N Orange is the municipal parking lot that serves the downtown commercial district, just across from the Alex Theater. This is a rare parking lot that makes a lot of sense and serves a necessary purpose. There's no way that the city will tear it down to build housing.

If I had far more time, I would as happily dive into the much longer list of what the city considers candidate sites. Nevertheless, the city wants to claim RHNA building potential on, among other things, three leased-up, high-density luxury apartment complexes, trying to have its cake and eat it too – have existing market-rate housing count as 'potential low-income sites'.

This draft does not conform with state law and must be rejected.

Dear Erick Krause,

YWCA Glendale and Pasadena requests the Housing Element Planning Committee to **engage the local community and advocacy organizations to address the historical and present-day racial inequities** impacting the lives of women and girls in Glendale as part of the 6th Cycle (2021-20219) Housing Element Update.

The City of Glendale is the fourth largest in Los Angeles County. Census data stated the Black population in Glendale in 1920 was 0.16 percent, and in 2019, it was only 1.6 percent. The low population percentages result from historical anti-Black practices as acknowledged by the City **on September 15, 2021**, with the passing of a Sundown Town Resolution.

The disparate outcomes from these discriminatory housing programs reflected today include American Indian, Black, and other People of Color facing significant income inequality, poor health outcomes, exposure to environmental pollutants, low homeownership rates, high eviction rates, and poor access to healthy food, quality, and well-resourced schools, and infrastructure. In the 6th Cycle (2021-20219) Housing Element Update we urge you to develop and implement a new, community-driven goal, **Goal 6 Racial Equity**. The City has acknowledged unjust and unequal practices. Now is the time to address housing discrimination against communities of color as a root cause for disparate outcomes.

YWCA is an organization that relies on effective housing advocacy for women experiencing domestic violence. We work to advance racial equity through systems change approach and address the root causes of housing inequities. We recognize that affordable, safe, and accessible housing is key to achieving economic vitality through this approach.

Racial equity is "both an outcome and a process." Racial equity prioritizes ensuring people of color have the opportunities they have historically been denied and from which they continue to be excluded (Reyes, 2021). **Housing planning** is critical to ensuring women and children have a safe and permanent home.

Through YWCA advocacy and services, we see how Black women and other women of color are discriminated against and harmed by systems, laws, and policies supposed to provide access to housing. At the same time, we rely on those very same systems and their implementation to aid so many of the more than 2,000 women, children, and families that we serve each year. **We need to work together to ensure no family faces housing discrimination, in particular racial discrimination, in our city.**

The 6th Cycle (2021-20219) Housing Element Update must:

- Amplify and prioritize BIPOC families in the City's engagement process, removing all barriers to civic engagement.
- Establish community-driven goals and policies for City officials to identify the City's existing and projected housing needs.

- Operationalize the City's commitment as the Sundown Town Resolution stated. Thus, reviewing and revising its policies, procedures, ordinances, values, goals, and mission through an anti-racism lens fosters an unbiased and inclusive environment free of discrimination and harassment toward any person or group.
- Measure racial and social equity in each step of the planning process for housing. Assess and pursue ways to achieve beneficial outcomes for American Indian, Black, and other People of Color.
- Develop strategies to repair the harm of historical racial, ethnic, and other social discrimination for Black, Indigenous, and People of Color.
- Develop strategies to strengthen racial and cultural anchors and increase housing opportunities to build wealth.

Additionally, in September 2021, Governor Gavin Newsom signed 31 affordable housing bills focusing on four areas:

- Streamlining the building of new homes.
- Breaking down barriers to build more affordable housing.
- Addressing systemic bias by elevating fair housing principles.
- Holding local governments accountable under the new Housing Accountability Unit (HAU) at the California Department of Housing and Community Development (HCD).

The Housing Element Planning Committee, in a community-driven consultation process, can review the Technical Elements of Inclusionary Housing Policies and Practices, shown in Appendix A and that include the following highlights:

- Choose income targets for the affordable units that match those of renter households of color. Most inclusionary housing policies have tended to serve households earning between 60% and 120% of Area Median Income (AMI). But in many communities, renter households of color are disproportionately represented in lower-income groups below 60% of AMI.
- Require or encourage the construction of unit sizes that match the household sizes of renter households of color. In some communities, new market-rate multifamily development is largely composed of smaller units—studios, one-bedrooms, and two-bedrooms. But low-income renter households of color may have disproportionately larger household sizes; for example, people of color are more likely to live in multigenerational households than White people.
- Adopt building design standards to avoid stigmatizing residents of affordable units: When people of color, regardless of their economic status, occupy buildings with predominantly White residents, they may experience "othering" or micro-aggressions from their neighbors, such as cold-shoulders, blame for noise, or suspicions about property damage.
- Consider the use of city subsidies to advance racial equity goals. New market-rate development tends to occur in high-opportunity areas from which people of color have been systematically excluded and are often unable to afford. In communities with stronger housing markets, inclusionary housing is an effective tool to provide affordable homes in high-opportunity areas. But in

communities with less strong housing markets, it may not be financially feasible for developers to include affordable units in new market-rate development.

- Base the decision about compliance alternatives on the needs and preferences of households of color. Some people assume that requiring affordable units to be built "on-site" with market-rate units is the best way to advance racial equity. If a primary policy goal is to ensure that affordable units are built in high-opportunity neighborhoods from which people of color have been historically excluded, on-site development is by far the most straightforward way to achieve that goal.

As the Housing Element Planning Committee may identify, YWCA Glendale and Pasadena is pleased to support a community-driven process that advances racial equity in the 6th Cycle (2021-20219) Housing Element Update. We look forward to receiving your prompt reply.

Hello Erik,

As a longtime resident and homeowner in Glendale with some experience in the land use arena, I would like to weigh in on the Draft Housing Element on behalf of the Adams Hill Neighborhood Association.

First, we are glad that no additional up zoning is required in order to meet the RHNA numbers. Past up zoning has resulted in the overdevelopment of market rate units, leaving very little land left for affordable housing.

As I mentioned during the November 15 Community Meeting, the Housing Plan should remove offensive, dehumanizing language such as “handicapped” and “the homeless” to refer to people with disabilities or to people who are experiencing homelessness.

The Draft Housing Element seems lacking in providing/addressing the following:

- The list of “Surplus City-owned lands” that the City has earmarked for possible affordable housing development.
- Where is the “Opportunity Area Map?”
- Which locations are considered “Underutilized Mixed-Use Sites”
- One of the Goals is “A City with Housing that is Livable and Sustainable” but the Housing Element does not provide specifics on how we might encourage sustainable building practices. Given that construction is a major contributor to climate change, the Housing Element should provide actionable and measurable requirements.
- What are the Quality of Life Improvements for Neighborhood “Target Areas” as alluded to in “Program 2D.”
- Past Housing Elements have touched on the need for more Open Space and Recreation Areas, but the shortfall is getting worse instead of improving. the Plan should outside specific steps on how the extremely park starved areas of the City will be addressed.
- What are the specifics on how they plan to achieve “Goal 2: High quality residential neighborhoods that are well designed” amidst intensified streamlining that limits design review.
- How we can prioritize affordable housing when mandates like SB9 don’t require that housing be affordable?

In the November 15 Community meeting, someone commented on single room occupancy units (SRO) being only in hotel/motel zones. We are very much against allowing SRO development in residential zones. Cities such as New York experienced increases in crime in the SRO developments to the point that NYC incentivized developers to replace these crime magnets with other types of developments.

The Housing Element should focus on **design equity** for affordable units instead of allowing people of limited means to be relegated to substandard living conditions.

Given that the City has a long record of overdeveloping market rate units, the Housing Element should include mandatory requirements that new multi-family housing contain high quality affordable housing. Affordable housing should not be made substandard through multiple concessions and incentives that degrade the quality of life for residents in and around the developments.

Thank you for your consideration.

Rondi Werner, CSI, CCS, CCCA, CDT, LEED GA, AIA Allied
Vice President, Glendale Homeowners Coordinating Council
Vice President, Adams Hill Neighborhood Association
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November 19, 2021

Gustavo Velasquez, Director
California Department of Housing & Community Development
2020 West El Camino Avenue, Suite 500
Sacramento, CA 95833

Dear Director Velasquez:

Thank you for the opportunity to comment on the process of updating the housing element of Glendale's general plan. We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding Glendale's 6th cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law**'s mission is to make housing in California more accessible and affordable through enforcement of state housing law.

We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

Last autumn, [AHLA shared a letter with the City of Glendale](#), providing guidance on how the City should fulfill both the letter and the spirit of housing element law. We have reviewed the City's draft Housing Element, **and have major concerns about the City of Glendale's ability to meet its state-mandated RHNA targets**. The staff report and draft site inventory are inconsistent with HCD's instructions, and the requirement that housing element updates affirmatively further fair housing under Assembly Bill 686.

We have identified a number of concerns, which are listed below in the Executive Summary and detailed in the following Memorandum. **Of particular concern is the improper counting of at least 1,537 housing units, completed during the 5th cycle, towards the 6th cycle RHNA goal (see section 3E).**

Executive Summary

- 1A. The housing element does not prioritize rezoning in transit-rich, job-rich, and high-resource neighborhoods, including single-family zoned areas.
- 1B. The housing element fails to institute local programs and funding sources for preservation of existing affordable housing.
- 2A. The housing element does not adequately identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built.

- 2B. The housing element fails to streamline housing production.
- 3A. The housing element fails to estimate and report both the likelihood of discontinuation and the realistic capacity of inventory sites, both vacant and nonvacant.
- 3B. The housing element does not report the proportion of sites from the previous housing element's inventory that were developed during the previous planning period, and HCD-recommended methodologies and data sources were not used in order to conduct a thorough "factors" analysis of sites' realistic development capacity.
- 3C. The housing element assigns more than 50% of the lower-income RHNA target to nonvacant sites, but fails to use statistical methods to determine that the sites' existing uses are likely to be discontinued during the planning period.
- 3D. A buffer of at least 15-30% extra capacity is not included in the housing element site inventory.
- 3E. The housing element improperly counts at least 1,537 units, completed during the 5th cycle, towards the 6th cycle RHNA goal. It also does not provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and does not adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.
- 3F. The housing element does not commit to a mid-cycle review to verify the housing element's assumptions about development probabilities.
- 3G. The housing element sets the City's quantified objectives far below its RHNA targets.
- 4A. The housing element fails to meaningfully increase the concentration of lower-income households in areas of the city where the existing concentration of lower-income households is low.
- 4B. The housing element fails to meaningfully reduce the concentration of lower-income households in areas with low environmental quality and significant exposure to noise/pollution.
- 4C. The housing element does not adequately prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities.
- 4D. The jurisdiction did not adequately solicit public feedback and commentary on the housing element in a way that accurately reflects the jurisdiction's socioeconomic makeup.

- 5A. The housing element appears to overestimate ADU production in order to support an overly optimistic forecast of future ADU production. The City did not use an HCD-recommended safe harbor methodology for forecasting future ADU production.
- 5B. The housing element does not commit to mid-cycle adjustments if inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if ADU production falls short of projections. Mid-cycle adjustments should automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and be designed to make up for an ADU shortfall.
- 5C. The housing element does not assess the affordability of forecasted ADUs using city-specific data; it instead uses a regional average.

Memorandum

1. Protections and preservation

A. The housing element does not adequately prioritize rezoning in transit-rich, job-rich, and high-resource neighborhoods, including single-family zoned areas. This is necessary to expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.

AB 686 (2018) requires housing element updates to “affirmatively further fair housing”, which is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.

HCD requires that a housing element’s site inventory and rezoning programs must not concentrate opportunities for affordable housing development in areas of segregation or high poverty. Rather, “sites must be identified throughout the community in a manner that affirmatively furthers fair housing.”¹ HCD recommends that jurisdictions distribute affordable housing opportunities throughout the jurisdiction, and first identify development potential for affordable housing in its best-resourced neighborhoods², as defined in the TCAC/HCD Opportunity Map. Additionally, HCD’s AFFH Guidance Memo defines “high-opportunity” holistically, defining areas with strong access to public transportation and job centers as being locations where affordable housing should be promoted through the housing element.³ These policies will create more affordable housing in well-resourced areas, promoting inclusion of people of all backgrounds and income levels in formerly exclusionary neighborhoods.

¹ HCD, Site Inventory Guidebook, pg. 9

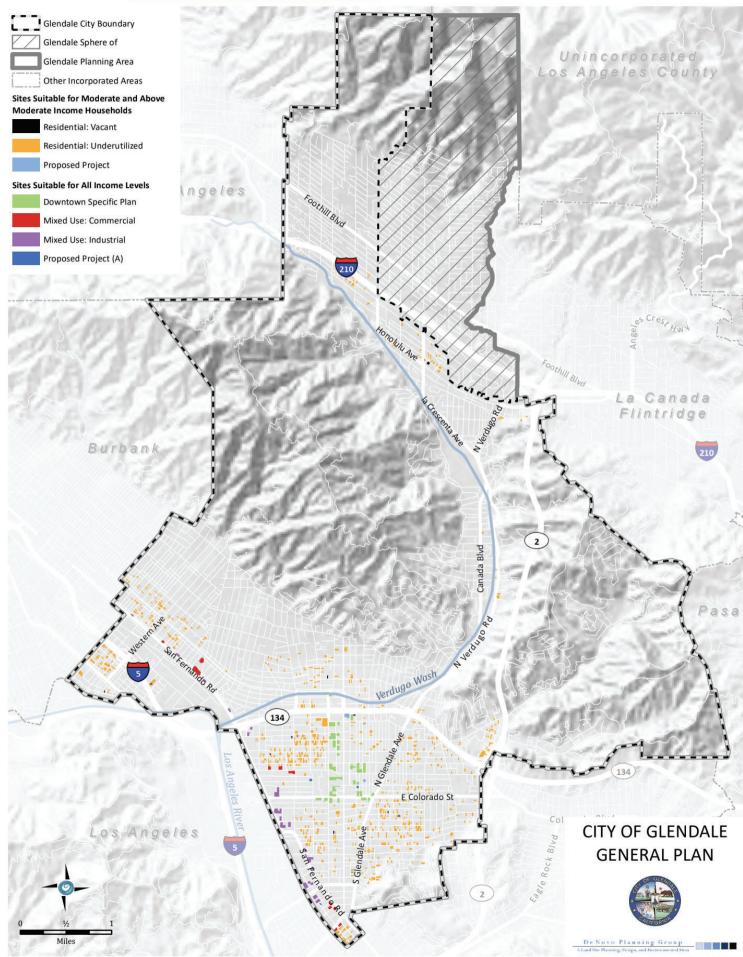
² [HCD Site Inventory Guidebook, pg. 3](#)

³ HCD, AFFH Guidance Memo, pg. 48

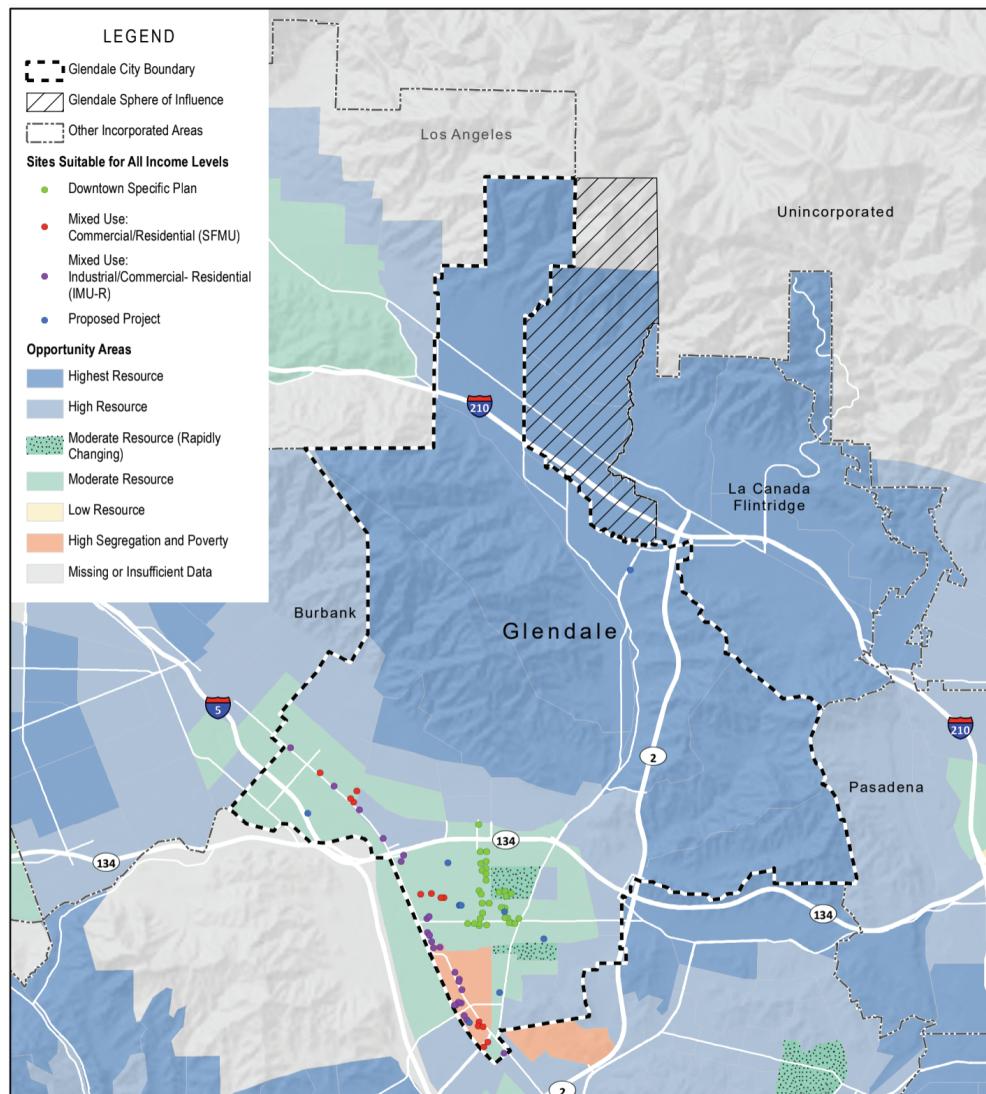
This is important because in our region, housing policy and land use perpetuate racist exclusion. [Redlining and restrictive covenants](#), which restricted where Black, Latino/a/x, Indigenous people, and Asian Americans could live, were once common in Los Angeles County. Discrimination in housing takes other forms today: even after *de jure* segregation was banned, opponents of neighborhood change in prosperous areas [weaponized zoning policy](#) to make apartment construction illegal in much of Los Angeles County, especially in high-income areas. Restrictive zoning has perpetuated historic patterns of segregation and exclusion, and continues to push affordable housing opportunities away from wealthy, high-opportunity cities and neighborhoods.

Unfortunately, the City has not proposed any rezoning to allow denser multifamily residential or mixed-use development on parcels where apartments are allowed today, and has not proposed the legalization of apartments in R1-zoned areas, which today make up [78% of the City's residentially-zoned land](#). Though the City is effectively claiming that it has enough underutilized parcels to generate over 13,000 new homes by 2029, the likelier outcome is that the City will continue to build less housing than it needs (see section 3A), perpetuating the City and region's housing shortage.

Proposed Sites Inventory (pg. 95, Background Report)

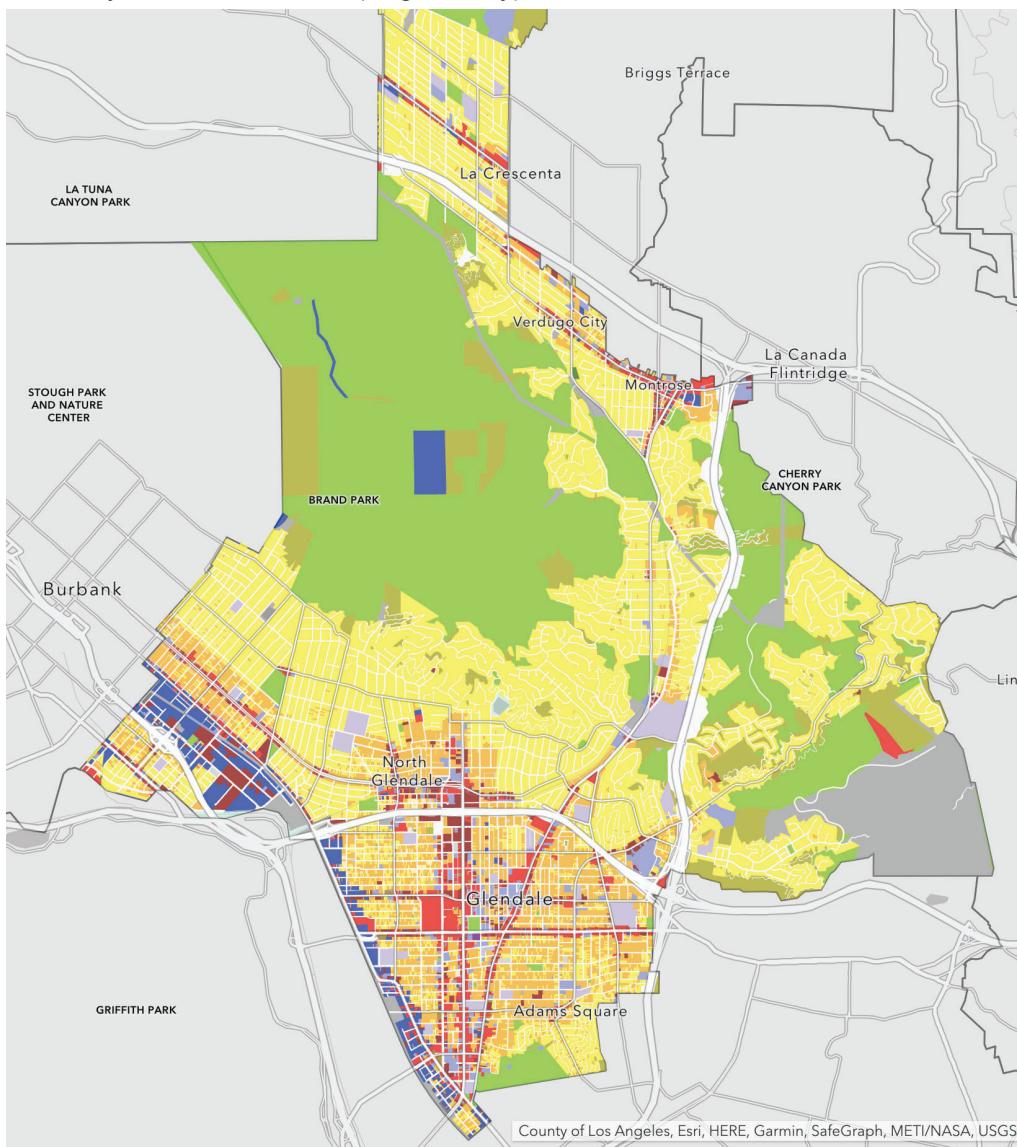


Proposed Sites Inventory by TCAC Opportunity Areas (pg. 143, Background Report)



Zoning map of Glendale (Source: [SCAG HELPR tool](#))

Areas in yellow are zoned R1 (single-family)



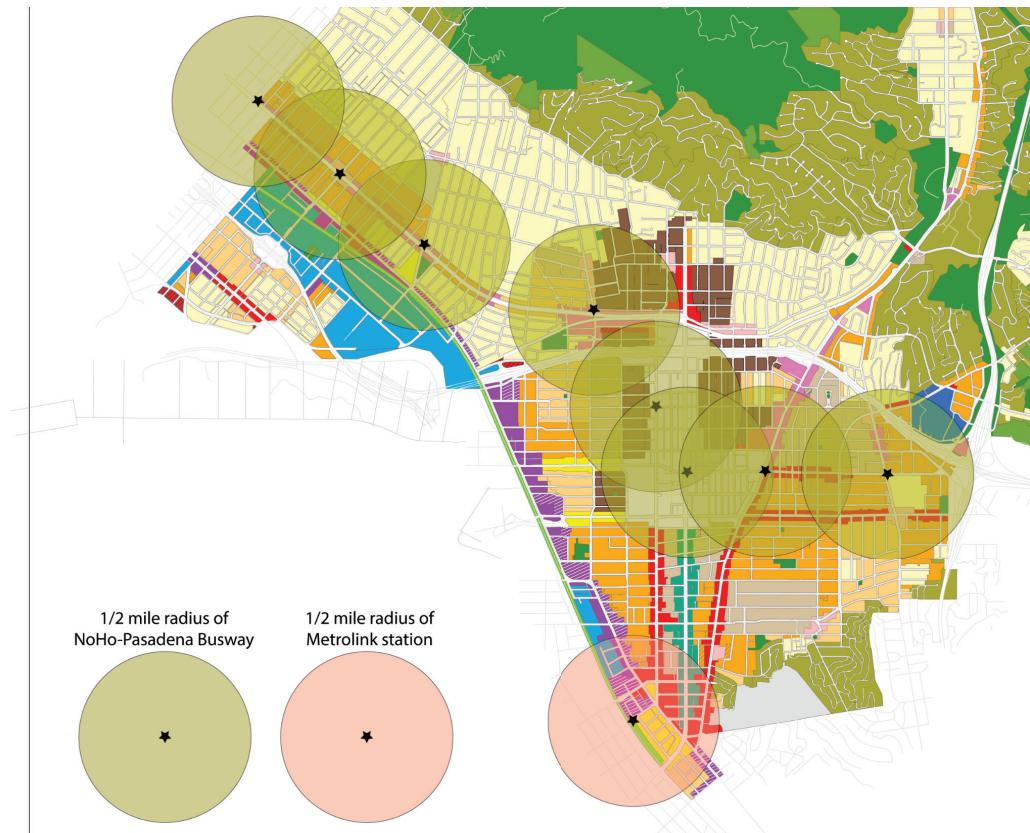
However, the City can help to fulfill its AFFH obligations by creating more housing opportunities near jobs and transit. This is not a new idea in Glendale, which originally grew up around the Glendale Boulevard Red Car Line. By the mid-2020s, Glendale will host the [Pasadena-NoHo busway](#), adding another four rapid transit stations within the city limits.



1920s-vintage buildings which should be allowed near the busway and Metrolink.

The City should rezone to allow larger buildings on all parcels within a half-mile of the Glendale Metrolink station and future busway, excluding sites within 500 feet of a freeway. When rezoning, Glendale should emulate the City of Los Angeles's Transit Oriented Communities program, which offers generous by-right density bonuses to developers who include affordable housing in new developments near mass transit. Draft standards, modeled on existing buildings, are included below, as is a potential rezoning map.

Zoning map of Glendale with land close to Metro and Metrolink overlaid



Proposed zoning standards near mass transit

Locale	Height allowed	Max density	Floor-Area Ratio	Parking	Density bonus	Setbacks
≤ ½ mi. to busway or Metrolink	125'	166 DU/acre	6:1	None req'd; Developer to decide	50-80%	Front: none Side: none Rear: 10'

Ending exclusionary zoning is necessary for the housing element to advance socioeconomic integration and greater housing affordability. The final housing element must make a stronger effort to affirmatively further fair housing and rezone sites in low-density, high-resource areas of Glendale to increase affordable and lower-income units in these neighborhoods, particularly near transit corridors.

B. The housing element fails to institute local programs and funding sources for preservation of existing affordable housing.

Under state law, a housing element must affirmatively “[a]ssist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate-income households” (Gov’t Code 65583(c)(2)). Additionally, HCD’s AFFH Guidance Memo states that “The schedule of actions generally must (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places.”⁴

Housing elements should use available public resources, including real estate transfer taxes and publicly owned land, in order to fund and encourage the preservation of existing affordable housing, potentially through a local Tenant Opportunity to Purchase Act, community land trusts, land banks, or assisting mission-driven nonprofits with acquisition of housing whose affordability covenants are close to expiration. This is important to ensure that lower-income households are able to maintain access to quality affordable housing options.

However, the draft housing element does not propose or commit to meaningful programs that would provide the financial resources necessary to preserve affordable housing. While the housing element discusses the need to preserve subsidized affordable housing and rehabilitate housing whose residents typically have low incomes, its proposed actions lack a meaningful, specific commitment to funding, making these actions unlikely to preserve these at-risk units. **We urge the City to increase its commitment to funding and supporting affordable housing preservation and production.**

⁴ AFFH Guidance Memo, p. 54

Recommendations - Protections and preservation:

- Rezone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in high- and highest-resource areas, including R1 parcels where single-family detached homes are currently mandated by law.
- Identify additional funding sources to support the preservation of existing affordable housing, including building repair/maintenance and enforcement of the building code/habitability requirements.

2. Prioritization of affordable housing

A. The housing element does not adequately identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built.

Under state law, a housing element must affirmatively “[a]ssist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate-income households” (Gov’t Code 65583(c)(2)). Additionally, HCD’s AFFH Guidance Memo makes clear that “The schedule of actions generally must (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places.”⁵

To accomplish these goals, housing elements should incorporate a program that creates affordable units, such as a density bonus program or base-bonus incentive system, that would apply to rezoned parcels. This will ensure that new housing development will directly create affordable units within mixed-income properties.

The City of Los Angeles’s Transit Oriented Communities program, which offers generous by-right density bonuses to developers who include affordable housing in new developments near mass transit, is worth emulating. Transit Oriented Communities has led to the [proposal of over 35,000 homes](#) (of which 20% are deed-restricted affordable units) in Los Angeles.

Unfortunately, Glendale’s housing element does not propose a local density bonus that exceeds the state density bonus program’s incentives, nor does it propose other new local programs to meaningfully encourage mixed-income and affordable housing production. The proposed Program 3A is simply an implementation of AB 2345 (2020), which updates the state’s density bonus program.⁶ The stated goal of Program 3A is to encourage “one density bonus project per year (without other public funding assistance), with a minimum of 8 units affordable to Very Low income households.”⁷ **Glendale must set its sights higher for mixed-income housing production, especially given that thousands of subsidized units are needed to meet the City’s RHNA goals.**

⁵ AFFH Guidance Memo, p. 54

⁶ Housing Element Housing Plan, City of Glendale, November 2021, pg. 29

⁷ Housing Element Housing Plan, City of Glendale, November 2021, pg. 29

Additionally, Glendale's Inclusionary Housing Ordinance imposes heavy mandatory set-aside requirements: new residential development larger than 7 units must set aside 15% of total units for lower and moderate households, with fractional units rounded up.⁸ A set-aside percentage this high imposes a major cost that discourages development, as occurred when very high inclusionary requirements were introduced in recent years in San Francisco and Downtown Santa Monica.

Glendale's inclusionary zoning policy should be revised to create a strong local density bonus program, which would encourage the production of affordable units, a stated objective of the housing element. This should include much larger density bonuses, higher maximum height and FAR limits, faster permitting, and less on-site parking than the state program, and should also apply these incentives to parcels zoned R1 (the state program does not apply to these parcels). This would create powerful new economic incentives for redevelopment, spurring more mixed-income housing production and creating more subsidized units.

B. The housing element fails to streamline housing production.

Housing element law requires cities to provide an analysis of governmental constraints on housing development, as well as a program to mitigate or remove these governmental constraints. This is important because local governmental constraints are a major reason why housing production in most California cities is low.

Unfortunately, building housing in Glendale is slow and difficult, due to the City's complex regulatory regime. A few examples:

- **Parking requirements:** The City imposes heavy on-site parking requirements for new housing, particularly for multifamily dwelling units. The City requires most studio, one-bedroom, and two-bedroom units to provide 2 parking spaces per unit, and even requires guest parking to be provisioned.⁹ This raises construction costs substantially and makes new multifamily housing less feasible to build.
- **Open space requirements and minimum lot sizes:** The City requires most multifamily development to leave 25-30% of the lot unbuilt, and mandates large setback and yard sizes.¹⁰ The City also sets a minimum lot size of 10,000 square feet in mixed-use zones.¹¹
- **Maximum building sizes and density limits:** The City sets unreasonably low maximum FARs, building heights, and density limits for most new multifamily development, even in R1250 zones ("High Density Residential"). Such zones only allow a maximum density of 36-60 homes/acre,¹² and a maximum FAR of 1.2,¹³ making high-density residential development difficult to achieve in practice.
- **Project approval process:** Given the restrictive nature of the base zoning code, many housing projects in Glendale request general plan or zoning amendments, a

⁸ Housing Element Housing Plan, City of Glendale, November 2021, pg. 33

⁹ Housing Element Background Report, City of Glendale, November 2021, pg. 72

¹⁰ Housing Element Background Report, City of Glendale, November 2021, pg. 69

¹¹ Housing Element Background Report, City of Glendale, November 2021, pg. 70

¹² Housing Element Background Report, City of Glendale, November 2021, pg. 56

¹³ Housing Element Background Report, City of Glendale, November 2021, pg. 69

discretionary process that involves a public hearing and City Council approval.¹⁴ New housing construction also typically requires Design Review Board approval. It's worth noting that processing time for permitting a multifamily unit is 3-6 months, while processing time for permitting a single-family home is only 2-3 months.¹⁵ These unreasonable roadblocks, from which single-family housing is exempted, make the process of approving multifamily housing lengthy and unpredictable, and inject political interference into the process.

As a result of these many constraints, the city's housing stock only grew less than 3% between 2010 and 2020¹⁶, the median rent is nearly \$1,750/month¹⁷, and the median home price now exceeds \$1 million.¹⁸ Per Professor Chris Elmendorf of the University of California, Davis and his co-authors of [Superintending Local Constraints on Housing Development](#), the above data suggest that restrictive land use rules are making homebuilding difficult in Glendale, leading to continued shortage and high costs.

However, while the housing element discusses governmental constraints in detail, it does not commit to a strong program to remove policy constraints that deter housing production. For example, the proposed Program 8B would "Identify additional opportunities beyond those already provided to enable permit streamlining to increase the production of housing in Glendale..."¹⁹ A weak promise to "identify" is not the same as specific commitments to expanding by-right permitting to specific categories of projects, by a specific implementation date.

Government Code Section 65583(c) requires housing elements to include programs with concrete action steps to facilitate housing production.²⁰ This is hardly an impossible target; other cities in California have successfully implemented process reforms that streamline housing production. For example, the City of Los Angeles' Transit Oriented Communities program approves qualifying mixed-income and 100% affordable projects by-right, leading to an average approval time of 6 months for these projects. Glendale could adopt a similar process to dramatically streamline the process of building new housing.

Second, the City should abolish or drastically limit the scope of design review. The City simply ignores the fact that Design Review is a purely discretionary action, subject to the whims of the Design Review Board, and not required to be granted. In addition, the City subjects almost all proposed buildings to design review, which is slow, subjective, and vulnerable to political meddling.

¹⁴ Housing Element Background Report, City of Glendale, November 2021, pg. 74

¹⁵ Housing Element Background Report, City of Glendale, November 2021, pg. 73

¹⁶ Housing Element Background Report, City of Glendale, November 2021, pg. 34

¹⁷ Housing Element Background Report, City of Glendale, November 2021, pg. 37

¹⁸ [Zillow Home Value Index, September 2021](#)

¹⁹ Housing Element Housing Plan, City of Glendale, November 2021, pg. 52

²⁰ "The element shall contain all of the following: A program [or programs] that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives..."

Third, the City can make more development viable by making on-site parking optional to provide, an important reform that would reduce housing costs and encourage more residential construction. Today, providing one parking space per unit increases the cost of a new home by 12.5%;²¹ an above-ground garage space costs an average of \$24,000 to build and an underground space costs \$34,000.²²

We urge Glendale to commit to major constraint removal policies in order to streamline affordable housing growth.

Recommendations - Prioritization of Affordable Housing:

- Introduce a density bonus program similar to Los Angeles' Transit Oriented Communities program (with 50-80% density bonuses) to permit additional affordable housing to be built near mass transit.
- Establish a fast by-right review process for all new multifamily and mixed-use buildings which meet the zoning law and the General Plan. Sacramento's Ministerial Housing Ordinance is an excellent model to follow.
- Eliminate conditional use permit requirements for multifamily development.
- Abolish or drastically limit the scope of the Design Review Board.
- Pre-approve standard ADU, small-scale “missing middle” multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.
- Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.
- Reduce restrictions on maximum height, floor-area ratio, unit size, and lot coverage.

3. Site Capacity Assessment

A. The housing element fails to estimate and report both the likelihood of discontinuation and the realistic capacity of inventory sites, both vacant and nonvacant.

Assembly Bill 1397 (2017) requires cities to provide an accurate assessment of realistic site capacity, including “the city’s or county’s past experience with converting existing uses to higher density residential development, the current demand for the existing use, and an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment.”

While the Housing Element Law does not expressly use the term “likelihood of development,” legal scholars from across the state have shown that AB 1397 (2017), read together with other recent laws, requires cities to discount sites’ capacity by the sites’ probability of development during the planning period. The Legislature has also put HCD in the driver’s seat for purposes of

²¹ <https://www.vtpi.org/park-hou.pdf>

²² <http://shoup.bol.ucla.edu/HighCost.pdf>

resolving any ambiguities about the definition or calculation of site capacity. Specifically, SB 6 (2019) authorizes HCD to promulgate “standards, forms, and definitions” for the site inventory and associated assessment of site capacity and constraints. An accurate assessment of the site inventory’s housing capacity is necessary in order for the housing element to achieve sufficient housing production.

The site capacity estimate should account for the following **two factors**, as required by HCD guidelines:

- **Likelihood of discontinuation**²³ - What is the likelihood that the site’s existing use will be discontinued, and that it will be redeveloped during the planning period?
- **Realistic capacity**²⁴ - If the site were to be redeveloped during the planning period, how many net new units of housing are likely to be built on it?

The portion of the jurisdiction’s RHNA target that a site will realistically accommodate during the planning period is:

$$\text{(likelihood of discontinuation)} \times \text{(realistic capacity)} = \text{expected additional development potential during the 6th cycle}$$

The draft housing element identifies a theoretical zoned capacity of 14,744 housing units: 8,874 units on underutilized or vacant lots, 1,272 ADUs, 503 units in proposed projects not yet entitled, 1,344 units entitled but not under construction, 2,052 units under construction or built since June 30, 2021, and 699 existing units converted to deed-restricted affordable housing.²⁵ However, the analysis doesn’t estimate a likelihood of discontinuation for site inventory parcels, **effectively assuming that about 85% of site inventory parcels will be redeveloped during the 6th cycle.**²⁶

Housing production data from the 5th cycle casts doubt on the City’s implicit assumption that 8,874 homes will be built on underutilized parcels by 2029. In 2014, Glendale’s 5th cycle housing element claimed theoretical capacity for roughly 10,000 more housing units.²⁷ But through 2020, Glendale permitted 3,972 homes²⁸, which equates to 4,539 homes permitted by the end of the 5th cycle (assuming that the same annual permitting pace continues in 2021). This implies that in Glendale, excess zoned capacity has only a **45% likelihood of being developed** (4,539 actual units divided by 10,000 theoretical units).

The City of Los Angeles’ 6th cycle housing element provides additional evidence that most parcels’ existing use is unlikely to discontinue in the near term. Together with the Terner Center, the City developed [a sophisticated parcel-level econometric model](#) to estimate the additional

²³ [HCD Site Inventory Guidebook, pg. 21](#)

²⁴ [HCD Site Inventory Guidebook, pg. 20](#)

²⁵ Housing Element Background Report, City of Glendale, November 2021, pg. 88-90 and pg. 102

²⁶ The City proposes to create 5,870 homes through in-pipeline projects, conversion of existing buildings to deed-restricted affordable housing, and ADUs, indicating that the remaining 7,555 homes needed to achieve the RHNA target would be created on site inventory parcels. Since the City claims that the site inventory contains enough theoretical zoned capacity for 8,874 homes, they therefore imply that 85% of the identified zoned capacity on the site inventory will be built by 2029.

²⁷ [Glendale 5th Cycle Housing Element, pg. 175](#)

²⁸ [HCD Annual Progress Report dataset, 2020](#)

development potential of its site inventory during the 6th cycle, using recent development trend data to forecast likely future residential development. The model forecasted that the sites with the strongest redevelopment opportunities (i.e. in the top 1 percent of redevelopment likelihood) only had a **13% probability of redevelopment** during the coming 8 years. This suggests that simply relying on underutilized parcels was unlikely to be an effective strategy for achieving the RHNA target, and that significant rezoning was therefore necessary.²⁹

Additionally, the City assumes that all underutilized residential site inventory parcels will be built to 75% of the legal maximum, all mixed-use parcels will be built to 50% of the legal maximum, and that all Downtown Specific Plan sites will be developed to 90% of legal maximum capacity. However, given the complex and restrictive nature of development in Glendale, it's reasonable to assume that developers will build to a lower percentage of the legal maximum, which is the norm in comparable cities. For example, in Santa Monica, developers regularly build far less than the legal maximum due to that city's restrictive zoning requirements. In Burbank, developers build to about 60-80% of the legal maximum zoning *for market-rate developments*.³⁰

Glendale does not provide equivalent data on historical use of residential land; it should estimate site capacity based on historical usage of zoned capacity on residentially-zoned land, but it does not. Per HCD guidelines, "When establishing realistic unit capacity calculations, the jurisdiction must consider the cumulative impact of standards such as maximum lot coverage, height, open space, parking, on-site improvements such as sidewalks or easements, and floor area ratios. The analysis should consider any development standards or the cumulative effect of development standards that would limit the achievable density on a site."³¹

Finally, the City's projections for how much housing that is affordable to lower-income households will be built on the proposed site inventory are unrealistic. Strangely, the City assumes that all units built in the Downtown Specific Plan Area and on Underutilized Mixed-Use Sites will all be affordable to lower-income households, while all units built on Underutilized and Vacant Residential Sites are counted towards the above moderate-income RHNA target.³² This is an especially odd assumption, given that many of the proposed Underutilized Mixed-Use and Downtown sites (counted entirely towards the lower-income RHNA target) are frequently within 1-2 blocks of proposed Underutilized Residential Sites (counted entirely towards the above moderate-income RHNA target).³³

The City's claims about lower-income housing development potential on individual sites are also questionable. For example, the City claims that a hotel at 120 W Colorado St will be redeveloped into 95 below-market-rate units, even though there is no plan to fund such development. For comparison, when the South Bay Galleria in Redondo Beach was redeveloped with a 150-room hotel, 300 apartments, and 217,000 square feet of retail space, only 30 units of deed-restricted affordable housing were built. Glendale's effective claim, that

²⁹ Appendix 4.6, Housing Element, City of Los Angeles, October 2021 draft, pg. 22-23. The model predicted that the top 1% of sites had an 8.6% probability of redevelopment in the coming 5 years, which is equivalent to a 13.4% probability over 8 years.

³⁰ [Burbank Draft Housing Element 2021-2029](#), 1-72

³¹ [HCD Site Inventory Guidebook](#), pg. 20

³² Housing Element Background Report, City of Glendale, November 2021, pg. 102

³³ See map of site inventory on pg. 5 of this letter.

nearly all of the site inventory parcels in Downtown will be redeveloped, and that all of it will be affordable to lower-income households, is simply not credible.

The City must fairly estimate the likelihood of discontinuation and realistic capacity for all parcels on the suitable sites inventory. There are multiple acceptable approaches: as discussed above, the City of Los Angeles' sites inventory model provides a strong data-driven approach. The City of Sacramento's [draft site inventory](#) provided a high-quality, numerical analysis of the likelihood of their sites' development through a "tiered classification system to classify the non-vacant underutilized sites".³⁴ Either approach offers a good model for the City to build on.

B. The housing element does not report the proportion of sites from the previous housing element's inventory that were developed during the previous planning period, and HCD-recommended methodologies and data sources were not used in order to conduct a thorough "factors" analysis of sites' realistic development capacity.

Assembly Bill 1397 (2017) requires cities to provide an accurate assessment of realistic site capacity, including "the city's or county's past experience with converting existing uses to higher density residential development, the current demand for the existing use, and an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment."

To assess the likelihood of development, a city can calculate a citywide discount factor, using the proportion of 5th Cycle sites subsequently developed as a starting point. One approach could be to create a citywide estimate of a site's redevelopment likelihood during the 6th Cycle, and apply that discount factor to all housing element sites. The Site Inventory Guidebook states, "if no information about the rate of development of similar parcels is available, report the proportion of parcels in the previous housing element's site inventory that were developed during the previous planning period".³⁵

Alternatively, cities could estimate a citywide discount factor by comparing citywide unbuilt capacity at the beginning of the 5th Cycle to the number of homes permitted citywide during the 5th Cycle. Cities could also make reasonable neighborhood-specific estimates of redevelopment likelihood, based on recent development trends and market conditions. The proportion of 5th Cycle sites that were later developed is an important piece of evidence validating the 6th Cycle housing element's assumptions about redevelopment likelihood, which is why cities must report it. **Unfortunately, the City does not report the proportion of 5th Cycle sites subsequently developed, nor does it undertake a quality "factors" analysis using any of the above suggested methodologies.**

C. The housing element assigns more than 50% of the lower-income RHNA target to nonvacant sites, but fails to use statistical methods (e.g. surveying a random sample of

³⁴ [Public Review Draft, City of Sacramento Housing Element 2021-2029, p. H-2-15](#)

³⁵ HCD Site Inventory Guidebook, pg. 21

owners of nonvacant sites) to determine that the sites' existing uses are likely to be discontinued during the planning period.

Assembly Bill 1397 (2017) requires cities to provide an accurate assessment of realistic site capacity, including “the city’s or county’s past experience with converting existing uses to higher density residential development, the current demand for the existing use, and an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment.”

When cities allocate over 50% of their lower-income RHNA targets to nonvacant sites, they must demonstrate through *substantial evidence* that the current use of these sites is likely to be discontinued during the planning period. This is necessary in order to ensure that enough parcels for affordable housing production are identified, and that the lower-income RHNA targets are ultimately achieved. HCD recently critiqued Beverly Hills’ draft housing element for failing to provide this analysis; Beverly Hills, like Glendale, presented a draft housing element whose site inventory relies on commercially-zoned sites for much of its proposed housing growth.³⁶

HCD requires housing elements to describe the methodology used to estimate sites’ realistic development capacity³⁷, while also giving cities leeway on how to arrive at these estimates³⁸. One option we recommend is the Survey Method; the city would survey the owners of each lower-income sample site and ask whether they intend to discontinue the site’s current use and sell or redevelop the site during the next eight years. Another option is the Historical Redevelopment Rate Method; the city would calculate the share of owners in each category who filed permits for demolition, change of use, or redevelopment during the previous planning period.

The draft housing element defines “underutilized residential sites” as parcels with potential for at least two additional units, where the existing building was developed before 1990, and the site inventory is composed of parcels that meet these two conditions.³⁹ While this is a reasonable way to filter out sites whose existing use is **unlikely** to discontinue, this is not the same as undertaking a robust analysis to demonstrate that sites’ existing uses are **likely** to discontinue during the 6th Cycle, and does not qualify as “substantial evidence”. The City did not utilize either the Survey Method or the Historical Redevelopment Rate Method to provide evidence that redevelopment has a high likelihood of occurring on the parcels in the site inventory. The City did not explain why these sites may be good candidates for redevelopment, and did not

³⁶ [Review of City of Beverly Hills’s 6th Cycle \(2021-2029\) Draft Housing Element, 7/30/21, Appendix, pg. 2.](#) “The element must include an analysis to demonstrate the potential for additional development. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City’s past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development...In addition, relying on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period.”

³⁷ HCD, Site Inventory Guidebook, pg. 19

³⁸ HCD, Site Inventory Guidebook, pg. 20-21

³⁹ [Housing Element Background Report, City of Glendale, November 2021, pg. 98](#)

provide letters from property owners indicating their interest in selling or redeveloping parcels on the site inventory. **This appears to violate AB 1397.**

D. A buffer of at least 15-30% extra capacity is not included in the housing element site inventory. This capacity buffer is especially necessary in order to accommodate the lower-income RHNA target.

The No Net Loss law established by SB 166 (2017) requires adequate sites to be maintained at all times throughout the planning period to accommodate the remaining RHNA target **by each income category**.⁴⁰ If a jurisdiction approves a development on a parcel listed in the site inventory that will have fewer units (either in total or at a given income level) than the number of units (either in total or at a given income level) anticipated in the site inventory, then the jurisdiction must identify and make available enough sites to accommodate the remaining unmet RHNA target for each income category.⁴¹

If additional sites with adequate zoned capacity don't exist, then the jurisdiction must rezone enough sites to accommodate the remaining unmet RHNA target within 180 days. If the jurisdiction fails to accomplish this rezoning in the required period, then the consequences will include decertification of the housing element and potential state legal action. HCD recommends that "the jurisdiction create a buffer in the housing element inventory of at least 15-30% more capacity than required, especially for capacity to accommodate the lower income RHNA."⁴² **This is important because it ensures that adequate affordable housing capacity exists in the housing element through the 6th Cycle.**

The City's draft housing element claims to provide capacity for 14,744 housing units, 10% higher than the City's RHNA goal of 13,425 homes.⁴³ **The City has not fulfilled HCD's recommendation to maintain a 15-30% capacity buffer in aggregate and at each income level, giving the City little margin if a site intended for affordable housing is developed with market-rate housing.** Additionally, it is worth reiterating that the City's claimed development potential for 8,053 lower-income housing units is premised on the unrealistic assumption that **all** new development in the City's Downtown Specific Plan and on parcels designated for mixed-use redevelopment will be affordable to lower-income households (see Section 3A).

⁴⁰ HCD [No Net Loss Law Memo](#), pg. 1

⁴¹ [HCD Site Inventory Guidebook](#), pg. 22

⁴² [HCD Site Inventory Guidebook](#), pg. 22

⁴³ Housing Element Background Report, City of Glendale, November 2021, pg. 102

Comparison of claimed vs. estimated additional development potential

Income Category	Estimated Add'n Dev Potential in Draft HE (45% dev likelihood)						Recommended Add'n Dev Potential w/20% NNL	Gap in Add'n Dev Potential
	RHNA Target	Claimed Capacity in Draft HE	NNL Buffer					
VLI + LI	5,602	8,053	44%	3,624		6,722		-3,099
MI	2,249	1,664	-26%	749		2,699		-1,950
AMI	5,574	5,027	-10%	2,262		6,689		-4,427
Total	13,425	14,744	10%	6,635		16,110		-9,475

The City should ensure that enough housing capacity is created to provide 15-30% capacity buffers at each level of income, to avoid violating the No Net Loss requirement. Otherwise, the City risks falling afoul of the No Net Loss requirement, making it vulnerable to mid-cycle rezoning, a costly process in terms of time, money, and political will.

E. The housing element improperly counts at least 1,537 units, completed during the 5th cycle, towards the 6th cycle RHNA goal. It also does not provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and does not adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.

HCD allows cities to count permitted or entitled units towards its 6th Cycle RHNA goals, on the grounds that some of these projects will be built during the 6th Cycle. However, the city must **realistically** estimate how many of these units will ultimately be built during the 6th Cycle, based on recent historical data. This is necessary because not every pending project gets approved, and not every approved project gets built. Assuming that all permitted or entitled projects will ultimately be built is a faulty assumption, and would make it likelier that the city does not achieve its 6th Cycle RHNA goals.

The City has counted 2,052 units in projects that were permitted after June 30, 2021, or were under construction or completed as of June 30, 2021, towards the 6th Cycle RHNA target.⁴⁴ **However, at least 1,537 of the City's claimed 2,052 units were completed well before June 30, 2021. In some cases, these buildings have housed residents since 2016.**

For example:

Address	Number of units claimed	Building information
3903 (3901-3915) San Fernando Rd	144 units (132 MI, 12 VLI)	The Link Glendale, which

⁴⁴ Housing Element Background Report, City of Glendale, November 2021, pg. 89-90 and pg. 94

		<u>was open and for rent as of May 24, 2021</u>
4201 Pennsylvania Ave	30 AMI units	<u>This is a townhome community that was completed in 2019</u>
327 Salem St	43 units (22 VLI, 21 LI)	<u>This is Veterans Village, a home for lower-income veterans that opened in 2016</u>
515 W Broadway	180 units (172 AMI, 8 VLI)	<u>This is the Vestalia, which opened in 2019</u>
633 N Central (Bldg A), 540 N Central (Bldg B)	507 MI units	<p><u>This is the Altana Glendale, which was near completion in 2016.</u></p> <p><u>Google Map Reviews indicate that renters have been living here since 2017.</u></p> <p>Additionally, <u>the least expensive units in this complex rent for \$2,500</u>, calling into question why these units were counted towards the MI category.</p>
3903 San Fernando Rd	142 units (130 MI, 12 VLI)	A double counting of The Link Glendale (see above)
600-610 N Central	235 AMI units	<p>This is the Modera Glendale;</p> <p><u>Google Map Reviews indicate that renters have been living here since 2018</u></p>
300 N Central	71 AMI units	<u>This is the Legendary Glendale, opened in 2015</u>
319 N Central (aka 313 W. California) and 301 N. Central (aka 304 Myrtle)	185 units (177 AMI, 8 VLI)	<u>This is the Onyx Glendale, built in 2016</u>

It is completely unacceptable that the City has double-counted these buildings, completed during the 5th cycle, towards its 6th cycle RHNAs goals. Given the seriousness of this error (or perhaps deliberate effort to justify a housing element that does not include rezoning to meet the RHNAs), HCD must disallow the City from counting any of the 2,052 units on the list towards the 6th cycle RHNAs goal, unless the City provides clear evidence that the site is truly in the process of being completed as of June 30, 2021.

Additionally, the City has counted the following towards the 6th cycle RHNA target:

- 1,344 units in projects that have been entitled or approved, but not yet permitted
- 503 units that have been proposed but not yet approved

The City has therefore assumed that all 1,847 units will ultimately be built, without adjusting for the likelihood that some will not.

Glendale should instead emulate the approach taken by the City of Los Angeles. Their [Initial Study](#) counted active planning entitlements, approved planning entitlements with no building permit, and permitted projects that have not yet been completed towards its 6th Cycle RHNA goals, but discounted each category based on the share of proposed units expected to be built, using the City's historical data.

The City must incorporate a similar estimate into its Inventory Analysis. Using data from recent projects, the City of Los Angeles estimated that 37% of projects with pending entitlements, 45% of projects with approved entitlements, and 79% of permitted projects, are ultimately completed.⁴⁵ Glendale should discount the number of pending and approved entitlements counted toward its RHNA target by *at least* the same factors:

1,344 units permitted x 45% chance of completion = 605 units

503 units pending entitlement x 37% chance of completion = 186 units

Thus, the City might reasonably claim 791 units from pending and entitled projects towards its RHNA. The City could also use local data from recent projects to estimate these percentages. But the City should certainly not count 1,847 units towards its 6th cycle RHNA goal.

F. The housing element does not commit to a mid-cycle review to verify the housing element's assumptions about development probabilities.

No city can perfectly forecast future redevelopment trends, and it is entirely possible that despite best efforts, a city's 6th Cycle housing production falls short of the RHNA target due to less redevelopment than expected.

For this reason, **the City should commit to a mid-cycle review of all housing production relative to the RHNA target**, perhaps by comparing the proportion of sites that were developed by midcycle to the housing element's assumed likelihood of development at the start of the cycle. The housing element should provide for by-right density bonuses on inventory sites and/or implement a fallback rezoning plan, which would automatically take effect mid-cycle in the event of a production shortfall. This is necessary in order to ensure that the City remains on track to achieve its RHNA target by the end of the 6th Cycle.

G. The housing element sets the City's quantified objectives far below its RHNA targets.

⁴⁵ [Initial Study, City of Los Angeles, pg. 21](#)

Although the City's RHNA target is 13,425 homes, the City has defined its quantified objective as only 5,510 homes, without providing a justification as to why the RHNA target is not achievable.⁴⁶ The City has essentially implied that it has no other policy options available to accommodate the RHNA target for below-market-rate units, or to encourage the production of housing that is naturally affordable for moderate-income households. The City has also indicated that only 60% of the above moderate-income target (3,350 homes out of a 5,574 home RHNA target) will be built by 2029, suggesting that either the private market is not interested in building 5,574 homes (an unlikely scenario given extremely high rents and home prices in Glendale), or that the City is unwilling to implement policies that would stimulate enough private-sector housing production to achieve the above moderate-income RHNA target.

Quantified Objectives, Draft Housing Element, pg. 58

Income Category	New Construction	Rehabilitation	Conservation/ Preservation
Extremely Low	260	20	373
Very Low	345	40	
Low	430	40	
Moderate	1,125	-	-
Above Moderate	3,350	-	-
Total	5,510	100	373

Fortunately, the City does have additional policy options available. The City should create a best-in-class local density bonus program, and should rezone low-density residential parcels to make them eligible for density bonus incentives (see Section 2A). This would encourage the production of more mid-rise and high-rise residential housing containing deed-restricted affordable units. Demand for housing in Glendale is extremely strong, suggesting that a well-designed density bonus program would be likely to yield a large number of new affordable and market-rate units.

The City should also support this outcome by committing through its housing element to aggressive constraint removal programs (see Section 2B), with the goal of further improving the economic feasibility of mixed-income redevelopment. Additionally, the City should implement policies that encourage the production of housing typologies that are affordable by design and available at moderate cost without subsidy, such as fourplexes, microunits, and buildings that do not have on-site parking garages.

⁴⁶ Housing Element Housing Plan, City of Glendale, November 2021, pg. 58

Cities should not set quantified objectives below its RHNA targets without exhausting all practicable options for increasing housing production during the planning period. The City must increase its quantified objectives and implement policies that encourage additional housing production at all levels of income.

Recommendations - Site Capacity Assessment:

- Provide a quantitative estimate of parcels' development probabilities, and incorporate this factor into the estimate of sites' realistic capacity.
- Report the proportion of sites in the previous housing element's inventory that were developed during the planning period.
- Share letters from owners of the site inventory parcels, indicating their interest in selling or redeveloping these properties during the 6th Cycle.
- Remove parcels from the site inventory where redevelopment is unlikely to occur during the 6th Cycle.
- If the City lacks enough suitable sites to achieve the RHNA target, rezone additional parcels where redevelopment is likely.
- Identify sufficient sites to provide a 15-30% No Net Loss buffer, especially for the VLI, LI, and MI categories, and rezone if there aren't enough suitable sites to provide this buffer.
- Ensure that all projects completed during the 5th cycle are not counted towards the 6th cycle RHNA target.
- Provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.
- Commit to a mid-cycle review to verify Planning's assumptions about development probabilities.
- Set quantified objectives equal to the City's RHNA targets at all income levels.

4. Affirmatively Furthering Fair Housing

A. The housing element fails to meaningfully increase the concentration of lower-income households in areas of the city where the existing concentration of lower-income households is low.

AB 686 (2018) requires housing element updates to "affirmatively further fair housing", which is defined as "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.

HCD's [AFFH Guidance Memo](#) establishes a number of important principles for promoting fair housing, including that the distribution of housing-element inventory sites with lower or moderate income capacity must not be skewed toward lower-income neighborhoods. This is

necessary in order to reverse the concentration of lower-income households and communities of color in high-poverty neighborhoods that lack economic and educational opportunities.

The guidance memo requires cities to calculate the percentage of households at lower, moderate, and above-moderate income levels in each census tract or “block group” in the city, and then do the same for the lower, moderate, and above-moderate-income RHNA units assigned to the tract or block group. The share of lower-income RHNA units assigned to tracts (or block groups) with a higher-than-average share of lower-income households should be less than the current share of lower-income households in those tracts.⁴⁷ **HCD's recent AFFH guidance makes it abundantly clear that this benchmark will be used to help determine AFFH compliance.**

Unfortunately, the draft housing element does not provide evidence that its proposed distribution of lower-income housing opportunities would reduce the concentration of lower-income households in locations with an existing concentration of low- and moderate-income households. **In fact, the City does not provide data on how much of the lower-income RHNA target would be accommodated outside of majority-LMI census tracts, or data on the distribution of site inventory parcels by median income of the neighborhood.**

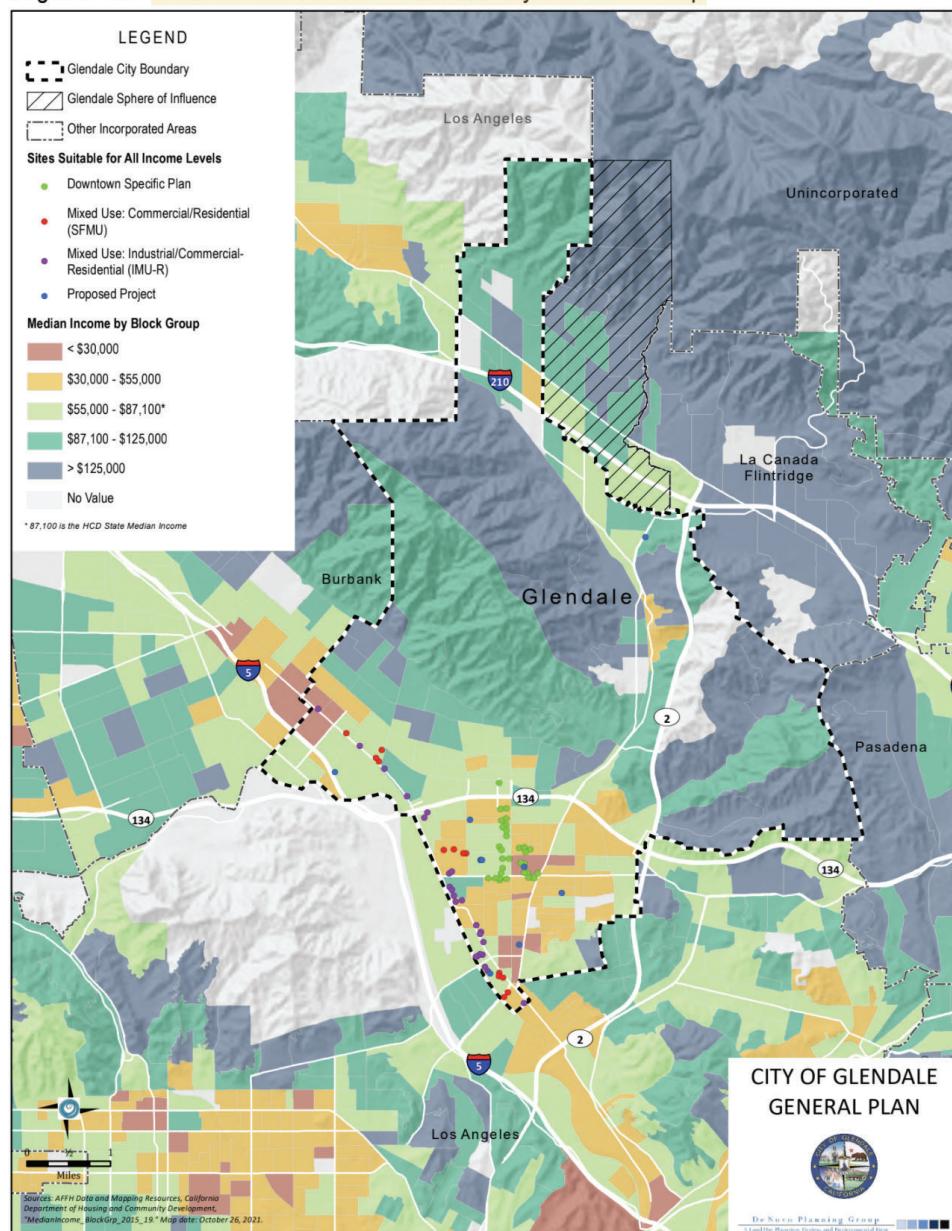
However, the City’s site inventory map indicates that most lower-income site inventory parcels are located in blockgroups with below-average incomes, and that the City’s highest-income blockgroups (median household incomes above \$125,000) would accommodate no lower-income site inventory parcels.⁴⁸ This arrangement is unlikely to reduce the concentration of lower-income households in lower-income areas.

⁴⁷ AFFH Guidance Memo, p. 47

⁴⁸ Housing Element Background Report, City of Glendale, November 2021, pg. 129

Proposed Lower-Income Sites Inventory and Blockgroups by Median Household Income (pg. 129, Background Report)

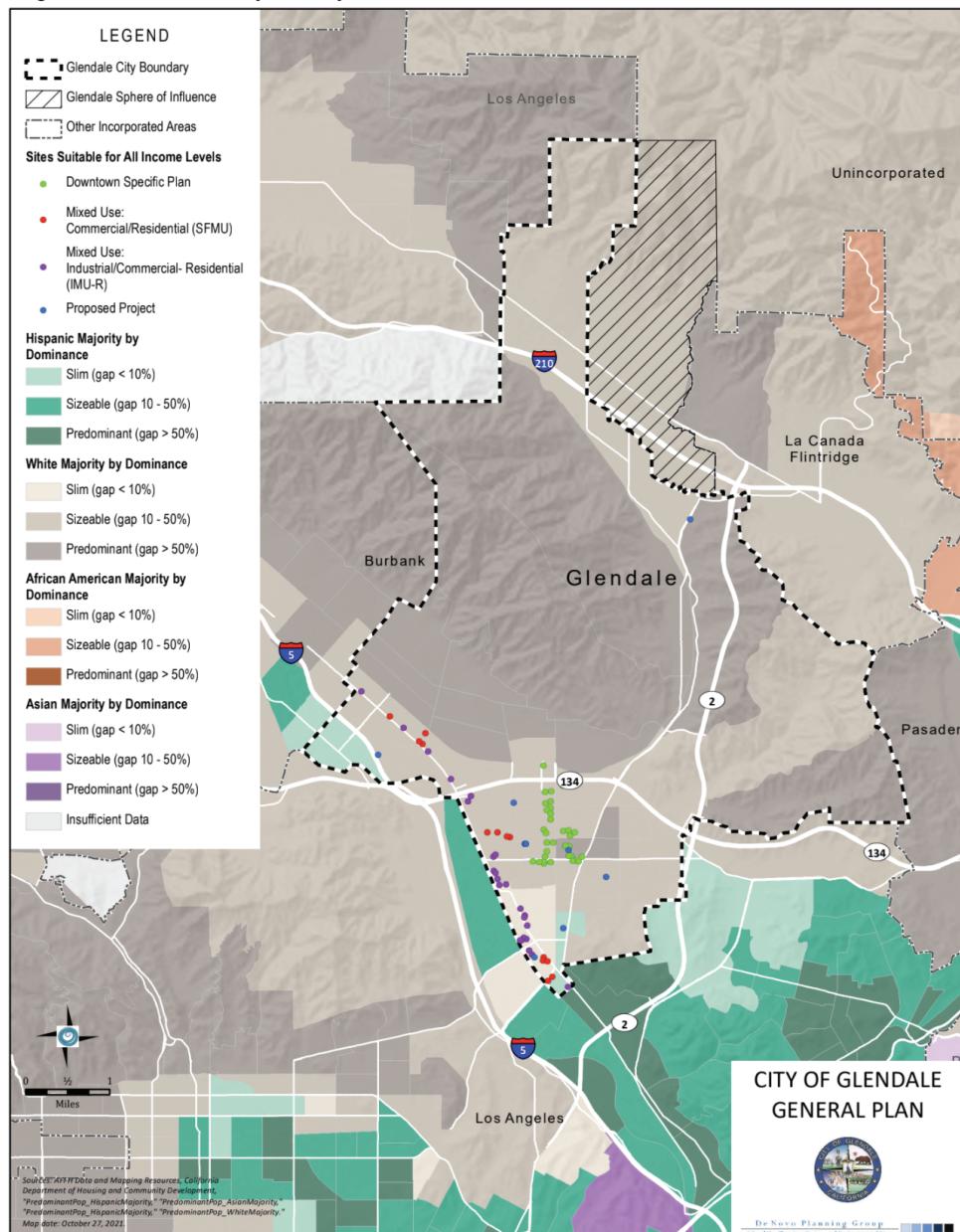
Figure 10: Median Household Income by Block Group



Additionally, very few lower-income sites are located in areas where white residents make up a large majority of the population.

Proposed Lower-Income Sites Inventory and Blockgroups by Demographic Makeup (pg. 131, Housing Element Background Report)

Figure 11: Ethnicity Analysis - Racial Concentrations



This flies in the face of the City's stated Policy 1.3, to "Promote the dispersion of affordable housing throughout the City while recognizing the potential for the integration of market rate and affordable units within individual projects."⁴⁹, since the lower-income site inventory distribution generally excludes the City's wealthiest and whitest neighborhoods.

⁴⁹ Housing Element Housing Plan, City of Glendale, November 2021, pg. 4

Furthermore, the City's proposed site inventory is unlikely to create a sufficient number of housing units that are affordable to households with low incomes, **anywhere in the City**. This is because it does not include enough parcels where redevelopment is economically feasible (see Section 3A), proposes most units on sites with pre-existing uses that are unlikely to be discontinued during the 6th cycle (see Section 3C), dissuades the development of affordable housing in high-resource, low-density areas (see Section 1A), and does not commit to the major reforms to zoning, land use, and project approval that are necessary in order to make strong housing development at all income levels realistic (see Section 2B). All this is a recipe for missing the RHNA target, especially at the lower-income levels, which means that the housing element is unlikely to create a significant number of affordable housing opportunities in Glendale. This would fail to advance the goal of socioeconomic integration or greater housing affordability.

B. The housing element fails to meaningfully reduce the concentration of lower-income households in areas with low environmental quality and significant exposure to noise/pollution.

HCD's AFFH guidance memo also requires cities to consider locations' environmental quality when developing a housing element's site inventory and rezoning program. "The analysis should not only address an overall score value of access to opportunity, but must also individually address access to...environmentally healthy neighborhoods and other important opportunities."⁵⁰

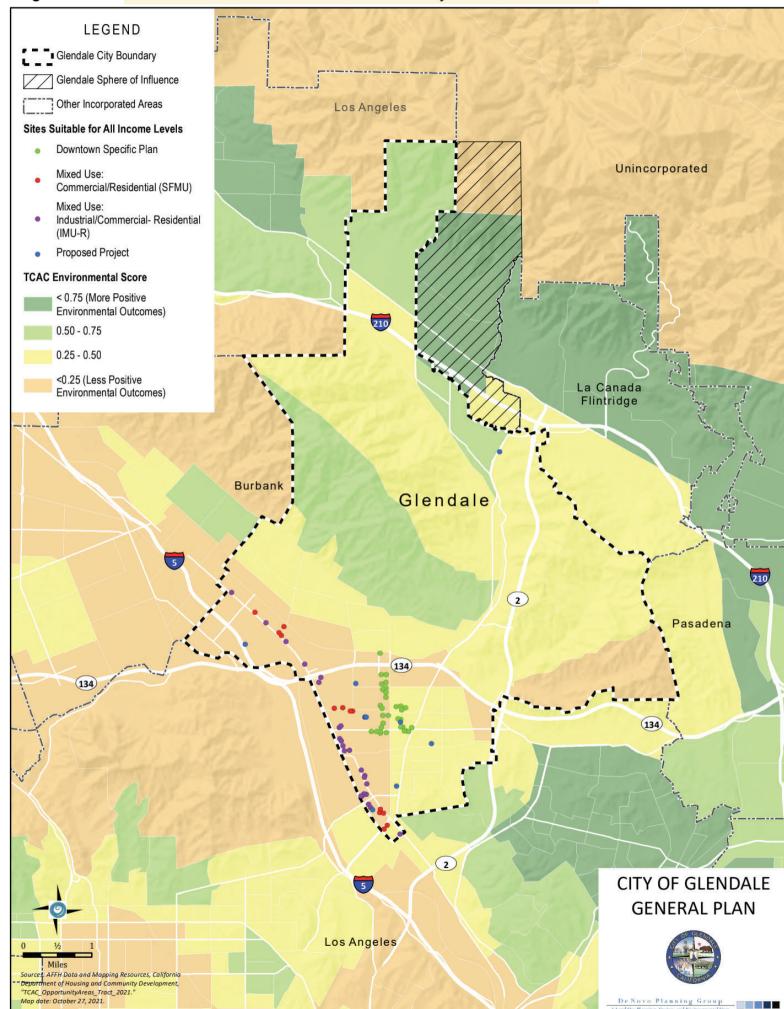
This is important because access to safe and affordable housing has a direct impact on public health. The very communities facing the highest rent burden are often the same frontline communities who bear the brunt of the negative impacts of pollution, noise, and low overall environmental quality, worsening health disparities by income and race. Cities must therefore promote affordable housing opportunities in locations with high environmental quality.

Unfortunately, the draft housing element does not provide data on the share of lower-income housing opportunities that would be promoted in locations with high environmental quality. However, most of the City's lower-income sites are located in the southwest portion of Glendale, rated as being in the bottom 25% statewide of environmental quality under the TCAC Environmental Score methodology, possibly due to close proximity to the 5 and 134 freeways. **The City must reduce the concentration of lower-income households in areas with low environmental quality by rezoning additional parcels where environmental quality is relatively high.**

⁵⁰ AFFH Guidance Memo, p. 48

Proposed Lower-Income Sites Inventory and Census Tract by TCAC Environmental Score (pg. 141, Background Report)

Figure 14: TCAC Environmental Score by Census Tract



C. The housing element does not adequately prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities.

High-income neighborhoods with good access to jobs, transit, schools, and parks tend to have very high housing costs. Racially motivated zoning [created many of these neighborhoods](#), and today's single-family zoning reinforces historical patterns of racial and income segregation, disproportionately harming BIPOC communities.

AB 686 requires jurisdictions to analyze fair housing issues and to affirmatively further fair housing (AFFH) through their housing element. It's no longer permissible to allow relatively affordable housing to be built only in areas of socioeconomic disadvantage. HCD recommends that jurisdictions distribute affordable housing opportunities throughout the jurisdiction, and first

identify development potential for affordable housing in its best-resourced neighborhoods⁵¹, as defined in the TCAC/HCD Opportunity Map. Additionally, HCD's AFFH Guidance Memo defines "high-opportunity" holistically, defining areas with strong access to education, transportation, economic prosperity, safety, parks and recreation areas, and environmental quality as being locations where affordable housing should be promoted through the housing element.⁵²

As described in Sections 1A, 2A, and 4A, the draft housing element does not legalize affordable housing in exclusionary neighborhoods where apartments are today banned, despite the prevalence of low-density zoning in the City's best-resourced, highest-income neighborhoods. The draft housing element also fails to remove constraints on housing production in areas where apartments are already legal, which would perpetuate a citywide failure to accommodate new affordable housing. By not reforming exclusionary zoning and encouraging strong housing growth in all of Glendale's neighborhoods, the draft housing element will continue to steer housing opportunities for lower-income households away from Glendale altogether, and will fail to achieve the City's lower-income RHNA target. **It is very hard to see how such a policy affirmatively furthers fair housing.**

Therefore, Glendale must rezone transit-rich, job-rich, and well-resourced neighborhoods, including single-family zoned areas, in order to expand housing opportunities at all levels of income and achieve the RHNA target (see Section 1A).

D. The jurisdiction did not adequately solicit public feedback and commentary on the housing element in a way that accurately reflects the jurisdiction's socioeconomic makeup.

Under state law, cities are required to "make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort." (Gov't Code 65583(c)(7)). This is necessary in order to ensure that all segments of the community, including those who are frequently excluded from decision-making, have a seat at the table in determining the future of their city. Housing element outreach and public feedback should not cater to the predominantly wealthy, white, and homeownership populations that customarily dominate land-use policy forums.

To overcome bias in patterns of public participation, jurisdictions should sample a random cross-section of the community (e.g., using postal service addresses), and elicit the respondents' preferences and priorities regarding zoning and residential development. If response rates favor privileged groups, the survey results should be reweighted accordingly so that they more accurately reflect the distribution of opinion within the community. Additionally, the City should consider giving increased weight to members of groups disproportionately affected by high housing costs and housing discrimination.

⁵¹ [HCD Site Inventory Guidebook pg. 3](#)

⁵² HCD, AFFH Guidance Memo, pg. 48

Additionally, when the jurisdiction takes public comment on its draft housing element, it should determine whether public comments accurately reflect the diversity of the community. If the pattern of participation proves to be demographically skewed, the jurisdiction should not include these comments as a valid representation of community input.

While the City undertook a public comment outreach effort throughout the housing element update process that included focus groups, surveys, and engagement with a wide range of community organizations, housing advocates, and other nonprofits, these efforts did not go far enough. The City did not undertake statistically robust random polling or surveying of the population, nor did it reweight the results of surveys it did conduct in order to reflect the distribution of opinion among the City's population groups.

Additionally, the City did not release its **draft** housing element until November 1, **after** the statutory deadline for adoption of the **final** housing element. This has led to a rushed public review process and has made it less likely that advocates' comments will be incorporated into the adopted housing element. All this fails to adequately assess the public's views and recommendations on housing policy.

Recommendations - Affirmatively Furthering Fair Housing:

- Upzone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing throughout Glendale, one of the County's best-resourced cities. This should include R1 zoned parcels where single-family detached homes are currently mandated by law.
- Ensure that housing opportunities for lower-income households are not concentrated in neighborhoods with high concentrations of low and moderate income households, or in neighborhoods with significant exposure to noise or air pollution.
- Identify new funding sources and public resources to encourage the production of affordable housing, such as reform of the City's real estate transfer tax, an introduction of congestion pricing.
- Exempt parcels containing rent-restricted and de facto affordable housing units from rezoning.
- Ensure that "no net loss" provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program.
- Prioritize the production of affordable housing on publicly-owned land.
- Create a 100% affordable housing zoning overlay that encompasses high-opportunity neighborhoods, including R1 zoned parcels.
- Gather public input by sampling a random cross-section of the community; if response rates favor privileged groups, reweight the survey results to more accurately reflect the distribution of opinion within the community.

5. Forecasts of ADU Development

A. The housing element appears to overestimate ADU production in order to support an overly optimistic forecast of future ADU production. The City did not use an HCD-recommended safe harbor methodology for forecasting future ADU production.

Local jurisdictions frequently use overly optimistic estimates of ADU capacity and future production to avoid necessary housing reform and rezoning. This is why HCD has established two safe harbors for forecasting ADU production during the 6th Cycle⁵³. One option (“Option #1”) is to project forward the local trend in ADU construction since January 2018. The other, for use when no other data is available (“Option #2”), assumes ADU production at five times the local rate of production prior to 2018.

HCD’s guidelines ensure that ADU development estimates reflect actual on-the-ground conditions so that they are realistic. This will maximize the likelihood that ADUs will be built to the level forecasted in the housing element update.

According to HCD, Glendale issued permits for 67 ADUs in 2018, 110 ADUs in 2019, and 146 ADUs in 2020.⁵⁴ Under a correct calculation of HCD’s “Option #1”, Glendale would take the average of the ADU permitting trend between 2018 and 2020, and forecast that 108 ADUs will be permitted per year during the 6th Cycle. **This would allow for a total 6th cycle forecast of 861 ADUs.**

However, the City counts 1,272 ADUs, or 159 ADUs per year, towards the City’s RHNA target. This is because Glendale has taken the three-year average number of ADUs **approved**, and claimed that this is equivalent to the number of ADUs likely to be **constructed** over the coming eight years.⁵⁵ **But not every ADU application approved results in a permit, and not every permit results in project completion.** This is why HCD urges cities to “use the trends in ADU **construction** since January 2018 to estimate new production”⁵⁶, and has signaled that the annual number of permits issued is a reasonable proxy for annual ADU production.

Glendale’s housing element significantly overstates the likely production of ADUs during the 6th cycle, possibly as a tactic to avoid rezoning. **The City must correct its calculation of the ADU safe harbor, and simply apply the average of annual ADU permits issued since 2018, per HCD’s guidelines.**

B. The housing element does not commit to mid-cycle adjustments if inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if ADU production falls short of projections. Mid-cycle adjustments should automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and be designed to make up for an ADU shortfall.

⁵³ [HCD Site Inventory Guidebook, pg. 31](#)

⁵⁴ Draft Housing Element, pg. 80

⁵⁵ Housing Element Background Report, City of Glendale, November 2021, pg. 97

⁵⁶ [HCD Site Inventory Guidebook, pg. 31](#)

No city can perfectly forecast future redevelopment trends, and it is entirely possible that despite best efforts, a city's 6th Cycle housing production falls short of the RHNA target due to less redevelopment than expected.

Anticipating this issue for ADUs, HCD's Site Inventory Guidebook states that cities' housing elements "should also include a monitoring program that a) tracks ADU and JADU creation and affordability levels, and b) commits to a review at the planning cycle midpoint to evaluate if production estimates are being achieved."⁵⁷ "Depending on the finding of that review, amendments to the housing element may be necessary, including rezoning pursuant to Government Code 65583.2 (h)and (i)."⁵⁸ This wisely provides a fail-safe in the event that ADU development falls short of forecasted production by the midpoint of the planning cycle.

A housing element's provision for mid-cycle adjustment should be feasible to implement at the midpoint of the cycle. Rezoning is generally a multiyear process, often involving extensive CEQA review and litigation. Rezonings initiated at the midpoint may result in little (if any) new zoned capacity during the planning period. For this reason, we recommend that jurisdictions proactively plan for the possibility of an ADU shortfall by providing in the housing element for by-right density bonuses on inventory sites, which would become automatically available mid-cycle if the ADU target is not met. This would also align with HCD's recommendation that housing elements provide a "specific commitment to adopt alternative measures such as rezoning or amending the element within a specific time (e.g., 6 months) if ADU assumptions for the number of units and affordability are not met."; HCD critiqued Beverly Hills' draft housing element for failing to include this commitment.⁵⁹

While the draft housing element's Program 1F proposes to "survey and evaluate a variety of potential methods and strategies to encourage ADU development affordable to lower and moderate income households and ADU development throughout the community including in high resource areas, and adopt appropriate procedures, policies, and regulatory provisions"⁶⁰, it did not commit to specific mid-cycle adjustment policies that would be implemented if ADU production were to fall short of forecasted growth. We recommend that the final housing element be amended to include by-right density bonuses on inventory sites that become automatically available at mid-cycle in the event of an ADU shortfall; this is necessary in order to ensure that the City remains on track to achieve its RHNA target by the end of the 6th Cycle.

C. The housing element does not assess the affordability of forecasted ADUs using city-specific data; it instead uses a regional average.

HCD requires cities to estimate the affordability of forecasted ADUs⁶¹, and provides the following examples for methodologies:

⁵⁷ [HCD Site Inventory Guidebook, pg. 31](#)

⁵⁸ [HCD Site Inventory Guidebook, pg. 31](#)

⁵⁹ [Review of City of Beverly Hills's 6th Cycle \(2021-2029\) Draft Housing Element, 7/30/21, Appendix, pg. 4](#)

⁶⁰ Housing Element Housing Plan, City of Glendale, November 2021, pg. 16

⁶¹ [HCD Site Inventory Guidebook, pg. 30](#)

- Surveying existing ADUs and JADUs for their current market rents, considering factors like square footage, number of bedrooms, amenities, age of the structure and general location, including proximity to public transportation.
- Examining current market rents for comparable rental properties to determine an average price per square foot in the community. This price can be applied to anticipated sizes of these units to estimate the anticipated affordability of ADUs and JADUs.
- Available regional studies and methodology on ADU affordability can also be a resource to determine the likely affordability mix for ADUs and JADUs.

However, many local jurisdictions' housing elements contain overly optimistic forecasts of production of ADUs that are rented at below-market rates; some cities do this to claim that it can meet its VLI and LI RHNA goals without additional rezoning. As with forecasts of total ADU production, forecasts of affordable ADU production must reflect actual on-the-ground conditions to ensure that they are realistic. This will help ensure that the housing element update accommodates affordable housing production commensurate with the VLI and LI RHNA targets.

However, the City assumes that 68% of new ADUs in Glendale will be affordable to extremely low-income, very low-income, and low-income households, which is based on the "Los Angeles II" category of 20 L.A. County jurisdictions in SCAG's [ADU Affordability Analysis](#). The City should not rely on SCAG's analysis because it is inconsistent with Glendale's more expensive local conditions.

The Los Angeles II region is not an appropriate proxy for assessing the affordability of rental properties in a high-cost city like Glendale. Applying the "Los Angeles II" affordability assumptions to Glendale, where the median rent for a two-bedroom apartment is nearly \$1,900/month⁶², overestimates the number of new ADUs that will be affordable to lower-income households, and will set the city up for failure in meeting its lower-income RHNA obligations. (For reference, "Los Angeles II" assumes that a two-person, low-income household can afford a rent of \$1,670/month.)

Instead, the City should use current market rents in Glendale to assess the likely affordability of new ADUs, and should supplement this analysis with a survey of the owners of recently-constructed ADUs (to determine average rent, as well as the number of ADUs that are rented for free or at a low cost to family members). This would provide a more accurate forecast of the number of ADUs that will be built at each level of income during the 6th Cycle.

Recommendations - Forecasts of ADU Development:

- The City must use HCD's Option 1 safe harbor, and project that 861 ADUs will be permitted during the 6th Cycle.
- Follow HCD's recommendation to track ADU and JADU creation and affordability levels, and commit to a review at the planning cycle midpoint to evaluate if production estimates are being achieved.
- Follow HCD's guidance on ADU affordability estimates, which clearly

⁶² Housing Element Background Report, City of Glendale, November 2021, pg. 47

demonstrates a preference for assessing the affordability of forecasted ADUs using city-specific data, rather than regional data.

The City of Glendale has a legal obligation to sufficiently plan to meet current and future residents' housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. The issues that we've highlighted above suggest that Glendale is not on a path to fulfilling this legal obligation. We urge you to change course and actively embrace this opportunity to provide a variety of attainable housing options for the residents and workers of Glendale.

Finally, state law imposes penalties on jurisdictions that fail to adopt a compliant 6th Cycle housing element update on time; noncompliant jurisdictions will forfeit the right to deny residential projects on the basis of local zoning, so long as projects include at least a 20% set-aside for below market-rate units or are 100% moderate-rate projects⁶³. Noncompliant jurisdictions may also lose the ability to issue building permits, including permits for kitchen and bath renovations. Jurisdictions that want to maintain local control over new development and maintain the ability to permit kitchen and bath renovations should therefore plan to adopt a compliant housing element update on time.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Sonja Trauss
Executive Director
YIMBY Law

CC: Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD

⁶³ [California Government Code 65589.5\(d\)\(5\)](#)



[Read about the coalition here](#)



ABUNDANT
HOUSING LA

COMMUNITY
CLINIC
ASSOCIATION
OF LOS ANGELES COUNTY



DOWNTOWN **WOMEN'S** CENTER



ASCENCIA
Lifting People Out of Homelessness



PACIFIC
PRESBYTERY





T.R.U.S.T.
SOUTH LA
TENEMOS QUE RECLAMAR Y UNIDOS SALVAR LA TIERRA



November 19, 2021

Glendale City Council
City of Glendale
613 E. Broadway
Glendale, CA 91206

Dear Councilmembers:

Thank you for the opportunity to comment on the process of updating the housing element of Glendale's general plan. We are writing on behalf of the **Our Future LA Coalition** regarding the 6th Cycle housing element update.

Why does this matter? Because we face a cascade of housing crises in our region. And while nearly everyone in Los Angeles County feels the crush of our housing crisis, Black and Latino residents feel it more than most:

- Black households have 1.12% the wealth of white households, and Latino households less than 5% (Federal Reserve Bank of San Francisco)
- Black people make up 8% of the county population, but 33.7% of people experiencing homelessness (LAHSA)
- Even under COVID-related eviction moratoriums, Black and Latino neighborhoods face disproportionately higher eviction threats (Los Angeles Times, UCLA)
- One in four AAPIs pay more than half of their income toward housing costs compared to whites (16 percent), putting many on the edge of financial vulnerability. This segment of the population is considered severely cost-burdened (Crisis to Impact Report, A joint publication of the National Coalition of Asian Pacific American Community Development and the University of California, Los Angeles)

These are the effects of decades of racist policies that we have not eradicated: Restrictive covenants, exclusionary zoning, and redlining made it impossible for Black families to build wealth through homeownership, and result in lower homeownership and higher rents today. The California Constitution's Article 34 and local "crime-free housing" policies put roadblocks in the way of addressing racial divisions in Californians' housing affordability and security.

This impact was felt devastatingly during the pandemic, when essential workers living in overcrowded housing were exposed to COVID at work and had no choice but to expose their families at home, leading to disproportionate deaths among Black and Latino people. Neighborhoods in South and Southeast LA, where nearly 20% of homes are overcrowded (defined as more than one person per room) had COVID rates of roughly 14,000 cases per 100,000 people. Neighborhoods on the Westside, where less than 5% of homes are overcrowded, had rates well under 5,000 cases per 100,000 people.¹ Death rates were similarly disproportionate -- at a time (January 2021) when the city of Beverly Hills was reporting 21 COVID deaths, and the neighborhood of Brentwood 9, the city of Compton reported 147, and the neighborhood of Westlake 202.² In all, COVID-19 mortality rates in LA County were roughly twice as high for Black people (31 deaths/100,000 individuals) and Latinos (29/100K) as for whites (15/100K) (from CGLA).

Of the 3,007 counties in the United States, L.A. County ranks last in housing affordability, overcrowding, and unsheltered homelessness. We are not doing enough to preserve and create homes for working class and lower-income people. The affordable housing crisis, rampant speculation, lack of tenant protections and rent control, and affordable housing shortage have gotten so bad that lower-income Black, Latino and AAPI families are being pushed out of their homes and communities at an alarming rate. At the rate we're going, next generations won't be able to live in Los Angeles County.

Los Angeles County is legally required to build 341,000 affordable homes by 2030. [To truly address our needs, we need more than double that.](#) At the rate we're going today, we might build 25,000. That's 7% of what's needed. That kind of failure will fall hardest on Black and

¹ ["When coronavirus invaded their tiny apartment, children desperately tried to protect dad", LA Times, 1/29/21](#)

² ["We Are Forced to Live in These Conditions': In Los Angeles, Virus Ravages Overcrowded Homes", NY Times, 1/23/21](#)

Latino families, who disproportionately face eviction, homelessness and having to choose between rent and food. Our Future LA demands we not let that happen.

In order to create a better housing future, we must make every neighborhood resource-rich so people can live where they want to live and don't have to leave their community to find opportunity. The Housing Element must also consider the intersection between housing, public health, and environmental justice. The very communities facing the highest rent burden are often the same communities who bear the brunt of the negative impacts brought on by environmental contamination and exposure to the worst air and soil qualities. For example, in LA County, 75% of active oil wells are located within 2,500 feet of homes, the vast majority of which are occupied by low-income people of color. We must also achieve equitable land use and zoning so that historically exclusionary communities build at greater densities, with value capture, while also ensuring that areas already zoned for density are protected from environmental and spatial racism and displacement pressures. As the region plans for growth, there must be no conversion of wildlife habitat to housing or further development in wildfire hazard areas, as identified by CalFire. We understand that the City cares deeply about these issues, and we hope to offer assistance in addressing them.

As it stands right now, the draft housing element will not meet the City's goals around equity and affordability. We submit these comments in the spirit of collaboration in order to partner and provide research, grounded data to help in meeting housing needs. We are interested in having a meeting to discuss these comments more.

Our Future LA Housing Element Comments

1. Protections

- A. The housing element should expand just-cause eviction protections to cover all tenants and establish a corresponding enforcement program.
- B. The housing element should implement a local RSO or strengthen/reduce the annual allowable rent increase for the existing RSO program.
- C. The housing element should codify a tenant's right to counsel in an eviction proceeding.
- D. The housing element should create a permanent tenant education program to inform tenants of their rights and how to access eviction defense resources.
- E. The housing element should create and implement a tenant anti-harassment ordinance combined with enforcement resources.

2. Preservation

- A. The housing element must do more to prioritize rezoning - with value capture - in high-resource neighborhoods which are transit- and job-rich, including single-family zoned areas. This is necessary to expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.
- B. The housing element should exclude parcels containing RSO housing units in the housing element's site inventory.
- C. The housing element should require that no net loss provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program.
- D. The housing element should institute local programs and funding sources for preservation of existing affordable housing.

3. Prioritization of affordable housing

- A. The housing element should utilize a value capture mechanism, such as inclusionary zoning, to locally fund and/or incentivize affordable housing.
- B. The housing element should prioritize creation of affordable housing on public land.
- C. The housing element should streamline affordable housing production.
- D. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas.
- E. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas currently zoned R1.

4. Site Capacity Assessment

- A. The housing element should estimate and report both the likelihood of development and the net new units if developed of inventory sites, both vacant and nonvacant.

Comparison of claimed vs. estimated additional development potential

Income Category	Estimated Add'n Dev Potential in Draft HE						Recommended Add'n Dev Potential w/20% NNL	Gap in Add'n Dev Potential
	RHNA Target	Claimed Capacity in Draft HE	NNL Buffer	(45% dev likelihood)	3,624	6,722		
VLI + LI	5,602	8,053	44%		3,624	6,722	-3,099	
MI	2,249	1,664	-26%		749	2,699	-1,950	

AMI	5,574	5,027	-10%	2,262	6,689	-4,427
Total	13,425	14,744	10%	6,635	16,110	-9,475

We estimate that the draft housing element will fall short of the RHNA goal, by 9,475 units of realistic capacity. The City must *fairly* estimate the likelihood of development for all parcels on the suitable sites inventory.

- B. The housing element should report the proportion of sites from the previous housing element's inventory that were developed during the previous planning period, and HCD-recommended methodologies and data sources should be used in order to conduct a thorough "factors" analysis of sites' realistic development capacity.
- C. The housing element assigns more than 50% of the lower-income RHNA target to nonvacant sites, but should use statistical methods (e.g. surveying a random sample of owners of nonvacant sites) to determine that the sites' existing uses are likely to be discontinued during the planning period.
- D. A buffer of at least 15-30% extra capacity is not included in the housing element site inventory. This capacity buffer is especially necessary in order to accommodate the lower-income RHNA target.

See No Net Loss (NNL) section of 4A.

- E. The housing element should not improperly count at least 1,537 units, completed during the 5th cycle, towards the 6th cycle RHNA goal. The housing element should provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and should adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.

- F. The housing element should commit to a mid-cycle review to verify the housing element's assumptions about development probabilities.

5. Affirmatively Furthering Fair Housing

- A. The housing element should meaningfully increase the concentration of lower-income households in areas of the city where the existing concentration of lower-income households is low.
- B. The housing element should meaningfully reduce the concentration of lower-income households in areas with significant exposure to noise/pollution, and commit to reducing/addressing noise and pollution.
- C. The housing element should ensure community-serving investment in historically disinvested areas. This includes place-based strategies that create a net gain of affordable housing and

stop displacement, prioritize environmental justice, enhance community health and strengthen equitable community leadership in land use planning.

D. The housing element should include a thorough analysis of local patterns in socioeconomic/racial segregation and integration, including patterns of overt racial or ethnic discrimination in the housing and land development market.

E. The housing element should adequately prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities.

F. The housing element should adequately identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built.

G. The jurisdiction did not adequately solicit public feedback and commentary on the housing element in a way that accurately reflects the jurisdiction's socioeconomic makeup.

6. Forecasts of ADU Development

A. The housing element did not use an HCD-recommended safe harbor methodology for forecasting future ADU production.

B. The housing element should provide for mid-cycle adjustments if inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if ADU production falls short of projections. Mid-cycle adjustments should automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and be large enough to make up for an ADU shortfall.

C. The housing element should assess the affordability of forecasted ADUs using city-specific data; it instead uses a regional average.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

Lisa Hirsch Marin
COO, Wellness, Emotional Health & Wellness
[Our Future LA Steering Committee Member](#)

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom
Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
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Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

December 10, 2021

Erik Krause, Director of Community Development
City of Glendale Community Development Department
633 East Broadway, Room 103
Glendale CA 91206
Em: EKrause@glendaleca.gov

RE: City of Glendale Draft 2021-2029 Housing Element Update

Dear Erik Krause,

On behalf of the Southwest Regional Council of Carpenters (“**Southwest Carpenters**” or “**SWRCC**”), my Office is submitting these comments on the City of Glendale’s (“**City**” or “**Lead Agency**”) draft 2021-2029 update to the City’s General Plan Housing Element (“**Draft HEU**” or “**Project**”).

The Southwest Carpenters is a labor union representing more than 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

SWRCC expressly reserve the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. 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.

SWRCC expressly reserve the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. 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.

SWRCC incorporate by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project's environmental documentation may assert any issue timely raised by other parties).

Moreover, SWRCC request that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“CEQA”), Cal Public Resources Code (“PRC”) § 21000 *et seq*, and the California Planning and Zoning Law (“Planning and Zoning Law”), Cal. Gov’t Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

The City should require the use of a local skilled and trained workforce to benefit the community’s economic development and environment. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

. . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.¹

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area’s jobs-housing balance, decreasing the amount of and length of job commutes and their associated greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the “[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component” can result in air pollutant reductions.²

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to “promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions.”³

¹ California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, available at <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>.

² South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, available at <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>.

³ City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, available at https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City “[c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint labor-management training programs, . . .”⁴ In addition, the City of Hayward requires all projects 30,000 square feet or larger to “utilize apprentices from state-approved, joint labor-management training programs.”⁵

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.⁶

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.⁷ Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents,

⁴ City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at <https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf>.*

⁵ City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

⁶ California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at <https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>*

⁷ Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>*.

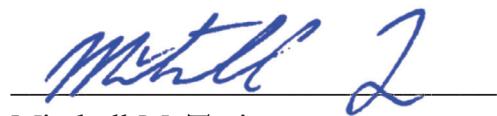
especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

I. CONCLUSION

SWRCC request that the City consider the aforementioned issues raised. Please contact my Office if you have any questions or concerns.

Sincerely,



Mitchell M. Tsai

Attorneys for Southwest Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

EXHIBIT A



Technical Consultation, Data Analysis and
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March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise (“SWAPE”) is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas (“GHG”) emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model (“CalEEMod”) is a “statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects.”¹ CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.²

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.³

¹ “California Emissions Estimator Model.” CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

² “California Emissions Estimator Model.” CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

³ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled (“VMT”) associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.⁴

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

$$\text{“VMT}_d = \sum(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$$

Where:

n = Number of land uses being modeled.”⁵

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

$$\text{“Emissions}_{\text{pollutant}} = \text{VMT} * \text{EF}_{\text{running,pollutant}}$$

Where:

$\text{Emissions}_{\text{pollutant}}$ = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

$\text{EF}_{\text{running,pollutant}}$ = emission factor for running emissions.”⁶

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.⁷ In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act (“CEQA”) requires that such changes be justified by substantial evidence.⁸ The default number of construction-related worker trips is calculated by multiplying the

⁴ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.

⁵ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.

⁶ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

⁷ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

⁸ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.⁹ Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively.”¹⁰ Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.¹¹ The operational home-to-work vehicle trip lengths are:

“[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings” (emphasis added).¹²

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).¹³

Worker Trip Length by Air Basin		
Air Basin	Rural (miles)	Urban (miles)
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	16.47	11.17
Minimum	10.80	10.80
Maximum	19.80	14.70
Range	9.00	3.90

⁹ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

¹⁰ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

¹¹ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.

¹² “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.

¹³ “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan (“Project”) located in the City of Claremont (“City”). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.¹⁴ In an effort to evaluate the potential for a local hire provision to reduce the Project’s construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,623
Amortized Construction GHG Emissions (MT CO ₂ e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,024
Amortized Construction GHG Emissions (MT CO ₂ e/year)	100.80
% Decrease in Construction-related GHG Emissions	
	17%

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project’s urbanization level and location.

¹⁴ “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

Attachment A

Location Type	Location Name	Rural H-W (miles)	Urban H-W (miles)
Air Basin	Great Basin	16.8	10.8
Air Basin	Lake County	16.8	10.8
Air Basin	Lake Tahoe	16.8	10.8
Air Basin	Mojave Desert	16.8	10.8
Air Basin	Mountain	16.8	10.8
Air Basin	North Central	17.1	12.3
Air Basin	North Coast	16.8	10.8
Air Basin	Northeast	16.8	10.8
Air Basin	Sacramento	16.8	10.8
Air Basin	Salton Sea	14.6	11
Air Basin	San Diego	16.8	10.8
Air Basin	San Francisco	10.8	10.8
Air Basin	San Joaquin	16.8	10.8
Air Basin	South Central	16.8	10.8
Air Basin	South Coast	19.8	14.7
Air District	Amador County	16.8	10.8
Air District	Antelope Valley	16.8	10.8
Air District	Bay Area AQMD	10.8	10.8
Air District	Butte County	12.54	12.54
Air District	Calaveras	16.8	10.8
Air District	Colusa County	16.8	10.8
Air District	El Dorado	16.8	10.8
Air District	Feather River	16.8	10.8
Air District	Glenn County	16.8	10.8
Air District	Great Basin	16.8	10.8
Air District	Imperial County	10.2	7.3
Air District	Kern County	16.8	10.8
Air District	Lake County	16.8	10.8
Air District	Lassen County	16.8	10.8
Air District	Mariposa	16.8	10.8
Air District	Mendocino	16.8	10.8
Air District	Modoc County	16.8	10.8
Air District	Mojave Desert	16.8	10.8
Air District	Monterey Bay	16.8	10.8
Air District	North Coast	16.8	10.8
Air District	Northern Sierra	16.8	10.8
Air District	Northern	16.8	10.8
Air District	Placer County	16.8	10.8
Air District	Sacramento	15	10

Air District	San Diego	16.8	10.8
Air District	San Joaquin	16.8	10.8
Air District	San Luis Obispo	13	13
Air District	Santa Barbara	8.3	8.3
Air District	Shasta County	16.8	10.8
Air District	Siskiyou County	16.8	10.8
Air District	South Coast	19.8	14.7
Air District	Tehama County	16.8	10.8
Air District	Tuolumne	16.8	10.8
Air District	Ventura County	16.8	10.8
Air District	Yolo/Solano	15	10
County	Alameda	10.8	10.8
County	Alpine	16.8	10.8
County	Amador	16.8	10.8
County	Butte	12.54	12.54
County	Calaveras	16.8	10.8
County	Colusa	16.8	10.8
County	Contra Costa	10.8	10.8
County	Del Norte	16.8	10.8
County	El Dorado-Lake	16.8	10.8
County	El Dorado-	16.8	10.8
County	Fresno	16.8	10.8
County	Glenn	16.8	10.8
County	Humboldt	16.8	10.8
County	Imperial	10.2	7.3
County	Inyo	16.8	10.8
County	Kern-Mojave	16.8	10.8
County	Kern-San	16.8	10.8
County	Kings	16.8	10.8
County	Lake	16.8	10.8
County	Lassen	16.8	10.8
County	Los Angeles-	16.8	10.8
County	Los Angeles-	19.8	14.7
County	Madera	16.8	10.8
County	Marin	10.8	10.8
County	Mariposa	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Merced	16.8	10.8
County	Modoc	16.8	10.8
County	Mono	16.8	10.8
County	Monterey	16.8	10.8
County	Napa	10.8	10.8

County	Nevada	16.8	10.8
County	Orange	19.8	14.7
County	Placer-Lake	16.8	10.8
County	Placer-Mountain	16.8	10.8
County	Placer-	16.8	10.8
County	Plumas	16.8	10.8
County	Riverside-	16.8	10.8
County	Riverside-	19.8	14.7
County	Riverside-Salton	14.6	11
County	Riverside-South	19.8	14.7
County	Sacramento	15	10
County	San Benito	16.8	10.8
County	San Bernardino-	16.8	10.8
County	San Bernardino-	19.8	14.7
County	San Diego	16.8	10.8
County	San Francisco	10.8	10.8
County	San Joaquin	16.8	10.8
County	San Luis Obispo	13	13
County	San Mateo	10.8	10.8
County	Santa Barbara-	8.3	8.3
County	Santa Barbara-	8.3	8.3
County	Santa Clara	10.8	10.8
County	Santa Cruz	16.8	10.8
County	Shasta	16.8	10.8
County	Sierra	16.8	10.8
County	Siskiyou	16.8	10.8
County	Solano-	15	10
County	Solano-San	16.8	10.8
County	Sonoma-North	16.8	10.8
County	Sonoma-San	10.8	10.8
County	Stanislaus	16.8	10.8
County	Sutter	16.8	10.8
County	Tehama	16.8	10.8
County	Trinity	16.8	10.8
County	Tulare	16.8	10.8
County	Tuolumne	16.8	10.8
County	Ventura	16.8	10.8
County	Yolo	15	10
County	Yuba	16.8	10.8
Statewide	Statewide	16.8	10.8

Worker Trip Length by Air Basin		
Air Basin	Rural (miles)	Urban (miles)
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	16.47	11.17
Mininum	10.80	10.80
Maximum	19.80	14.70
Range	9.00	3.90

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2028
Utility Company	Southern California Edison			N2O Intensity (lb/MWhr)	0.006
CO2 Intensity (lb/MMWhr)	702.44	CH4 Intensity (lb/MMWhr)	0.029		

1.3 User Entered Comments & Non-Default Data

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Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

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tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

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2.1 Overall Construction

Unmitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
tons/yr																	
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1969	213.1969	0.0601	0.0000	214.6993	
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.682	1,721.682	0.1294	0.0000	1,724.9187	
2023	0.6148	3.3649	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.529	1,627.529	0.1185	0.0000	1,630.4925	
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	0.03	0.0400e-003	0.0147	0.0000	52.9078	52.9078	0.0200e-003	0.0000	53.1082
Maximum	4.1619	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.682	1,721.682	0.1294	0.0000	1,724.9187	

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2.1 Overall Construction

Mitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	tons/yr	MT/yr
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0764	0.2549	0.0000	213.1967
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.682
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.529
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9077
Maximum	4.1619	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.682
											3	1,724.918

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	9-1-2021	11-30-2021	1.4103	1.4103
2	12-1-2021	2-28-2022	1.3613	1.3613
3	3-1-2022	5-31-2022	1.1985	1.1985
4	6-1-2022	8-31-2022	1.1921	1.1921
5	9-1-2022	11-30-2022	1.1918	1.1918
6	12-1-2022	2-28-2023	1.0774	1.0774
7	3-1-2023	5-31-2023	1.0320	1.0320
8	6-1-2023	8-31-2023	1.0260	1.0260

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9	9-1-2023	11-30-2023			1.0265					1.0265		
10	12-1-2023	2-29-2024			2.8857					2.8857		
11	3-1-2024	5-31-2024			1.6207					1.6207		
		Highest			2.8857					2.8857		

2.2 Overall Operational Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	MT/yr	
																	tons/yr	
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835		
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3.896.073	3.896.073	0.1303	0.0468	3.913.283		
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.498	7,620.498	0.3407	0.0000	7,629.016		
Waste								0.0000	0.0000	0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354	
Water								0.0000	0.0000	0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567	
Total	6.8692	9.5223	30.3407	0.0914	7.7979	0.2260	8.0240	2.0895	0.2219	2.3114	236.9712	12,294.18	12,531.15	15.7904	0.1260	12,963.47	51	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

2.2 Overall Operational Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0966	0.0966	0.0966	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0000	0.0000	0.0000	3,896.073	3,896.073	0.1303	0.0468	3,913.283	
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.498	7,620.498	0.3407	0.0000	7,629.016
Waste					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	207.8079	207.8079	0.0000	0.0000	207.8079	
Water					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	6.8692	9.5223	30.3407	0.0914	7.7979	0.2260	8.0240	2.0895	0.2219	2.3114	236.9712	12,294.18	12,531.15	15.7904	0.1260	12,963.47
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	1/21/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.0496	0.0000	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004	0.0233	0.0233	0.0216	0.0216	0.0216	0.0216	51.0012	51.0012	51.0012	0.0144	0.0000	51.3601
Total	0.0475	0.4716	0.3235	5.8000e-004	0.0496	0.0233	0.0729	7.5100e-003	0.0216	0.0291	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601

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3.2 Demolition - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	2.9000e-003	0.0641	0.0233	2.0000e-004	6.4100e-003	2.1000e-004	6.6200e-003	1.7300e-003	2.0000e-004	1.9300e-003	0.0000	19.6816	19.6816	1.2800e-003	0.0000	19.7136

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004	0.0233	0.0233	0.0233	0.0233	0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	0.0475	0.4716	0.3235	5.8000e-004	0.0496	0.0233	0.0729	7.5100e-003	0.0216	0.0291	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600

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3.2 Demolition - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	2.9000e-003	0.0641	0.0233	2.0000e-004	6.4100e-003	2.1000e-004	6.6200e-003	1.7300e-003	2.0000e-004	1.9300e-003	0.0000	19.6816	19.6816	1.2800e-003	0.0000	19.7136

3.3 Site Preparation - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004	0.0204	0.0204	0.0204	0.0188	0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	0.0389	0.4050	0.2115	3.8000e-004	0.1807	0.0204	0.2011	0.0993	0.0188	0.1181	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061

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3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9800e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	5.0000e-005	0.0000	1.7814	0.0000	0.0000
Total	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9800e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	5.0000e-005	0.0000	1.7814	0.0000	0.0000

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004	0.0204	0.0204	0.0204	0.0188	0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0108	0.0000	33.7060
Total	0.0389	0.4050	0.2115	3.8000e-004	0.1807	0.0204	0.0204	0.0188	0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0108	0.0000	33.7060

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3.3 Site Preparation - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9800e-003	5.2000e-004	1.0000e-004	5.4000e-004	0.0000	1.7801	5.0000e-005	0.0000	1.7814	
Total	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9800e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	5.0000e-005	0.0000	1.7814	

3.4 Grading - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003	0.0377	0.0377	0.0377	0.0347	0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	0.0796	0.8816	0.5867	1.1800e-003	0.1741	0.0377	0.2118	0.0693	0.0347	0.1040	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776

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3.4 Grading - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003	0.0377	0.0377	0.0377	0.0347	0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	0.0796	0.8816	0.5867	1.1800e-003	0.1741	0.0377	0.2118	0.0693	0.0347	0.1040	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775

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3.4 Grading - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607

3.4 Grading - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004	5.7200e-003	5.7200e-003	5.7200e-003	5.2600e-003	5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	0.0127	0.1360	0.1017	2.2000e-004	5.7200e-003	5.7200e-003	5.7200e-003	5.2600e-003	5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414

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3.4 Grading - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	2.1000e-004	0.6679	0.6679	2.0000e-005	0.6684
Total	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	2.1000e-004	0.6679	0.6679	2.0000e-005	0.6684

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004	5.7200e-003	5.7200e-003	5.7200e-003	5.2600e-003	5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	0.0127	0.1360	0.1017	2.2000e-004	0.0807	5.7200e-003	0.0865	0.0180	5.2600e-003	0.0233	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414

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3.4 Grading - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	2.1000e-004	0.6679	0.20000e-005	0.0000	0.6684
Total	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	2.1000e-004	0.6679	0.20000e-005	0.0000	0.6684

3.5 Building Construction - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Off-Road	0.2158	1.9754	2.0700	3.4100e-003	0.1023	0.1023	0.1023	0.0963	0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	0.2158	1.9754	2.0700	3.4100e-003	0.1023	0.1023	0.1023	0.0963	0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881

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3.5 Building Construction - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6361	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	0.4616	2.0027	3.9885	0.0152	1.2243	0.0121	1.2363	0.3278	0.0112	0.3390	0.0000	1,408.795	1,408.795	0.0530	0.0000	1,410.120
																8

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877

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3.5 Building Construction - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6361	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	0.4616	2.0027	3.9885	0.0152	1.2243	0.0121	1.2363	0.3278	0.0112	0.3390	0.0000	1,408.795	1,408.795	0.0530	0.0000	1,410.120
																8

3.5 Building Construction - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1942	1.7765	2.0061	3.3300e-003	0.0864	0.0864	0.0864	0.0813	0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	0.1942	1.7765	2.0061	3.3300e-003	0.0864	0.0864	0.0864	0.0813	0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814

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3.5 Building Construction - 2023

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	0.4135	1.5218	3.5707	0.0144	1.1953	9.8700e-003	1.2051	0.3200	9.1400e-003	0.3292	0.0000	1,327.336	1,327.336	0.0462	0.0000	1,328.4916

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1942	1.7765	2.0061	3.3300e-003	0.0864	0.0864	0.0864	0.0813	0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	0.1942	1.7765	2.0061	3.3300e-003	0.0864	0.0864	0.0864	0.0813	0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811

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3.5 Building Construction - 2023

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	0.4135	1.5218	3.5707	0.0144	1.1953	9.8700e-003	1.2051	0.3200	9.1400e-003	0.3292	0.0000	1,327.336	1,327.336	0.0462	0.0000	1,328.4916

3.6 Paving - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	0.0000	0.0000	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	6.7100e-003	0.0663	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	0.0000	0.0000	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

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3.6 Paving - 2023**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
	tons/yr												MT/yr				
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	1.0500e-004	1.0000e-004	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	2.0000e-005	0.0000	0.8968
Total	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	1.0500e-004	1.0000e-005	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	2.0000e-005	0.0000	0.8968

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	6.7100e-003	0.0663	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	3.0500e-003	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

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3.6 Paving - 2023**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr												MT/yr				
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	1.0000e-004	1.0000e-005	2.8000e-004	1.0000e-004	2.9000e-004	0.0000	0.8963	2.0000e-005	0.0000	0.8968
Total	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	1.0000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	2.0000e-005	0.0000	0.8968	0.0000	0.8968

3.6 Paving - 2024**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr												MT/yr				
Off-Road	0.0109	0.1048	0.1609	2.5000e-004	5.1500e-003	5.1500e-003	4.7400e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	0.0000	22.2073	
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.0109	0.1048	0.1609	2.5000e-004	5.1500e-003	5.1500e-003	4.7400e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	0.0000	22.2073	

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3.6 Paving - 2024**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	0.0000	1.4706
Total	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	0.0000	1.4706

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Off-Road	0.0109	0.1048	0.1609	2.5000e-004	5.1500e-003	5.1500e-003	5.1500e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	0.0000	22.2073	
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.0109	0.1048	0.1609	2.5000e-004	5.1500e-003	5.1500e-003	5.1500e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	0.0000	22.2073	

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3.6 Paving - 2024**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	0.0000	1.4706
Total	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	0.0000	1.4706

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Archit. Coating	4.1372							0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	0.0000	4.4745
Total	4.1404	0.0213	0.0317	5.0000e-005	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	0.0000	4.4745

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3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	4.1372				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	4.1404	0.0213	0.0317	5.0000e-005	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745

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3.7 Architectural Coating - 2024 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
	tons/yr															MT/yr	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558	
Total	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558	

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.498	7,620.498	0.3407	0.0000	7,629.016
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.498	7,620.498	0.3407	0.0000	7,629.016

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated		Mitigated	
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4,075.50	13,660,065	13,660,065	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452	20,552,452	20,552,452

4.3 Trip Type Information

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Land Use	Miles				Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-NW	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	19	4
High Turnover (Sit Down Restaurant)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															
Electricity Mitigated					0.0000	0.0000		0.0000	0.0000		2,512.646	2,512.646	0.1037	0.0215	2,521.635	6
Electricity Unmitigated					0.0000	0.0000		0.0000	0.0000		2,512.646	2,512.646	0.1037	0.0215	2,521.635	6
NaturalGas Mitigated	0.1398	1.2312	0.7770	0.003	0.0966	0.0966		0.0966	0.0966		1,383.426	1,383.426	0.0265	0.0254	1,391.647	8
NaturalGas Unmitigated	0.1398	1.2312	0.7770	0.003	0.0966	0.0966		0.0966	0.0966		1,383.426	1,383.426	0.0265	0.0254	1,391.647	8

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

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

Land Use	NaturalGas Use kBtu/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
		tons/yr												MT/yr			
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004			1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284		
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487	0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408	
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004			1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468		
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310	0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468	
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004			6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557		
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004			6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993		
Regional Shopping Center	91840	5.0000e-004	0.003	4.5000e-003	3.7800e-003		3.0000e-005	3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301		
Total	0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	1,383.426₈	1,383.426₈	0.0265	0.0254	1,391.647₈	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

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

Land Use	NaturalGas Use kBTU/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
		tons/yr												MT/yr			
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004			1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284		
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004			1.7500e-003	1.7500e-003			0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004			6.4900e-003	6.4900e-003			0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004			6.8800e-003	6.8800e-003			0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	0.003	4.5000e-003	3.7800e-003		3.0000e-005	3.4000e-004	3.4000e-004			0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total	0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	1,383.426₈	1,383.426₈	0.0265	0.0254	1,391.647₈

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

5.3 Energy by Land Use - Electricity

Unmitigated

Land Use	Electricity Use kWh/yr	Total CO2 MT/yr	CH4	N2O	CO2e
Apartments Low Rise	1060/10	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	0.003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		2,512.6465	0.1037	0.0215	2,521.6356

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

5.3 Energy by Land Use - Electricity

Mitigated

Land Use	Electricity Use kWh/yr	Total CO2 MT/yr	CH4	N2O	CO2e
Apartments Low Rise	1060/10	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		2,512.6465	0.1037	0.0215	2,521.6356

6.0 Area Detail

6.1 Mitigation Measures Area

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e		
	tons/yr															MT/yr		
Mitigated	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835		
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835		

6.2 Area by SubCategory

Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e		
	tons/yr															MT/yr		
Architectural Coating	0.4137				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
Consumer Products	4.3998				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
Hearth	0.0206	0.1763	0.0750	1.1200e-003	0.0143	0.0143	0.0143	0.0143	0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295		
Landscaping	0.3096	0.1187	10.3054	5.4000e-004	0.0572	0.0572	0.0572	0.0572	0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540		
Total	5.1437	0.2950	10.3804	1.6600e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

6.2 Area by SubCategory**Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Architectural Coating	0.4137				0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998				0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143		0.0143	0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572		0.0572	0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	5.1437	0.2950	10.3804	1.6600e-003		0.0714		0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

7.0 Water Detail**7.1 Mitigation Measures Water**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

7.2 Water by Land Use**Unmitigated**

Land Use	Mgal	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
			MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471	
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363	
General Office Building	7.99892 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019	
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482	
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079	
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663	
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490	
Total		585.8052	3.0183	0.0755	683.7567	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

7.2 Water by Land Use**Mitigated**

Land Use	Mgal	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471	
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363	
General Office Building	7.99892 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019	
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3560	8.8200e-003	62.8482	
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079	
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663	
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490	
Total		585.8052	3.0183	0.0755	683.7567	

8.0 Waste Detail**8.1 Mitigation Measures Waste**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

8.2 Waste by Land Use

Unmitigated

Land Use	Waste Disposed tons	Total CO2 MT/yr	CH4	N2O	CO2e
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		207.8079	12.2811	0.0000	514.8354

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

8.2 Waste by Land Use

Mitigated

Land Use	Waste Disposed tons	Total CO2 MT/yr	CH4	N2O	CO2e
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total	207.8079	12.2811	0.0000	514.8354	

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Boilers

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

User Defined Equipment

	Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Village South Specific Plan (Proposed) Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2028
Utility Company	Southern California Edison			N2O Intensity (lb/MWhr)	0.006
CO2 Intensity (lb/MMWhr)	702.44	CH4 Intensity (lb/MMWhr)	0.029		

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission) Mitigated Construction

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

2.2 Overall Operational Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
	lb/day															lb/day	
Area	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11	92	
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	7	
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	50,306.60	50,306.60	2.1807	34	50,361.12	08	
Total	41.1168	67.2262	207.5497	0.6278	45.9592	2.4626	48.4217	12.2950	2.4385	14.7336	0.0000	76,811.18	76,811.18	2.8282	0.4832	77,025.87	86

Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															lb/day
Area	30,5020	15,0496	88,4430	0,0944		1,5974	1,5974		1,5974	1,5974	0,0000	18,148,59	18,148,59	0,4874	0,3300	18,259,11 92
Energy	0,7660	6,7462	4,2573	0,0418		0,5292	0,5292		0,5292	0,5292		8,355,983	8,355,983	0,1602	0,1532	8,405,638 7
Mobile	9,8489	45,4304	114,8495	0,4917	45,9592	0,3360	46,2851	12,2950	0,3119	12,6070		50,306,60	50,306,60	2,1807		50,361,12 08
Total	41,1168	67,2262	207,5497	0,6278	45,9592	2,4626	48,4217	12,2950	2,4385	14,7336	0,0000	76,811,18	76,811,18	2,8282	0,4832	77,025,87 86

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388	1.5513	1.5513	1.5513	1.4411	1.4411	1.4411	3,747.944	3,747.944	3,747.944	1.0549	9	3,774.317
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419	3,747.944	3,747.944	3,747.944	1.0549	9	3,774.317

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.2 Demolition - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852	1,292.241	1,292.241	0.0877	1,294.433	7	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457	170.8155	170.8155	5.0300e-003	170.9413		
Total	0.1916	4.1394	1.5644	0.0136	0.4346	0.0139	0.4485	0.1176	0.0133	0.1309	1,463.056	1,463.056	0.0927	1,465.375	0	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388	1.5513	1.5513	1.5513	1.4411	1.4411	1.4411	3,747.944	3,747.944	1.0549	3,774.317	4	0.0000
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	3.3074	1.4411	1.4411	1.4411	3,747.944	3,747.944	1.0549	3,774.317	4	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.2 Demolition - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852	1,292.241	1,292.241	0.0877	1,294.433	7	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457	170.8155	170.8155	5.0300e-003	170.9413		
Total	0.1916	4.1394	1.5644	0.0136	0.4346	0.0139	0.4485	0.1176	0.0133	0.1309	1,463.056	1,463.056	0.0927	1,465.375	0	

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
lb/day																	
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000	
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.656	3,685.656	1.1920		3,715.457	3
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	3,685.656	3,685.656	1.1920		3,715.457	3	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	204.9786	204.9786	6.0400e-003	205.1296	205.1296	205.1296	205.1296
Total	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	204.9786	204.9786	6.0400e-003	205.1296	205.1296	205.1296	205.1296

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e	
lb/day																		
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.656	3,685.656	1.1920	3,715.457	3	3,715.457	3
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3,685.656	3,685.656	1.1920	3,715.457	3	3,715.457	3

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0772	0.0530	0.7250	0.2060e-003	0.2012	1.6300e-003	0.2028	0.0534	0.0549	0.0549	204.9786	204.9786	6.0400e-003	204.9786	204.9786	205.1296
Total	0.0772	0.0530	0.7250	0.2060e-003	0.2012	1.6300e-003	0.2028	0.0534	0.0549	0.0549	204.9786	204.9786	6.0400e-003	204.9786	204.9786	205.1296

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
	lb/day																
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000	
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.043	6,007.043	1.9428			6,055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230			6,007.043	6,007.043	1.9428		6,055.613

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.4 Grading - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	227.7540	227.7540	6.7100e-003	227.9217		
Total	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	227.7540	227.7540	6.7100e-003	227.9217		

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	0.0000	6.007.043	6.007.043	1.9428		
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	0.0000	6.007.043	6.007.043	1.9428		6.055.613

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.4 Grading - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	227.7540	227.7540	6.7100e-003	227.9217	227.9217	227.9217	227.9217
Total	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	227.7540	227.7540	6.7100e-003	227.9217	227.9217	227.9217	227.9217

3.4 Grading - 2022

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000	
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	6,011.410	6,011.410	1.9442	5	5	6,060.015	8
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	6,011.410	6,011.410	1.9442			6,060.015	8

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.4 Grading - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609				219.7425	219.7425	6.0600e-003	219.8941
Total	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609				219.7425	219.7425	6.0600e-003	219.8941

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965				0.0000	0.0000	0.0000	0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	0.0000	6,011.410	6,011.410	5	1.9442	5	6,060.015
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	0.0000	6,011.410	6,011.410	5	1.9442	5	6,060.015

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.4 Grading - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	219.7425	219.7425	6.0600e-003	219.8941		
Total	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	219.7425	219.7425	6.0600e-003	219.8941		

3.5 Building Construction - 2022

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.7612	0.7612	0.7612	0.7612	2,554.333	2,554.333	0.6120	2,569.632		
Total	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.7612	0.7612	0.7612	0.7612	2,554.333	2,554.333	0.6120	2,569.632		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873	3,896.548	3,896.548	0.2236	3,902.138	4	
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390	8,800.685	8,800.685	0.2429	8,806.758	2	
Total	3.6242	15.3350	33.1995	0.1247	9.8688	0.0949	9.9637	2.6381	0.0883	2.7263	12,697.23	12,697.23	0.4665	12,708.89	66	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120	2,569.632	2
Total	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120	2,569.632	2

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.5 Building Construction - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873	3,896.548	3,896.548	0.2236	3,902.138	4	
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390	8,800.685	8,800.685	0.2429	8,806.758	2	
Total	3.6242	15.3350	33.1995	0.1247	9.8688	0.0949	9.9637	2.6381	0.0883	2.7263	12,697.23	12,697.23	0.4665	12,708.89	66	

3.5 Building Construction - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	2,555.209	2,555.209	0.6079	2,570.406	1		
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	2,555.209	2,555.209	0.6079	2,570.406	1		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747	3,773.876	3,773.876	0.1982	3,778.830	0	
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372	8,478.440	8,478.440	0.2190	8,483.916	0	
Total	3.3229	11.9468	30.5127	0.1203	9.8688	0.0797	9.9485	2.6381	0.0738	2.7118	12,252.31	12,252.31	0.4172	12,262.74	60	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	0.0000	2,555.209	2,555.209	0.6079	2,570.406	1
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	0.0000	2,555.209	2,555.209	0.6079	2,570.406	1

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.5 Building Construction - 2023 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747	3,773.876	3,773.876	0.1982	3,773.876	3,773.876	0	3,778.830
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372	8,478.440	8,478.440	0.2190	8,478.440	8,478.440	0	8,483.916
Total	3.3229	11.9468	30.5127	0.1203	9.8688	0.0797	9.9485	2.6381	0.0738	2.7118	12,252.31	12,252.31	0.4172	12,262.74	12,262.74	60	

3.6 Paving - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Off-Road	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	1	2,207.584	2,207.584	0.7140	2,207.584	2,207.584	6	2,225.433
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	1	2,207.584	2,207.584	0.7140	2,207.584	2,207.584	6	2,225.433

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.6 Paving - 2023

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	158.7723	158.7723	4.1000e-003	158.7723	158.7723	4.1000e-003	158.8748
Total	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	158.7723	158.7723	4.1000e-003	158.7723	158.7723	4.1000e-003	158.8748

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	0.0000	1	2.207.584	2.207.584	1	0.7140	2.225.433
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	0.0000	1	2.207.584	2.207.584	1	0.7140	2.225.433

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.6 Paving - 2023

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	158.7723	158.7723	4.1000e-003	158.7723	158.7723	4.1000e-003	158.8748
Total	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	158.7723	158.7723	4.1000e-003	158.7723	158.7723	4.1000e-003	158.8748

3.6 Paving - 2024

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547	2.207.547	0.7140	2.225.396	2.225.396	0.0000	3
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547	2.207.547	0.7140	2.225.396	2.225.396	0.0000	3

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.6 Paving - 2024

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	153.8517	153.8517	3.7600e-003	153.9458	153.9458	153.9458	153.9458
Total	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	153.8517	153.8517	3.7600e-003	153.9458	153.9458	153.9458	153.9458

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	0.0000	2.207.547	2.207.547	0.7140	0.7140	2.225.396	2.225.396
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	0.0000	2.207.547	2.207.547	0.7140	0.7140	2.225.396	2.225.396

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.6 Paving - 2024

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	153.8517	153.8517	3.7600e-003	153.9458	153.9458	153.9458	153.9458
Total	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	153.8517	153.8517	3.7600e-003	153.9458	153.9458	153.9458	153.9458

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Archit. Coating	236.4115	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	281.4481	281.4481	0.0159	281.8443	281.8443	281.8443	281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	281.4481	281.4481	0.0159	281.8443	281.8443	281.8443	281.8443

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.7 Architectural Coating - 2024 Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1.641.085	1.641.085	1.641.085	0.0401	1.642.088	2	6
Total	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,641.085	1,641.085	1,641.085	0.0401	1,642.088	2	6

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	lb/day																
Archit. Coating	236.4115							0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.1808	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	0.0000	281.4481	281.4481	281.4481	0.0159	281.8443	
Total	236.5923	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	0.0000	281.4481	281.4481	281.4481	0.0159	281.8443	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.7 Architectural Coating - 2024 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,641.085	1,641.085	1,641.085	0.0401	0.0401	1,642.088
Total	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,641.085	1,641.085	1,641.085	0.0401	0.0401	1,642.088
																6

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	50.306.60	50.306.60	2.1807	50.361.12		
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	50.306.60	50.306.60	2.1807	50.361.12		

4.2 Trip Summary Information

Land Use	Weekday	Average Daily Trip Rate	Saturday	Sunday	Unmitigated Annual VMT	Mitigated Annual VMT
Apartments Low Rise	145.75	154.25	154.00		506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4,075.50		13,660,065	13,660,065
General Office Building	288.45	62.55	31.05		706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72		3,413,937	3,413,937
Hotel	192.00	187.50	160.00		445,703	445,703
Quality Restaurant	501.12	511.92	461.20		707,488	707,488
Regional Shopping Center	528.08	601.44	357.84		1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31		20,552,452	20,552,452

4.3 Trip Type Information

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Land Use	Miles				Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-NW	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	19	4
High Turnover (Sit Down Restaurant)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	7

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

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

Land Use	NaturalGas Use kBTU/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																	
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486	
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666	4,209.916	4,209.916	0.0807	0.0772	4,234.933	
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884	
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696	2,677.634	2,677.634	0.0513	0.0491	2,693.546	
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355	561.1436	561.1436	0.0108	0.0103	564.4782	
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377	595.0298	595.0298	0.0114	0.0109	598.5658	
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003	29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778	
Total	0.7660	6.7463	4.2573	0.0418		0.5292	0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	
												2	2			7	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

5.2 Energy by Land Use - NaturalGas

Mitigated

Land Use	NaturalGas Use kBtu/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
		lb/day																
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003			131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666			4,209.916	4,209.916	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003			150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696			2,677.634	2,677.634	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355			561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377			595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003			29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total	0.7660	6.7463	4.2573	0.0418		0.5292	0.5292	0.5292	0.5292	0.5292	0.5292			8,355.983	8,355.983	0.1602	0.1532	8,405.6387

6.0 Area Detail

6.1 Mitigation Measures Area

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

6.2 Area by SubCategory

Unmitigated

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

6.2 Area by SubCategory**Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															lb/day
Architectural Coating	2.2670				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Consumer Products	24.1085				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Hearth	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4766	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574	148.5950	148.5950	0.1424	0.1424	0.1424	152.1542
Total	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
																92

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

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

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

	Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Village South Specific Plan (Proposed)
Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2028
Utility Company	Southern California Edison			N2O Intensity (lb/MWhr)	0.006
CO2 Intensity (lb/MMWhr)	702.44	CH4 Intensity (lb/MMWhr)	0.029		

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

tblVehicleTrips	SU_TR	5.95
tblVehicleTrips	SU_TR	72.16
tblVehicleTrips	SU_TR	25.24
tblVehicleTrips	WD_TR	6.59
tblVehicleTrips	WD_TR	6.65
tblVehicleTrips	WD_TR	11.03
tblVehicleTrips	WD_TR	6.41
tblVehicleTrips	WD_TR	127.15
tblVehicleTrips	WD_TR	65.80
tblVehicleTrips	WD_TR	8.17
tblVehicleTrips	WD_TR	3.84
tblVehicleTrips	WD_TR	89.95
tblVehicleTrips	WD_TR	42.70
tblVehicleTrips	NumberCatalytic	9.43
tblWoodstoves	NumberCatalytic	1.25
tblWoodstoves	NumberCatalytic	0.00
tblWoodstoves	NumberNoncatalytic	0.00
tblWoodstoves	NumberNoncatalytic	48.75
tblWoodstoves	WoodstoveDayYear	0.00
tblWoodstoves	WoodstoveDayYear	0.00
tblWoodstoves	WoodstoveWoodMass	0.00
tblWoodstoves	WoodstoveWoodMass	999.60
tblWoodstoves	WoodstoveWoodMass	999.60

2.0 Emissions Summary

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day												lb/day			
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6.221.493	6.221.493	1.9491	0.0000	6.270.221
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14.630.30	14.630.30	1.9499	0.0000	14.657.26
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14.210.34	14.210.34	1.0230	0.0000	14.235.91
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2.352.417	2.352.417	0.7175	0.0000	2.370.355
Maximum	237.2328	46.4651	47.3319	0.1455	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	14.630.30	14.630.30	1.9499	0.0000	14.657.26

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

2.2 Overall Operational Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
	lb/day										lb/day						
Area	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11	92	
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	7	
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083	47,917.80	47,917.80	2.1953	0.05	47,912.68	39	
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4399	14.7349	0.0000	74,422.37	74,422.37	2.8429	0.4832	74,637.44	17

Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day														lb/day	
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983	8,355.983	0.1602	0.1532	8,405.638 7
Mobile	9.5233	45.9914	110.0422	0.4681	0.3373	46.2965	12.2950	0.3132	12.6083			47,917.80	47,917.80	2.1953	0.05	47,972.68 39
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4399	14.7349	0.0000	74,422.37	74,422.37	2.8429	0.4832	74,637.44 17

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.944	3,747.944	1.0549		3,774.317
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419	3,747.944	3,747.944	1.0549	3,774.317	4	3,774.317

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.2 Demolition - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854	1,269.855	1,269.855	0.0908	1,272.125	2	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457	160.8377	160.8377	4.7300e-003	160.9560		
Total	0.2019	4.1943	1.5706	0.0133	0.4346	0.0141	0.4487	0.1176	0.0135	0.1311	1,430.693	1,430.693	0.0955	1,433.081	2	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000		0.0000	
Off-Road	3.1651	31.4407	21.5650	0.0388	1.5513	1.5513	1.5513	1.4411	1.4411	1.4411	0.0000	3,747.944	3,747.944	1.0549	3,774.317	4
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	3.3074	1.4411	1.4411	1.4411	0.0000	3,747.944	3,747.944	1.0549	3,774.317	4

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.2 Demolition - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854	1,269.855	1,269.855	0.0908	1,272.125		
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457	160.8377	160.8377	4.7300e-003	160.9560		
Total	0.2019	4.1943	1.5706	0.0133	0.4346	0.0141	0.4487	0.1176	0.0135	0.1311	1,430.693	1,430.693	0.0955	1,433.081	2	

3.3 Site Preparation - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809				3,685.656	3,685.656	1.1920
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	3,685.656	3,685.656	1.1920	3,715.457	3	3,715.457

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	193.0052	193.0052	5.6800e-003	193.1472	193.1472	193.1472	193.1472
Total	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	193.0052	193.0052	5.6800e-003	193.1472	193.1472	193.1472	193.1472

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.656	3,685.656	1.1920	3,715.457	3,715.457	3,715.457
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3,685.656	3,685.656	1.1920	3,715.457	3,715.457	3,715.457

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.3 Site Preparation - 2021 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	193.0052	193.0052	5.6800e-003	193.1472	193.1472	193.1472
Total	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549	193.0052	193.0052	5.6800e-003	193.1472	193.1472	193.1472

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	6,007.043	6,007.043	4	1.9428	4	6,055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	6,007.043	6,007.043	4	1.9428	4	6,055.613

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.4 Grading - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	214.4502	214.4502	6.3100e-003	214.6080	214.6080	214.6080
Total	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	214.4502	214.4502	6.3100e-003	214.6080	214.6080	214.6080

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	0.0000	6.007.043	6.007.043	4	1.9428	6.055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	0.0000	6.007.043	6.007.043	4	1.9428	6.055.613

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.4 Grading - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	214.4502	214.4502	6.3100e-003	214.6080	214.6080	214.6080
Total	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610	214.4502	214.4502	6.3100e-003	214.6080	214.6080	214.6080

3.4 Grading - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	6,011.410	6,011.410	5	1.9442	5	6,060.015
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	6,011.410	6,011.410	5	1.9442	5	6,060.015

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.4 Grading - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	206.9139	206.9139	5.7000e-003	207.0563		
Total	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	206.9139	206.9139	5.7000e-003	207.0563		

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	0.0000	6,011.410	6,011.410	5	1.9442	6,060.015
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	0.0000	6,011.410	6,011.410	5	1.9442	6,060.015

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.4 Grading - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	206.9139	206.9139	5.7000e-003	207.0563		
Total	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609	206.9139	206.9139	5.7000e-003	207.0563		

3.5 Building Construction - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	2,554.333	2,554.333	0.6120	2,569.632		
Total	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	2,554.333	2,554.333	0.6120	2,569.632		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.5 Building Construction - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0266	0.9412	0.2636	0.0245	0.2881	3,789.075	3,789.075	0.2381	3,795.028	3	
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390	8,286.901	8,286.901	0.2282	8,292.605	8	
Total	4.0156	15.5266	30.9685	0.1186	9.8688	0.0957	9.9645	2.6381	0.0891	2.7271	12,075.97	12,075.97	0.4663	12,087.63	41	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120	2,569.632	2
Total	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120	2,569.632	2

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.5 Building Construction - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0266	0.9412	0.2636	0.0245	0.2881	3,789.075	3,789.075	0.2381	3,795.028	3	
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390	8,286.901	8,286.901	0.2282	8,292.605	8	
Total	4.0156	15.5266	30.9685	0.1186	9.8688	0.0957	9.9645	2.6381	0.0891	2.7271	12,075.97	12,075.97	0.4663	12,087.63	41	

3.5 Building Construction - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	2,555.209	2,555.209	0.6079	2,570.406	1	
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	2,555.209	2,555.209	0.6079	2,570.406	1	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.5 Building Construction - 2023**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752	3,671.400	3,671.400	3,671.400	0.2096	3,676.641	7
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372	7,983.731	7,983.731	7,983.731	0.2055	7,988.868	3
Total	3.6978	12.1065	28.3496	0.1144	9.8688	0.0803	9.9491	2.6381	0.0743	2.7124	11.655.13	11.655.13	11.655.13	0.4151	11.665.50	99

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	0.0000	2,555.209	2,555.209	2,555.209	0.6079	2,570.406	1
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	0.0000	2,555.209	2,555.209	2,555.209	0.6079	2,570.406	1

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.5 Building Construction - 2023 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752	3,671.400	3,671.400	3,671.400	3,676.641	7	7	7	
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372	7,983.731	7,983.731	7,983.731	7,988.868	8	8	8	
Total	3.6978	12.1065	28.3496	0.1144	9.8688	0.0803	9.9491	2.6381	0.0743	2.7124	11.655.13	11.655.13	11.655.13	11.665.50	25	25	25	99

3.6 Paving - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e	
Off-Road	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	1	2,207.584	2,207.584	2,207.584	0.7140	1	1	1	2,225.433
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	1	2,207.584	2,207.584	2,207.584	0.7140	1	1	1	2,225.433

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.6 Paving - 2023**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	149.5081	149.5081	3.8500e-003	149.6043	149.6043	149.6043	149.6043
Total	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	149.5081	149.5081	3.8500e-003	149.6043	149.6043	149.6043	149.6043

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.0000	2.207.584	2.207.584	0.7140	2.225.433	2.225.433	6	6
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.0000	2.207.584	2.207.584	0.7140	2.225.433	2.225.433	6	6

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.6 Paving - 2023**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	149.5081	3.8500e-003	149.5081	149.5081	149.5081	149.5081	149.6043
Total	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456	149.5081	3.8500e-003	149.5081	149.5081	149.5081	149.5081	149.6043

3.6 Paving - 2024**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547	2.207.547	0.7140	0.7140	0.7140	0.7140	2.225.396
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2	2	2	2	2	2	3
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547	2.207.547	0.7140	0.7140	0.7140	0.7140	2.225.396

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.6 Paving - 2024**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	144.8706	144.8706	144.8706	144.8706	144.8706	3.5300e-003	144.9587
Total	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	144.8706	144.8706	144.8706	144.8706	144.8706	3.5300e-003	144.9587

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	0.0000	2.207.547	2.207.547	2.207.547	2.207.547	0.7140	2.225.396
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	0.0000	2.207.547	2.207.547	2.207.547	2.207.547	0.7140	2.225.396

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.6 Paving - 2024

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	144.8706	144.8706	144.8706	144.8706	144.8706	144.9587
Total	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456	144.8706	144.8706	144.8706	144.8706	144.8706	144.9587

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Archit. Coating	236.4115	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	281.4481	281.4481	281.4481	0.0159	0.0159	281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	281.4481	281.4481	281.4481	0.0159	0.0159	281.8443

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,545.286	1,545.286	0	0.0376	1,546.226	2
Total	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,545.286	1,545.286	0	0.0376	1,546.226	2

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Archit. Coating	236.4115	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	0.0000	281.4481	281.4481	0.0159	281.8443	281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	0.0000	281.4481	281.4481	0.0159	281.8443	281.8443

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.7 Architectural Coating - 2024 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,545.286	1,545.286	0.0376	1,546.226	2	
Total	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866	1,545.286	1,545.286	0.0376	1,546.226	2	

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.33373	46.2965	12.2950	0.3132	12.6083	47.917.80	47.917.80	2.1953	47.972.68	39	
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.33373	46.2965	12.2950	0.3132	12.6083	47.917.80	47.917.80	2.1953	47.972.68	39	

4.2 Trip Summary Information

Land Use	Weekday	Average Daily Trip Rate	Saturday	Sunday	Unmitigated Annual VMT	Mitigated Annual VMT
Apartments Low Rise	145.75	154.25	154.00		506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4,075.50		13,660,065	13,660,065
General Office Building	288.45	62.55	31.05		706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72		3,413,937	3,413,937
Hotel	192.00	187.50	160.00		445,703	445,703
Quality Restaurant	501.12	511.92	461.20		707,488	707,488
Regional Shopping Center	528.08	601.44	357.84		1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31		20,552,452	20,552,452

4.3 Trip Type Information

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Land Use	Miles				Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-NW	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	19	4
High Turnover (Sit Down Restaurant)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	Fm10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	7

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

5.2 Energy by Land Use - NaturalGas

Unmitigated

Land Use	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
	kBTU/yr	lb/day																
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004				8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003	131.6662	2.5200e-003	2.4100e-003	132.4486	
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211				0.2666	0.2666		0.2666	0.2666	4,209.916	4,209.916	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004				9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2456	2.2314	1.8743	0.0134				0.1696	0.1696		0.1696	0.1696	2,677.634	2,677.634	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003				0.0355	0.0355		0.0355	0.0355	561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003				0.0377	0.0377		0.0377	0.0377	595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004				1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003	29,6019	29,6019	5,7000e-004	5,4000e-004	29,7778
Total		0.7660	6.7463	4.2573	0.0418				0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.6387

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

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

Land Use	NaturalGas Use kBtu/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
		lb/day															
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.916	4,209.916	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.634	2,677.634	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total	0.7660	6.7463	4.2573	0.0418		0.5292	0.5292	0.5292	0.5292	0.5292	0.5292		8,355.983	8,355.983	0.1602	0.1532	8,405.6387

6.0 Area Detail**6.1 Mitigation Measures Area**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

6.2 Area by SubCategory

Unmitigated

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

6.2 Area by SubCategory**Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															lb/day
Architectural Coating	2.2670				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Consumer Products	24.1085				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Hearth	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4766	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574	148.5950	148.5950	0.1424	0.1424	0.1424	152.1542
Total	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
																92

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

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

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

	Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2028
Utility Company	Southern California Edison			N2O Intensity (lb/MWhr)	0.006
CO2 Intensity (lb/MMWhr)	702.44	CH4 Intensity (lb/MMWhr)	0.029		

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

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tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

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2.1 Overall Construction

Unmitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7654	210.7654	0.0600	0.0000	212.2661
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.655	1,418.655	0.1215	0.0000	1,421.6925
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.441	1,342.441	0.1115	0.0000	1,345.2291
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	0.03	0.0118	0.0000	44.6355	44.6355	7.8300e-003	0.0000	44.8311
Maximum	4.1592	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.655	1,418.655	0.1215	0.0000	1,421.6925

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

2.1 Overall Construction

Mitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	0.2542	0.0000	210.7651	210.7651	0.0600	0.0000	212.2658
	tons/yr											MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7651	210.7651	0.0600	0.0000	212.2658	
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.655	1,418.655	0.1215	0.0000	1,421.692	
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.440	1,342.440	0.1115	0.0000	1,345.228	
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	0.0118	0.0000	44.6354	44.6354	0.0000	0.0000	44.8311		
Maximum	4.1592	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.655	1,418.655	0.1215	0.0000	1,421.692	

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)					
1	9-1-2021	11-30-2021	1,4091						
2	12-1-2021	2-28-2022	1,3329						
3	3-1-2022	5-31-2022	1,1499						
4	6-1-2022	8-31-2022	1,1457						
5	9-1-2022	11-30-2022	1,1415						
6	12-1-2022	2-28-2023	1,0278						
7	3-1-2023	5-31-2023	0.9868						
8	6-1-2023	8-31-2023	0.9831						

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9	9-1-2023	11-30-2023	0.9798	0.9798
10	12-1-2023	2-29-2024	2.8757	2.8757
11	3-1-2024	5-31-2024	1.6188	1.6188
	Highest		2.8757	2.8757

2.2 Overall Operational Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	MT/yr	
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835		
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3.896.073	3.896.073	0.1303	0.0468	3.913.283		
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.498	7,620.498	0.3407	0.0000	7,629.016		
Waste								0.0000	0.0000	0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354	
Water								0.0000	0.0000	0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567	
Total	6.8692	9.5223	30.3407	0.0914	7.7979	0.2260	8.0240	2.0895	0.2219	2.3114	236.9712	12,294.18	12,531.15	15.7904	0.1260	12,963.47	51	

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2.2 Overall Operational Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0966	0.0966	0.0966	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0000	0.0000	0.0000	3,896.073	3,896.073	0.1303	0.0468	3,913.283	
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.498	7,620.498	0.3407	0.0000	7,629.016
Waste					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	207.8079	207.8079	0.0000	0.0000	207.8079	
Water					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	6.8692	9.5223	30.3407	0.0914	7.7979	0.2260	8.0240	2.0895	0.2219	2.3114	236.9712	12,294.18	12,531.15	15.7904	0.1260	12,963.47
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	1/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.0496	0.0000	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004	0.0233	0.0233	0.0216	0.0216	0.0216	0.0216	51.0012	51.0012	51.0012	0.0144	0.0000	51.3601
Total	0.0475	0.4716	0.3235	5.8000e-004	0.0496	0.0233	0.0729	7.5100e-003	0.0216	0.0291	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601

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3.2 Demolition - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	2.6500e-003	0.0639	0.0209	2.0000e-004	5.6200e-003	2.0000e-004	5.8200e-003	1.5300e-003	1.9000e-004	1.7200e-003	0.0000	18.9847	18.9847	1.2600e-003	0.0000	19.0161

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004	0.0233	0.0233	0.0233	0.0216	0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	0.0475	0.4716	0.3235	5.8000e-004	0.0233	0.0233	0.0233	0.0216	0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600

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3.2 Demolition - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	2.6500e-003	0.0639	0.0209	2.0000e-004	5.6200e-003	2.0000e-004	5.8200e-003	1.5300e-003	1.9000e-004	1.7200e-003	0.0000	18.9847	18.9847	1.2600e-003	0.0000	19.0161

3.3 Site Preparation - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004	0.0204	0.0204	0.0204	0.0188	0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	0.0389	0.4050	0.2115	3.8000e-004	0.1807	0.0204	0.2011	0.0993	0.0188	0.1181	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061

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3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	0.0000	1.2234
Total	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	0.0000	1.2234

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004	0.0204	0.0204	0.0204	0.0188	0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0108	0.0000	33.7060
Total	0.0389	0.4050	0.2115	3.8000e-004	0.1807	0.0204	0.0204	0.0188	0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0108	0.0000	33.7060

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3.3 Site Preparation - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	0.0000	1.2234
Total	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	0.0000	1.2234

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003	0.0377	0.0377	0.0377	0.0347	0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	0.0000	104.3776
Total	0.0796	0.8816	0.5867	1.1800e-003	0.1741	0.0377	0.2118	0.0693	0.0347	0.1040	0.0000	103.5405	103.5405	0.0335	0.0000	0.0000	104.3776

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3.4 Grading - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-005	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	8.0000e-005	0.0000	2.5828	
Total	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-005	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	8.0000e-005	0.0000	2.5828	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003	0.0377	0.0377	0.0377	0.0347	0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	0.0796	0.8816	0.5867	1.1800e-003	0.1741	0.0377	0.2118	0.0693	0.0347	0.1040	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775

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3.4 Grading - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	8.0000e-005	0.0000	2.5828	0.0000	0.0000
Total	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	8.0000e-005	0.0000	2.5828	0.0000	0.0000

3.4 Grading - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004	5.7200e-003	5.7200e-003	5.7200e-003	5.2600e-003	5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414	
Total	0.0127	0.1360	0.1017	2.2000e-004	5.7200e-003	5.7200e-003	5.7200e-003	5.2600e-003	5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414	

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3.4 Grading - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	1.0000e-005	0.0000	0.4590	0.4590
Total	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	1.0000e-005	0.0000	0.4590	0.4590

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr												MT/yr			
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004	5.7200e-003	5.7200e-003	5.7200e-003	5.2600e-003	5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	0.0127	0.1360	0.1017	2.2000e-004	5.7200e-003	5.7200e-003	5.7200e-003	5.2600e-003	5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414

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3.4 Grading - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590

3.5 Building Construction - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Off-Road	0.2158	1.9754	2.0700	3.4100e-003	0.1023	0.1023	0.1023	0.0963	0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	0.2158	1.9754	2.0700	3.4100e-003	0.1023	0.1023	0.1023	0.0963	0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881

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3.5 Building Construction - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6361	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	0.3578	1.9125	2.9812	0.0119	0.8696	9.4100e-003	0.8790	0.2336	8.7800e-003	0.2424	0.0000	1,105.977	1,105.977	0.0451	0.0000	1,107.103
																9

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877

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3.5 Building Construction - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6361	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	0.3578	1.9125	2.9812	0.0119	0.8696	9.4100e-003	0.8790	0.2336	8.7800e-003	0.2424	0.0000	1,105.977	1,105.977	0.0451	0.0000	1,107.103
																9

3.5 Building Construction - 2023**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Off-Road	0.1942	1.7765	2.0061	3.3300e-003	0.0864	0.0864	0.0864	0.0813	0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	0.1942	1.7765	2.0061	3.3300e-003	0.0864	0.0864	0.0864	0.0813	0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814

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3.5 Building Construction - 2023

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	0.3177	1.4420	2.6646	0.0112	0.8490	7.3700e-003	0.8564	0.2281	6.8500e-003	0.2349	0.0000	1,042.529	1,042.529	0.0392	0.0000	1,043.509
																0

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1942	1.7765	2.0061	3.3300e-003	0.0864	0.0864	0.0864	0.0813	0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	0.1942	1.7765	2.0061	3.3300e-003	0.0864	0.0864	0.0864	0.0813	0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811

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3.5 Building Construction - 2023

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	0.3177	1.4420	2.6646	0.0112	0.8490	7.3700e-003	0.8564	0.2281	6.8500e-003	0.2349	0.0000	1,042.529	1,042.529	0.0392	0.0000	1,043.509
																0

3.6 Paving - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	0.0000	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	6.7100e-003	0.0663	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	0.0000	3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

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3.6 Paving - 2023**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	0.0000	0.0000	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	6.7100e-003	0.0663	0.0948	1.5000e-004	3.3200e-003	3.3200e-003	3.3200e-003	0.0000	0.0000	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227

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3.6 Paving - 2023**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160	0.6160
Total	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160	0.6160

3.6 Paving - 2024**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Off-Road	0.0109	0.1048	0.1609	2.5000e-004	5.1500e-003	5.1500e-003	4.7400e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	0.0000	22.2073	22.2073
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0109	0.1048	0.1609	2.5000e-004	5.1500e-003	5.1500e-003	4.7400e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	0.0000	22.2073	22.2073

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3.6 Paving - 2024**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	1.0000e-004	1.3300e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	1.0000e-004	1.3300e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr										MT/yr						
Off-Road	0.0109	0.1048	0.1609	2.5000e-004	5.1500e-003	5.1500e-003	4.7400e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	0.0000	22.2073	
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.0109	0.1048	0.1609	2.5000e-004	5.1500e-003	5.1500e-003	4.7400e-003	4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	0.0000	22.2073	

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3.6 Paving - 2024**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr												MT/yr				
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	0.004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	1.0000e-004	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	1.0100
Total	4.4000e-004	2.9000e-004	0.004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	1.0000e-004	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	1.0100

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	tons/yr												MT/yr				
Archit. Coating	4.1372							0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745	
Total	4.1404	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745	

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3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	0.0000	17.1394
Total	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	0.0000	17.1394

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
Archit. Coating	4.1372							0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	0.0000	4.4745
Total	4.1404	0.0213	0.0317	5.0000e-005	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	0.0000	4.4745

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3.7 Architectural Coating - 2024 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															MT/yr
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7.620.498	7.620.498	0.3407	0.0000	7,629.016
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7.620.498	7.620.498	0.3407	0.0000	7,629.016

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated		Mitigated	
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4,075.50	13,660,065	13,660,065	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452	20,552,452	20,552,452

4.3 Trip Type Information

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Land Use	Miles				Trip %				Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-NW	H-S or C-W	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by	Pass-by	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	40.60	86	11	11	3	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	40.60	86	11	11	3	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	19	4	4	4
High Turnover (Sit Down Restaurant)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	20	43	43	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	38	4	4	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	18	44	44	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	35	11	11	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															
Electricity Mitigated					0.0000	0.0000		0.0000	0.0000		2,512.646	2,512.646	0.1037	0.0215	2,521.635	6
Electricity Unmitigated					0.0000	0.0000		0.0000	0.0000		2,512.646	2,512.646	0.1037	0.0215	2,521.635	6
NaturalGas Mitigated	0.1398	1.2312	0.7770	0.003	0.0966	0.0966		0.0966	0.0966		1,383.426	1,383.426	0.0265	0.0254	1,391.647	8
NaturalGas Unmitigated	0.1398	1.2312	0.7770	0.003	0.0966	0.0966		0.0966	0.0966		1,383.426	1,383.426	0.0265	0.0254	1,391.647	8

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

Land Use	NaturalGas Use kBTU/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
		tons/yr												MT/yr			
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004			1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284		
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004			1.7500e-003	1.7500e-003			0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004			6.4900e-003	6.4900e-003			0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004			6.8800e-003	6.8800e-003			0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	0.003	4.5000e-003	3.7800e-003		3.0000e-005	3.4000e-004	3.4000e-004			0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total	0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	1,383.426₈	1,383.426₈	0.0265	0.0254	1,391.647₈

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

Land Use	NaturalGas Use kBTU/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
		tons/yr												MT/yr			
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004			1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284		
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004			1.7500e-003	1.7500e-003			0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004			6.4900e-003	6.4900e-003			0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004			6.8800e-003	6.8800e-003			0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	0.003	4.5000e-003	3.7800e-003		3.0000e-005	3.4000e-004	3.4000e-004			0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total	0.1398	1.2312	0.7770	7.6200e-003	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0966	0.0000	1,383.426₈	1,383.426₈	0.0265	0.0254	1,391.647₈

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

5.3 Energy by Land Use - Electricity

Unmitigated

Land Use	Electricity Use kWh/yr	Total CO2 MT/yr	CH4	N2O	CO2e
Apartments Low Rise	1060/10	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	0.003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		2,512.6465	0.1037	0.0215	2,521.6356

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

5.3 Energy by Land Use - Electricity

Mitigated

Land Use	Electricity Use kWh/yr	Total CO2 MT/yr	CH4	N2O	CO2e
Apartments Low Rise	1060/10	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	5845560	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		2,512.6465	0.1037	0.0215	2,521.6356

6.0 Area Detail

6.1 Mitigation Measures Area

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e		
	tons/yr															MT/yr		
Mitigated	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835		
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835		

6.2 Area by SubCategory

Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e		
	tons/yr															MT/yr		
Architectural Coating	0.4137				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
Consumer Products	4.3998				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
Hearth	0.0206	0.1763	0.0750	1.1200e-003	0.0143	0.0143	0.0143	0.0143	0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295		
Landscaping	0.3096	0.1187	10.3054	5.4000e-004	0.0572	0.0572	0.0572	0.0572	0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540		
Total	5.1437	0.2950	10.3804	1.6600e-003	0.0714	0.0714	0.0714	0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

6.2 Area by SubCategory**Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Architectural Coating	0.4137				0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998				0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143		0.0143	0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572		0.0572	0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	5.1437	0.2950	10.3804	1.6600e-003		0.0714		0.0714	0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

7.0 Water Detail**7.1 Mitigation Measures Water**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

7.2 Water by Land Use**Unmitigated**

Land Use	Mgal	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471	
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363	
General Office Building	7.99892 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019	
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482	
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079	
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663	
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490	
Total		585.8052	3.0183	0.0755	683.7567	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

7.2 Water by Land Use

Mitigated

Land Use	Mgal	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471	
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363	
General Office Building	7.99892 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019	
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3560	8.8200e-003	62.8482	
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079	
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663	
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490	
Total		585.8052	3.0183	0.0755	683.7567	

8.0 Waste Detail

8.1 Mitigation Measures Waste

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

8.2 Waste by Land Use**Unmitigated**

Land Use	Waste Disposed tons	Total CO2 MT/yr	CH4	N2O	CO2e
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		207.8079	12.2811	0.0000	514.8354

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

8.2 Waste by Land Use

Mitigated

Land Use	Waste Disposed tons	Total CO2 MT/yr	CH4	N2O	CO2e
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total	207.8079	12.2811	0.0000	514.8354	

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

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Boilers

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

User Defined Equipment

	Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Village South Specific Plan (Proposed)
Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2028
Utility Company	Southern California Edison			N2O Intensity (lb/MWhr)	0.006
CO2 Intensity (lb/MMWhr)	702.44	CH4 Intensity (lb/MMWhr)	0.029		

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

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tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

Year	Emissions by Species (lb/day)										Carbon Footprint (tCO2e)					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6.163.416	6.163.416	1.9475	0.0000	6,212,103
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.44	12,493.44	1.9485	0.0000	12,518,57
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.48	12,150.48	0.9589	0.0000	12,174,46
2024	237.0219	46.4415	40.8776	0.1240	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12,493.44	12,493.44	1.9485	0.0000	12,518,57
Maximum	237.0219	46.4415	40.8776	0.1240	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12,493.44	12,493.44	1.9485	0.0000	12,518,57

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

Year	Emissions by Species (lb/day)										Emissions by Sector (lb/day)					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6.163.416	6.163.416	1.9475	0.0000	6.212.103
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12.493.44	12.493.44	1.9485	0.0000	12.518.57
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12.150.48	12.150.48	0.9589	0.0000	12.174.46
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2.313.180	2.313.180	0.7166	0.0000	2.331.095
Maximum	237.0219	46.4415	40.8776	0.1240	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12.493.44	12.493.44	1.9485	0.0000	12.518.57

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

2.2 Overall Operational Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e		
	lb/day										lb/day							
Area	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11	92		
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.983	8,355.983	2	0.1602	0.1532	8,405.638	7	
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	50,306.60	50,306.60	34	2.1807	50,361.12	50,361.12	08	
Total	41.1168	67.2262	207.5497	0.6278	45.9592	2.4626	48.4217	12.2950	2.4385	14.7336	0.0000	76,811.18	76,811.18	16	2.8282	0.4832	77,025.87	86

Mitigated Operational

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.944	3,747.944	1.0549		3,774.317
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419	3,747.944	3,747.944	1.0549	3,774.317	4	3,774.317

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.2 Demolition - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852	1,292.241	1,292.241	0.0877	1,294.433	7	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311	117.2799	117.2799	3.5200e-003	117.3678		
Total	0.1760	4.1265	1.3884	0.0131	0.3810	0.0135	0.3946	0.1034	0.0129	0.1163	1,409.521	1,409.521	0.0912	1,411.801	5	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
lb/day																	
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008	0.0000	0.0000	0.0000	0.0000	0.0000		
Off-Road	3.1651	31.4407	21.5650	0.0388	1.5513	1.5513	1.5513	1.4411	1.4411	1.4411	0.0000	3,747.944	3,747.944	1.0549	3,774.317	4	
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419	0.0000	3,747.944	3,747.944	1.0549	3,774.317	4	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.2 Demolition - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852	1,292.241	1,292.241	0.0877	1,294.433	7	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311	117.2799	117.2799	3.5200e-003	117.3678		
Total	0.1760	4.1265	1.3884	0.0131	0.3810	0.0135	0.3946	0.1034	0.0129	0.1163	1,409.521	1,409.521	0.0912	1,411.801	5	

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
lb/day																	
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000	
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809				3,685.656	3,685.656	1.1920	3,715.457
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	3,685.656	3,685.656	1.1920	3,715.457	3		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	0.0374	140.7359	140.7359	4.2200e-003	140.8414		
Total	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	0.0374	140.7359	140.7359	4.2200e-003	140.8414		

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000	0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		0.0000	3,685.656	3,685.656	1.1920	3,715.457	3
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3,685.656	3,685.656	1.1920	3,715.457	3	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.3 Site Preparation - 2021 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	0.0374	140.7359	140.7359	4.2200e-003	140.8414		
Total	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	0.0374	140.7359	140.7359	4.2200e-003	140.8414		

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000	
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	1.8265	4	4	6,007.043	6,007.043	1.9428	6,055.613	4
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	6,007.043	6,007.043	1.9428	6,055.613	4		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	156.3732	156.3732	4.6900e-003	156.4904	156.4904	156.4904
Total	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	156.3732	156.3732	4.6900e-003	156.4904	156.4904	156.4904

Mitigated Construction On-Site

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.4 Grading - 2021

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	156.3732	4.6900e-003	156.3732	4.6900e-003	156.3732	4.6900e-003
Total	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	156.3732	4.6900e-003	156.3732	4.6900e-003	156.3732	4.6900e-003

3.4 Grading - 2022

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	6,011.410	6,011.410	6,011.410	5	5	6,060.015
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	6,011.410	6,011.410	6,011.410	5	5	6,060.015

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.4 Grading - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	150.8754	150.8754	4.2400e-003	150.9813		
Total	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	150.8754	150.8754	4.2400e-003	150.9813		

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	0.0000	6,011.410	6,011.410	5	1.9442	6,060.015
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	0.0000	6,011.410	6,011.410	5	1.9442	6,060.015

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.4 Grading - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	150.8754	150.8754	4.2400e-003	150.9813			
Total	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	150.8754	150.8754	4.2400e-003	150.9813			

3.5 Building Construction - 2022

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	2,554.333	2,554.333	0.6120	2,569.632			
Total	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	2,554.333	2,554.333	0.6120	2,569.632			

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873	3,896.548	3,896.548	0.2236	3,902.138	4	
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617	6,042.558	6,042.558	0.1697	6,046.800	0	
Total	2.8378	14.7106	24.5142	0.0971	7.0087	0.0741	7.0828	1.8799	0.0691	1.9490	9,939.106	9,939.106	0.3933	9,948.938	4	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120	2,569.632	2
Total	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120	2,569.632	2

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.5 Building Construction - 2022

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873	3,896.548	3,896.548	0.2236	3,902.138	4	
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617	6,042.558	6,042.558	0.1697	6,046.800	0	
Total	2.8378	14.7106	24.5142	0.0971	7.0087	0.0741	7.0828	1.8799	0.0691	1.9490	9,939.106	9,939.106	0.3933	9,948.938	4	

3.5 Building Construction - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	2,555.209	2,555.209	0.6079	2,570.406	1		
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	2,555.209	2,555.209	0.6079	2,570.406	1		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747	3,773.876	3,773.876	0.1982	3,778.830	0	
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604	5,821.402	5,821.402	0.1529	5,825.225	4	
Total	2.5807	11.3809	22.5017	0.0936	7.0088	0.0595	7.0682	1.8799	0.0552	1.9350	9,595.279	9,595.279	0.3511	9,604.055	4	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	0.0000	2,555.209	2,555.209	0.6079	2,570.406	1
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	0.0000	2,555.209	2,555.209	0.6079	2,570.406	1

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.5 Building Construction - 2023 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747	3,773.876	3,773.876	0.1982	3,778.830	0		
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604	5,821.402	5,821.402	0.1529	5,825.225	4		
Total	2.5807	11.3809	22.5017	0.0936	7.0088	0.0595	7.0682	1.8799	0.0552	1.9350	9,595.279	9,595.279	0.3511	9,604.055	4		

3.6 Paving - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	1	2,207.584	2,207.584	0.7140	2,225.433	6		
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			
Total	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	1	2,207.584	2,207.584	0.7140	2,225.433	6		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.6 Paving - 2023**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	109.0150	109.0150	2.8600e-003	109.0150	109.0150	109.0150	109.0866
Total	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	109.0150	109.0150	2.8600e-003	109.0150	109.0150	109.0150	109.0866

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.0000	2.207.584	2.207.584	0.7140	2.225.433	2.225.433	6	6
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.0000	2.207.584	2.207.584	0.7140	2.225.433	2.225.433	6	6

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.6 Paving - 2023**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	109.0150	109.0150	2.8600e-003	109.0150	109.0150	109.0150	109.0150
Total	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	109.0150	109.0150	2.8600e-003	109.0150	109.0150	109.0150	109.0150

3.6 Paving - 2024**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547	2.207.547	0.7140	2.225.396	2.225.396	3	3
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547	2.207.547	0.7140	2.225.396	2.225.396	3	3

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.6 Paving - 2024**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	105.6336	105.6336	2.6300e-003	105.6336	105.6336	2.6300e-003	105.6992
Total	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	105.6336	105.6336	2.6300e-003	105.6336	105.6336	2.6300e-003	105.6992

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	0.0000	2.207.547	2.207.547	0.7140	0.7140	2.225.396	
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4685	0.4310	0.4310	0.4310	0.0000	2.207.547	2.207.547	0.7140	0.7140	2.225.396	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.6 Paving - 2024

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	105.6336	105.6336	2.6300e-003	105.6992		
Total	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	105.6336	105.6336	2.6300e-003	105.6992		

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	236.4115				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	281.4481	281.4481	0.0159	281.8443		
Total	236.5923	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	281.4481	281.4481	0.0159	281.8443		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.7 Architectural Coating - 2024 Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315	1,126.758	1,126.758	0.0280	1,127.458	1,127.458	3	3
Total	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315	1,126.758	1,126.758	0.0280	1,127.458	1,127.458	3	3

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	lb/day																
Archit. Coating	236.4115	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.1808	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	0.0000	0.0000	281.4481	281.4481	0.0159	281.8443	
Total	236.5923	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	0.0000	0.0000	281.4481	281.4481	0.0159	281.8443	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

3.7 Architectural Coating - 2024 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315	1,126.758	1,126.758	0.0280	1,127.458	3	1,127.458
Total	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315	1,126.758	1,126.758	0.0280	1,127.458	3	1,127.458

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	50.306.60	50.306.60	2.1807	50.361.12		
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070	50.306.60	50.306.60	2.1807	50.361.12		

4.2 Trip Summary Information

Land Use	Weekday	Average Daily Trip Rate	Saturday	Sunday	Unmitigated Annual VMT	Mitigated Annual VMT
Apartments Low Rise	145.75	154.25	154.00		506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4,075.50		13,660,065	13,660,065
General Office Building	288.45	62.55	31.05		706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72		3,413,937	3,413,937
Hotel	192.00	187.50	160.00		445,703	445,703
Quality Restaurant	501.12	511.92	461.20		707,488	707,488
Regional Shopping Center	528.08	601.44	357.84		1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31		20,552,452	20,552,452

4.3 Trip Type Information

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Land Use	Miles				Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-NW	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	19	4
High Turnover (Sit Down Restaurant)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	7

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

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

Land Use	NaturalGas Use kBtu/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																	
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486	
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666	4,209.916	4,209.916	0.0807	0.0772	4,234.933	
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884	
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696	2,677.634	2,677.634	0.0513	0.0491	2,693.546	
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355	561.1436	561.1436	0.0108	0.0103	564.4782	
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377	595.0298	595.0298	0.0114	0.0109	598.5658	
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003	29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778	
Total	0.7660	6.7463	4.2573	0.0418		0.5292	0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	
												2	2			7	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

5.2 Energy by Land Use - NaturalGas

Mitigated

Land Use	NaturalGas Use kBtu/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
		lb/day																
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003			131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666			4,209.916	4,209.916	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003			150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696			2,677.634	2,677.634	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355			561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377			595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003			29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total	0.7660	6.7463	4.2573	0.0418		0.5292	0.5292	0.5292	0.5292	0.5292	0.5292			8,355.983	8,355.983	0.1602	0.1532	8,405.6387

6.0 Area Detail

6.1 Mitigation Measures Area

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Mitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11	92
Unmitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11	92

6.2 Area by SubCategory

Unmitigated

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

6.2 Area by SubCategory**Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															lb/day
Architectural Coating	2.2670				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Consumer Products	24.1085				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Hearth	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4766	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574	148.5950	148.5950	0.1424	0.1424	152.1542	
Total	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
																92

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

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

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

	Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Village South Specific Plan (Proposed)
Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2028
Utility Company	Southern California Edison			N2O Intensity (lb/MWhr)	0.006
CO2 Intensity (lb/MMWhr)	702.44	CH4 Intensity (lb/MMWhr)	0.029		

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day														lb/day	
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.337	6,154.337	1.9472	0.0000	6,203.018
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.34	12,035.34	1.9482	0.0000	12,060.60
2023	4.3939	25.8848	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.40	11,710.40	0.9617	0.0000	11,734.44
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.051	2,307.051	0.7164	0.0000	2,324.962
Maximum	237.0656	46.4460	39.6338	0.1195	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12,035.34	12,035.34	1.9482	0.0000	12,060.60

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

Year	lb/day										lb/day					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6.154337	6.154337	1.9472	0.0000	6,203,018 6
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12.03534	12.03534	1.9482	0.0000	12,060,60 13
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11.71040	11.71040	0.9617	0.0000	11,734,44 97
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.051	2,307.051	0.7164	0.0000	2,324,962 7
Maximum	237.0656	46.4460	39.6338	0.1195	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	12.03534	12.03534	1.9482	0.0000	12,060,60 13

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

2.2 Overall Operational Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
	lb/day										lb/day						
Area	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11	92	
Energy	0.7660	6.7462	4.2573	0.0418	0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	7	
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083	47,917.80	47,917.80	2.1953	0.05	47,912.68	39	
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4399	14.7349	0.0000	74,422.37	74,422.37	2.8429	0.4832	74,637.44	17

Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day														lb/day	
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11 92
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.983	8,355.983	0.1602	0.1532	8,405.638 7
Mobile	9.5233	45.9914	110.0422	0.4681	0.3373	46.2965	12.2950	0.3132	12.6083			47,917.80	47,917.80	2.1953	0.05	47,972.68 39
Total	40.7912	67.7872	202.7424	0.6043	45.9592	2.4640	48.4231	12.2950	2.4399	14.7349	0.0000	74,422.37	74,422.37	2.8429	0.4832	74,637.44 17

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.944	3,747.944	1.0549		3,774.317
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	4.8588	0.5008	1.4411	1.9419	3,747.944	3,747.944	1.0549	3,774.317	4	3,774.317

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.2 Demolition - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854	1,269.855	1,269.855	0.0908	1,272.125	2	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311	110.4707	110.4707	3.3300e-003	110.5539		
Total	0.1835	4.1800	1.4144	0.0128	0.3810	0.0137	0.3948	0.1034	0.0131	0.1165	1,380.326	1,380.326	0.0941	1,382.679	1	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	3.1651	31.4407	21.5650	0.0388	1.5513	1.5513	1.5513	1.4411	1.4411	1.4411	0.0000	3,747.944	3,747.944	1.0549	3,774.317	4
Total	3.1651	31.4407	21.5650	0.0388	3.3074	1.5513	3.3074	1.4411	1.4411	1.4411	0.0000	3,747.944	3,747.944	1.0549	3,774.317	4

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.2 Demolition - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854	1,269.855	1,269.855	0.0908	1,272.125		
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311	110.4707	110.4707	3.3300e-003	110.5539		
Total	0.1835	4.1800	1.4144	0.0128	0.3810	0.0137	0.3948	0.1034	0.0131	0.1165	1,380.326	1,380.326	0.0941	1,382.679	1	

3.3 Site Preparation - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809				3,685.656	3,685.656	1.1920
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	3,685.656	3,685.656	1.1920	3,715.457	3	3,715.457

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	132.5649	132.5649	3.9900e-003	132.6646	132.6646	132.6646
Total	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	132.5649	132.5649	3.9900e-003	132.6646	132.6646	132.6646

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.656	3,685.656	1.1920	3,715.457	3
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3,685.656	3,685.656	1.1920	3,715.457	3

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	132.5649	132.5649	3.9900e-003	132.6646	132.6646
Total	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374	132.5649	132.5649	3.9900e-003	132.6646	132.6646

3.4 Grading - 2021

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.043 4	6,007.043 4	1.9428		6,055.613 4
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230		6,007.043 4	6,007.043 4	1.9428		6,055.613 4

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.4 Grading - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	147.2943	147.2943	4.4300e-003	147.4051		
Total	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	147.2943	147.2943	4.4300e-003	147.4051		

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620	1.9853	1.9853	1.9853	1.8265	1.8265	0.0000	6,007.043	6,007.043	1.9428			6,055.613
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.6587	3.5965	1.8265	5.4230	0.0000	6,007.043	6,007.043	1.9428		6,055.613

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.4 Grading - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	147.2943	147.2943	4.4300e-003	147.4051		
Total	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415	147.2943	147.2943	4.4300e-003	147.4051		

3.4 Grading - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	6,011.410	6,011.410	1.9442	5	5	6,060.0158
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	6,011.410	6,011.410	1.9442			6,060.0158

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.4 Grading - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	142.1207	142.1207	4.0000e-003	142.1207	142.1207	142.2207
Total	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415				142.1207	142.1207	142.2207

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621	1.6349	1.6349	1.6349	1.5041	1.5041	1.5041	0.0000	6,011.410	6,011.410	5	1.9442	6,060.015
Total	3.6248	38.8435	29.0415	0.0621	8.6733	1.6349	10.3082	3.5965	1.5041	5.1006	0.0000	6,011.410	6,011.410	5	1.9442	6,060.015

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.4 Grading - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415	142.1207	142.1207	4.0000e-003	142.2207	142.2207	142.2207
Total	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415			142.1207	142.1207	4.0000e-003	142.2207

3.5 Building Construction - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.7612	0.7612	0.7612	0.7612	2,554.333	2,554.333	0.6120	2,569.632	2	2,569.632
Total	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.7612	0.7612	0.7612	0.7612	2,554.333	2,554.333	0.6120	2,569.632	2	2,569.632

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.5 Building Construction - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0266	0.9412	0.2636	0.0245	0.2881	3,789.075	3,789.075	0.2381	3,795.028	3	
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617	5,691.935	5,691.935	0.1602	5,695.940	8	
Total	3.0904	14.8350	23.2704	0.0926	7.0087	0.0749	7.0836	1.8799	0.0699	1.9498	9,481.010	9,481.010	0.3984	9,490.969	1	

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120	2,569.632	2
Total	1.7062	15.6156	16.3634	0.0269	0.8090	0.8090	0.8090	0.7612	0.7612	0.7612	0.0000	2,554.333	2,554.333	0.6120	2,569.632	2

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.5 Building Construction - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0286	0.9412	0.2636	0.0245	0.2881	3,789.075	3,789.075	0.2381	3,795.028	3	
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617	5,691.935	5,691.935	0.1602	5,695.940	8	
Total	3.0904	14.8350	23.2704	0.0926	7.0087	0.0749	7.0836	1.8799	0.0699	1.9498	9,481.010	9,481.010	0.3984	9,490.969	1	

3.5 Building Construction - 2023**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	2,555.209	2,555.209	0.6079	2,570.406	1	
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	2,555.209	2,555.209	0.6079	2,570.406	1	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.5 Building Construction - 2023**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752	3,671.400	3,671.400	0.2096	3,676.641	7	7
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604	5,483.797	5,483.797	0.1442	5,487.402	0	4
Total	2.8211	11.4799	21.2591	0.0893	7.0088	0.0601	7.0688	1.8799	0.0557	1.9356	9,155.198	9,155.198	0.3538	9,164.043	7	7

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
lb/day																	
Off-Road	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	0.0000	2,555.209	2,555.209	0.6079	2,570.406	1	1
Total	1.5728	14.3849	16.2440	0.0269	0.6997	0.6997	0.6997	0.6584	0.6584	0.6584	0.0000	2,555.209	2,555.209	0.6079	2,570.406	1	1

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.5 Building Construction - 2023

Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	lb/day										lb/day						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752	3,671.400	3,671.400	0.2096	3,676.641	7	3,671.400	3,676.641
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604	5,483.797	5,483.797	0.1442	5,487.402	0	5,483.797	5,487.402
Total	2.8211	11.4799	21.2591	0.0893	7.0088	0.0601	7.0688	1.8799	0.0557	1.9356	9,155.198	9,155.198	0.3538	9,164.043	7	9,155.198	9,164.043

3.6 Paving - 2023

Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
	lb/day										lb/day						
Off-Road	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	2,207.584	2,207.584	0.7140	2,225.433	6	2,207.584	2,225.433
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.4694	2,207.584	2,207.584	0.7140	2,225.433	6	2,207.584	2,225.433

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.6 Paving - 2023**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	102.6928	102.6928	2.7000e-003	102.7603	102.7603		
Total	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	102.6928	102.6928	2.7000e-003	102.7603	102.7603		

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.0000	2.207.584	2.207.584	0.7140	2.225.433	2.225.433	6	
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
Total	1.0327	10.1917	14.5842	0.0228	0.5102	0.5102	0.5102	0.4694	0.4694	0.0000	2.207.584	2.207.584	0.7140	2.225.433	2.225.433	6	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.6 Paving - 2023**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	102.6928	102.6928	2.7000e-003	102.7603	102.7603		
Total	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311	102.6928	102.6928	2.7000e-003	102.7603	102.7603		

3.6 Paving - 2024**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547	2.207.547	0.7140	2.225.396	2.225.396		
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2	2	2			0.0000	
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	2.207.547	2.207.547	0.7140	2.225.396	2.225.396		

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.6 Paving - 2024**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	99.5045	99.5045	2.4700e-003	99.5663	99.5663	0.0000	0.0000
Total	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	99.5045	99.5045	2.4700e-003	99.5663	99.5663	0.0000	0.0000

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	FM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Off-Road	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	0.0000	2.207.547	2.207.547	0.7140	0.7140	2.225.396	3
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.9882	9.5246	14.6258	0.0228	0.4685	0.4685	0.4310	0.4310	0.4310	0.4310	0.0000	2.207.547	2.207.547	0.7140	0.7140	2.225.396	3

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.6 Paving - 2024**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	99.5045	99.5045	2.4700e-003	99.5663	99.5663	99.5663
Total	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311	99.5045	99.5045	2.4700e-003	99.5663	99.5663	99.5663

3.7 Architectural Coating - 2024**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	236.4115				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	281.4481	281.4481	0.0159	281.8443	281.8443	281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	281.4481	281.4481	0.0159	281.8443	281.8443	281.8443

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e	
lb/day																		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315	1,061.381	1,061.381	1,062.041	0	0.0264	8	8	
Total	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315	1,061.381	1,061.381	1,062.041	0	0.0264	8	8	1,062.041

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	CH4	N2O	CO2e
lb/day																	
Archit. Coating	236.4115	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	0.0000	281.4481	281.4481	281.4481	0.0159	0.0159	281.8443
Total	236.5923	1.2188	1.8101	2.9700e-003	0.0609	0.0609	0.0609	0.0609	0.0609	0.0609	0.0000	281.4481	281.4481	281.4481	0.0159	0.0159	281.8443

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

3.7 Architectural Coating - 2024 Mitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315	1,061.381	1,061.381	1,062.041	0	0.0264	
Total	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315	1,061.381	1,061.381	1,062.041	0	0.0264	

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.33373	46.2965	12.2950	0.3132	12.6083	47.917.80	47.917.80	2.1953	47.972.68	39	
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.33373	46.2965	12.2950	0.3132	12.6083	47.917.80	47.917.80	2.1953	47.972.68	39	

4.2 Trip Summary Information

Land Use	Weekday	Average Daily Trip Rate	Saturday	Sunday	Unmitigated Annual VMT	Mitigated Annual VMT
Apartments Low Rise	145.75	154.25	154.00		506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4,075.50		13,660,065	13,660,065
General Office Building	288.45	62.55	31.05		706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72		3,413,937	3,413,937
Hotel	192.00	187.50	160.00		445,703	445,703
Quality Restaurant	501.12	511.92	461.20		707,488	707,488
Regional Shopping Center	528.08	601.44	357.84		1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31		20,552,452	20,552,452

4.3 Trip Type Information

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Land Use	Miles				Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-NW	H-S or C-C	H-O or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	19	4
High Turnover (Sit Down Restaurant)	16.60	8.40	6.90	8.50	72.50	19.00	37	20	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	Fm10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

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

Land Use	NaturalGas Use kBtu/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																	
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486	
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666	4,209.916	4,209.916	0.0807	0.0772	4,234.933	
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884	
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696	2,677.634	2,677.634	0.0513	0.0491	2,693.546	
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355	561.1436	561.1436	0.0108	0.0103	564.4782	
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377	595.0298	595.0298	0.0114	0.0109	598.5658	
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003	29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778	
Total	0.7660	6.7463	4.2573	0.0418		0.5292	0.5292	0.5292		0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	
												2	2			7	

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

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

Land Use	NaturalGas Use kBtu/yr	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
		lb/day															
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003	131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486	
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666	4,209.916	4,209.916	0.0807	0.0772	4,234.933	
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003	150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884	
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696	2,677.634	2,677.634	0.0513	0.0491	2,693.546	
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355	561.1436	561.1436	0.0108	0.0103	564.4782	
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377	595.0298	595.0298	0.0114	0.0109	598.5658	
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003	29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778	
Total	0.7660	6.7463	4.2573	0.0418		0.5292	0.5292	0.5292	0.5292	0.5292	0.5292	8,355.983	8,355.983	0.1602	0.1532	8,405.638	
																	7

6.0 Area Detail**6.1 Mitigation Measures Area**

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11	92
Unmitigated	30.5020	15.0496	88.4430	0.0944	1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11	92

6.2 Area by SubCategory

Unmitigated

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

6.2 Area by SubCategory**Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															lb/day
Architectural Coating	2.2670				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Consumer Products	24.1085				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Hearth	1.6500	14.1000	6.0000	0.0900	1.1400	1.1400	1.1400	1.1400	1.1400	1.1400	0.0000	18,000.00	18,000.00	0.3450	0.3300	18,106.96
Landscaping	2.4766	0.9496	82.4430	4.3600e-003	0.4574	0.4574	0.4574	0.4574	0.4574	0.4574	148.5950	148.5950	0.1424	0.1424	0.1424	152.1542
Total	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974	1.5974	1.5974	1.5974	0.0000	18,148.59	18,148.59	0.4874	0.3300	18,259.11
																92

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

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

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

	Equipment Type	Number

11.0 Vegetation

Attachment C

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,623
Amortized (MT CO2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized (MT CO2e/year)	100.80
<i>% Decrease in Construction-related GHG Emissions</i>	
	17%

EXHIBIT B

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H₂O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Presentations:

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

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

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

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States” Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. *The 23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Flora, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference Orlando, FL*.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey

Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.

Case No.: 2:17-cv-01624-ES-SCM

Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division

M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant*.

Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237

Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica

Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants

Case No.: No. BC615636

Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica

The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants

Case No.: No. BC646857

Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado

Bells et al. Plaintiff vs. The 3M Company et al., Defendants

Case: No 1:16-cv-02531-RBJ

Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District

Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants

Cause No 1923

Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa

Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants

Cause No C12-01481

Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois

Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants

Case No.: No. 0i9-L-2295

Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles

Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC

Case No.: LC102019 (c/w BC582154)

Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division

Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*

Case Number: 4:16-cv-52-DMB-JVM

Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al., et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015

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

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas

Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant*.

Case Number cc-11-01650-E

Rosenfeld Deposition: March and September 2013

Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio

John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*

Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)

Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division

Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sessler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs*, vs. BP Products North America, Inc., *Defendant*.

Case 3:10-cv-00622

Rosenfeld Deposition: February 2012

Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland

Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants

Case Number: 03-C-12-012487 OT

Rosenfeld Deposition: September 2013

EXHIBIT C



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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Santa Monica, California 90401
Tel: (949) 887-9013
Email: mhagemann@swave.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

**Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review**

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradoao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.



Glendale Housing Element Input.
Glendale Association of Realtors®

Property / Parcel	Building SQFT.	Land SQFT.	Leases	Potential Units Per Housing Element Report	Type of Units Per City Report	Not A Good RHNA Candidate. Here is Why.
APN: 5642-014-952 R	70,274	229		Low Income	The Green Space in Americana containing the Trolley ride, the Fountain, and the public park is perhaps the attraction that is most important to the Americana Draw. Potential covenant in all of Americana Retail leases to be maintained as green space. Also recorded in the condominium subdivision map for over 152 condos in Americana.	
322 Americana Way R	69,670	YES	147	Low Income	Movie Theater. Part of Americana at Brand. Potential Long-Term Lease with AMC, the current operator	
200 W. Broadway Ave. R NEED APN	140,000	43,560	Yes	75	Low Income	Dicks Sporting Goods & Golds Gym. Net Operating Income (NOI) of \$2,345Mill per year. Being marketed for sale. If property sold for a CAP rate of 4%, the per square foot price of land will be over \$1,333.00 ! No developer will pay such a sum to develop 75 units .
130 N. Central Ave. R	41,936	Yes	125	Low Income	Owner, Holland Partners, had a development agreement with the city when they purchased the property in 2013. We believe the agreement was for market rate housing , not low-income housing as represented in the city report.	





Glendale Housing Element Input.
Glendale Association of Realtors®

Property / Parcel	Building Size	Land Size	Leases	Potential Units Per Housing Element Report	Type of Units Per Report	Not A Good RHNA Candidate. Here is Why.
201 W. Lexington Drive R		120,000	Yes	390 *Should be 247 Units a reduction of 143 Units	Low Income	The California Community Housing Agency purchased the property at 275 W. Lexington Drive from Cypress Equity Investments. Note: 494 units. The credit for low-income housing should be 25% to 50% of the number of the units, or up to 247 units and not the 390 units represented in the report
232 N. Orange Ave. K		91,000	22,798	Parking Structure	74	Low Income You will have an uprising amongst mid-Brand merchants such as Porto's, Panera, etc. if the city decides to demolish 1000+ space parking structure to build 74 units!
225 W. Broadway Ave. K		122,000	76,665	Yes	250	Low Income Occupied by tenants. IRS and Social Security Admin are the two largest tenants. IRS lease ends 4 years in this RHNA cycle. Unless sure that IRS won't renew and or has no options to renew, the report's assumption of 250 low-income units should be revised.
300 S. Central Ave. K		9,921	25,987	Yes	85	Low Income Chase Bank and Shoe City are the tenants. Owned by Caruso Affiliated. Renovated in 2011. Leases started 2011





Glendale Housing Element Input.
Glendale Association of Realtors®

Property / Parcel R	Building Size	Land Size	Leases	Potential Units Per Housing Element Report	Type of Units Per Report	Not A Good RHNA Candidate. Here is Why.
APN: 5642-006-064	43,074	49,268	YMCA	161	Low Income	Historic Landmark. Four-story Spanish Colonial Revival building. YMCA Building. Note: Part of the property on the Kenwood Ave. side was already developed (Acre 121).
APN: 5643-001-912	211,286	85,339	Altana Apt. Bldg.	278 *Reduction of 25 units	Low Income	Altana was built in 2016. 507-unit apartment Bldg. The California Community Housing Agency purchased the property. The credit for low-income housing should be 25% to 50% of the number of the units, or up to 253 units and not the 278 units represented in the report.
APN: 5643-003-047	27,007			88		This parcel number does not exist in Assessor's data base
6136 San Fernando Rd. Address: 6316 San Fernando Rd.		31,363	Water Treatment Center	13	Low Income	More explanation needed
				Adjustment (1,415) Units		





January 4, 2022

Gustavo Velasquez, Director
California Department of Housing & Community Development
2020 West El Camino Avenue, Suite 500
Sacramento, CA 95833

Dear Director Velasquez:

We are writing on behalf of **Abundant Housing LA** regarding Glendale's 6th Cycle housing element update. As you know, we have shared several comment letters with HCD describing our concerns about major deficiencies in the City's housing element update. Among our concerns is the City's failure to identify enough parcels in its site inventory and proposed rezoning program to achieve its RHNA target of 13,425 homes by 2029.

Assembly Bill 1397 (2017) requires cities to provide an accurate assessment of realistic site capacity, including "the city's or City's past experience with converting existing uses to higher density residential development, the current demand for the existing use, and an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment."

When cities allocate over 50% of their lower-income RHNA targets to nonvacant sites, they must demonstrate through *substantial evidence* that the current use of these sites is likely to be discontinued during the planning period. This is necessary in order to ensure that enough parcels for affordable housing production are identified, and that the lower-income RHNA targets are ultimately achieved. **To date, the City has not yet adequately provided this substantial evidence.**

Abundant Housing LA has partnered with [MapCraft Labs](#), an economic and policy analysis firm with expertise in housing elements and quantitative real estate analysis, to forecast the true realistic capacity of the City's site inventory and proposed rezoning program. The analysis considers the likely impact of housing element updates on housing production and proposes alternative rezoning scenarios that are more likely to achieve the RHNA target. In particular, MapCraft analyzed the market feasibility of the unit capacity claims made on parcels included in jurisdictions' site inventories.

This analysis calls into question the City's conclusion that its housing element creates the conditions for achieving the RHNA target. Among our core findings:

- While the City's site inventory and rezoning program claimed capacity for about 14,700 housing units, **our analysis suggests that expected housing capacity could fall short by 1,500 to 3,000 housing units.**

- On 41 sites where the City has claimed 3,465 housing units, our analysis found that these sites are either unlikely to be redeveloped to the density that the City is claiming, or are unlikely to be redeveloped altogether. **This represents 41% of the housing units in the City's site inventory.**

In light of this information, we respectfully recommend that HCD urge the City to reassess its site capacity claims, and revise its site inventory and proposed rezoning program. The City should add more parcels to its site inventory and expand its proposed rezoning program, particularly for low-density parcels in high-demand neighborhoods like Vineyard, Mariposa, Pacific-Edison, and Grandview. The City should also consider eliminating or reducing on-site parking requirements, which would greatly improve the economic feasibility of denser housing development.

We encourage you to review Abundant Housing LA and MapCraft's full report describing how these conclusions were reached. We would be happy to discuss our findings with you and your colleagues. Thank you for your team's continued hard work and dedication to solving California's housing shortage and affordability crisis.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

MAPCRAFT

Abundant Housing LA Feedback on Glendale Housing Element

Date: December 16, 2021
To: Abundant Housing LA
From: MapCraft Inc
Subject: Housing Element Analysis Results

Executive Summary

Based on an analysis of the sites found in the City of Glendale's site inventory, which claimed capacity for over 14,700 total units across over 940 sites, our analysis suggests that Glendale's expected housing capacity could fall short by between 1,500 and 3,000 units.

Glendale could consider the following actions to meet RHNA goals:

- Right-sizing claimed capacity on sites in the current site inventory, both by reducing expectations on many sites and by upzoning other sites. The city could revisit additional opportunities to rezone more parcels in the inventory, particularly in areas like the Vineyard, Mariposa, Pacific-Edison, and Grandview neighborhoods.
- Adding more sites to the site inventory and evaluating rezoning of those sites. The inventory includes 14% of the city's 6,700 parcels, so there are many places that could be explored further to address this potential shortfall.
- Reducing or eliminating parking requirements and promoting automobile alternatives to reduce households' demand for parking. If developers could meet household demand with fewer on-site parking stalls, it could make multifamily development in many parts of the City more economically feasible.
- Introducing new economic incentives to increase the financial feasibility of redevelopment, especially for projects that include below-market-rate units.
- Consider establishing development minimums to ensure high utilization of sites with feasible housing capacity.

Purpose of this Analysis

The State of California requires local jurisdictions to periodically update their housing elements to address housing needs, as identified by the Regional Housing Needs Assessment (RHNA). Cities in the Southern California Association of Governments (SCAG) region are in the process of developing updates to their housing elements, as part of the 6th cycle of the RHNA Allocation Plan, which will cover the planning period October 2021 through October 2029.

In March 2021, California's Department of Housing and Community Development (HCD) approved SCAG's adopted RHNA Allocation Plan, apportioning the region's housing growth target to its

MAPCRAFT

jurisdictions. City governments in SCAG are responsible for updating their Housing Elements and submitting them to HCD by October 2021. The Housing Elements must include an inventory of parcels suitable and available for residential development. The total capacity of the sites must be sufficient to accommodate the total housing need, by income level, allocated throughout the planning period.

Abundant Housing LA (AHLA) is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis. AHLA is providing feedback on housing elements to jurisdictions during the public comment period, and communicating to HCD staff its assessment of the housing elements. AHLA's review of housing elements is intended to ensure that jurisdictions develop high-quality housing element updates, and fully comply with state housing element law.

To that end, AHLA partnered with MapCraft to assess the site inventories shared by jurisdictions as part of their housing element updates. The analysis considers the likely impact of the draft housing elements on housing production and suggests alternative rezoning scenarios that are more likely to achieve cities' RHNA goals. MapCraft worked with a team to determine the likelihood that new housing production would be possible at the scale assumed by draft housing elements. In particular, MapCraft analyzed the market feasibility of the unit capacity claims made on sites included in jurisdictions' site inventories. This memorandum serves as the documentation for the results of various analyses completed by MapCraft for assessing Glendale's Housing Element.

Categorizing Site Inventory Claims

We conducted multiple tests of the City of Glendale's proposed site inventory. For each site for which data was available, we assessed the following:

1. How historic development patterns compared with the unit capacity claimed in the site inventory
2. How physical zoned capacity, taking into account major zoning constraints, beyond just the allowed units per acre, compared with the unit capacity claimed in the site inventory
3. How the scale of pipeline developments identified in the site inventory compare to the unit capacity claims made on similar sites in the site inventory
4. How financially feasible scales of development compared to the unit capacity claimed in the site inventory

Based on the tests on each site, we classified the housing capacity claimed on each site in the site inventory as one of three categories: reasonable, questionable, or unreasonable. Although the tests were nuanced, in general these categories meant:

- Capacity estimates were categorized as "reasonable" when a MapCraft test found that viable capacity on the site was greater than what the jurisdiction claimed in the inventory
- Capacity estimates were categorized as "questionable" when a MapCraft test found that viable capacity was roughly similar to, though lower than, the claim in the inventory

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- Capacity estimates were categorized as “unreasonable” when a MapCraft test found that viable capacity was deemed substantially less than what was claimed

Multiple feasibility tests were performed for each site. If the number of claimed units on a site was found to be unreasonable according to multiple tests, we are confident that a reevaluation of the site is warranted.

- More specifically, if the site’s claimed capacity resulted in “unreasonable” for more than one third of the applicable tests, we concluded the site’s claim was unreasonable.
- If none of the tests resulted in an “unreasonable” finding, and more than one third of the applicable tests resulted in “reasonable”, then we concluded the site’s claim was reasonable.
- The rest of the sites, which fall between our thresholds for “reasonable” and “unreasonable,” were defined as “questionable.”

We analyzed 943 sites in Glendale’s site inventory, with a total claimed capacity of 9,356 units. This includes 10 sites with 490 units in projects that are already pending, which we assumed to be reasonable capacity claims and did not analyze further. It also includes 933 sites with 8,866 units that were identified for potential future development, which we analyzed further. **Our analysis suggests that on 41 sites where Glendale has claimed 3,465 units, the capacity claims we analyzed were “unreasonable” or “questionable.” This represents 41% of the total capacity of the sites we analyzed.**

Table 1: Results of Site Inventory Categorization

	Number of Sites	Claimed Units	Percent of Sites	Percent of Units
Reasonable	888	5,023	96%	59%
Questionable	24	940	3%	11%
Unreasonable	17	2,525	2%	30%
Subtotal	929	8,488	100%	100%
Incomplete data*	4	378	N/A	N/A
Total	933	8,866	100%	100%

*Sites with Incomplete data needed for our tests. These Sites were not included in our analysis

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Exhibit 1: Sites Inventory Categorization – Percent of Sites

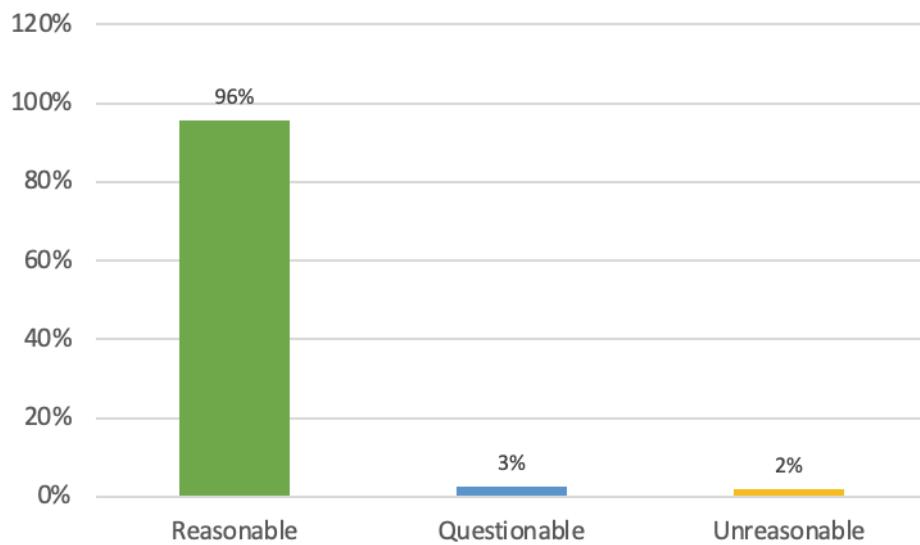
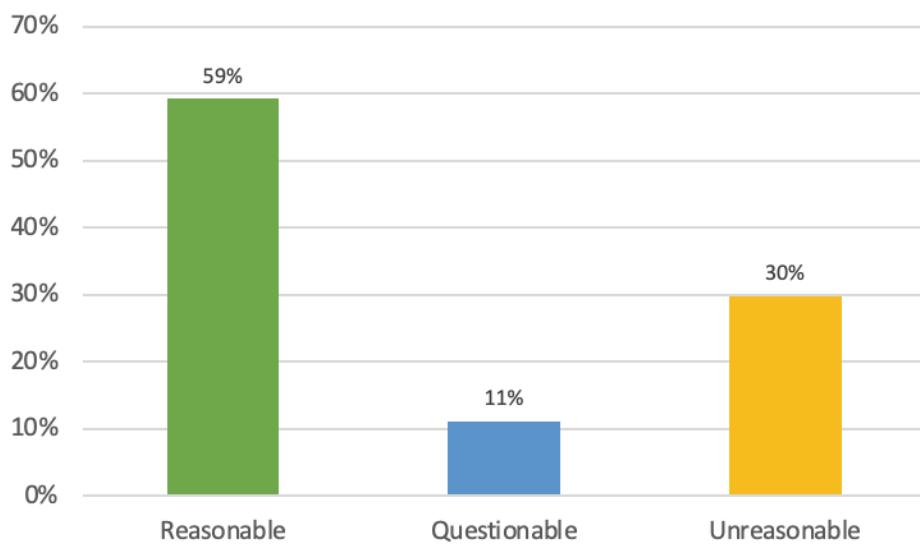


Exhibit 2: Sites Inventory Categorization – Percent of Units



Additionally, we estimated the scale of development that might reasonably be expected on parcels in the site inventory. Our analysis suggests that Glendale's **expected capacity could fall short by anywhere between 1,498 units and 2,995 units, as compared to the 8,866 units claimed on the inventory sites that we analyzed.**

To arrive at a range of unit assumptions, we applied two different sets of assumptions about the viability of units being developed on sites deemed reasonable, questionable, or unreasonable. For a more conservative estimate, we assumed 100% viability for reasonable, 50% viability for questionable, and 0% viability for unreasonable, whereas for a more lenient estimate, we assumed 100%, 75%, and 50% respectively and subtracted those units from the total.

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Table 2: Expected Capacity Shortfall

Site Classifications	Claimed Units on Sites	Conservative Estimates		Lenient Estimates	
		Expected viability of Units on Site	Claimed units that are not viable	Expected viability of units on sites	Claimed units that are not viable
Reasonable	5,023	100% Viable	-	100% Viable	-
Questionable	940	50% Viable	470	75% Viable	235
Unreasonable	2,525	0% Viable	2,525	50% Viable	1,263
Total	7,815		2,995 (35% Not Viable)		1,498 (18% Not Viable)

The city has multiple potential policy actions available to increase the viability of redevelopment on the site inventory parcels, such as:

- Add more market-feasible sites to the site inventory
- Upzone sites to enable more intense market-feasible housing development opportunities on sites already in the inventory and any sites added to the inventory
- Consider introducing new incentives and other “carrots” to encourage housing production, such as fee waivers or direct subsidies, a faster permitting process, and greater flexibility on setback size or maximum lot coverage
- Consider establishing development minimums to ensure high utilization of sites with feasible housing capacity

Test Results

The following tests were conducted on sites in the Glendale site inventory to assess whether the claimed development density in the housing element was reasonable. This was based on a comparison of the inventory claims to historic development patterns, sites' zoned capacity, similar projects under development, and the current financial feasibility of projects of a similar scale.

1. Analysis of Historic Development Patterns (Utilization of Zoned Capacity)

MapCraft evaluated projects built in the last ten years, using Los Angeles County tax assessor data, to estimate whether the claimed development density of a site inventory parcel was comparable with Glendale's recent record of housing production.

Test 1a – Historic Development Scale

As a first test, we searched for projects built anywhere in Glendale over the last 10 years that were on sites whose size was within 20% of the site size identified in the inventory and with development densities (units per acre) that were within 20% of the density claimed in the inventory (units divided by site size).

If recent developments matched the claimed density of a site inventory parcel, we categorized the parcel as “Reasonable.” If no similar historical developments existed, we assumed that zoning had

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prohibited such developments or other factors precluded such developments from being built in Glendale and categorized the parcel as “Questionable.” We refrained from categorizing any site inventory parcel as “unreasonable” based on the historic development scale test.

Table 3: Analysis of Historic Development Scale Results (Test 1a)

	Percent of Sites	Percent of Units
Reasonable	61%	33%
Questionable	39%	67%

*This test was applicable on 100% of the sites we analyzed

Test 1b – Historic Development in Zones

For site inventory parcels where rezoning is not proposed in the housing element, we conducted two other tests comparing the historic development patterns to the number of units claimed on sites in the site inventory.

Test 1b determined whether development occurred in the last 10 years on parcels whose zoning matches the zoning of the site in the inventory. Sites were categorized as “reasonable” if there was development in that zoning category in the last 10 years, or “unreasonable” if there was not.

Table 4: Analysis of Historic Development in Zones Results (Test 1b)

	Percent of Sites	Percent of Units
Reasonable	99%	87%
Unreasonable	1%	13%

*This test was applicable on 100% of the sites we analyzed

Test 1c – Historic Development Scale in Zones

Test 1c compared the observed density of historic developments in each zoning category to the claimed density of sites in the inventory in the same zoning category. This test categorized sites as “reasonable” if the claimed density for the site was less than the density of recent projects in the same zoning category, “questionable” if the parcel’s proposed density for redevelopment was within 10% of the maximum historic development density in the same zoning category, or “unreasonable” if the parcel’s proposed density for redevelopment exceeded 10% of the maximum historic development density in the same zoning category.

Table 5: Analysis of Historic Development Scale in Zones Results (Test 1c)

	Percent of Sites	Percent of Units
Reasonable	20%	40%
Questionable	79%	37%
Unreasonable	1%	23%

*This test was applicable on 99% of the sites we analyzed

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Key Takeaways:

- A majority (61%) of the sites in the inventory have claimed densities that match recent developments in Glendale, which corresponds to a reasonable claim for 33% of the units.
- The vast majority (99%) of sites are in zones that have seen some scale of development in the last 10 years, which corresponds to 87% of the claimed units.
- For sites in zones that have experienced development, under a quarter (20%) have claimed densities that are reasonable (i.e. less than the average density observed in those zones in the last 10 years). This only accounts for under half (40%) of the claimed units for this subset of sites.
- For sites in zones that have seen development, a large majority (79%) have claimed densities that are questionable and greater than the average density observed in those zones in the last 10 years. This accounts for a smaller proportion (37%) of the claimed units for this subset of sites.

2. Evaluation of Zoned Capacity

For site inventory parcels where rezoning is not proposed, MapCraft conducted tests based on the physical capacity of the zoning code, acknowledging that various zoning parameters might result in a lower effective capacity than the units per acre allowed in a zone. We collected several zoning attributes for each zone listed in the inventory, including maximum height limits, maximum FAR, maximum impervious coverage, minimum lot area per unit, maximum dwelling units per lot, and maximum dwelling units per acre. Using the zoning category noted for each site in Glendale's site inventory, we estimated how many units could be accommodated on the site under the relevant zoning limits and compared the result to what was claimed in the site inventory.

This test categorized sites as “reasonable” if the claimed density for the site was less than the density resulting from any of the zoning attributes, “questionable” if the claimed density was less than the maximum density resulting from the majority of zoning attributes (e.g. based on height, based on FAR, etc.) but the claimed density was up to 10% greater than what one or more zoning attributes would accommodate, or “unreasonable” if the claimed density was greater than what a majority of zoning attributes would accommodate.

Table 6: Evaluation of Zoned Capacity Results (Test 2)

	Percent of Sites	Percent of Units
Reasonable	98%	98%
Questionable	2%	1%
Unreasonable	0%	0%

*This test was applicable on 100% of the sites we analyzed

Key Takeaways:

- Almost all the sites in the inventory (98%) have density claims that are reasonable, which corresponds to the same proportion of the claimed units for this subset of sites.

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- About 2% of the sites in the inventory have density claims that are questionable.

3. Analysis of Site Inventory Pipeline

To understand the current conditions for housing development on site inventory parcels where rezoning is not proposed, MapCraft used the pipeline project data in Glendale's site inventory as another way of determining what scales of development could be expected on other sites in the inventory. The scale of the pipeline projects planned on sites in a given zone provided a sample of real-world development densities for other developments in those Glendale zones. The samples were used to compare the development density (units per acre) of upcoming projects to the claimed density on each site in the inventory that was not expected to be rezoned.

This test categorized sites as "reasonable" if the claimed density for the site was less than the pipeline patterns in the zone, "questionable" if it was within 10% of the maximum pipeline development density, or "unreasonable" if it exceeded 10% of the maximum pipeline development density.

Table 7: Analysis of Site Inventory Pipeline Results (Test 3)

	Percent of Sites	Percent of Units
Reasonable	98%	63%
Questionable	0%	0%
Unreasonable	2%	37%

*This test was applicable on 82% of the sites we analyzed

Key Takeaways:

- This test was applicable for four fifths (82%) of the sites in the inventory, meaning that less than a fifth of the sites (18%) are in zones that currently do not have any pending or approved projects listed among pipeline sites.
- Most sites (98%) that could be compared to pipeline projects in the same zone had claimed densities that are reasonable. However, this only corresponds to 63% of the claimed units for this subset of sites.

4. Financial Feasibility Analysis (Market-Driven Development Expectations)

MapCraft assessed the financial viability of the claims made in the site inventory by evaluating the financial feasibility of developing housing at a scale similar to the densities claimed on each site in the inventory.

MapCraft used real estate pro formas to analyze the financial feasibility of a variety of housing development types. To determine whether the unit capacity claimed on each site in the inventory might be financially feasible, MapCraft evaluated the financial feasibility of development types that had densities that were within 10% of the claimed density on each site.

Pro forma analyses can help identify market feasible development types by determining whether the value of a potential development is greater than the project's construction costs, land costs,

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and other costs. MapCraft estimated the land cost for each site in the inventory, using the market values provided by the Los Angeles County tax assessor. This comparison also helps to demonstrate that the existing use of a parcel is likely to be discontinued. Costs also included parking provision, which was tested in two ways: 1) based on current parking provision in the Glendale submarket and 2) assuming an aggressive reduction in mandated parking ratios and parking demand. To ensure the results reflected the market conditions applicable to each site in the inventory, the pro forma for each development type was run with the corresponding neighborhood-level market inputs.

Test 4a – Feasibility with Historic Parking Provision

For the first test, which considered parking provided at rates observed in existing development in the submarket, MapCraft categorized sites as “reasonable” if there were feasible development types that matched the scale of development claimed on each site. Sites were categorized as “questionable” if there were not feasible prototypes with similar densities. We did not include the option for an “unreasonable” result because this tested the feasibility of development using current observed parking provision, which may be higher than what is possible in new development today.

Table 8: Feasibility Analysis Results - historic parking provision (Test 4a)

	Percent of Sites	Percent of Units
Reasonable	0%	0%
Questionable	100%	100%
Unreasonable	N/A	N/A

*This test was applicable on 98% of the sites we analyzed

Test 4b – Feasibility with Reduced Parking Provision

The second test considered more lenient parking provision, which can contribute to development feasibility by reducing cost and saving space. MapCraft categorized sites as “questionable” if there were feasible development types that matched the scale of development claimed on each site. Sites were classified as “unreasonable” if the most financially feasible of the prototypes with similar densities could not pay for land based on the assessor’s estimate of total value. We did not include the option for a “reasonable” result for this test, given the more lenient parking assumptions may not be viable in all submarkets.

Table 9: Feasibility Analysis Results - reduced parking provision (Test 4b)

	Percent of Sites	Percent of Units
Reasonable	N/A	N/A
Questionable	100%	100%
Unreasonable	0%	0%

*This test was applicable on 98% of the sites we analyzed

Key Takeaways:

- We found that today’s housing market does not support the scales of development claimed on many sites in the inventory.

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- We found that today's housing market could better support the scales of development claimed on many sites in the inventory if less parking were demanded and required than what has historically been provided. The City could reduce or eliminate parking requirements and promote automobile alternatives to reduce households' demand for parking, thereby making it more economically feasible to develop multifamily housing in many areas, especially as construction costs continue to rise.

Test Results of Rezoning Scenarios

We analyzed 933 sites to assess whether there was market potential to exceed the capacity claimed in the site inventory should Glendale upzone site inventory parcels more ambitiously than what's proposed in the housing element. For this analysis, we considered all sites in the inventory, both the sites that Glendale is already planning to rezone and sites where the existing zoning is expected to persist.

We conducted two different tests, using MapCraft pro forma feasibility assessments (for more details, see approach outlined in Test 4) to estimate the market potential on the sites in the inventory. By comparing MapCraft's market feasible unit estimates to the unit capacity claimed in the site inventory, we were able to identify sites where upzoning may yield more capacity than currently tabulated.

Test 5a – Maximum density of potential upzoned sites

As a first test, we considered the most intense housing options that could be feasibly built on each site. We first identified the array of feasible housing development prototypes on each site, which may include both high- and low-density housing options. In this case, financial feasibility was based on a development project's prospects of paying more for the site than the current property value. We compared the housing capacity of the densest of those feasible prototypes to the capacity claimed in the site inventory to determine if further upzoning could yield more capacity.

Across the 933 sites that we analyzed, 790 could be financially feasible for redevelopment at a capacity that exceeded the capacity proposed for the parcel in the site inventory. Of those sites, none were sites slated to be rezoned and all were sites that were not slated to be rezoned. The table and charts below show the resulting estimated units, based on the greatest density of development types that had market potential to displace the existing use, and how that estimate compares to the total claimed units in the inventory.

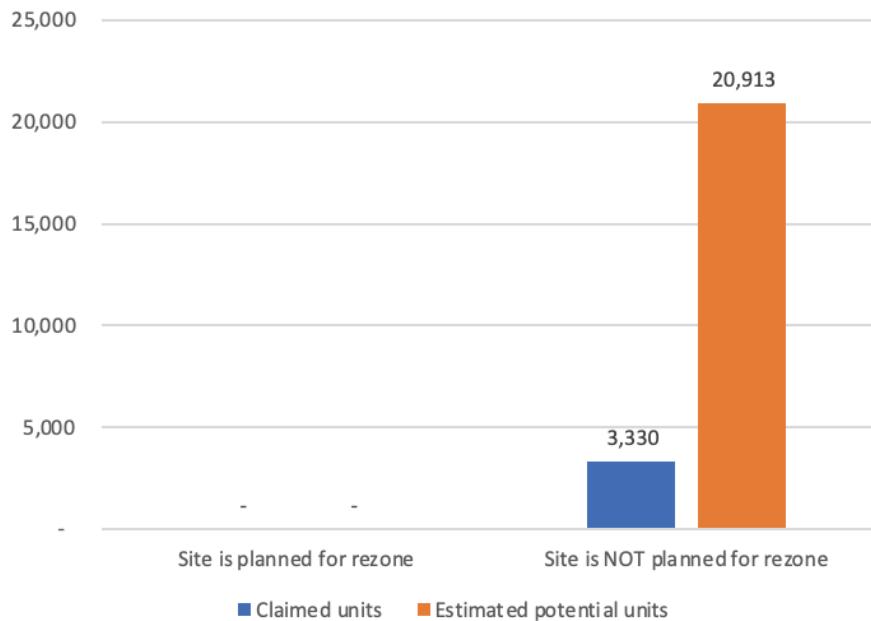
Table 10: Estimated Units from Max Density of Potential Upzones (Test 5a)

	Number of sites where feasible development exceeded claimed capacity (% of all inventoried sites in that category)	Potential Incremental Units Identified by Test 5a (Claimed Units)
Site planned for rezone in site inventory	0 (0%)	0 (0)
Site NOT planned for rezone in site inventory	790 (85%)	17,583 (3,330)

*This test was applicable on 100% of the sites we analyzed

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Exhibit 3: Estimated Units from Max Density of Potential Upzones (Test 5a)



Test 5b – Maximum feasibility of potential upzoning

We conducted a second test that considered the most financially feasible options. that could be built on each site. As in Test 5a, we considered the array of feasible housing development prototypes on each site. For Test 5b, we compared the housing capacity of the most feasible prototype to the capacity claimed in the site inventory to determine if further upzoning could yield more capacity. Because the most feasible prototype could be lower density than other feasible prototypes, this approach produced more conservative outcomes than Test 5a.

Accordingly, there were 781 sites that had feasible development options with capacity that exceeded what was claimed in the site inventory. Of those sites, none were sites slated to be rezoned and all were sites that were not slated to be rezoned. The table and charts below show the resulting estimated units, based on the greatest density of development types that had market potential to displace the existing use, and how that estimate compares to the total claimed units in the inventory.

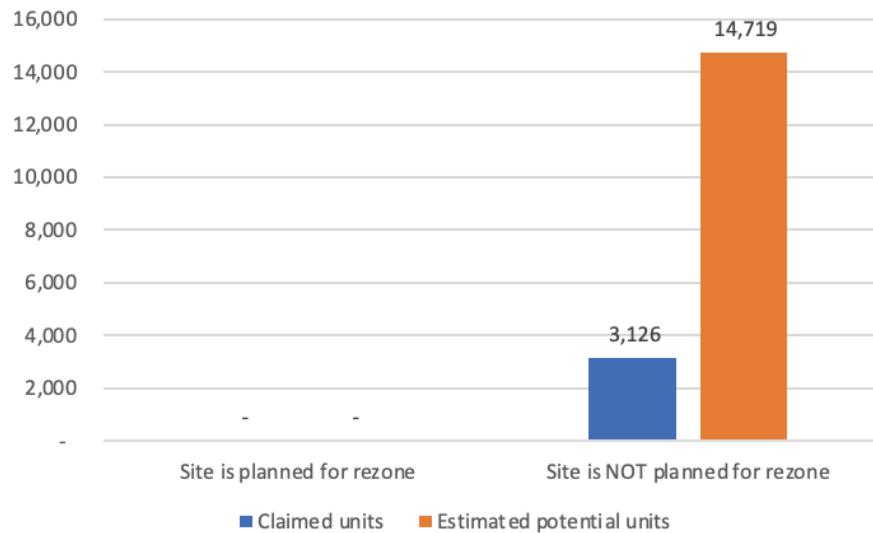
Table 11: Results of Test 5b

	Number of sites where feasible development exceeded claimed capacity (% of all inventoried sites in that category)	Potential Incremental Units Identified by Test 5a (Claimed Units)
Site planned for rezone in site inventory	0 (0%)	0 (0)
Site NOT planned for rezone in site inventory	781 (84%)	11,593 (3,126)

*This test was applicable on 100% of the sites we analyzed

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Exhibit 4: Estimated Units from Max Feasibility of Potential Upzones (Test 5b)

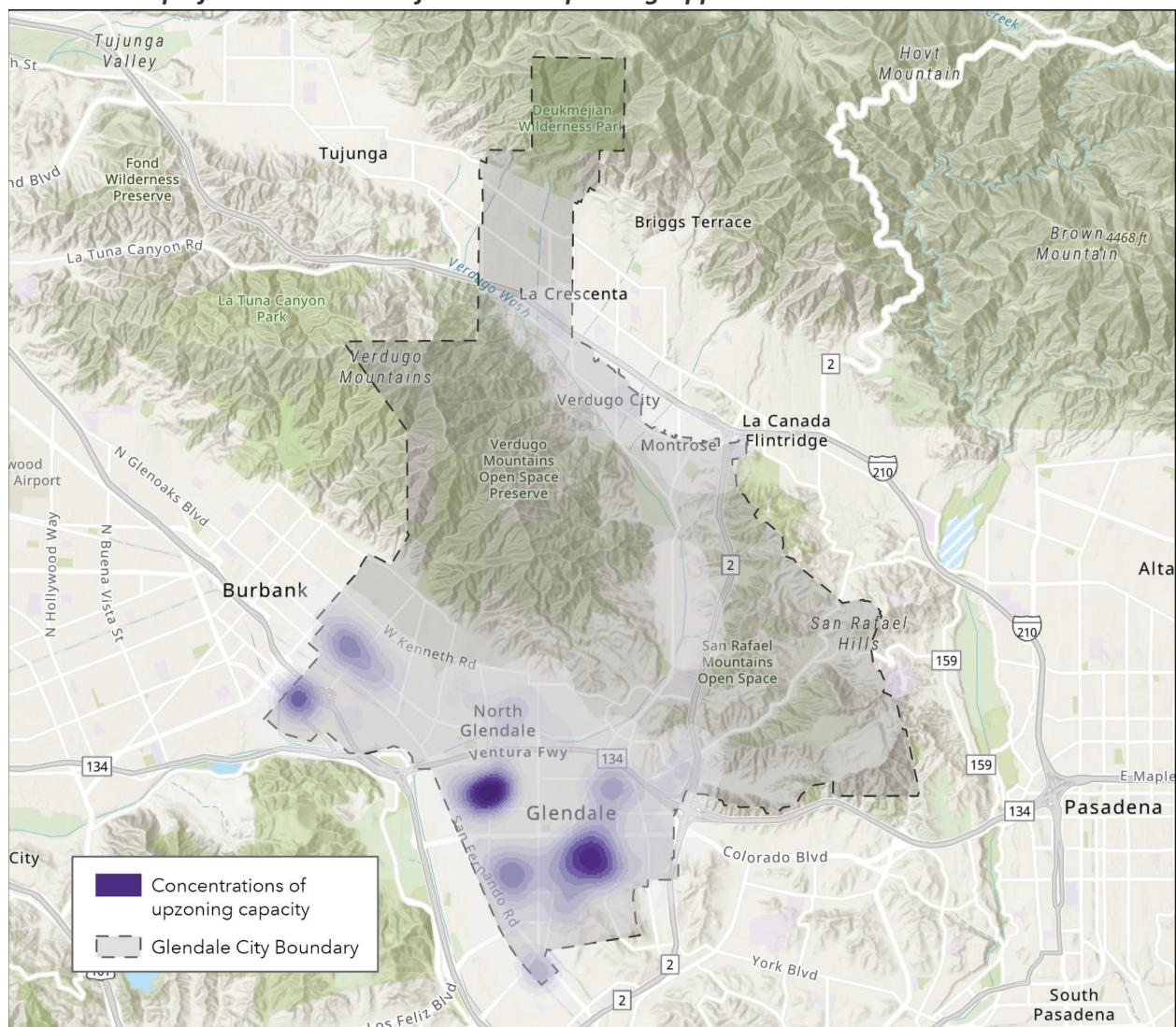


Given these results, we believe that there is substantial capacity “left on the table” for sites currently in the site inventory - for both sites already planned to be rezoned as well as sites not expected to be rezoned. But there are opportunities to identify additional parcels where market feasible capacity exists and add those sites to the proposed site inventory.

Viable upzoning opportunities exist in many parts of the city, and we observed concentrations of sites with greater market feasible housing capacity in the Vineyard, Mariposa, Pacific-Edison, and Grandview neighborhoods. These locations may be areas where Glendale could effectively add more market-feasible sites to the inventory by rezoning these sites to allow for denser development.

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Exhibit 5: Map of Concentrations of Potential Upzoning Opportunities



Key Takeaways:

- Additional capacity could be achieved on the majority of sites in the inventory where market-feasible opportunities to upzone exist. Glendale could consider upzoning parcels already in the inventory to reduce any potential housing production shortfall.
- Comparing results from Test 5a to 5b, it appears that the most financially feasible development options may be less intense than other feasible development options in some cases. For example, for-sale townhomes may be more profitable than small rental apartment buildings with more housing units. For that reason, if the city decides to adjust their zoning, they may consider establishing site utilization minimums so that sites redevelop at higher intensities.



Amanda Tropiano <atropiano@denovoplanning.com>

Glendale Housing Element "final" draft feedback

Mike Van Gorder <mike.vangorder@gmail.com>

Mon, Jan 24, 2022 at 9:47 PM

To: "Devine, Paula" <pdevine@glendaleca.gov>, akassakhian@glendaleca.gov, VAgajanian@glendaleca.gov, anajarian@glendaleca.gov, "Brotman, Daniel" <dbrotman@glendaleca.gov>

Cc: "Lanzafame, Philip" <PLanzafame@glendaleca.gov>, EKrause@glendaleca.gov, "Housing Elements@HCD" <housingelements@hcd.ca.gov>, Amanda Tropiano <atropiano@denovoplanning.com>

Hello Glendale City Council -

I understand that the council will be voting tomorrow night on the final draft of the Glendale 6th Cycle Housing Element. It is bewildering to me why this housing element - the draft of which was rushed out to HCD without first soliciting public input - is being considered as a "final" draft barely three weeks after the receipt of HCD's response letter. Veteran HCD housing reviewers take weeks to evaluate a single housing element, and yet staff seems to expect council to ingest an 800-page document in their spare time.

Naturally, since there was barely any time between the receipt of the HCD letter, the composition of this final draft, and the pending vote tomorrow night, this draft has not properly addressed the problems that HCD - and the public - has noted. The core problem here is that without any real time to study the document, council will be hopelessly dependent on staff's advice on the housing element that they have prepared. Staff, of course, is certain to stand behind their work. The public and third parties cannot meaningfully contribute to the analysis of this document, as staff didn't give us a chance. Since the public was cut out of contributing to the draft document before it was submitted, and HCD determined that the draft was noncompliant on those grounds, HCD should and likely *will* find fault with the final draft for the same reason.

I myself have barely had enough time to analyze this as much as I'd like, but I've already found some pretty significant problems.

- This draft no longer overtly claims that the entire RHNA share for low-income households can be accommodated in the downtown area without upzoning anywhere else. However, their version of 'widening the lens' is abandoning *some* of the bad-faith sites that were selected in the draft element, leaving some of them in, and adding some more sites in industrial areas in south Glendale, almost exclusively in my zip code, 91204. There is, from what I found, no support behind the assumptions made that all low-income sites chosen will be built with 100% affordable housing, again violating state statute. HCD noted that realistic capacity needed consideration in its response letter; this "final" draft has abandoned any attempt at establishing it.
- To continue pushing the narrative that development must only occur in south Glendale, there are *new* bad faith sites that have been selected. The biggest site on the new list is marked as APN 5641-003-900, and it is claimed that 300 affordable units will be built there. You may know it better as the National Guard Armory, next to the site that was proposed as a dog park just this week. In that meeting, where we heard that Councilmember Agajanian supports the idea of the dog park (I do, too!), we also learned that the Armory was leased out at that address for at least the next twenty years, far beyond the eight-year housing cycle being discussed.

 Los Angeles County
Assessor Portal

5641-003-900 

Map Search PAIS Assessor Interne

Summary

AIN: 5641-003-900

Situs Address:	Use Type: Other Property Type	Parcel Status: ACTIVE
	Parcel Type: Government Owned, Exempt	Create Date:
	Tax Rate Area: 04045	Delete Date:
		Tax Status: EXEMPT
		Year Defaulted:
		Exemption: None

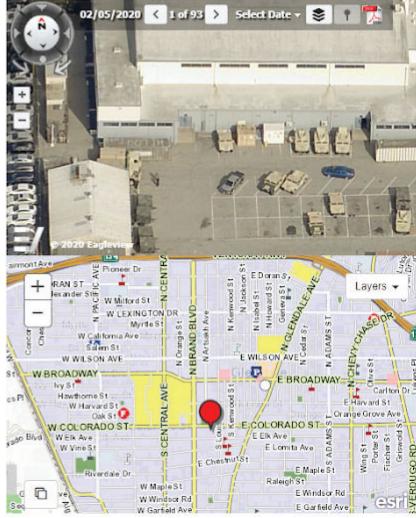
Building & Land Overview

Use Code: 8800	# of Units: /	Year Built: Effective Year: 93,552	 Parcel Map / Map Index
Design Type: Building SqFt: 0	Beds/Baths: /	Land SqFt: 93,552	

	2022 Roll Preparation	2021 Current Roll	RC	Year	1975 Base Value
Land \$	845,344 \$	0	0	0 \$	660,000
Improvements \$	0 \$	0	0	0 \$	0
Total \$	845,344 \$	0		\$ 660,000	

Assessor's Responsible Division

District: North District Office	North District Office 	Phone: (618) 833-6000
Region: 03	13800 Balboa Blvd.	Toll Free: 1 (888) 807-2111
Cluster: 03900	Sylmar, CA 91342	M-F 7:30 am to 5:00 pm



- The sites inventory is so graphically unfriendly (font size 2.5, 30+ columns of data, hundreds of rows per page) that I can't post thumbnail pictures of the inventory and have it look at all meaningful. Suffice to say that housing staff kept sites like the Robbins Brothers engagement ring store, the Church of Niscience, the Social Security Administration commercial complex at 225 W. Broadway, and the municipal parking lots serving the downtown area from the draft element and are claiming hundreds of sites for affordable housing. None of these sites are going to host affordable housing in the next eight years.
- I don't have time to review all of them, but i count 2,700 Very Low Income sites, all of which are situated around the downtown cluster and on my side of Tropico & Pacific Edison. If we again consider likelihood of development, we can easily remove over a thousand claimed sites just for the few APNs i mention above. Losing these units makes the housing element noncompliant with state statute.
- Considering likelihood of development again, it must be noted that about 6,000 total sites are being claimed in this downtown/91204 cluster, and they are marked with a helpful tag of "not used in prior housing element". That leaves another 6,000 or so sites - all above-moderate and moderate income sites - that have been recycled from the 5th housing element. So let's check in with the 5th cycle numbers:

Table 1: Regional Housing Needs Allocation – 5th Cycle Progress

Status	Extremely Low	Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	254	254	310	337	862	2,017
Built	0	125	218	19	4,131	4,493
Remaining Allocation	254	129	92	318	0	793

Sources: City of Glendale 2014-2021 Housing Element; 2020 General Plan Annual Progress Report

- We don't have an Above Moderate Income Housing Supply Crisis, but if we average 0% (ELI), 50% (VLI), 30%, and 5%, we get 21%. So we can reasonably expect that 21% of the sites chosen will actually be developed.
- 21% of 1,700 affordable sites in the downtown/91204 area is 361; 21% of the 6,000 units everywhere else is 1,260.
- All of this is to say, the city cannot rely on the sites that are in the inventory to satisfy RHNA, because the same approach remains: "Don't touch any single-family neighborhood in any way. Never upzone an area that used to be redlined." North Glendale will never bear its share of the housing crisis. Only suffocated south glendale, and two zip codes at that, are to be developed.
- The housing element acknowledges Glendale's racist development history and mentions that council has instructed staff to create a "Historical Context Statement", which is then explained as "describing those historical development patterns within which the significance of resources can be understood." This is progress. It is, however, lacking a practical and programmatic response to the consolidation of housing wealth in older, whiter hands in North Glendale.
- The HCD response letter noted a lack of analysis around Racially Concentrated Areas of Poverty and Affluence, among many other things. The "Final" draft analyzes the city's Racially Concentrated Area of Affluence by noting that it is single-family homes and that it is on the border with Burbank. It says, "there are no candidate sites" in the RCAA, because the city refuses to change any governmental constraints on R-1 neighborhoods. It also then makes an argument that 'white wealth in Glendale is lower than white wealth in Los Angeles County'. None of this is analysis.
- In discussing the housing discrimination survey, the draft says "a vast majority of survey respondents said that housing discrimination was not an issue in their neighborhoods", then saying that 73% (548 persons) had not

experienced housing discrimination. That leaves 204 residents that did experience housing discrimination! Discrimination is, by definition, going to affect a minority, but 27% is a substantial amount of housing discrimination. Does staff consider this an "acceptable" amount of discrimination? For a housing element whose understanding of Affirmatively Furthering Fair Housing is wholly and incorrectly oriented towards addressing discrimination, this is a problematic framing.

If i had more time, i would dissect this further. I wanted to get this information in front of the council before it votes to approve it based on whatever sliver of information that staff would provide in its presentation. I'm certain i haven't found every problem with this element. I urge council to vote down this final draft so that the public and third parties can meaningfully weigh in and so that staff can write something that will make a difference for the community instead of maintaining a broken status quo.

-Mike Van Gorder



December 16, 2022

Gustavo Velasquez, Director
California Department of Housing & Community Development (HCD)
2020 West El Camino Avenue, Suite 500
Sacramento, CA 95833

Dear Director Velasquez:

Thank you for the opportunity to comment on the process of updating the Housing Element of the City of Glendale's general plan. We are writing on behalf of **Abundant Housing LA (AHLA)** and **YIMBY Law** regarding Glendale's adopted 6th Cycle Housing Element (HE)¹. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law**'s mission is to make housing in California more accessible and affordable through enforcement of state housing law.

Executive Summary

We urge HCD not to certify Glendale's adopted HE upon until it is revised to fully comply with the letter and spirit of state housing element law. This letter will analyze the plan's programs related to the sites inventory, government constraint removal, funding and incentives for affordable housing, tenant protections, and affirmatively furthering fair housing. It will also describe our consultant's analysis of the sites inventory and, in conclusion, reflect on HCD's prior correction list.

HCD should send this adopted HE back with a correction list. On the **sites inventory**, the HE fails to upzone, makes unrealistic assumptions and sets quantified objectives far below the City's Regional Housing Needs Allocation. On **constraints**, the HE fails to address problematic parking requirements and drifts into vagueness and ambiguity on several programs. Regarding **funding and incentives for affordable housing**, more analysis is needed to show the inclusionary zoning ordinance is not acting as a constraint on housing production, the proposed scope of the density bonus program is unclear and in need of strengthening and more public funding is needed for affordable housing and renter support programs, in ways that do not discourage housing construction. **Tenant protections** are in need of strengthening and the commitment to a potential tenant opportunity to purchase program is weak and in need of elaboration. Glendale must also acknowledge its existing de facto segregated living patterns and create more housing opportunities throughout the city, to **affirmatively further fair**

¹ On [10/12/2020](#), [11/19/2021](#) and [2/15/2022](#) AHLA shared letters with Glendale and HCD, regarding drafts of the HEU, providing comments on how Glendale should fulfill both the letter and the spirit of housing element law. On [4/22/2022](#), HCD sent a letter to Glendale regarding its adopted 6th Cycle housing element, identifying corrections that need to be made to obtain certification of the plan. Glendale adopted the revised housing element at the [12/6/2022](#) Council meeting and HCD received it for review on 12/14/2022.

housing. Our consultant, MapCraft Inc., found a previous draft of the plan would likely result in a **housing production shortfall of 1,500 to 3,000 homes.**

I. Sites Inventory

Several aspects of the sites inventory methodology are cause for concern.

A. No Upzoning

Glendale permitted 4,039 housing units in the 5th cycle, compared to a 5th cycle Regional Housing Needs Allocation (RHNA) of 2,017 units. However, the City fell far short in the production of housing affordable to low and moderate income households, meeting only 20% of the very low income, 52% of the low income and 3% of the moderate-income RHNA². In addition, the 6th cycle RHNA target is much higher overall, 13,425 units, and for low and moderate income homes in particular. If Glendale saw the same housing production in the 6th cycle as it saw in the 5th cycle, it would only meet about 30% of its overall RHNA and fall even farther short on low and moderate income housing. In this context, the plan's lack of rezoning is of particular concern. Without making more sites available for multifamily housing, or other meaningful policy interventions, Glendale cannot credibly claim that it will meet the 6th Cycle RHNA at any income level.

B. Unrealistic Assumptions About the Likelihood of Development

Portions of the sites inventory methodology are updated to provide a more detailed justification of the calculations of the number of housing units expected. There is some use of pre-screening criteria such as improvements to land value ratio, existing FAR and age of existing structures³, to determine which sites are included in the inventory and reduction factors are applied to account for the likelihood that not all parcels will be developed at the maximum density allowed, due to governmental constraints. However, the methodology does not attempt to estimate or account for the possibility that some sites will not be redeveloped during the planning period. The expected yield of a site should be adjusted to account for both the probability of development and reductions in density of typical development resulting from governmental constraints. The plan does not address the former issue. Furthermore, the plan's claim that existing uses do not constrain existing development because Glendale can point to some examples of redevelopment that occurred despite several types of existing uses, is superficial. Just because a redevelopment proceeded in a particular case, does not prove that existing uses never act as constraints. This aspect of the analysis does not meet the legal standard of proving that existing uses are likely to discontinue when at least half of the lower-income RHNA is being accommodated on non-vacant sites⁴, as it is in Glendale.

² "Housing Element Implementation and APR Dashboard." California Department of Housing and Community Development

³ Glendale Adopted Housing Element Background Report, page 118.

⁴ California Government Code [Section 65583.2.\(g\)\(2\)](#).

C. Quantified Objectives Set Far Below RHNA

As shown in Table 1 below, Glendale has set its quantified objectives (QOs) for new construction far below its RHNA⁵. Furthermore the QOs for rehabilitation and conservation/preservation, not shown in Table 1, do not mitigate the situation much, adding just 757 units to the lower-income housing stock overall. Overall, the new construction QOs are just 41.0% of the RHNA and less than 20.0% for the lower-income RHNA. Housing affordable to low and moderate income households does face special constraints, which are not entirely under Glendale's control, such as inadequate public subsidies from higher levels of government. However, Glendale does have control over programs such as density bonuses and local taxes and fees that could support affordable housing. Setting QOs for affordable housing so low indicates that more programmatic effort is needed in the HE to support such efforts and to lobby for additional resources from the state and federal governments. With regard to market rate housing, Glendale has no excuse to set its QOs so low. With adequate government constraint removal programs, the market can produce Glendale's RHNA for above moderate income housing. The overall new construction QOs should be no less than the RHNA, 13,425 units, and Glendale must adjust its programs to facilitate more affordable housing.

Table 1 - New Construction Quantified Objectives 2021-2029

Affordability Level	RHNA	New Construction Quantified Objective	Quantified Objective as % of RHNA
Very Low Income	3,439	605	17.6%
Low Income	2,163	430	19.9%
Moderate Income	2,249	1,125	50.0%
Above Mod. Income	5,574	3,350	60.1%
Total	13,425	5,510	41.0%

II. Government Constraint Removal

The plan would allow many concerning governmental constraints to remain in effect. Glendale deserves some credit for its existing land use pattern, in which single-family homes are much less prevalent as a share of all housing units (about 34%) than is the case in Los Angeles County as a whole (about 48%)⁶. Denser forms of housing are more conducive to affordability than single-family homes, since they can distribute the cost of expensive land over more units, and increasing residential density, by definition, is what allows additional development to occur on infill sites, in order to meet RHNA goals and expand housing supply to push down home prices and rents. Yet although Glendale has achieved a somewhat urban form to date, there is more it can and should do to facilitate housing production.

⁵ Glendale Adopted Housing Element, Housing Plan, page 78.

⁶ [“Table DP04. Selected Housing Characteristics.”](#) American Community Survey 2021 one-year estimates.

A. Parking requirements

Glendale still clings to the discredited practice of applying minimum parking requirements for residential development, which increases the cost of building housing, lowers the number of units developers propose and skews the transportation system more towards driving, which results in more greenhouse gas emissions, worse air quality, and more traffic collisions⁷. Program 9.B makes a commitment to reduce guest parking requirements and parking requirements for efficiency and one-bedroom units⁸. However the program does not commit to reduce these standards by a specific amount. Abundant Housing LA's own research shows that Glendale requires 2.00-3.00 spaces per unit plus 0.25 space per unit as guest parking in base zoning districts. The average of the parking requirements for studio, one, two, three and four-bedroom units was 2.30 in Glendale, compared to 2.04 in Los Angeles County as a whole⁹. Glendale should eliminate or at least reduce its parking requirements, which are more burdensome than the County average, but it is not sufficient to generally state an intention to do so. Glendale must commit to specific reductions in order for HCD or the public to evaluate whether this program constitutes meaningful constraint removal. Furthermore, Glendale fails to commit to reducing parking requirements for "family sized" units, containing two or more bedrooms. This is especially worrisome since the housing needs of large families must be specifically analyzed and addressed in the housing element¹⁰. Instead, Glendale is disincentivizing housing for large families by requiring up to three parking spaces per unit.

B. Vague programmatic commitments

Program 3.E is a good example of vague programmatic commitments found in Glendale's HE¹¹. This program calls for modified zoning regulations to facilitate housing development in mixed-use corridors by June 2024. While this is a worthy goal, the program does not specify which standards would be adjusted to facilitate such housing developments. The goal is a 20% increase in applications, but the baseline against which this goal would be measured is not stated, making accountability difficult.

Returning to Program 9.B¹², discussed above in the context of parking requirements, Section H discusses reforming multifamily and mixed use development standards, such as lot coverage, height limits and a Conditional Use Permit requirement. Again, this is all rather vague. Programs are supposed to respond to the constraints analysis and be specific enough to make accountability possible. Merely identifying standards that might be changed, somehow, is not enough, since it gives no sense of the magnitude of the potential change. With regard to removing the CUP requirement, the commitment is just to "evaluate" doing so, as opposed to

⁷ Shoup, Donald ed. (2018). *Parking and the City*.

⁸ Glendale Adopted Housing Element, Housing Plan, page 74.

⁹ Barboza, David (2022). "[Los Angeles County Multifamily Residential Parking Requirements: Prospects for Reform](#)." Abundant Housing LA.

¹⁰ California Government Code [Section 65583.\(a\)\(7\)](#).

¹¹ Glendale Adopted Housing Element, Housing Plan, page 39.

¹² Glendale Adopted Housing Element, Housing Plan, page 74.

actually doing so. The housing element is the proper venue for such an evaluation. Programs should be about following through in a meaningful way.

III. Funding and Incentives for Affordable Housing

Glendale needs to put forward more meaningful funding and incentives for affordable housing.

A. The inclusionary zoning ordinance

Glendale has an existing inclusionary zoning (IZ) ordinance. IZ can be a useful tool to promote housing affordability and facilitate the production of the lower-income RHNA. However, it is important for IZ ordinances to be carefully designed, so that they impose requirements that are feasible and do not constrain housing development. Glendale's IZ ordinance requires 15% of housing units to be affordable to lower income households in multifamily developments with eight or more units, with an in lieu fee compliance option¹³. This program's design is positive in the sense that it aligns with state density bonus law, so that all projects subject to IZ would be eligible for a density bonus as well. However, the HE does not analyze the IZ ordinance as a potential constraint on housing development. Glendale should summarize the evidence it may have that the IZ requirement was set based on a study that takes into account feasibility and local market conditions.

B. Density Bonus

Program 3.A calls for enhanced density bonuses on a "case-by-case basis"¹⁴. It is unclear what this might mean in practice, but this approach has the appearance of an unpredictable, discretionary process. Instead, Glendale should lay out criteria for density bonuses that are more generous than those offered by state law. For example, density bonuses should be more generous within $\frac{1}{2}$ mile of Glendale's commuter rail station, in Downtown Glendale and in high-opportunity areas (based on TCAC opportunity scores). Furthermore Glendale's ordinance must be aligned with state law in other areas.

C. City Financial Assistance for Affordable Housing.

Proposed city financial assistance for affordable housing is inadequate and targets just 400 housing units during the planning period, which as Table 1 shows, is far below the City's lower-income RHNA¹⁵. Glendale appears to be relying heavily on federal funds, such as CDBG, the amounts of which are outside of the City's direct control. Glendale does generate some funding through IZ in lieu fees, but clearly not enough to produce significant amounts of affordable housing. What is missing is a commitment to lobby the state and federal governments

¹³ Glendale Adopted Housing Element, Housing Plan, page 37.

¹⁴ Glendale Adopted Housing Element, Housing Plan, page 32.

¹⁵ Glendale Adopted Housing Element, Housing Plan, page 33.

for more resources and proposals for a local funding source that would raise more money without significantly affecting housing production overall.

IV. Tenant Protections

Glendale's HE takes some tentative steps into tenant protections, but stronger action is needed in this area.

A. Tenant Opportunity to Purchase

Program 5B proposes for staff to provide an analysis to the City Council regarding a possible ordinance allowing tenants a right of first refusal to purchase their building if the owner proposes to sell it¹⁶. The first problem with this, of course, is that there is no commitment to actually adopt such an ordinance. Secondly, even if such an ordinance were adopted, there is no indication that major barriers to its effective implementation would be addressed, such as the manner in which tenants would be assisted in organizing themselves and raising the funds necessary to purchase a building. These challenges deserve attention in the HE.

B. Landlord/Tenant Mediation

Program 7A includes a landlord/tenant mediation component¹⁷. This is positive. However, it underscores the importance of a meaningful overall plan. Mediation is unlikely to address fundamental problems such as lower-income tenants being unable to afford rent.

V. Affirmatively Furthering Fair Housing

Glendale can also do better to affirmatively further fair housing (AFFH).

A. Failure to Reverse Patterns of De Facto Segregation

As we pointed out in our previous letters, the fundamental problem with Glendale's HE as it relates to AFFH, is the lack of upzoning. Without creating new housing opportunities in higher-opportunity areas, particularly for lower-income households, Glendale will be unable to reverse patterns of race and class-based de facto segregation and address income-based disparities in exposure to sources of pollution. Without action in this area Glendale's AFFH approach will remain inadequate and incomplete. Political challenges are not an excuse to ignore AFFH obligations.

B. Uplifting Historically Marginalized Neighborhoods

The other major domain of AFFH is ensuring that historically marginalized neighborhoods are uplifted through strategic investments, so that all neighborhoods can become areas of

¹⁶ Glendale Adopted Housing Element, Housing Plan, page 44.

¹⁷ Glendale Adopted Housing Element, Housing Plan, page 50.

opportunity. Here Glendale has been more responsive, incorporating several programmatic revisions attempting to tie investment to the areas that need it most. We see this for example in Program 1E (Adaptive Reuse), Program 1H (Alternative Adequate Sites), Program 2A (Multifamily Acquisition/Rehabilitation Loan Program) and others. Here, the concern is ensuring that Glendale follows through on its commitments and reports progress on these equity metrics, in addition to the overall metrics for each program, as part of its Annual Progress Reports.

VI. MapCraft Analysis

Abundant Housing LA commissioned an analysis of a previous draft of Glendale's HE, which was performed by MapCraft Inc. and published on 12/16/2021¹⁸. The analysis found that Glendale's expected housing capacity could fall short by between 1,500 and 3,000 units. Furthermore, MapCraft found that 30% of the units claimed in Glendale's sites inventory were "unreasonable" and 11% were "questionable." The analysis made the following recommendations:

- *Right-sizing claimed capacity on sites in the current site inventory, both by reducing expectations on many sites and by upzoning other sites. The city could revisit additional opportunities to rezone more parcels in the inventory, particularly in areas like the Vineyard, Mariposa, Pacific-Edison, and Grandview neighborhoods.*
- *Adding more sites to the site inventory and evaluating rezoning of those sites. The inventory includes 14% of the city's 6,700 parcels, so there are many places that could be explored further to address this potential shortfall.*
- *Reducing or eliminating parking requirements and promoting automobile alternatives to reduce households' demand for parking. If developers could meet household demand with fewer on-site parking stalls, it could make multifamily development in many parts of the City more economically feasible.*
- *Introducing new economic incentives to increase the financial feasibility of redevelopment, especially for projects that include below-market-rate units.*
- *Consider establishing development minimums to ensure high utilization of sites with feasible housing capacity.*

Conclusion

In closing, we wish to reflect on some of HCD's prior comments on the previously adopted HE¹⁹. On AFFH, more thorough analysis is needed, but also programs sufficient to make meaningful change on AFFH outcomes. As we have seen, one of the two major domains of AFFH action, expanding access to higher-opportunity neighborhoods, is not addressed, since the plan contemplates no upzoning of exclusionary neighborhoods. HCD noted more analysis is needed to justify the sites inventory methodology. Here we have criticized the assumption that sites in the inventory are 100% likely to develop during the planning period and the notion that

¹⁸ ["Abundant Housing LA Feedback on Glendale Housing Element."](#) MapCraft Inc.

¹⁹ Coy, Melinda (4/22/2022). ["RE: City of Glendale's 6th Cycle \(2021-2029\) Adopted Housing Element."](#) California Department of Housing and Community Development.

quantified objectives, even for market-rate housing, should be set so far below the City's RHNA. On governmental constraints, HCD highlighted several areas in need of improved analysis and we have criticized the City's high parking requirements and the vagueness of its constraint removal commitments, which are supposed to respond specifically to the constraints analysis. HCD noted that requiring more than one parking space for efficiency and one-bedroom units is excessive, and we agree.

Glendale has shown that it is capable of planning neighborhoods that are vibrant, walkable, and strengthened by abundant housing, especially Downtown and increasingly, near the Metrolink station. Glendale is one of the largest cities in Los Angeles County and a regional job center, with a RHNA of over 13,000 homes. Glendale is capable of producing an improved, legally-compliant housing element, and must do so. Please send the latest version of the plan back with a correction list.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

Leonora Camner

Leonora Camner
Executive Director
Abundant Housing LA

Sonja Trauss

Sonja Trauss
Executive Director
YIMBY Law

Letter Recipients

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Councilmember Elen Asatryan, easatryan@glendaleca.gov
Councilmember Ara Najarian, anajarian@glendaleca.gov
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City Manager, Roubik Golanian, rgolianian@glendaleca.gov
City Attorney, Michael J. Garcia, mjgarcia@glendaleca.gov
Director of Community Development, Bradley Calvert, bcalvert@glendaleca.gov

From: [\[REDACTED\]](#)
To: [\[REDACTED\]](#)
Subject: [REDACTED]
Date: Monday, January 30, 2023 10:37:30 PM
Attachments: [\[REDACTED\].pdf](#)

Ms. Prasad,

I want to bring your attention to a site which was included in Glendale's housing element as a proposed project under review for 180 low income (51-80% AMI) units. This site comprises five (5) parcels and is referred to in Table 65 of the housing element (see attached) as 110-132 N. Glendale Avenue. More specifically, in the Sites Inventory the addresses and parcel numbers for this proposed project are:

123 N Everett St (5674-006-009)
139 N Everett St (5674-006-011)
115 N Everett St (5674-006-013)
10 N Glendale Ave (5674-006-015)
123 N Glendale Ave (5674-006-016)

I checked the city's Planning Projects Map and found that there is no housing project under review at this site.
<https://glendalegeo.maps.arcgis.com/apps/OnTheMap/index.html?appid=263867783199ba5d078cd4bec911a1d1&lg=0&map=arcgis.com>

Moreover, the city's Director of Community Development, Bradley Calvert, confirmed by email to a Glendale resident (Karen Kwak), who inquired about the specifics of this purported pipeline project, that the city currently does not have any proposal for a project on that site. With Ms. Kwak's permission, I have forwarded her correspondence with Mr. Calvert to evidence that no plan has been proposed to the city by the owner of the property listed above for the development of residential units at this site, much less 180 low income housing units.

I first became suspicious about this site when I noticed it was entirely low income, instead of the usual 15% or 20% proposed by builders in order to apply for a density bonus and development standard waivers and concessions under state housing laws. A 100% affordable housing project by a private builder seemed unlikely. Sure enough, it turns out it is not even happening! This fraudulent act by the city should be grounds for HCD to illegal and rescind the permit. As I have mentioned in my previous comments, Glendale is desperately trying to avoid rezoning by falsely claiming, using a Sites Inventory consisting of dummy sites, that under current zoning the city has sufficient underutilized sites available to meet its RHNA for all income categories. Now we have learned that they even knowingly fabricated a 180 unit low income pipeline project to deceive the state in this regard.

As you complete your review of Glendale's amended housing element, I urge you to scrutinize all sites identified for the lower income category. I extracted the Sites Inventory from the housing element as a separate PDF file and highlighted all parcels which I believe will not be available for residential redevelopment during the 2021-2029 planning period. The burden of proof is on the city to produce findings based on substantial evidence to show otherwise. Without rezoning, Glendale will not be able to produce a housing element that is compliant with state housing element law.

Thank you,
Alex Kharachaturian

----- Forwarded message -----

From: Karen Kwak <karen.kwak@benton.com>

Date: Mon, Jan 30, 2023 at 2:46 PM

Subject: Housing project at 110-132 N. Glendale?

To: Calvert, Bradley <BCalvert@GlendaleCA.gov>

Thanks for the info.

On Mon, Jan 30, 2023 at 7:03 AM Calvert, Bradley <BCalvert@GlendaleCA.gov> wrote:

Karen,

We do not currently have any proposal for a project on that site as of today.

Bradley Calvert, AICP | Director of Community Development | City of Glendale | Community Development

633 E Broadway Room 101 | Glendale, CA 91206 | 818-548-2115

BCalvert@GlendaleCA.gov | www.gla.org | [chooseglendaleca.com](http://www.chooseglendaleca.com) | Connect With Us!

-----Original Message-----

From: spark 18 <spark18@benton.com>

Sent: Monday, January 30, 2023 10:37 AM

To: Calvert, Bradley <BCalvert@GlendaleCA.gov>

Subject: Housing project at 110-132 N. Glendale?

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr Calvert,

I heard that Murray Pepper, the husband of a former Beverly Hills mayor who was found to be a slumlord, purchased the property at 110-132 N. Glendale, which is currently a Dollar Tree store, a Chipotle (where I once bought a burrito), and some parking lots. According to the Housing Element, this property can turn into 180 units of affordable housing.

Do you know if this project is in the pipeline? Or can you direct us to the appropriate staff member who would have this information?

This property is very close to City Hall, so you see why we would not want a slumlord to build housing there. Then again, that could be fun.

Thanks,

Karen Kwak

Beverly Hills Mayor Under Fire Since

https://www.ocregister.com/stories/272717/www_impero.com/0274ac3bea0271a.aspx?2000-01-11-mic-34388.aspx&link_id=10217017&chksm=4e1d15c17a510dbd7f7d76d0a08807c7c411511bc-342116c01a4bc-799b465c739575093c438106866098495155

Property Officials say she died by fire in squishy Phoenix apartments to a 'local charity' without making promised repairs.

Sent from my iPhone

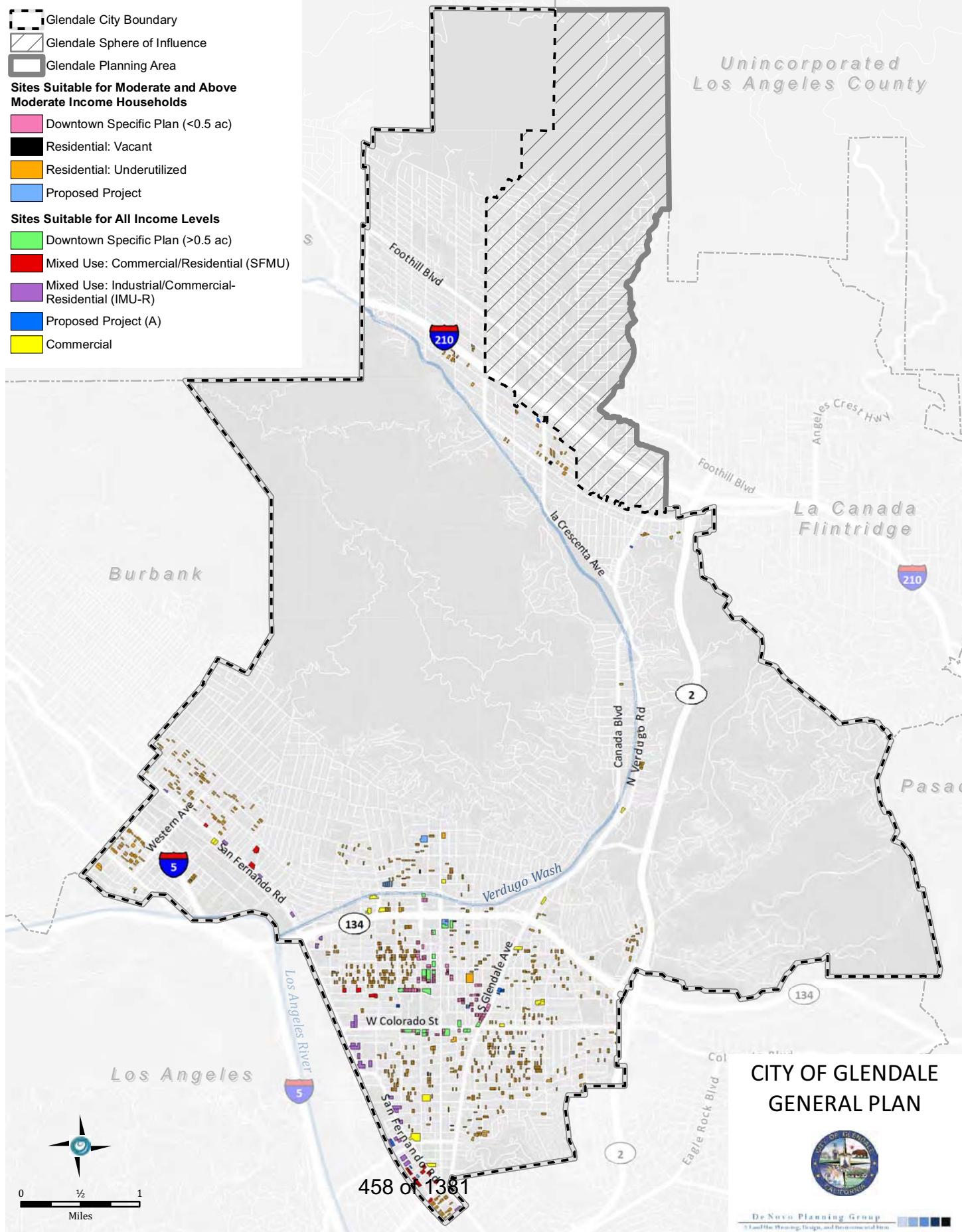
- 1) Proposed projects;
- 2) Accessory dwelling units;
- 3) Vacant residential sites;
- 4) Underutilized sites in residential areas;
- 5) Underutilized sites in mixed-use areas;
- 6) **Underutilized sites in commercial areas; and**
- 7) Sites in the Downtown Specific Plan area.

As described throughout this section, the City has sufficient land appropriately zoned for residential uses throughout the community to accommodate its RHNA allocation for the 2021-2029 planning period. Moreover, Glendale has a proven track record of supporting development of affordable housing, working with affordable housing developers, promoting home types that are affordable to lower-income households, including multifamily projects and mixed-use developments, and addressing needs of the community's vulnerable populations, including seniors. The City will continue to implement its Inclusionary Zoning Ordinance to ensure the production of affordable units. Sites designated to accommodate the City's RHNA allocation for the 2021-2029 planning period are illustrated on Figure 3: Proposed Housing Element Sites, [Housing Sites Inventory](#), and detailed in Appendix A.

1. Proposed Projects

As of December 2021, ~~The~~ the City is currently reviewing [11-1619 multifamily](#) projects [and 54 single-family development applications](#) which would result in the production of [503-7821,141 new units](#) (in total, the proposed projects include 1,209 units but there are 63 units existing at these sites for a total net increase of 1,141 new units), including [a net of 34 new](#) units affordable to [very](#) lower-income households (these will be deed-restricted), [207 new units affordable to lower-income households \(these will be deed-restricted\)](#), [61 units affordable to moderate-income households](#), and [900 new](#) units affordable to above-moderate income households.

Figure 3. Proposed Housing Element Sites



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Table 65: *Credits Towards the RHNA Proposed Projects*

Proposed Project	Extremely and Very Low income (0-50% AMI)	Low income (51-80% AMI)	Moderate income (81-120% AMI)	Above Moderate income (121%+ AMI)	Total
126-132 S Kenwood St				42	42
620 N Brand Blvd/625 N Maryland				294	294
401-409 Hawthorne St	5			<u>2320</u>	<u>2825</u>
452 W Milford	2			15	17
534 N Kenwood				11	11
1642 S Central Ave	3		<u>28</u>	<u>28</u>	31
822 E Chesnut St		4		<u>4213</u>	13
1242 S Maryland	4			<u>4112</u>	12
526 Hazel St	2		<u>15</u>	<u>15</u>	17
3450 N Verdugo	4		<u>18</u>	<u>18</u>	22
<u>238 Concord</u>				<u>13</u>	<u>13</u>
<u>345 W Cerritos</u>				<u>44</u>	<u>44</u>
<u>246 N Jackson</u>				<u>11</u>	<u>11</u>
<u>441-445 W Glenoaks</u>				<u>27</u>	<u>27</u>
<u>1303 N Central</u>	<u>10</u>	<u>3</u>		<u>102</u>	<u>115</u>
400 N Maryland	4			24	28
2817 Montrose Ave	4			<u>38</u>	<u>42</u>
→ <u>110-132 N Glendale Ave</u>		<u>180</u>		0	<u>180</u>
<u>444 W Cypress</u>		<u>24</u>		<u>187</u>	<u>211</u>
<u>Various Single Family Applications</u>				<u>54</u>	<u>54</u>
Total	192034	40207	75640	968408704	5037821,209
Existing Units at Proposed Project Locations	0	0	0	68	68
Net Increase in Units	34	207	0	900	1,141

Source: City of Glendale, December 2021



APPENDIX A: SITE INVENTORY

Adopted February 2022
Revised November 2022

**Please Start Here, Instructions in Cell A2, Table in
A3:B17**

Form Fields

Site Inventory Forms must be submitted to HCD for a housing element or amendment adopted on or after January 1, 2021. The following form is to be used for satisfying this requirement. To submit the form, complete the Excel spreadsheet and submit to HCD at sitesinventory@hcd.ca.gov. Please send the Excel workbook, not a scanned or PDF copy of the tables.

General Information	
Jurisdiction Name	GLENDALE
Housing Element Cycle	6th
Contact Information	
First Name	Erik
Last Name	Krause
Title	Deputy Director of Community Development
Email	ekrause@glendaleca.gov
Phone	(818) 937-8156
Mailing Address	
Street Address	<u>633 East Broadway, Room 103</u>
City	GLENDALE
Zip Code	91206
Website	
	https://www.glendaleca.gov/

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

For Los Angeles County jurisdictions, please format the APN's as follows: 9999-999-999

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
GLENDALE	511 N CENTRAL AVE	91203	5637-003-048		DSP	DSP/TD	0	0	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	8	8	16	Downtown Specific Plan	Residential: 12 units	0; 0.57
GLENDALE	501 N CENTRAL AVE	91203	5637-003-050		DSP	DSP/TD	0	0	0.18	Commercial	YES - Current	NO - Privately-Owned	Available		0	13	13	26	Downtown Specific Plan	5,671 SF Commercial (1-story)	0.72; 0.34
GLENDALE	505 N CENTRAL AVE	91203	5637-003-052		DSP	DSP/TD	0	0	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	5	5	10	Downtown Specific Plan	Residential: 17 units	0; 0.35
GLENDALE	405 N CENTRAL AVE	91203	5637-004-046		DSP	DSP/TD	0	0	0.18	Parking	YES - Current	NO - Privately-Owned	Available		0	13	13	26	Downtown Specific Plan	Surface parking lot	0; 0
GLENDALE	401 N CENTRAL AVE	91203	5637-004-047		DSP	DSP/TD	0	0	0.19	Commercial	YES - Current	NO - Privately-Owned	Available		0	14	14	28	Downtown Specific Plan	4,698 SF Commercial (1-story)	0.56; 0.01
GLENDALE	333 N CENTRAL AVE	91203	5637-005-040		DSP	DSP/TD	0	0	0.47	Commercial	YES - Current	NO - Privately-Owned	Available		0	33	33	66	Downtown Specific Plan	18,600 SF Commercial (1-story)	0.91; 0.04
GLENDALE	343 N CENTRAL AVE	91203	5637-005-044		DSP	DSP/TD	0	0	0.45	Commercial	YES - Current	NO - Privately-Owned	Available		0	32	32	64	Downtown Specific Plan	6,289 SF Commercial (1-story)	0.32; 0.78
GLENDALE	221 N CENTRAL AVE	91203	5637-008-001		DSP	DSP/TD	0	0	0.22	Commercial	YES - Current	NO - Privately-Owned	Available		0	16	16	32	Downtown Specific Plan	7,450 SF Commercial (1-story)	0.77; 0.4
GLENDALE	215 N CENTRAL AVE	91203	5637-008-081		DSP	DSP/TD	0	0	0.14	Commercial	YES - Current	NO - Privately-Owned	Available		0	10	10	20	Downtown Specific Plan	4,790 SF Commercial (1-story)	0.79; 0.5
GLENDALE	205 N CENTRAL AVE	91203	5637-008-096		DSP	DSP/TD	0	0	0.43	Commercial	YES - Current	NO - Privately-Owned	Available		0	30	30	60	Downtown Specific Plan	12,321 SF Commercial (1-story)	0.66; 1.47
GLENDALE	107 N CENTRAL AVE	91203	5637-009-006		DSP	DSP/TD	0	0	0.19	Commercial	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	4,884 SF Commercial (1-story)	0.74; 1.11
GLENDALE	101 N CENTRAL AVE	91203	5637-009-007		DSP	DSP/TD	0	0	0.12	Commercial	YES - Current	NO - Privately-Owned	Available		0	9	9	18	Downtown Specific Plan	9,372 SF Commercial (2-story)	1.76; 1.1
GLENDALE	333 W BROADWAY	91204	5637-009-012		DSP	DSP/TD	0	0	0.19	Commercial	YES - Current	NO - Privately-Owned	Available		0	13	13	26	Downtown Specific Plan	11,014 SF Commercial (2-story)	1.33; 2
GLENDALE	335 W BROADWAY	91204	5637-009-013		DSP	DSP/TD	0	0	0.19	Commercial	YES - Current	NO - Privately-Owned	Available		0	13	13	26	Downtown Specific Plan	2,600 SF Commercial (1-story)	0.31; 0.54
GLENDALE	341 W BROADWAY	91204	5637-009-014		DSP	DSP/TD	0	0	0.19	Parking	YES - Current	NO - Privately-Owned	Available		0	13	13	26	Downtown Specific Plan	Surface parking lot	0; 0.01
GLENDALE	343 W BROADWAY	91204	5637-009-015		DSP	DSP/TD	0	0	0.19	Parking	YES - Current	NO - Privately-Owned	Available		0	13	13	26	Downtown Specific Plan	Surface parking lot	0; 0
GLENDALE	347 W BROADWAY	91204	5637-009-016		DSP	DSP/TD	0	0	0.19	Parking	YES - Current	NO - Privately-Owned	Available		0	13	13	26	Downtown Specific Plan	Surface parking lot	0; 0
GLENDALE	351 W BROADWAY	91204	5637-009-017		DSP	DSP/TD	0	0	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	12	12	24	Downtown Specific Plan	Residential: 3 units	0; 0.19
GLENDALE	353 W BROADWAY	91204	5637-009-018		DSP	DSP/TD	0	0	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	Residential: 5 units	0; 0.78
GLENDALE	325 W BROADWAY	91204	5637-009-030		DSP	DSP/TD	0	0	0.38	Commercial	YES - Current	NO - Privately-Owned	Available		0	27	27	54	Downtown Specific Plan	18,928 SF Commercial (2-story)	1.15; 1.55
GLENDALE	357 W BROADWAY	91204	5637-009-031		DSP	DSP/TD	0	0	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	Residential: 5 units	0; 0.2
GLENDALE	112 N COLUMBUS AVE	91203	5637-009-037		DSP	DSP/TD	0	0	0.06	Residential	YES - Current	NO - Privately-Owned	Available		0	4	4	8	Downtown Specific Plan	Residential: 1 unit	0; 0.06
GLENDALE	111 N CENTRAL AVE	91203	5637-009-052		DSP	DSP/TD	0	0	0.16	Commercial	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	3,006 SF Commercial (1-story)	0.43; 0.44
GLENDALE	313 W BROADWAY	91204	5637-009-064		DSP	DSP/TD	0	0	0.4	Commercial	YES - Current	NO - Privately-Owned	Available		0	28	28	56	Downtown Specific Plan	6,025 SF Commercial (1-story)	0.35; 0.32
GLENDALE	319 S BRAND BLVD	91204	5641-001-001		DSP	DSP/TD	0	0	0.18	Commercial	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	4,910 SF Commercial (1-story)	0.7; 0.46
GLENDALE	317 S BRAND BLVD	91204	5641-001-002		DSP	DSP/TD	0	0	0.16	Commercial	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	5,650 SF Commercial (1-story)	0.81; 0.75
GLENDALE	121 W ELK AVE	91204	5641-001-003		DSP	DSP/TD	0	0	0.11	Parking	YES - Current	NO - Privately-Owned	Available		0	8	8	16	Downtown Specific Plan	Surface parking lot	1; 0.01
GLENDALE	210 W COLORADO ST	91204	5641-001-011		DSP	DSP/TD	0	0	0.34	Commercial	YES - Current	NO - Privately-Owned	Available		0	24	24	48	Downtown Specific Plan	1,980 SF Commercial (1-story)	0.13; 0.45
GLENDALE	215 W ELK AVE	91204	5641-001-017		DSP	DSP/TD	0	0	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	Residential: 1 unit	0; 0.55
GLENDALE	213 W ELK AVE	91204	5641-001-018		DSP	DSP/TD	0	0	0.17	Parking	YES - Current	NO - Privately-Owned	Available		0	12	12	24	Downtown Specific Plan	Parking Lots (Commercial Use)	0; 0
GLENDALE	300 S BRAND BLVD	91204	5641-003-001		DSP	DSP/TD	0	0	0.41	Commercial	YES - Current	NO - Privately-Owned	Available		0	29	29	58	Downtown Specific Plan	17,000 SF Commercial (2-story)	0.99; 0.69
GLENDALE	318 S BRAND BLVD	91204	5641-003-003		DSP	DSP/TD	0	0	0.11	Commercial	YES - Current	NO - Privately-Owned	Available		0	8	8	16	Downtown Specific Plan	2,700 SF Commercial (1-story)	0.55; 0.47
GLENDALE	320 S BRAND BLVD	91204	5641-003-004		DSP	DSP/TD	0	0	0.25	Commercial	YES - Current	NO - Privately-Owned	Available		0	18	18	36	Downtown Specific Plan	393 SF Commercial (1-story)	0.04; 0.01
GLENDALE	300 E COLORADO ST	91205	5642-004-040		DSP	DSP/EB	0	0	0.38	Commercial	YES - Current	NO - Privately-Owned	Available		0	27	27	54	Downtown Specific Plan	4,988 SF Commercial Gym	0.3; 0.54
GLENDALE	103 S KENWOOD ST	91205	5642-004-042		DSP	DSP/EB	0	0	0.18	Commercial	YES - Current	NO - Privately-Owned	Available		0	13	13	26	Downtown Specific Plan	1-story Commercial (3 bldgs)	0.76; 0.46
GLENDALE	320 E BROADWAY	91205	5642-004-023		DSP	DSP/EB	0	0	0.09	Commercial	YES - Current	NO - Privately-Owned	Available		0	6	6	12	Downtown Specific Plan	984 SF Commercial (1-story)	0.26; 0.2
GLENDALE	318 E BROADWAY	91205	5642-004-024		DSP	DSP/EB	0	0	0.09	Commercial	YES - Current	NO - Privately-Owned	Available		0	6	6	12	Downtown Specific Plan	1,560 SF Commercial (1-story)	0.41; 0.07
GLENDALE	316 E BROADWAY	91205	5642-004-025		DSP	DSP/EB	0	0	0.17	Commercial	YES - Current	NO - Privately-Owned	Available		0	12	12</				

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
GLENDALE	N MARYLAND AVE/E CALIFORNIA	91203	5642-016-906		DSP	DSP/TD	0	0	0.15	Parking	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	Surface parking lot	0; 0
GLENDALE	W DORAN ST/N ORANGE ST	91203	5643-001-064		DSP	DSP/GAT	0	0	0.31	Commercial	YES - Current	NO - Privately-Owned	Available		0	22	22	44	Downtown Specific Plan	486 SF Commercial (1-story)	0.04; 0.1
GLENDALE	418 N CENTRAL AVE	91203	5643-003-036		DSP	DSP/OC	0	0	0.39	Commercial	YES - Current	NO - Privately-Owned	Available		0	28	28	56	Downtown Specific Plan	10,507 SF Commercial (2-story)	1.19; 0.41
GLENDALE	303 N MARYLAND AVE	91206	5643-019-900		DSP	DSP/TD	0	0	0.48	Parking	YES - Current	NO - Privately-Owned	Available		0	36	36	72	Downtown Specific Plan	Surface parking lot	0; 0
GLENDALE	340 N CENTRAL AVE	91203	5643-020-029		DSP	DSP/OC	0	0	0.21	Parking	YES - Current	NO - Privately-Owned	Available		0	15	15	30	Downtown Specific Plan	Surface parking lot	0.99; 0
GLENDALE	336 N CENTRAL AVE	91203	5643-020-03		DSP	DSP/OC	0	0	0.21	Commercial	YES - Current	NO - Privately-Owned	Available		0	15	15	30	Downtown Specific Plan	5,810 SF Commercial (2-story)	0.64; 0.29
GLENDALE	334 N CENTRAL AVE	91203	5643-020-03		DSP	DSP/OC	0	0	0.2	Commercial	YES - Current	NO - Privately-Owned	Available		0	14	14	28	Downtown Specific Plan	4,892 SF Commercial (2-story)	0.55; 0.28
GLENDALE	330 N CENTRAL AVE	91203	5643-020-032		DSP	DSP/OC	0	0	0.21	Commercial	YES - Current	NO - Privately-Owned	Available		0	15	15	30	Downtown Specific Plan	2,432 SF Commercial (1-story)	0.33; 0.78
GLENDALE	201 W CALIFORNIA AVE	91203	5643-020-038		DSP	DSP/OC	0	0	0.22	Commercial	YES - Current	NO - Privately-Owned	Available		0	16	16	32	Downtown Specific Plan	12,405 SF Commercial (1-story)	1.49; 0.14
GLENDALE	309 N ORANGE ST	91203	5643-020-039		DSP	DSP/OC	0	0	0.42	Commercial	YES - Current	NO - Privately-Owned	Available		0	30	30	60	Downtown Specific Plan	10,000 SF Commercial (1-story)	1.02; 0
GLENDALE	208 ARDEN AVE APT-000D	91203	5644-003-033		DSP	DSP/GAT	0	0	0.17	Parking	YES - Current	NO - Privately-Owned	Available		0	12	12	24	Downtown Specific Plan	Surface parking lot	1.01; 0.02
GLENDALE	212 ARDEN AVE	91203	5644-003-073		DSP	DSP/GAT	0	0	0.33	Commercial	YES - Current	NO - Privately-Owned	Available		0	23	23	48	Downtown Specific Plan	5,688 SF Commercial (1-story)	0.39; 1.75
GLENDALE	820 N CENTRAL AVE	91203	5644-003-081		DSP	DSP/GAT	0	0	0.33	Parking	YES - Current	NO - Privately-Owned	Available		0	23	23	48	Downtown Specific Plan	Surface parking lot	0.39; 0
GLENDALE	313 S CENTRAL AVE	91204	5696-004-003		DSP	DSP/TD	0	0	0.16	Commercial	YES - Current	NO - Privately-Owned	Available		0	12	12	24	Downtown Specific Plan	1,700 SF Commercial (1-story)	0.24; 0.24
GLENDALE	356 W COLORADO ST	91204	5696-004-016		DSP	DSP/TD	0	0	0.14	Commercial	YES - Current	NO - Privately-Owned	Available		0	10	10	20	Downtown Specific Plan	4,400 SF Commercial (2-story)	0.71; 0.95
GLENDALE	360 W COLORADO ST	91204	5696-004-017		DSP	DSP/TD	0	0	0.14	Commercial	YES - Current	NO - Privately-Owned	Available		0	10	10	20	Downtown Specific Plan	950 SF Commercial (1-story)	0.15; 0.11
GLENDALE	364 W COLORADO ST	91204	5696-004-018		DSP	DSP/TD	0	0	0.14	Commercial	YES - Current	NO - Privately-Owned	Available		0	10	10	20	Downtown Specific Plan	3,558 SF Commercial (1-story)	0.57; 0.09
GLENDALE	318 W COLORADO ST	91204	5696-004-040		DSP	DSP/TD	0	0	0.41	Commercial	YES - Current	NO - Privately-Owned	Available		0	29	29	58	Downtown Specific Plan	11,132 SF Commercial (1-story)	0.62; 0.94
GLENDALE	333 S CENTRAL AVE	91204	5696-004-04		DSP	DSP/TD	0	0	0.16	Commercial	YES - Current	NO - Privately-Owned	Available		0	11	11	22	Downtown Specific Plan	7,000 SF Commercial (2-story)	1; 0.27
GLENDALE	108 N COLUMBUS AVE	91203	5637-009-076		DSP	DSP/TD	0	0	0.78	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	111	0	0	111	Downtown Specific Plan (A)	6,108 SF Commercial (1-story)	0.18; 0.28
GLENDALE	320 S CENTRAL AVE	91204	5641-001-027		DSP	DSP/TD	0	0	0.59	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	84	0	0	84	Downtown Specific Plan (A)	10,875 SF Commercial Strip Mall	0.42; 0.77
GLENDALE	300 S CENTRAL AVE	91204	5641-001-028		DSP	DSP/TD	0	0	0.6	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	85	0	0	85	Downtown Specific Plan (A)	9,921 SF Commercial Strip Mall	0.38; 0.11
GLENDALE	120 E COLORADO ST	91205	5641-003-022		DSP	DSP/TD	0	0	1.38	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	196	0	0	196	Downtown Specific Plan (A)	9,360 SF Commercial (1-story)	0.16; 0.13
GLENDALE	406 E COLORADO ST	91205	5641-004-007		DSP	DSP/EB	0	0	0.56	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	79	0	0	79	Downtown Specific Plan (A)	7,840 SF Medical Office 1-story	0.32; 1.5
GLENDALE	326 E COLORADO ST	91205	5641-004-008		DSP	DSP/EB	0	0	0.52	Hotel/motel	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	74	0	0	74	Downtown Specific Plan (A)	12,344 SF Motel 41 rooms 2-story	0.55; 1.5
GLENDALE	225 W BROADWAY	91204	5642-002-056		DSP	DSP/BC	0	0	1.78	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	250	0	0	250	Downtown Specific Plan (A)	121,948 SF Office - 5 stories	1.59; 1.62
GLENDALE	503 E COLORADO ST	91205	5642-009-034		DSP	DSP/EB	0	0	0.74	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	105	0	0	105	Downtown Specific Plan (A)	12,497 SF Commercial (1-story)	0.39; 0
GLENDALE	305 E COLORADO ST	91205	5642-010-050		DSP	DSP/EB	0	0	1.03	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	147	0	0	147	Downtown Specific Plan (A)	Surface Parking Lot	1; 0.06
GLENDALE	212 W CALIFORNIA AVE	91203	5642-015-045		DSP	DSP/OC	0	0	1.88	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	265	0	0	265	Downtown Specific Plan (A)	164,308 SF Parking Structure	2.01; 0.16
GLENDALE	236 N CENTRAL AVE	91203	5642-015-058		DSP	DSP/OC	0	0	1.28	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	178	0	0	178	Downtown Specific Plan (A)	172,254 SF Commercial (multi-story)	3.15; 0.95
GLENDALE	232 N ORANGE ST	91203	5642-016-900		DSP	DSP/MO	0	0	0.52	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	74	0	0	74	Downtown Specific Plan (A)	Orange Street Garage	0; 0
GLENDALE	116 W DORAN ST	91203	5643-001-040		DSP	DSP/GAT	0	0	0.58	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	82	0	0	82	Downtown Specific Plan (A)	Parking Garage	1.88; 1.36
GLENDALE	600 N BRAND BLVD	91203	5643-018-084		DSP	DSP/GAT	0	0	1.08	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	154	0	0	154	Downtown Specific Plan (A)	92,269 SF Commercial (Multi-story)	2.52; 3.35
GLENDALE	600 N MARYLAND AVE	91206	5643-018-085		DSP	DSP/GAT	0	0	1.14	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	162	0	0	162	Downtown Specific Plan (A)	Parking Garage	1.7; 0.6
GLENDALE	340 N ORANGE ST	91203	5643-020-036		DSP	DSP/MO	0	0	0.7	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	100	0	0	100	Downtown Specific Plan (A)	Parking Garage	1; 0.32
GLENDALE	W CALIFORNIA AVEN ORANGE ST	91203	5643-020-906		DSP	DSP/MO	0	0	0.9	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	128	0	0	128	Downtown Specific Plan (A)	Surface Parking Lot	0; 0
GLENDALE	900 N CENTRAL AVE	91203	5644-013-043		DSP	DSP/GAT	0	0	0.52	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Hol	74	0	0	74	Downtown Specific Plan (A)	9,081 SF Commercial (1-story)	0.4; 3.17
GLENDALE	300 W COLORADO ST	91204	5696-004-039		DSP																

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
GLENDALE	534 N KENWOOD ST	91206	5643-007-004		High Density	R 1250	0	35	0.17	Residential	YES - Current	NO - Privately-Owned	Pending Project		0	0	11	Proposed Project	Residential; 2 units	0; 0.29	
GLENDALE	625 N MARYLAND AVE	91206	5643-018-031	DSP	DSP/GAT	R 2250	0	0	0.16	Commercial	YES - Current	NO - Privately-Owned	Pending Project		0	0	31	Proposed Project	Office Buildings	0.74; 0.57	
GLENDALE	620 N BRAND BLVD	91203	5643-018-032	DSP	DSP/GAT	R 2250	0	0	1.35	Commercial	YES - Current	NO - Privately-Owned	Pending Project		0	0	263	Proposed Project	Banks Savings & Loan	1.78; 0.3	
GLENDALE	3450 N VERDUGO RD	91206	5613-007-011		Commercial Service C3 I	R 2250	0	43	0.21	Commercial	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	4	0	18	Proposed Project (A)	Office Buildings	0.84; 0.92	
GLENDALE	526 HAZEL ST	91201	5627-014-009		Medium Density	R 2250	0	19	0.09	Residential	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	2	0	15	17 Proposed Project (A)	Residential; 3 units	0; 0.25	
GLENDALE	452 MILFORD ST	91203	5637-020-006		Medium High Density	R 1650	0	26	0.16	Residential	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	2	0	15	17 Proposed Project (A)	Residential; 3 units	0; 0.25	
GLENDALE	S MARYLAND AVE/E CYPRESS ST	91205	5640-015-044		Medium Density	R 2250 P	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Pending Project		0	0	12	12 Proposed Project (A)	Residential; 0 units	0; 0	
GLENDALE	1642 S CENTRAL AVE	91204	5640-029-014		Mixed Use	SFMU	0	100	0.23	Residential	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	3	0	28	31 Proposed Project (A)	Residential; 2 units	0; 0.15	
GLENDALE	400 N MARYLAND AVE	91206	5643-005-032	DSP	R 1250	R 2250	0	35	0.25	Residential	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	4	0	24	28 Proposed Project (A)	Residential; 4 units	0; 0.09	
GLENDALE	822 E CHESTNUT ST	91205	5675-008-014		Medium Density	R 2250	0	19	0.28	Residential	YES - Current	NO - Privately-Owned	Pending Project		0	0	13	13 Proposed Project (A)	Residential; 1 unit	0; 0.25	
GLENDALE	409 HAWTHORNE ST	91204	5695-007-037		High Density	R 1250	0	35	0.15	Residential	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	2	0	7	9 Proposed Project (A)	Residential; 1 unit	0; 0.44	
GLENDALE	105 HAWTHORNE ST	91204	5695-007-038		High Density	R 1250	0	35	0.14	Residential	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	2	0	7	9 Proposed Project (A)	Residential; 2 units	0; 0.65	
GLENDALE	401 HAWTHORNE ST	91204	5695-007-039		High Density	R 1250	0	35	0.14	Residential	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	1	0	6	7 Proposed Project (A)	Residential; 2 units	0; 0.66	
GLENDALE	3244 ALTURA AVE	91214	5606-011-041		Medium Density	R 2250	0	19	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3 Residential; Underutilized	Residential; 1 unit	0; 0.55	
GLENDALE	3254 ALTURA AVE	91214	5606-011-063		Medium Density	R 2250	0	19	0.22	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3 Residential; Underutilized	Residential; 1 unit	0; 0.38	
GLENDALE	3315 MONTROSE AVE	91214	5607-001-016		Moderate Density	R 3050	0	14	0.18	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 0.42	
GLENDALE	3361 MONTROSE AVE	91214	5607-001-027		Moderate Density	R 3050	0	14	0.18	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 0.25	
GLENDALE	3442 MONTROSE AVE	91214	5607-004-017		Moderate Density	R 3050	0	14	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 0.86	
GLENDALE	3406 MONTROSE AVE	91214	5607-004-025		Moderate Density	R 3050	0	14	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 0.91	
GLENDALE	3402 MONTROSE AVE	91214	5607-004-026		Moderate Density	R 3050	0	14	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 1.37	
GLENDALE	4025 NEW YORK AVE	91214	5607-004-028		Moderate Density	R 3050	0	14	0.22	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 0.19	
GLENDALE	3405 MONTROSE AVE	91214	5607-004-029		Moderate Density	R 3050	0	14	0.22	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 0.28	
GLENDALE	3422 MONTROSE AVE	91214	5607-004-046		Moderate Density	R 3050	0	14	0.36	Residential	YES - Current	NO - Privately-Owned	Available		0	0	4	4 Residential; Underutilized	Residential; 1 unit	0; 0.62	
GLENDALE	4115 NEW YORK AVE	91214	5607-004-051		Moderate Density	R 3050	0	14	0.2	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 1	
GLENDALE	3242 HONOLULU AVE	91214	5607-016-001		Moderate Density	R 3050	0	14	0.34	Residential	YES - Current	NO - Privately-Owned	Available		0	0	5	5 Residential; Underutilized	Residential; 0 units	0; 0.25; 0.16	
GLENDALE	4030 RAMSDELL AVE	91214	5610-012-020		Medium High Density	R 1650	0	26	0.18	Residential	YES - Current	NO - Privately-Owned	Available		0	0	4	4 Residential; Underutilized	Residential; 1 unit	0; 0.03	
GLENDALE	4024 RAMSDELL AVE	91214	5610-012-021		Medium High Density	R 1650	0	26	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3 Residential; Underutilized	Residential; 1 unit	0; 1.39	
GLENDALE	2820 HERMOSA AVE	91214	5610-016-049		Medium High Density	R 1650	0	26	0.18	Residential	YES - Current	NO - Privately-Owned	Available		0	0	4	4 Residential; Underutilized	Residential; 1 unit	0; 0.94	
GLENDALE	2810 HERMOSA AVE	91214	5610-016-052		Medium High Density	R 1650	0	26	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3 Residential; Underutilized	Residential; 1 unit	0; 0.28	
GLENDALE	2810 PIEDMONT AVE	91214	5610-017-030		Medium High Density	R 1650	0	26	0.22	Residential	YES - Current	NO - Privately-Owned	Available		0	0	5	5 Residential; Underutilized	Residential; 1 unit	0; 0.25	
GLENDALE	2824 MONTROSE AVE	91214	5610-019-036		Medium High Density	R 1650	0	26	0.32	Residential	YES - Current	NO - Privately-Owned	Available		0	0	7	7 Residential; Underutilized	Residential; 1 unit	0; 0.33	
GLENDALE	4142 LA CRESCENTA AVE	91214	5610-021-044		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 0.14	
GLENDALE	4122 LA CRESCENTA AVE	91214	5610-021-047		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2 Residential; Underutilized	Residential; 1 unit	0; 0.13	
GLENDALE	2677 PIEDMONT AVE	91202	5610-022-047		Medium High Density	R 1650	0	26	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	0	4	4 Residential; Underutilized	Residential; 1 unit	0; 0.43	
GLENDALE	2720 MUNROE AVE	91202	5610-022-074		Medium High Density	R 1650	0	26	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	0	5	5 Residential; Underutilized	Residential; 0 units	0; 0.14; 2.32	
GLENDALE	2726 PIEDMONT AVE	91202	5610-023-006		Medium High Density	R 1650	0	26	0.44	Residential	YES - Current	NO - Privately-Owned	Available		0	0	10	10 Residential; Underutilized	Residential; 3 units	0; 0.07	
GLENDALE	2738 PIEDMONT AVE	91202	5610-023-063		Medium High Density	R 1650	0	26	0.45	Residential	YES - Current	NO - Privately-Owned	Available		0	0	11	11 Residential; Underutilized	Residential; 3 units	0; 0.22	
GLENDALE	2719 HERMOSA AVE	91202	5610-023-074		Moderate Density	R 3050	0	14	0.25	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3 Residential; Underutilized	Residential; 1 unit	0; 0.54	
GLENDALE	2701 HERMOSA AVE	91202	5610-023-078</																		

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
GLENDALE	1123 RAYMOND AVE	91201	5623-019-027		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.51
GLENDALE	1121 RAYMOND AVE	91201	5623-019-028		Medium Density	R 2250	0	19	0.15	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1039 RAYMOND AVE	91201	5623-021-011		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.36
GLENDALE	1045 RAYMOND AVE	91201	5623-021-013		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 1.3
GLENDALE	1053 RAYMOND AVE	91201	5623-021-015		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.43
GLENDALE	1057 RAYMOND AVE	91201	5623-021-016		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1017 RAYMOND AVE	91201	5623-021-032		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.27
GLENDALE	1021 WESTERN AVE	91201	5623-023-023		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1042 RAYMOND AVE	91201	5623-024-009		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1038 RAYMOND AVE	91201	5623-024-010		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.38
GLENDALE	1050 WESTERN AVE	91201	5623-025-022		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.42
GLENDALE	1020 WESTERN AVE	91201	5623-026-041		Medium Density	R 2250	0	19	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.86
GLENDALE	1052 WINCHESTER AVE	91201	5623-026-032		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 1.17
GLENDALE	1043 RUBERTA AVE	91201	5623-027-011		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 1.86
GLENDALE	1041 RUBERTA AVE	91201	5623-027-012		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.33
GLENDALE	1037 RUBERTA AVE	91201	5623-027-013		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.46
GLENDALE	1042 JUSTIN AVE	91201	5623-027-027		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.54
GLENDALE	1053 SONORA AVE	91201	5623-029-043		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.42
GLENDALE	1049 SONORA AVE	91201	5623-029-044		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.35
GLENDALE	1043 SONORA AVE	91201	5623-029-045		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.89
GLENDALE	1036 RUBERTA AVE	91201	5623-029-046		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.53
GLENDALE	1040 RUBERTA AVE	91201	5623-029-049		Medium Density	R 2250	0	19	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1058 RUBERTA AVE	91201	5623-029-054		Medium Density	R 2250	0	19	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 0 units	0; 11; 0
GLENDALE	1016 SONORA AVE	91201	5623-030-012		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.48
GLENDALE	1014 SONORA AVE	91201	5623-030-013		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.67
GLENDALE	1034 SONORA AVE	91201	5623-031-027		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.17
GLENDALE	1010 SPAZIER AVE	91201	5624-003-049		Medium Density	R 2250	0	19	0.22	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.33
GLENDALE	1061 LINDEN AVE	91201	5624-006-006		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.45
GLENDALE	1063 ALLEN AVE	91201	5624-008-028		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 1.28
GLENDALE	1065 ALLEN AVE	91201	5624-008-029		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1084 LINDEN AVE	91201	5624-008-036		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.37
GLENDALE	1034 ALLEN AVE	91201	5624-009-002		Medium Density	R 2250	0	19	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1026 ALLEN AVE	91201	5624-009-004		Medium Density	R 2250	0	19	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1027 IRVING AVE	91201	5624-009-016		Medium Density	R 2250	0	19	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1070 ALLEN AVE	91201	5624-010-007		Medium Density	R 2250	0	19	0.15	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.48
GLENDALE	1047 IRVING AVE	91201	5624-010-010		Medium Density	R 2250	0	19	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.72
GLENDALE	1059 IRVING AVE	91201	5624-010-019		Medium Density	R 2250	0	19	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.69
GLENDALE	1042 IRVING AVE	91201	5624-011-014		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutil		

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
GLENDALE	973 W GLENOAKS BLVD	91202	5628-020-012		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.5
GLENDALE	1231 VIOLA AVE	91202	5633-008-013		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 2 units	0; 1.67
GLENDALE	1237 VIOLA AVE	91202	5633-008-014		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 3 units	0; 0.66
GLENDALE	1231 N CENTRAL AVE	91202	5633-008-027		High Density	R 1250	0	35	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 1 unit	0; 0.05
GLENDALE	1212 VIOLA AVE	91202	5633-009-018		High Density	R 1250	0	35	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	6	6	Residential: Underutilized	Residential; 0 units	0; 0.47
GLENDALE	1211 VIOLA AVE	91202	5633-010-028		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	6	6	Residential: Underutilized	Residential; 1 unit	0; 1.5
GLENDALE	1301 N PACIFIC AVE	91202	5634-013-012		Medium High Density	R 1650	0	26	0.23	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 3 units	0; 0.04
GLENDALE	543 GLENWOOD RD	91202	5634-013-020		Medium High Density	R 1650	0	26	0.16	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	624 GLENWOOD RD	91202	5634-015-003		Medium High Density	R 1650	0	26	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.14
GLENDALE	612 GLENWOOD RD	91202	5634-015-006		Medium High Density	R 1650	0	26	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 2 units	0; 0.82
GLENDALE	552 GLENWOOD RD	91202	5634-015-012		Medium High Density	R 1650	0	26	0.21	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	632 W STOCKER ST	91202	5634-026-001		Moderate Density	R 3050	0	14	0.24	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 0 units	0; 0.47-0.57
GLENDALE	618 W STOCKER ST	91202	5634-025-006		Medium High Density	R 1650	0	26	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 2 units	0; 0.25
GLENDALE	595 SOUTH ST	91202	5634-025-034		Medium High Density	R 1650	0	26	0.18	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 1 unit	0; 0.36
GLENDALE	537 SOUTH ST	91202	5634-026-023		Medium High Density	R 1650	0	26	0.15	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.68
GLENDALE	451 PALM DR	91202	5636-001-014		High Density	R 1250	0	35	0.16	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 1 unit	0; 0.45
GLENDALE	433 PALM DR	91202	5636-001-018		High Density	R 1250	0	35	0.16	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 2 units	0; 0.67
GLENDALE	410 W STOCKER ST	91202	5636-001-033		High Density	R 1250	0	35	0.16	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 2 units	0; 0.46
GLENDALE	1151 N COLUMBUS AVE	91202	5636-001-034		High Density	R 1250	0	35	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 5 units	0; 0.36
GLENDALE	408 W DRYDEN ST	91202	5636-004-006		High Density	R 1250	0	35	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	420 W DRYDEN ST	91202	5636-004-007		High Density	R 1250	0	35	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 1 unit	0; 0.01
GLENDALE	1038 N COLUMBUS AVE	91202	5636-004-037		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 2 units	0; 0.95
GLENDALE	1006 SAN RAFAEL AVE	91202	5636-007-002		High Density	R 1250	0	35	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 3 units	0; 0.39
GLENDALE	1008 SAN RAFAEL AVE	91202	5636-007-003		High Density	R 1250	0	35	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 2 units	0; 0.08
GLENDALE	1028 SAN RAFAEL AVE # B	91202	5636-007-008		High Density	R 1250	0	35	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 4 units	0; 0.51
GLENDALE	1029 MELROSE AVE	91202	5636-007-080		High Density	R 1250	0	35	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 2 units	0; 0.26
GLENDALE	1151 SAN RAFAEL AVE	91202	5636-008-004		High Density	R 1250	0	35	0.23	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 3 units	0; 0.22
GLENDALE	1102 SAN RAFAEL AVE	91202	5636-010-003		High Density	R 1250	0	35	0.17	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 1 unit	0; 0.35
GLENDALE	1144 SAN RAFAEL AVE	91202	5636-010-013		High Density	R 1250	0	35	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 3 units	0; 0.26
GLENDALE	1113 MELROSE AVE	91202	5636-010-021		High Density	R 1250	0	35	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 3 units	0; 0.45
GLENDALE	1145 MELROSE AVE	91202	5636-010-029		High Density	R 1250	0	35	0.2	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 4 units	0; 0.8
GLENDALE	1146 MELROSE AVE	91202	5636-011-002		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	7	7	Residential: Underutilized	Residential; 0 units	0; 0
GLENDALE	1128 MELROSE AVE	91202	5636-011-033		High Density	R 1250	0	35	0.22	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 3 units	0; 0.97
GLENDALE	371 BURCHETT ST	91203	5636-013-029		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 3 units	0; 0.22
GLENDALE	360 BURCHETT ST	91203	5636-014-005		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	6	6	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	372 BURCHETT ST	91203	5636-014-006		High Density	R 1250	0	35	0.45	Residential	YES - Current	NO - Privately-Owned Available			0	0	20	20	Residential: Underutilized	Residential; 0 units	0; 0.71
GLENDALE	422 BURCHETT ST	91203	5636-015-015		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	6	6	Residential: Underutilized	Residential; 1 unit	0; 0.74
GLENDALE	430 BURCHETT ST	91203	5636-015-017		High Density	R 1250	0	35	0.19	Residential	YES - Current	NO - Privately-Owned Available			0	0	6	6	Residential: Underutilized	Residential;	

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
GLENDALE	452 SALEM ST	91203	5637-016-014		Medium High Density	R 1650	0	26	0.160059357	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.338847405
GLENDALE	467 W WILSON AVE	91203	5637-016-021		Medium High Density	R 1650	0	26	0.161664158	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.330613163
GLENDALE	443 W WILSON AVE	91203	5637-016-027		Medium High Density	R 1650	0	26	0.157790408	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.392447799
GLENDALE	429 W WILSON AVE	91203	5637-016-030		Medium High Density	R 1650	0	26	0.160929826	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.12221636
GLENDALE	425 W WILSON AVE	91203	5637-016-031		Medium High Density	R 1650	0	26	0.158880417	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.314941064
GLENDALE	419 W WILSON AVE	91203	5637-016-033		Medium High Density	R 1650	0	26	0.160316864	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.249991132
GLENDALE	415 W WILSON AVE	91203	5637-016-034		Medium High Density	R 1650	0	26	0.160191737	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.168588723
GLENDALE	416 W CALIFORNIA AVE	91203	5637-017-005		Medium High Density	R 1650	0	26	0.16084458	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.643374009
GLENDALE	434 W CALIFORNIA AVE	91203	5637-017-008		Medium High Density	R 1650	0	26	0.161007401	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.420358419
GLENDALE	436 W CALIFORNIA AVE	91203	5637-017-009		Medium High Density	R 1650	0	26	0.175894274	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	4	Residential: Underutilized	Residential; 1 unit	0; 0.249998825
GLENDALE	444 W CALIFORNIA AVE	91203	5637-017-011		Medium High Density	R 1650	0	26	0.158966236	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.666665665
GLENDALE	448 W CALIFORNIA AVE	91203	5637-017-012		Medium High Density	R 1650	0	26	0.160418289	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.087161071
GLENDALE	459 SALEM ST	91203	5637-017-022		Medium High Density	R 1650	0	26	0.160122097	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.033182315
GLENDALE	443 SALEM ST	91203	5637-017-025		Medium High Density	R 1650	0	26	0.161062411	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.499645689
GLENDALE	441 SALEM ST	91203	5637-017-026		Medium High Density	R 1650	0	26	0.160663565	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.219122816
GLENDALE	425 SALEM ST	91203	5637-017-030		Medium High Density	R 1650	0	26	0.155496437	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.249996666
GLENDALE	421 SALEM ST	91203	5637-017-032		Medium High Density	R 1650	0	26	0.163001865	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.249999632
GLENDALE	415 SALEM ST	91203	5637-017-033		Medium High Density	R 1650	0	26	0.159795850	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.304414649
GLENDALE	409 SALEM ST	91203	5637-017-034		Medium High Density	R 1650	0	26	0.15983705	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.186666139
GLENDALE	415 W CALIFORNIA AVE	91203	5637-018-017		Medium High Density	R 1650	0	26	0.154971081	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.007361399
GLENDALE	416 MYRTLE ST	91203	5637-018-034		Medium High Density	R 1650	0	26	0.159877736	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.540755713
GLENDALE	468 W LEXINGTON DR	91203	5637-019-001		Medium High Density	R 1650	0	26	0.147981544	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.331035985
GLENDALE	460 W LEXINGTON DR	91203	5637-019-003		Medium High Density	R 1650	0	26	0.149236662	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.363441048
GLENDALE	454 W LEXINGTON DR	91203	5637-019-005		Medium High Density	R 1650	0	26	0.15131842	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.02480942
GLENDALE	444 W LEXINGTON DR	91203	5637-019-008		Medium High Density	R 1650	0	26	0.150044412	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.079908044
GLENDALE	440 W LEXINGTON DR	91203	5637-019-009		Medium High Density	R 1650	0	26	0.156224677	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.584698632
GLENDALE	416 W LEXINGTON DR	91203	5637-019-015		Medium High Density	R 1650	0	26	0.1570075	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.556765718
GLENDALE	406 W LEXINGTON DR	91203	5637-019-020		Medium High Density	R 1650	0	26	0.155008763	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.740583013
GLENDALE	405 MYRTLE ST	91203	5637-019-025		Medium High Density	R 1650	0	26	0.152526304	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.156181594
GLENDALE	415 MYRTLE ST	91203	5637-019-027		Medium High Density	R 1650	0	26	0.15137499	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.142812586
GLENDALE	417 MYRTLE ST	91203	5637-019-028		Medium High Density	R 1650	0	26	0.157993253	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.6802273478
GLENDALE	421 MYRTLE ST	91203	5637-019-029		Medium High Density	R 1650	0	26	0.154895531	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.598806198
GLENDALE	441 MYRTLE ST	91203	5637-019-034		Medium High Density	R 1650	0	26	0.160476502	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.336660617
GLENDALE	461 MYRTLE ST	91203	5637-019-038		Medium High Density	R 1650	0	26	0.16318474	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.624990646
GLENDALE	463 MYRTLE ST	91203	5637-019-039		Medium High Density	R 1650	0	26	0.156784759	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.019394061
GLENDALE	465 MYRTLE ST	91203	5637-019-040		Medium High Density																

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GLENDALE	240 CONCORD ST	91203	5638-020-036		Medium Density	R 2250	0	19	0.171590287	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.168222556
GLENDALE	239 CHESTER ST	91203	5638-020-038		Medium Density	R 2250	0	19	0.173599107	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249913164
GLENDALE	338 MAGNOLIA AVE	91204	5640-005-011		Medium Density	R 2250	0	19	0.172176339	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.461003477
GLENDALE	327 W CYPRESS ST	91204	5640-005-027		Medium Density	R 2250 P	0	19	0.172178325	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.004413304
GLENDALE	323 W PALMER AVE	91204	5640-009-005		Medium Density	R 2250	0	19	0.167124561	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.335434267
GLENDALE	327 W PALMER AVE	91204	5640-009-006		Medium Density	R 2250	0	19	0.167126537	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.17167575
GLENDALE	205 W PALMER AVE	91204	5640-010-019		Medium High Density	R 1650	0	26	0.210829089	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	5	Residential: Underutilized	Residential; 1 unit	0; 0.249977102
GLENDALE	131 MAGNOLIA AVE	91204	5640-011-031		Medium High Density	R 1650	0	26	0.173761082	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 2 units	0; 0.005684147
GLENDALE	1241 S ORANGE ST	91204	5640-012-016		Medium High Density	R 1650	0	26	0.195166447	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.06249129
GLENDALE	123 E PALMER AVE	91205	5640-014-021		Medium Density	R 2250	0	19	0.219973535	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.037083953
GLENDALE	1258 S MARYLAND AVE	91205	5640-015-023		Medium Density	R 2250 P	0	19	0.172175056	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.464242155
GLENDALE	1844 VASSAR ST	91204	5640-037-017		Moderate Density	R 3050	0	14	0.183575001	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.01534665
GLENDALE	1838 VASSAR ST	91204	5640-037-018		Moderate Density	R 3050	0	14	0.183574259	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249957819
GLENDALE	1836 VASSAR ST	91204	5640-037-019		Moderate Density	R 3050	0	14	0.183574011	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.250038289
GLENDALE	1914 VASSAR ST	91204	5640-038-024		Moderate Density	R 3050	0	14	0.16357926	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249976644
GLENDALE	1925 VASSAR ST	91204	5640-039-007		Moderate Density	R 3050	0	14	0.183561862	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.410795784
GLENDALE	1929 VASSAR ST	91204	5640-039-008		Moderate Density	R 3050	0	14	0.183561682	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.389743948
GLENDALE	1936 GARDENA AVE	91204	5640-039-019		Moderate Density	R 3050	0	14	0.183580528	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.629956532
GLENDALE	1924 GARDENA AVE	91204	5640-039-022		Moderate Density	R 3050	0	14	0.183581323	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.460089775
GLENDALE	1823 VASSAR ST	91204	5640-040-001		Moderate Density	R 3050	0	14	0.182582959	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.432274986
GLENDALE	1835 VASSAR ST	91204	5640-040-005		Moderate Density	R 3050	0	14	0.179856361	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249999237
GLENDALE	1839 VASSAR ST	91204	5640-040-006		Moderate Density	R 3050	0	14	0.186465049	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.258728927
GLENDALE	1832 GARDENA AVE	91204	5640-040-012		Moderate Density	R 3050	0	14	0.186241394	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.56546691
GLENDALE	1818 GARDENA AVE	91204	5640-040-016		Moderate Density	R 3050	0	14	0.183571588	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249938842
GLENDALE	1814 GARDENA AVE	91204	5640-040-017		Moderate Density	R 3050	0	14	0.183187893	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.876750504
GLENDALE	1821 GARDENA AVE	91204	5640-041-004		Moderate Density	R 3050	0	14	0.227631679	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.137635901
GLENDALE	1823 GARDENA AVE	91204	5640-041-005		Moderate Density	R 3050	0	14	0.224676488	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.004552645
GLENDALE	1827 GARDENA AVE	91204	5640-041-006		Moderate Density	R 3050	0	14	0.228467899	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249984392
GLENDALE	1839 GARDENA AVE	91204	5640-041-009		Moderate Density	R 3050	0	14	0.223457874	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.004449404
GLENDALE	1843 GARDENA AVE	91204	5640-041-010		Moderate Density	R 3050	0	14	0.213860755	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249935092
GLENDALE	1909 GARDENA AVE	91204	5640-041-014		Moderate Density	R 3050	0	14	0.210956235	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	1913 GARDENA AVE	91204	5640-041-016		Moderate Density	R 3050	0	14	0.208894144	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.088428333
GLENDALE	1917 GARDENA AVE	91204	5640-041-017		Moderate Density	R 3050	0	14	0.203200239	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.068950646
GLENDALE	1925 GARDENA AVE	91204	5640-041-018		Moderate Density	R 3050	0	14	0.208380808	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.016113069
GLENDALE	1937 GARDENA AVE	91204	5640-041-021		Moderate Density	R 3050	0	14	0.189237636	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249995212
GLENDALE	208 W ELK AVE	91204	5641-002-008																		

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GLENDALE	716 N HOWARD ST	91206	5644-020-003		High Density	R 1250	0	35	0.165280037	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	Residential: Underutilized	Residential; 1 unit	0; 0.249945053	
GLENDALE	709 N HOWARD ST	91206	5644-020-037		High Density	R 1250	0	35	0.156168536	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 2 units	0; 0.007372426	
GLENDALE	545 N ADAMS ST	91206	5645-001-019		Medium High Density	R 1650	0	26	0.285748371	Residential	YES - Current	NO - Privately-Owned Available			0	0	6	Residential: Underutilized	Residential; 1 unit	0; 0.549545511	
GLENDALE	1405 E CALIFORNIA AVE	91206	5645-002-047		Medium Density	R 2250	0	19	0.167133729	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 1 unit	0; 0.363565568	
GLENDALE	1416 E CALIFORNIA AVE	91206	5645-002-057		Medium Density	R 2250	0	19	0.171527307	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 1 unit	0; 0.351449313	
GLENDALE	1431 STANLEY AVE	91206	5645-002-076		Medium Density	R 2250	0	19	0.17701575	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 1 unit	0; 0.440286349	
GLENDALE	1228 E CALIFORNIA AVE	91206	5645-003-006		Medium High Density	R 1650	0	26	0.152888621	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 2 units	0; 1.225980417	
GLENDALE	328 N CHEVY CHASE DR	91206	5645-004-058		Medium High Density	R 1650	0	26	0.20963252	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	Residential: Underutilized	Residential; 1 unit	0; 0.249976071	
GLENDALE	1219 E LEXINGTON DR	91206	5645-005-005		Medium High Density	R 1650	0	26	0.156404443	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.380715006	
GLENDALE	1235 E LEXINGTON DR	91206	5645-005-009		Medium High Density	R 1650	0	26	0.179191094	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	Residential: Underutilized	Residential; 1 unit	0; 0.553083263	
GLENDALE	1243 E LEXINGTON DR	91206	5645-005-012		Medium High Density	R 1650	0	26	0.183304085	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.905662929	
GLENDALE	1307 E LEXINGTON DR	91206	5645-005-016		Medium High Density	R 1650	0	26	0.179578063	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	Residential: Underutilized	Residential; 1 unit	0; 0.257441208	
GLENDALE	1309 E LEXINGTON DR	91206	5645-005-016		Medium High Density	R 1650	0	26	0.179584834	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	Residential: Underutilized	Residential; 1 unit	0; 0.30676654	
GLENDALE	1127 E DORAN ST	91206	5645-006-045		Medium High Density	R 1650	0	26	0.171542421	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 2 units	0; 0.249998863	
GLENDALE	421 PIEDMONT AVE	91206	5645-008-015		Medium High Density	R 1650	0	26	0.151905848	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.17130362	
GLENDALE	921 E LEXINGTON DR	91206	5645-009-013		Medium High Density	R 1650	0	26	0.154846862	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.304133674	
GLENDALE	1003 E LEXINGTON DR	91206	5645-009-019		Medium High Density	R 1650	0	26	0.153933216	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 2 units	0; 1.800014574	
GLENDALE	1011 E LEXINGTON DR	91206	5645-009-020		Medium High Density	R 1650	0	26	0.159016148	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.249998382	
GLENDALE	1015 E LEXINGTON DR	91206	5645-009-022		Medium High Density	R 1650	0	26	0.15332949	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 2 units	0; 0.674847573	
GLENDALE	1021 E LEXINGTON DR	91206	5645-009-022		Medium High Density	R 1650	0	26	0.146733907	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 2 units	0; 0.08863134	
GLENDALE	345 N CEDAR ST	91206	5645-010-030		Medium High Density	R 1650	0	26	0.215027522	Residential	YES - Current	NO - Privately-Owned Available			0	0	5	Residential: Underutilized	Residential; 1 unit	0; 0.46750027	
GLENDALE	324 N ADAMS ST	91206	5645-013-001		Medium High Density	R 1650	0	26	0.231576865	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 3 units	0; 0.52171418	
GLENDALE	342 N ADAMS ST	91206	5645-013-005		Medium High Density	R 1650	0	26	0.157824121	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.431166907	
GLENDALE	1112 E LEXINGTON DR	91206	5645-013-007		Medium High Density	R 1650	0	26	0.157187492	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 1	
GLENDALE	1147 E CALIFORNIA AVE	91206	5645-013-016		Medium High Density	R 1650	0	26	0.193925926	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	Residential: Underutilized	Residential; 1 unit	0; 0.355810358	
GLENDALE	1105 E CALIFORNIA AVE	91206	5645-013-018		Medium High Density	R 1650	0	26	0.17008363	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 2 units	0; 0.273382375	
GLENDALE	320 N ADAMS ST	91206	5645-013-024		Medium High Density	R 1650	0	26	0.187019515	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 2 units	0; 0.33960862	
GLENDALE	337 N CHEVY CHASE DR	91206	5645-014-030		Medium High Density	R 1650	0	26	0.153281468	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.249998479	
GLENDALE	1236 E LEXINGTON DR	91206	5645-014-041		Medium High Density	R 1650	0	26	0.245089246	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	Residential: Underutilized	Residential; 4 units	0; 1.024728079	
GLENDALE	1108 E CALIFORNIA AVE	91206	5645-015-002		Medium High Density	R 1650	0	26	0.183947762	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 2 units	0; 0.092703276	
GLENDALE	1116 E CALIFORNIA AVE	91206	5645-015-003		Medium High Density	R 1650	0	26	0.160264184	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.190168298	
GLENDALE	1112 E CALIFORNIA AVE	91206	5645-015-008		Medium High Density	R 1650	0	26	0.184958385	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 2 units	0; 0.196294675	
GLENDALE	232 N ADAMS ST	91206	5645-015-011		Medium High Density	R 1650	0	26	0.179327288	Residential	YES - Current	NO - Privately-Owned Available			0	0	4	Residential: Underutilized	Residential; 1 unit	0; 0.249998562	
GLENDALE	1111 E WILSON AVE	91206	5645-016-004		Medium High Density	R 1650	0	26	0.161843632	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	Residential: Underutilized	Residential; 2 units	0; 0.180024449	
GLENDALE	1100 STANLEY AVE	91206	5645-016-007		Medium High Density	R 1650	0	26	0.156526483	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.207358369	
GLENDALE	1118 STANLEY AVE	91206	5645-016-011		Medium High Density	R 1650	0	26	0.160464186	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	Residential: Underutilized	Residential; 1 unit	0; 0.282988576	
GLENDALE	1120 STANLEY AVE	91206	5645																		

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
GLENDALE	1105 ORANGE GROVE AVE	91205	5674-014-022		Medium Density	R 2250	0	19	0.152100485	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.433797849
GLENDALE	1022 E HARVARD ST	91205	5674-015-001		Medium Density	R 2250	0	19	0.161680575	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249998251
GLENDALE	1006 E HARVARD ST	91205	5674-015-005		Medium Density	R 2250	0	19	0.152451322	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.322671822
GLENDALE	1003 ORANGE GROVE AVE	91205	5674-015-020		Medium Density	R 2250	0	19	0.160266111	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249989228
GLENDALE	1009 ORANGE GROVE AVE	91205	5674-015-021		Medium Density	R 2250	0	19	0.150592665	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.269378376
GLENDALE	624 ORANGE GROVE AVE	91205	5674-018-001		Medium Density	R 2250	0	19	0.155417928	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.670038797
GLENDALE	616 ORANGE GROVE AVE	91205	5674-018-012		Medium Density	R 2250	0	19	0.155285787	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.02493019
GLENDALE	636 ORANGE GROVE AVE	91205	5674-018-004		Medium Density	R 2250	0	19	0.155376871	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 0 units	0; 0
GLENDALE	818 ORANGE GROVE AVE	91205	5674-019-005		Medium Density	R 2250	0	19	0.156847806	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.025703149
GLENDALE	1006 ORANGE GROVE AVE	91205	5674-020-005		Medium Density	R 2250	0	19	0.157708972	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.303550371
GLENDALE	1128 ORANGE GROVE AVE	91205	5674-021-011		Medium Density	R 2250	0	19	0.157031294	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.007003346
GLENDALE	1141 E ELK AVE	91205	5674-022-011		Medium Density	R 2250	0	19	0.148502398	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.611498782
GLENDALE	1009 E ELK AVE	91205	5674-023-010		Medium Density	R 2250	0	19	0.155261038	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249988999
GLENDALE	919 E ELK AVE	91205	5674-023-014		Medium Density	R 2250	0	19	0.154164247	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	907 E ELK AVE	91205	5674-023-017		Medium Density	R 2250	0	19	0.15596823	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.311283535
GLENDALE	807 E ELK AVE	91205	5674-024-006		Medium Density	R 2250	0	19	0.154568874	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.246152933
GLENDALE	801 E ELK AVE	91205	5674-024-007		Medium Density	R 2250	0	19	0.189700514	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.226029878
GLENDALE	819 E ELK AVE	91205	5674-024-017		Medium Density	R 2250	0	19	0.154517682	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 1.88765148
GLENDALE	817 E ELK AVE	91205	5674-024-018		Medium Density	R 2250	0	19	0.153461273	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.458854149
GLENDALE	815 E ELK AVE	91205	5674-024-019		Medium Density	R 2250	0	19	0.152616443	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.3424969
GLENDALE	637 E ELK AVE	91205	5674-025-016		Medium Density	R 2250	0	19	0.156592989	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.466372487
GLENDALE	607 E ELK AVE	91205	5674-025-027		Medium Density	R 2250	0	19	0.155676997	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25542671
GLENDALE	528 E ELK AVE	91205	5674-027-005		Medium Density	R 2250	0	19	0.156865788	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249973598
GLENDALE	536 E ELK AVE	91205	5674-027-007		Medium Density	R 2250	0	19	0.158853484	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.838739932
GLENDALE	531 E LOMITA AVE	91205	5674-027-017		Medium Density	R 2250	0	19	0.154356184	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.63904423
GLENDALE	702 E ELK AVE	91205	5674-028-008		Medium Density	R 2250	0	19	0.155468402	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249953477
GLENDALE	711 E LOMITA AVE	91205	5674-028-017		Medium Density	R 2250	0	19	0.15243832	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 1.682786007
GLENDALE	629 E LOMITA AVE	91205	5674-028-022		Medium Density	R 2250	0	19	0.151219652	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249999562
GLENDALE	625 E LOMITA AVE	91205	5674-028-023		Medium Density	R 2250	0	19	0.150776281	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.18027354
GLENDALE	824 E ELK AVE	91205	5674-029-013		Medium Density	R 2250	0	19	0.153375487	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249988899
GLENDALE	422 S ADAMS ST	91205	5674-031-003		Medium Density	R 2250	0	19	0.169340428	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.494223229
GLENDALE	1115 E CHESTNUT ST	91205	5675-001-015		Medium Density	R 2250	0	19	0.194971771	Residential	YES - Current	NO - Privately-Owned Available			0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.250141084
GLENDALE	1137 E CHESTNUT ST	91205	5675-001-021		Medium Density	R 2250	0	19	0.161662448	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.202653351
GLENDALE	514 S BELMONT ST	91205	5675-002-013		Medium Density	R 2250	0	19	0.163170182	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.587035872
GLENDALE	816 E LOMITA AVE	91205	5675-003-008		Medium Density	R 2250	0	19	0.163614652	Residential	YES - Current	NO - Privately-Owned Available			0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.249914795
GLENDALE	817 E CHESTNUT ST	91205	5675-003-017		Medium Density	R 2250</															

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GLENDALE	901 E GARFIELD AVE	91205 5675-022-034		Medium High Density R 1650	0	26	0.157288201	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 1 unit	0; 0.439518539		
GLENDALE	831 E GARFIELD AVE	91205 5675-022-035		Medium High Density R 1650	0	26	0.204432225	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.820148869		
GLENDALE	1008 E WINDSOR RD	91205 5675-022-045		Medium High Density R 1650	0	26	0.192708421	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.25169293		
GLENDALE	816 E WINDSOR RD	91205 5675-023-005		Medium High Density R 1650	0	26	0.188077061	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.187641229		
GLENDALE	700 E WINDSOR RD	91205 5675-024-006		Medium High Density R 1650	0	26	0.208826973	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.197611159		
GLENDALE	631 E GARFIELD AVE	91205 5675-024-009		Medium High Density R 1650	0	26	0.196504103	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.523751127		
GLENDALE	826 MARIPOSA ST	91205 5675-025-014		Medium High Density R 1650	0	26	0.182375643	Residential	YES - Current	NO - Privately-Owned Available				0	0	4	4	Residential: Underutilized Residential; 1 unit	0; 1.685440232		
GLENDALE	537 E GARFIELD AVE	91205 5675-025-019		Medium High Density R 1650	0	26	0.173709011	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.23315172		
GLENDALE	534 E WINDSOR RD	91205 5675-025-022		Medium High Density R 1650	0	26	0.256709437	Residential	YES - Current	NO - Privately-Owned Available				0	0	6	6	Residential: Underutilized Residential; 1 unit	0; 0.018512202		
GLENDALE	611 E ACACIA AVE	91205 5675-028-003		Medium High Density R 1650	0	26	0.194676964	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.219776125		
GLENDALE	615 E ACACIA AVE	91205 5675-028-004		Medium High Density R 1650	0	26	0.201124559	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.285712068		
GLENDALE	619 E ACACIA AVE	91205 5675-028-005		Medium High Density R 1650	0	26	0.173238943	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.062875167		
GLENDALE	623 E ACACIA AVE	91205 5675-028-006		Medium High Density R 1650	0	26	0.173569089	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.235564033		
GLENDALE	625 E ACACIA AVE	91205 5675-028-007		Medium High Density R 1650	0	26	0.172205782	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 1 unit	0; 0.527384256		
GLENDALE	812 E GARFIELD AVE	91205 5675-029-009		Medium High Density R 1650	0	26	0.187807975	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.003558579		
GLENDALE	705 E ACACIA AVE A	91205 5675-029-022		Medium High Density R 1650	0	26	0.236393325	Residential	YES - Current	NO - Privately-Owned Available				0	0	4	4	Residential: Underutilized Residential; 2 units	0; 0.002162324		
GLENDALE	1015 E ACACIA AVE	91205 5675-030-002		Medium High Density R 1650	0	26	0.20063738	Residential	YES - Current	NO - Privately-Owned Available				0	0	4	4	Residential: Underutilized Residential; 1 unit	0; 0.372449688		
GLENDALE	1005 E ACACIA AVE	91205 5675-030-034		Medium High Density R 1650	0	26	0.188663497	Residential	YES - Current	NO - Privately-Owned Available				0	0	4	4	Residential: Underutilized Residential; 1 unit	0; 0.24994361		
GLENDALE	1119 E ACACIA AVE	91205 5675-031-011		Medium Density R 2250	0	19	0.177146242	Residential	YES - Current	NO - Privately-Owned Available				0	0	2	2	Residential: Underutilized Residential; 1 unit	0; 0.364757371		
GLENDALE	1011 S ADAMS ST	91205 5676-003-019		Medium Density R 1650	0	26	0.391503741	Residential	YES - Current	NO - Privately-Owned Available				0	0	12	12	Residential: Underutilized Residential; 0 units	0; 0.187640651; 1.461065938		
GLENDALE	815 E CHEVY CHASE DR	91205 5676-004-004		Medium High Density R 1650	0	26	0.282071563	Residential	YES - Current	NO - Privately-Owned Available				0	0	5	5	Residential: Underutilized Residential; 2 units	0; 0.092299908		
GLENDALE	825 E CHEVY CHASE DR	91205 5676-004-012		Medium High Density R 1650	0	26	0.210165733	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.317737304		
GLENDALE	724 E ACACIA AVE	91205 5676-005-004		Medium High Density R 1650	0	26	0.192132757	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.652631478		
GLENDALE	722 E ACACIA AVE	91205 5676-005-041		Medium High Density R 1650	0	26	0.192922169	Residential	YES - Current	NO - Privately-Owned Available				0	0	4	4	Residential: Underutilized Residential; 1 unit	0; 0.36091497		
GLENDALE	1014 MARIPOSA ST	91205 5676-008-006		Medium High Density R 1650	0	26	0.177442998	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.311789496		
GLENDALE	1018 MARIPOSA ST	91205 5676-008-007		Medium High Density R 1650	0	26	0.174540482	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.298871788		
GLENDALE	1024 MARIPOSA ST	91205 5676-008-008		Medium High Density R 1650	0	26	0.175118097	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 2 units	0; 0.047325452		
GLENDALE	1028 MARIPOSA ST	91205 5676-008-009		Medium High Density R 1650	0	26	0.159240681	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 1 unit	0; 0.147015505		
GLENDALE	1009 BOYNTON ST	91205 5676-008-018		Medium High Density R 1650	0	26	0.148811636	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 1 unit	0; 0.616730602		
GLENDALE	1023 BOYNTON ST	91205 5676-008-022		Medium High Density R 1650	0	26	0.196675853	Residential	YES - Current	NO - Privately-Owned Available				0	0	4	4	Residential: Underutilized Residential; 1 unit	0; 0.389342117		
GLENDALE	1023 MARIPOSA ST	91205 5676-009-009		Medium High Density R 1650	0	26	0.160747321	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 1 unit	0; 0.794969143		
GLENDALE	1021 MARIPOSA ST	91205 5676-009-010		Medium High Density R 1650	0	26	0.152874943	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 1 unit	0; 0.185817958		
GLENDALE	513 E PALMER AVE	91205 5676-011-010		Medium High Density R 1650	0	26	0.157093202	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 1 unit	0; 0.249964792		
GLENDALE	541 E PALMER AVE	91205 5676-012-010		Medium High Density R 1650	0	26	0.156076120	Residential	YES - Current	NO - Privately-Owned Available				0	0	3	3	Residential: Underutilized Residential; 1 unit	0; 0.25		
GLENDALE	715 E PALMER AVE	91205 5676-014-009		Medium High Density R 1650	0	26	0.170454791	Residential	YES - Current	NO - Privately-Owned Available				0	0	2	2	Residential: Underutilized Residential; 2 units	0; 0.133308746		
GLENDALE	1211 TYLER ST	91205 5676-019-020		Moderate Density R 3050	0	14	0.210469202	Residential	YES - Current	NO - Privately-Owned Available				0	0	2	2	Residential: Underutilized Residential; 1 unit	0; 0.883218754		
GLENDALE	1215 TYLER ST	9																			

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
GLENDALE	417 W MAPLE ST	91204	5696-014-033		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.6
GLENDALE	420 W MAPLE ST	91204	5696-016-007		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.07
GLENDALE	442 W MAPLE ST	91204	5696-016-012		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.59
GLENDALE	448 W MAPLE ST	91204	5696-016-014		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.6
GLENDALE	454 W MAPLE ST	91204	5696-016-015		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.2
GLENDALE	429 W WINDSOR RD	91204	5696-016-027		Medium Density	R 2250	0	19	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.46
GLENDALE	441 W WINDSOR RD	91204	5696-016-030		Medium Density	R 2250	0	19	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	347 W WINDSOR RD	91204	5696-017-000		Medium Density	R 2250	0	19	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.22
GLENDALE	355 W WINDSOR RD	91204	5696-017-010		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.28
GLENDALE	342 W MAPLE ST	91204	5696-017-024		Medium Density	R 2250	0	19	0.22	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.29
GLENDALE	346 W MAPLE ST	91204	5696-017-025		Medium Density	R 2250	0	19	0.22	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0
GLENDALE	432 W WINDSOR RD	91204	5696-019-011		Medium Density	R 2250	0	19	0.24	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.23
GLENDALE	428 W WINDSOR RD	91204	5696-019-012		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.3
GLENDALE	408 W WINDSOR RD	91204	5696-019-017		Medium Density	R 2250	0	19	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.66
GLENDALE	411 W GARFIELD AVE	91204	5696-019-021		Medium Density	R 2250	0	19	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 2 units	0; 0.02
GLENDALE	413 W GARFIELD AVE	91204	5696-019-022		Medium Density	R 2250	0	19	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.37
GLENDALE	421 W GARFIELD AVE	91204	5696-019-024		Medium Density	R 2250	0	19	0.21	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.26
GLENDALE	432 W GARFIELD AVE	91204	5696-022-008		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	428 W GARFIELD AVE	91204	5696-022-009		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.17
GLENDALE	424 W GARFIELD AVE	91204	5696-022-015		Medium Density	R 2250	0	19	0.18	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.24
GLENDALE	416 W GARFIELD AVE	91204	5696-022-025		Medium Density	R 2250	0	19	0.19	Residential	YES - Current	NO - Privately-Owned	Available		0	0	3	3	Residential: Underutilized	Residential; 1 unit	0; 0.56
GLENDALE	321 W ACACIA AVE	91204	5696-024-021		Medium Density	R 2250	0	19	0.17	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.17
GLENDALE	325 W ACACIA AVE	91204	5696-024-022		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.22
GLENDALE	357 W ACACIA AVE	91204	5696-024-030		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.28
GLENDALE	1026 FLORENCE PL	91204	5696-025-012		Medium Density	R 2250	0	19	0.15	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.34
GLENDALE	1018 FLORENCE PL	91204	5696-025-014		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.44
GLENDALE	1016 FLORENCE PL	91204	5696-025-015		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.25
GLENDALE	340 W ACACIA AVE	91204	5696-025-018		Medium Density	R 2250	0	19	0.15	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.68
GLENDALE	332 W ACACIA AVE	91204	5696-025-020		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.22
GLENDALE	1033 VIRGINIA PL	91204	5696-025-027		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.53
GLENDALE	316 W ACACIA AVE	91204	5696-025-036		Medium Density	R 2250	0	19	0.16	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.22
GLENDALE	2308 FLORENCITA AVE	91020	5807-024-020		Moderate Density	R 3050 P	0	14	0.18	Residential	YES - Current	NO - Privately-Owned	Available		0	0	2	2	Residential: Underutilized	Residential; 1 unit	0; 0.15
GLENDALE	2740 HERMOSA AVE	91020	5810-024-905		Moderate Density	R 3050	0	14	0.5	Vacant	YES - Current	NO - Privately-Owned	Available		0	0	7	7	Residential: Vacant	Vacant	0; 0
GLENDALE	532 HAZEL ST	91201	5627-014-001		Medium Density	R 2250	0	19	0.14	Vacant	YES - Current	NO - Privately-Owned	Available		0	0	3	3	Residential: Vacant	Vacant	0; 0
GLENDALE	211 W WINDSOR RD	91206	5643-018-038		Medium High Density	R 1650	0	26	0.2	Vacant	YES - Current	NO - Privately-Owned	Available		0	0	5	5	Residential: Vacant	Vacant	0; 0
GLENDALE	625 N LOUISE ST	91206	5643-018-025		High Density	R 1250	0	35	0.16	Vacant	YES - Current	NO - Privately-Owned	Available		0	0	6	6	Residential: Vacant	Vacant	0; 0
GLENDALE	2817 MONTROSE AVE	91214	5627-020-077		Medium High Density	R 1650	0	26	0.82	Educational/Institution	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	4	0	38	42	Proposed Project (A)	Church	0; 0
GLENDALE	123 N EVERETT ST	91206	5674-006-009		Medium High Density	R 1650	0	26	0.14	Parking	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Hol	21	0	0	21	Proposed Project (A)	Parking Lots (Commercial Use)</	

Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

For Los Angeles County jurisdictions, please format the APN's as follows: 9999-999-999

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses	Infrastructure	Optional Information1	Optional Information2	Optional Information3
GLENDALE																						
GLENDALE																						

Table C: Land Use, Table Starts in A2

Zoning Designation From Table A, Column G and Table B, Columns L and N (e.g., "R-1")	General Land Uses Allowed residential")	(e.g., "Low-density
C2	C2 (Community Commercial) Zone. The C2 zone is intended as a zone to accommodate shopping and convenience services for the community in conformance with the comprehensive general plan of the city. In order to maintain the health, safety and general welfare and assure compatibility with surrounding residential neighborhoods, commercial uses and building heights shall be restricted and buffering techniques incorporated into the development design. https://library.qcode.us/lib/glendale_ca/pub/municipal_code/item/title_30-chapter_30_12-30_12_010	
DSP/EB	Downtown Specific Plan East Broadway: Mixed-use residential, retail, office https://www.glendaleca.gov/home/showpublisheddocument/50230/636904148989570000	
DSP/GAT	Downtown Specific Plan Gateway: Mixed-use residential, retail, office https://www.glendaleca.gov/home/showpublisheddocument/50230/636904148989570000	
DSP/MO	Downtown Specific Plan Mid Orange: Mixed-use residential, retail, office https://www.glendaleca.gov/home/showpublisheddocument/50230/636904148989570000	
DSP/OC	Downtown Specific Plan Orange Central: Mixed-use residential, retail, office https://www.glendaleca.gov/home/showpublisheddocument/50230/636904148989570000	
DSP/TD	Downtown Specific Plan Transitional District: Mixed-use residential, retail, office https://www.glendaleca.gov/home/showpublisheddocument/50230/636904148989570000	
IMU R	IMU-R (Industrial/Commercial-Residential Mixed Use) Zone. The IMU-R zoning district is applied to areas appropriate for a mix of commercial, industrial, and residential activities and provides for a full range of goods and services to the community located along portions of industrial/commercial thoroughfares, in conformance with the general plan. This district allows for a mix of commercial and residential or just commercial, industrial, or residential (stand alone) land uses. https://qcode.us/codes/glendale/view.php?topic=30-30_14-30_14_010&frames=on	
R 1250	R-1250 (High Density Residential) Zone. The R-1250 zone is intended primarily as a zone for high-density residential development with a minimum of one thousand two hundred fifty (1,250) square feet of lot area per dwelling unit or approved overlay zone uses, in conformance with the comprehensive general plan of the city. The location of the R-1250 zone is based on convenience, adequacy of services, traffic circulation and the existence of open space and recreation areas that support the concentration of population in such zones. It is in the public interest that multiple residential dwelling areas in the community be made pleasant, inviting and efficient and that considerations of amenity and attractiveness are appropriate in the promotion of the health, safety and general welfare. https://qcode.us/codes/glendale/view.php?topic=30-30_11-30_11_010&frames=on	
R 1650	R-1650 (Medium-High Density Residential) Zone. The R-1650 zone is intended primarily as a zone for medium-high density residential development with a minimum of one thousand six hundred fifty (1,650) square feet of lot area per dwelling unit or approved overlay zone uses, in conformance with the comprehensive general plan of the city. The location of the R-1650 zone is based on convenience, adequacy of services, traffic circulation and the existence of open space and recreation areas that support the concentration of population in such zones. It is in the public interest that multiple residential dwelling areas in the community be made pleasant, inviting and efficient and that considerations of amenity and attractiveness are appropriate in the promotion of the health, safety and general welfare. https://qcode.us/codes/glendale/view.php?topic=30-30_11-30_11_010&frames=on	

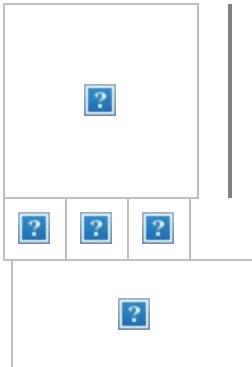
Zoning Designation From Table A, Column G and Table B, Columns L and N (e.g., "R-1")	General Land Uses Allowed residential")	(e.g., "Low-density
R 2250	R-2250 (Medium Density Residential) Zone. The R-2250 zone is intended primarily as a zone for medium density residential development with a minimum of two thousand two hundred fifty (2,250) square feet of lot area per dwelling unit or approved overlay zone uses, in conformance with the comprehensive general plan of the city. This zone is intended to promote medium size garden type multiple dwelling residential developments which are efficient and attractive in order to promote the health, safety and general welfare. https://qcode.us/codes/glendale/view.php?topic=30-30_11-30_11_010&frames=on	
R 3050	R-3050 (Moderate Density Residential) Zone. The R-3050 zone is intended primarily as a zone for moderate density residential development with a minimum of three thousand fifty (3,050) square feet of lot area per dwelling unit or approved overlay zone uses, in conformance with the comprehensive general plan of the city. This zone is intended to act as a transition and buffer between low density residential land uses and more intensive development and to stabilize well maintained neighborhoods that have been developed generally in harmony with the open space and other amenities associated with low and moderate density residential land uses. https://qcode.us/codes/glendale/view.php?topic=30-30_11-30_11_010&frames=on	
SFMU	SFMU (Commercial/Residential Mixed Use) Zone. The SFMU zoning district is applied to areas appropriate for a mix of commercial and residential activities in conformance with the general plan. This district allows for a mix of residential and commercial, or just commercial, or just residential (stand alone) land uses. The only exception to this provision applies to lots fronting San Fernando Road, Broadway, and Colorado Street, which requires that commercial uses be located along the street frontage. https://qcode.us/codes/glendale/view.php?topic=30-30_14-30_14_010&frames=on	
DSP/BC	Downtown Specific Plan Broadway Center: Mixed-use residential, retail, office https://www.glendaleca.gov/home/showpublisheddocument/50230/636904148989570000	
C3 I	C3 (Commercial Service) Zone. The C3 zone offers a full range of goods and services to the community located along commercial thoroughfares within the city in conformance with the comprehensive general plan. In order to maintain the health, safety and general welfare and assure compatibility with surrounding areas, commercial uses and building heights shall be restricted and buffering techniques incorporated into the development design. The roman numeral following the designation refers to the height district, which only applies to commercial uses. https://library.qcode.us/lib/glendale_ca/pub/municipal_code/item/title_30-chapter_30_12-30_12_010	
R 2250 P	R-2250 (Medium Density Residential) Zone with a Parking Overlay. The R-2250 zone is intended primarily as a zone for medium density residential development with a minimum of two thousand two hundred fifty (2,250) square feet of lot area per dwelling unit or approved overlay zone uses, in conformance with the comprehensive general plan of the city. This zone is intended to promote medium size garden type multiple dwelling residential developments which are efficient and attractive in order to promote the health, safety and general welfare. The P overlay zone is intended as a zone for commercial and industrial parking areas as an interim use in residential zones adjacent to such commercial and industrial uses. https://qcode.us/codes/glendale/view.php?topic=30-30_11-30_11_010&frames=on ; https://library.qcode.us/lib/glendale_ca/pub/municipal_code/item/title_30-chapter_30_22-30_22_010	

Zoning Designation From Table A, Column G and Table B, Columns L and N (e.g., "R-1")	General Land Uses Allowed (e.g., "Low-density residential")
R 3050 H	<p>is intended primarily as a zone for moderate density residential development with a minimum of three thousand fifty (3,050) square feet of lot area per dwelling unit or approved overlay zone uses, in conformance with the comprehensive general plan of the city. This zone is intended to act as a transition and buffer between low density residential land uses and more intensive development and to stabilize well maintained neighborhoods that have been developed generally in harmony with the open space and other amenities associated with low and moderate density residential land uses. The H overlay zone is intended as a zone to address the unique requirements of horses in residential zones in a manner conducive to the public health, safety and general welfare. https://qcode.us/codes/glendale/view.php?topic=30-30_11-30_11_010&frames=on; https://library.qcode.us/lib/glendale_ca/pub/municipal_code/item/title_30-</p>
R 1250 PS	<p>zone is intended primarily as a zone for high-density residential development with a minimum of one thousand two hundred fifty (1,250) square feet of lot area per dwelling unit or approved overlay zone uses, in conformance with the comprehensive general plan of the city. The location of the R-1250 zone is based on convenience, adequacy of services, traffic circulation and the existence of open space and recreation areas that support the concentration of population in such zones. It is in the public interest that multiple residential dwelling areas in the community be made pleasant, inviting and efficient and that considerations of amenity and attractiveness are appropriate in the promotion of the health, safety and general welfare. The PS overlay zone is intended as a zone for parking structures. The provisions of the underlying zone shall prevail except for parking lots and structures which shall be governed by the provisions of the PS zone. https://qcode.us/codes/glendale/view.php?topic=30-30_11-30_11_010&frames=on; https://library.qcode.us/lib/glendale_ca/pub/municipal_code/item/title_30-</p>
R 3050 P	<p>zone is intended primarily as a zone for moderate density residential development with a minimum of three thousand fifty (3,050) square feet of lot area per dwelling unit or approved overlay zone uses, in conformance with the comprehensive general plan of the city. This zone is intended to act as a transition and buffer between low density residential land uses and more intensive development and to stabilize well maintained neighborhoods that have been developed generally in harmony with the open space and other amenities associated with low and moderate density residential land uses. The H overlay zone is intended as a zone to address the unique requirements of horses in residential zones in a manner conducive to the public health, safety and general welfare. https://qcode.us/codes/glendale/view.php?topic=30-30_11-30_11_010&frames=on; https://library.qcode.us/lib/glendale_ca/pub/municipal_code/item/title_30-chapter_30_21; https://library.qcode.us/lib/glendale_ca/pub/municipal_code/item/title_30-</p>
C2 I	<p>C2 (Community Commercial) Zone. The C2 zone is intended as a zone to accommodate shopping and convenience services for the community in conformance with the comprehensive general plan of the city. In order to maintain the health, safety and general welfare and assure compatibility with surrounding residential neighborhoods, commercial uses and building heights shall be restricted and buffering techniques incorporated into the development design. The roman numeral following the designation refers to the height district, which only applies to commercial uses.</p>

From: Prasad, Hillary@HCD
To: Housing.Elements@HCD
Subject: FW: Comments on Amended 6th Cycle Housing Element (Glendale)
Date: Wednesday, November 16, 2022 9:22:51 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Correspondence with Daniel Brotman Chapter 9.30 GMC.pdf](#)
[Amended 6th Cycle Housing Element page 401.pdf](#)

Can you please add this email and attachments to the public comments folder for Glendale?

Thank you,



Hillary Prasad
Specialist, Housing Policy Division
Housing and Community Development
2020 W. El Camino Avenue, Suite 500 | Sacramento, CA 95833
Phone: 916.776.7545

From: Alex Khatchaturian <alexkhatchaturian@gmail.com>
Sent: Wednesday, November 16, 2022 5:10 PM
To: ekrause@glendaleca.gov
Cc: vzemaitaitis@glendaleca.gov; Prasad, Hillary@HCD <Hillary.Prasad@hcd.ca.gov>; Calvert, Bradley <BCalvert@glendaleca.gov>; Asp, Kristen <KAsp@glendaleca.gov>; Golanian, Roubik <RGolanian@glendaleca.gov>; mjgarcia@glendaleca.gov
Subject: Comments on Amended 6th Cycle Housing Element (Glendale)

Mr. Krause,

My review of the amended housing element was primarily focused on the city's analysis of the fair housing implications related to the enforcement of its Just Cause and Retaliatory Evictions Ordinance, as codified in Chapter 9.30 of the municipal code.

Glendale currently does not and does not plan to enforce the tenant protection provisions of its Just Cause and Retaliatory Evictions Ordinance. I attached to this e-mail my correspondence with Councilmember Dan Brotman from two years ago in which he stated, after conferring with the City Attorney and city staff, that Glendale has elected to not enforce the tenant protection provisions of Chapter 9.30 of the municipal code.

Please note the Enforcement Procedures section of the ordinance (Chapter 9.30.055) states:

"The city, at its sole discretion, may choose to enforce the provisions of this chapter through

administrative fines, administrative citations and any other administrative procedure set forth in Chapters 1.20 and 1.24 of the municipal code, as amended. The city's decision to pursue or not pursue enforcement of any kind shall not affect a tenant's rights to pursue civil remedies."

The amended Housing Element does not contain any commitment for the establishment of a tenant protections enforcement program. Nor does it contain any plan to remove discretion out of the enforcement process and place a ministerial duty on city staff to enforce the tenant protection provisions. Instead, in response to HCD's request for analysis on the fair housing implications related to the enforcement of the adopted ordinance, the amended Housing Element states:

"Enforcement is administered by the Community Development Department Housing staff, who try to resolve housing-related issues through informal mediation, informing the sides of their rights, and dispatching City resources where appropriate."

I attached page 401 of the amended housing element for reference.

The reality is, as the councilmember communicated unequivocally in his response to my question, the city does not enforce tenant protections. Moreover, as evidenced by the amended housing element, the city does not plan to enforce tenant protections. Instead, as I have personally experienced myself, city staff refer tenants to seek civil remedies when they call to report violations of tenant protection provisions. Informal mediation and educating landlords and tenants about their rights is not an effective enforcement mechanism for safeguarding tenant protections. Violations of tenant protections need to be enforced the way violations of our indigenous tree ordinance are enforced.

It is disheartening to see that city staff made no effort to address this issue, especially considering that two-thirds of Glendale residents are tenants. Unless Glendale implements an enforcement program that commits to safeguarding tenant protections without discretion, I do not think the city will be certified by HCD as compliant with state housing element law.

Thank you,
Alex Khatchaturian



Alex Khatchaturian <alexkhatchaturian@gmail.com>

Chapter 9.30 JUST CAUSE AND RETALIATORY EVICTIONS

9 messages

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@glendaleca.gov>

Wed, Sep 16, 2020 at 9:49 AM

Mr. Brotman,

The moratorium on evictions expires at the end of this month. Do you know if tenants faced with unlawful termination of their tenancy can rely on the City to enforce the provisions of Glendale Municipal Code Chapter 9.30? Or are tenants limited to pursue costly civil remedies, which puts them at a great disadvantage against landlords?

I understand the City has sole discretion over whether to pursue or not pursue enforcement of any kind. I am curious if there has been any discussion among members of the City Council regarding this matter.

Thank you,
Alex Khatchaturian

Brotman, Daniel <dbrotman@glendaleca.gov>
To: Alex Khatchaturian <alexkhatchaturian@gmail.com>

Wed, Sep 16, 2020 at 9:20 PM

Hi Alex,

The governor recently signed an eviction moratorium bill called AB 3380. It replaces our local ordinance. I'm sure you can find lots of information on the web, but here's a summary I was given.

- Full protections: Any rent missed between March 1 and August 31 will be converted to civil debt. (This means landlords can take tenants to small claims court for any missed rent – but they can't evict them for not paying it.)
- Protections with a caveat: For rents missed between Sept. 1 and January 31, tenants must pay 25% of rent within that period, or else they'll be open to eviction. The remaining 75% of their rent is treated as a civil debt, just like the provision for missed rent from between March 1 and August 31.
- More time: Also under the new law, the usual three-day-notice to evict that landlords post – mandatory before they go through the court process to evict a tenant – is now a 15-day-notice.
- How the process works for tenants: Once a landlord has posted a 15-day notice, a tenant can file with courts that they have a pandemic-related hardship. A tenant filing with the courts that they have a pandemic-related hardship must swear under penalty of perjury that they are enduring a pandemic-

related hardship. (This is a much higher bar than the attestation that was required under AB 1436). Additionally, if a tenant earns 130% of a county's Area Median Income or higher, a landlord can ask for them to produce proof of a pandemic-related financial hardship, like a layoff or wage-reduction notice from an employer.

- No more eviction moratoria at the local level: Eviction moratoria previously passed by cities and counties will be grandfathered in, but they won't be able to pass any extensions.
- Courts: Courts can begin processing evictions for non-payment of rent in non-COVID cases on October 5th.
- Property owners: The mortgage forbearance provisions for property owners that were in AB 1436 are not in the new bill.

It's pretty good news for tenants. Not great for landlords.

Regards,

Dan

From: Alex Khatchaturian <alexkhatchaturian@gmail.com>
Date: Wednesday, September 16, 2020 at 9:50 AM
To: "Brotman, Daniel" <dbrotman@Glendaleca.gov>
Subject: Chapter 9.30 JUST CAUSE AND RETALIATORY EVICTIONS

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

[Quoted text hidden]

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@Glendaleca.gov>

Thu, Sep 17, 2020 at 6:41 AM

Mr. Brotman,

I am familiar with this new state law (AB 3088), but Glendale has a Just Cause Eviction Ordinance codified in Chapter 9.30 of municipal code. My question was whether the city will enforce the provisions of this ordinance, by assessing fines and penalties to landlords who do not comply. If a landlord attempts to evict a tenant without cause, in violation of city law, can the tenant rely on the city to enforce its laws, or does the tenant have to

pursue civil remedies at its own cost?

Glendale's ordinance, which was adopted last year, affords tenants with certain protections. But a lot of tenants cannot afford to retain counsel and initiate civil suits when they are wronged by their landlords. Most attorneys, understandably, won't represent tenants unless the lease provides the prevailing party attorney fees and costs.

I urge you to discuss enforcement of city laws protecting tenants, such as the Just Cause Eviction Ordinance, with the City Council and City staff. Is the city going to enforce Glendale Municipal Code Chapter 9.30?

Thank you,
Alex Khatchaturian
[Quoted text hidden]

Brotman, Daniel <dbrotman@glendaleca.gov>
To: Alex Khatchaturian <alexkhatchaturian@gmail.com>

Thu, Sep 17, 2020 at 7:33 AM

Hi Alex,

Sorry, I thought you were talking about the eviction moratorium. I will forward your question to our city attorney. I suspect the answer will be that we don't have resources to enforce but we'll see.

By the way, I brought up the idea of funding free or low cost legal support for tenants through a non-profit a couple months ago (when we were allocating Measure S funds). Unfortunately, I didn't get support from my colleagues. If this is a widespread issue, and if the lawyer who does pro-bono work for the Glendale Tenants Union is fully loaded, perhaps we can re-look at it.

Dan

Sent from my iPhone

On Sep 17, 2020, at 6:41 AM, Alex Khatchaturian <alexkhatchaturian@gmail.com> wrote:

[Quoted text hidden]

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@glendaleca.gov>

Thu, Sep 17, 2020 at 8:10 AM

Mr. Brotman,

I anticipate many landlords will seek alternatives to evict non-paying tenants, because the state has passed strong protections for tenants who are not paying rent. Instead of going after them for non-payment, they will seek just cause evictions, knowing that the city will not penalize them for noncompliance with local requirements. For example, a landlord can say he wants to remodel the unit, get an inflated estimate from a contractor showing the cost exceeds 8x the monthly rent (as required by the ordinance), obtain permits for the work, and demand the tenant vacate within 30 or 60 days. Once the tenant vacates, the landlord need not follow through; he can do minor cosmetic improvements and rent the unit at market price. The Glendale ordinance prohibits such bad faith practices, but if the City does not enforce it, the law has no teeth! Of course the evicted tenant can sue for wrongful eviction, but do you see the injustice here? The purpose of the just cause ordinance is to protect tenants, not allow landlords to use it as an alternative for evicting them. Moreover, a lot of tenants are not financially secure to engage in costly lawsuits.

I appreciate you validating my concerns, and I look forward to hearing back from you once you get a response

from the city attorney.

Thank you,
Alex Khatchaturian
[Quoted text hidden]

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@glendaleca.gov>

Mon, Sep 28, 2020 at 9:58 AM

Mr. Brotman,

I am following up to check if you received a response from the city attorney regarding the city's enforcement of the provisions of Chapter 9.30 of Glendale Municipal Code. Specifically, is the city going to assess fines and penalties to landlords who do not comply with Glendale's Just Cause Eviction Ordinance?

Thank you,
Alex Khatchaturian

[Quoted text hidden]

Brotman, Daniel <dbrotman@glendaleca.gov>
To: Alex Khatchaturian <alexkhatchaturian@gmail.com>

Mon, Sep 28, 2020 at 10:28 AM

I don't think I did. Will follow up.

[Quoted text hidden]

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@glendaleca.gov>

Sun, Oct 11, 2020 at 3:54 PM

Mr. Brotman,

I have not heard back from you. Please follow up regarding this matter. I want to know if the city is going to assess fines and penalties to landlords who do not comply with Glendale's Just Cause Eviction Ordinance.

Thank you,
Alex Khatchaturian

[Quoted text hidden]

Brotman, Daniel <dbrotman@glendaleca.gov>
To: Alex Khatchaturian <alexkhatchaturian@gmail.com>

Mon, Oct 12, 2020 at 2:32 PM

Hi Alex,

I finally had a conversation with staff about this. The direct answer is that we don't enforce and don't plan to. We do have a few people on staff that take calls and try to help informally, either by contacting landlord to explain the requirements or referring tenants to sources of free or low cost legal advice. Staff tells me there have been very few JC eviction related calls. Most calls relate to things like rent increases or relocation payments. I believe there have been a few retaliation related. Some calls to understand COVID protections, etc. This is all anecdotal and not based on hard data.

As I mentioned before, I like the idea of using some of our Measure S dollars to fund 3rd party tenant legal assistance, but that hasn't gotten support yet. I may ask again.

FYI, there's an item coming to Council/HA tomorrow afternoon regarding a potential Landlord-Tenant Commission. The report refers to Culver City's Landlord-Tenant Mediation Board; it's a forum for voluntary mediation but has not been very active as far as I know. I'm doubtful that something like this would bring much value here, but open to ideas.

[Quoted text hidden]

- Just Cause Eviction: Addresses the twelve (12) legal reasons for eviction and other issues relating to the termination of a tenancy.
- Relocation Assistance: -Tenants are eligible for relocation assistance when a tenant elects to vacate a unit in response to a rent increase that increases the rent by more than 7% of the rent that was in place at any time during the 12 month period preceding the effective date of the rent increase.
- Right to Lease: Requires landlords to offer a lease with a minimum term of 1 year to prospective tenants and current tenants who are issued rent increases.

The Rental Rights Program expands tenant protections found in the City's Just Cause Eviction, which was established in 2002, and works to: minimize displacement of tenants by requiring a landlord to have a "just cause" in order to terminate a tenancy and prohibiting retaliation for the exercise for designated rights; mitigate the impact of tenants who have to vacate their rental unit when they are unable to afford higher rent increases, when the unit requires eviction for major rehabilitation, or similar reasons, by providing relocation assistance; and address instability and substandard living conditions and services. Enforcement is administered by the Community Development Department Housing staff, who try to resolve housing-related issues through informal mediation, informing the sides of their rights, and dispatching City resources where appropriate. Independently, or through Housing staff's referral, the City Attorney's office will investigate allegations of retaliation and the City's prosecutor may file criminal charges where appropriate. As previously stated, this has only happened in a small number of cases since 2013; mediation/education efforts are typically successful in resolving the issue and there have been no prosecutions. The Rental Rights Program works in tandem with the State's Tenant Protection Act of 2019 to provide a rent cap and evictions protections for renters. These programs support fair housing efforts to reduce the risk of displacement, particularly for lower income renters and protected classes.

Research has shown that low-income renter populations are disproportionately exposed to environmental hazards and that housing tenure is a telling determinant of social vulnerability to disasters. Renters bear the brunt of the existing affordable housing shortage, and their adaptive capacity to cope and recover from the impacts of environmental hazards may be reduced due to systemic inequities and limited resources. As discussed in the Constraints section under Environmental Constraints, environmental hazards affecting residential development in the City include geologic and seismic conditions, as well as wildfire, which provide the greatest threat to the built environment, and aircraft accident. More than half of the City lies within Very High Fire Hazard Severity Zones (VHFHSZ). VHFHSZs in Glendale are located in the Verdugo Mountains and San Rafael Hills (generally north of Kenneth Road and Glenoaks Boulevard and south of the 210 Freeway) and San Gabriel Mountains (northern tip of the City). Residents living within these VHFHSZ areas are at risk of displacement due to wildfire. In order to reduce the risk, new development must comply with applicable City requirements for fuel modification zones, fire-safe site design principals, and other fire prevention activities. The Glendale Local Hazard Mitigation Plan and Glendale Safety Element contain details policies and programs to reduce risk to life and property due to hazards, including environmental hazards, and address on emergency preparedness and aviation disaster response. Liquefaction and other seismic-related issues are further addressed by the State Universal Building Code (UBC).

Regionally, much of Los Angeles County is designated as sensitive to displacement. Nearly every census tract in and around central (downtown) Los Angeles; along the I-110 Freeway; east Los Angeles; and in the Gateway Cities, is designated as a sensitive community. Coastal areas and western Los Angeles County (e.g., Beverly Hills, Malibu, Calabasas) are generally not designated sensitive. Most areas along I-110 between I-10 and I-405, and along I-105 receive a displacement typology of "Low-Income/Susceptible to Displacement". Downtown Los Angeles and neighborhoods to the north and west of Downtown (including Mid-City, Echo Park, and Highland Park) are undergoing "Advanced Gentrification" or "Early/Ongoing Gentrification". Generally, the same areas that are not designated sensitive (coastal areas and western Los Angeles County) are "Stable/Advanced Exclusive". Glendale exhibits similar patterns to the rest of the County, where areas with high real estate values are generally exclusive and areas with lower real estate values are at risk of displacement.

From: [Alex Khatchaturian](#)
To: [Brotman, Daniel](#)
Cc: [Prasad, Hillary@HCD](#)
Subject: Housing Element Review; Sites Inventory
Date: Thursday, December 29, 2022 3:33:28 PM
Attachments: [HCD Sites Inventory Guidebook.pdf](#)

Councilmember Brotman,

AB 1397 includes specific criteria for assessment of the realistic availability of nonvacant sites during the planning period. If nonvacant sites accommodate half or more of the lower income need (as is the case in Glendale), the housing element must describe findings based on substantial evidence that the existing use does not constitute an impediment for additional residential use on the site.

Specifically, Government Code 65583.2(g)(2) states:

"In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. **An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.**"

The HCD Site Inventory Guidebook (page 27), attached for reference, clarifies the "substantial evidence" standard of proof by stating:

"In general, substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. An example of substantial evidence would be a nonvacant site with a grocery store and with a building lease expiring in a year, and evidence that the store has entered into a lease to relocate to another site subsequent to the lease expiring."

Furthermore, the HCD Site Inventory Guidebook adds:

"Examples of substantial evidence that an existing use will likely be discontinued in the current planning period include, but are not limited to:

- The lease for the existing use expires early within the planning period.
- The building is dilapidated, and the structure is likely to be removed, or a demolition permit has been issued for the existing uses.
- There is a development agreement that exists to develop the site within the planning period.
- The entity operating the existing use has agreed to move to another location early enough within the planning period to allow residential development within the planning period.
- The property owner provides a letter stating its intention to develop the property with residences during the planning period."

The city must make its findings evidencing the suitability of the nonvacant sites available for public comment and review. If findings supporting the realistic development potential

for certain lower income sites do not exist, as I believe is the case for the properties listed below, then the city should seek alternative sites that meet the criteria required by AB 1397.

1. Former site of the Sears building and nearby parking lots
216 N Central Ave (5642-015-056); 14 moderate, 14 above moderate
220 N Central Ave (5642-015-057); 15 moderate, 15 above moderate
201 W California Ave (5643-020-038); 16 moderate, 16 above moderate
309 N Orange St (5643-020-039); 30 moderate, 30 above moderate
212 W California (5642-015-045); 265 lower
236 N Central (5642-015-058); 178 lower

The Sites Inventory of the most recent draft of the Housing Element Update, adopted by the City Council on December 6, 2022, shows a total capacity of 443 lower income units at the current site of the Sears building (178) and the adjacent parking structure (265). On December 6, 2022, just hours before the City Council adopted the revised draft of the Housing Element Update, the City Council held a special meeting for stage I preliminary design review pertaining to the development proposed at the former Sears site.

During this presentation we learned that the developer, who has been communicating and working with city staff during the past year and a half, is proposing to build 682 units at the above-mentioned parcels, but only 69 will be made affordable to lower income individuals and families. The remaining 613 units are proposed to be above moderate and they will be leased at market rate.

City staff was aware of the project and it was stated multiple times during the meeting that they have been working with the developer for over a year and a half. It seems disingenuous to tell the state that a site has capacity for 443 lower income units when staff has been working with the developer for a year and a half and knows they plan to provide 69 affordable units, the minimum required by the city's inclusionary zoning law.

Moreover, during the meeting, council members were discussing the possibility of the Sears building being a historic resource. If there is sincere concern about preserving the building, the city should take into account the environmental impediments for housing development at this site and remove it from the Sites Inventory. It does not seem ethical to leave the site in the housing element in order to get credits towards the RHNA and then bring up potential historical resource concerns to deter the project from moving forward at public meetings.

Finally, everyone on the city council expressed a preference for the project to have a commercial or retail component, such as a restaurant. Please note that state law now allows for standalone residential development on commercial or even mixed use zoned sites.

The Sites Inventory needs to be revised to show the correct number of lower income (69) and above moderate (613) units proposed by the developer for the former Sears site.

2. 225 W Broadway (5642-002-056)

The Social Security Administration is a tenant in this building. Moreover, UnitedHealth has signed a long term lease for an Optum primary care clinic that would preclude redevelopment at this site during the 2021-2029 planning period.

The Sites Inventory shows this site as having the capacity for 250 lower income units. This

site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

3. 6444 San Fernando Rd (5623-027-903)

The US Post Office is in this building. The Sites Inventory shows this site as having the capacity for 21 lower income units. This site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

4. 206 N Kenwood St (5642-017-901)

This site is occupied by Allan F. Daily High School. The Sites Inventory shows this site as having the capacity for 103 lower income units. Absent findings, based on substantial evidence, that the existing use will be discontinued during the current planning period, this site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

5. 831 N Pacific Ave (5636-006-024)

My family owns this property. We were never consulted by city staff or the city consultant about interest in redeveloping this property into multi-family housing. The property has a 25,000 SF building which is leased to Big Square. Earlier this year we signed a ten (10) year lease extension with the tenant. The lease expires 8/31/2032.

The Sites Inventory shows this site as having the capacity for 40 lower income units. This site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

6. 1124 E Broadway (5674-012-018)

Multi-tenant shopping center;

My family owns this property. We were never consulted by city staff or the city consultant about interest in redeveloping this property into multi-family housing. The property has multiple tenants with lease agreements extending beyond the planning period. The Sites Inventory shows this site as having the capacity for 24 lower income units. This site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

7. 1122 E Broadway (5674-012-020)

CVS Pharmacy anchor for 1124 E Broadway

My family owns the "wings" of the strip mall (See #6 above). The CVS parcel is owned by another entity, but we share the parking lot. This site alone cannot be redeveloped without the "wings". Therefore, this site (capacity 47 lower income units) should also be eliminated.

In addition to the previously mentioned sites, there are a number of other properties designated in the Sites Inventory to have capacity for lower income units which currently have commercial uses that are presumed to impede additional residential development. The Housing Element does not present any findings to substantiate that these uses are likely to be discontinued during the planning period

a. 900 N Central (5644-013-043); 74 lower units

Crab Avenue Restaurant

b. 311 W Los Feliz Rd (5640-018-019); 108 lower units
Vons anchored shopping center

c. 1000 S Central Ave (5641-018-017); 82 lower units
JoAnn Fabrics

d. 1000 N Brand Blvd (5644-011-022); 22 lower units
Citizens Business Bank

e. 826 N Glendale Ave (5646-022-020); 27 lower units
Outpatient surgery center

f. 717 E Colorado St (5674-018-041); 20 lower units
Car wash

In all, the above sites account for more than 1,200 lower income units. I sincerely feel that these are "dummy sites" with no realistic potential for turning over into multi-family housing. The city is trying hard to avoid rezoning, but with current zoning we do not have enough underutilized parcels to generate the number of housing units required by 2029.

I recommend the city to rezone to allow larger buildings on all parcels within 1/2 mile of the Glendale Metrolink station and the recently approved NoHo-Pasadena BRT. This will open up opportunities for the turnover of commercial sites into multi-family residential projects and alleviate Glendale's housing shortage. In addition, generous development standards near mass transit will provide incentive for the development of affordable and lower-income units in Glendale's job-rich and high-resource neighborhoods. Glendale needs to take advantage of the future bus rapid transit line and rezone for higher density residential developments, especially areas north of the 134 freeway.

I will be submitting additional comments to HCD pertaining to recent amendments to the city's ADU Ordinance, which I believe do not encourage ADU development, and the city's decision to not enforce the tenant protection provisions of its Just Cause and Retaliatory Evictions Ordinance. As I have stated previously in my correspondence with city staff, the amended Housing Element does not contain any commitment for the establishment of a tenant protections enforcement program. Nor does it contain any plan to remove discretion out of the enforcement process and place a ministerial duty on city staff to enforce the tenant protection provisions.

I look forward to hearing back from you.

Thank you,
Alex Khatchaturian

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



June 10, 2020

MEMORANDUM FOR: Planning Directors and Interested Parties

A handwritten signature in black ink, appearing to read "mk".

FROM: Megan Kirkeby, Acting Deputy Director
Division of Housing Policy Development

SUBJECT: **Housing Element Site Inventory Guidebook
Government Code Section 65583.2**

The housing element of the general plan must include an inventory of land suitable and available for residential development to meet the locality's regional housing need by income level. The purpose of this Guidebook is to assist jurisdictions and interested parties with the development of the site inventory analysis for the 6th Housing Element Planning Cycle and identify changes to the law as a result of Chapter 375, Statutes of 2017 (AB 1397), Chapter 958, Statutes of 2018 (AB 686), Chapter 664, Statutes of 2019 (AB 1486), and Chapter 667, Statutes of 2019 (SB 6). The Guidebook should be used in conjunction with the site inventory form developed by the California Department of Housing and Community Development (HCD). These laws introduced changes to the following components of the site inventory:

- Design and development of the site inventory (SB 6, 2019)
- Requirements in the site inventory table (AB 1397, 2017 AB 1486, 2019)
- Capacity calculation (AB 1397, 2017)
- Infrastructure requirements (AB 1397, 2017)
- Suitability of nonvacant sites (AB 1397, 2017)
- Size of site requirements (AB 1397, 2017)
- Locational requirements of identified sites (AB 686, 2018)
- Sites identified in previous housing elements (AB 1397, 2017)
- Nonvacant site replacement unit requirements (AB 1397, 2017)
- Rezone program requirements (AB 1397, 2017)

The workbook is divided into five components: (Part A) identification of sites; (Part B) sites to accommodate the lower income RHNA; (Part C) capacity analysis; (Part D) non-vacant sites; and (Part E) determination of adequate sites.

If you have any questions, or would like additional information or technical assistance, please contact the Division of Housing Policy Development at (916) 263-2911.

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BACKGROUND AND PURPOSE

Housing Element Site Inventory Requirements

Scarcity of land with adequately zoned capacity is a significant contributor to increased land prices and housing development costs. A lack of adequately zoned sites exacerbates the already significant deficit of housing affordable to lower income households. An effective housing element provides the necessary conditions for conserving, preserving and producing an adequate supply of housing affordable at a variety of income levels and provides a vehicle for establishing and updating housing and land-use strategies to reflect changing needs, resources, and conditions. Among other things, the housing element establishes a jurisdiction's strategy to plan for and facilitate the development of housing over the five-to-eight year planning period by providing an inventory of land adequately zoned or planned to be zoned for housing and programs to implement the strategy.

The purpose of the housing element's site inventory is to identify and analyze specific land (sites) that is available and suitable for residential development in order to determine the jurisdiction's capacity to accommodate residential development and reconcile that capacity with the jurisdiction's Regional Housing Need Allocation (RHNA). The available and suitable sites are referred to as "adequate sites" throughout this Guidebook. The site inventory enables the jurisdiction to determine whether there are sufficient adequate sites to accommodate the RHNA by income category. A site inventory and analysis will determine whether program actions must be adopted to "make sites available" with appropriate zoning, development standards, and infrastructure capacity to accommodate the new development need.

Sites are suitable for residential development if zoned appropriately and available for residential use during the planning period. If the inventory demonstrates that there are insufficient sites to accommodate the RHNA for each income category, the inventory must identify sites for rezoning to be included in a housing element program to identify and make available additional sites to accommodate those housing needs early within the planning period.

Other characteristics to consider when evaluating the appropriateness of sites include physical features (e.g., size and shape of the site, improvements currently on the site, slope instability or erosion, or environmental and pollution considerations), location (e.g., proximity to and access to infrastructure, transit, job centers, and public or community services), competitiveness for affordable housing funding (e.g., Low Income Housing Tax Credit scoring criteria), and likelihood or interest in development due to access to opportunities such as jobs and high performing schools¹. When determining sites to include in the inventory to meet the lower income housing need, HCD recommends that a local government first identify development potential in high opportunity neighborhoods. This will assist the local government in meeting its requirements to affirmatively further fair housing and ensure developments are more competitive for development financing.

¹ Please Note: Significant increases in the housing capacity of the residential land inventory of the housing element could also warrant planning for updating of other elements, including the land use, safety, circulation elements and inclusion of an environmental justice element or environmental justice policies. The housing element must include a program describing the means by which consistency will be achieved with other general plan elements and community goals (GC 65583(c)(8)).

SITE INVENTORY GUIDEBOOK FRAMEWORK

The following is a Guidebook designed to assist a jurisdiction through the site inventory analysis required by Housing Element Law. Use of the Guidebook is not required for a determination of compliance by HCD. The Guidebook is intended to facilitate the jurisdiction in determining if adequate sites are available by income category to accommodate the jurisdiction's share of the RHNA or if rezoning or other program actions are needed. Areas of the law that are newly added since the beginning of the 5th housing element cycle are marked with the designation *NEW*.

Guidebook Structure

PART A: IDENTIFICATION OF SITES

General characteristics of suitable sites identified in the inventory, including zoning, infrastructure availability, and environmental constraints, among others.



PART B: SITES TO ACCOMMODATE LOW AND VERY LOW- INCOME RHNA

Analysis to determine if sites are appropriate to accommodate the jurisdiction's RHNA for low- and very low-income households.



PART C: CAPACITY ANALYSIS

Description of the methodology used to determine the number of units that can be reasonably developed on a site.



PART D: NONVACANT SITES

Analysis to determine if nonvacant sites are appropriate to accommodate the jurisdiction's RHNA.



PART E: DETERMINATION OF ADEQUATE SITES

After consideration of the above analysis and any alternate methods to accommodate RHNA, the determination of whether sufficient sites exist to accommodate RHNA or if there is a shortfall requiring a program to rezone additional sites.

PART A: IDENTIFICATION OF SITES

Step 1: Identification of Developable Sites

Government Code section 65583.2(a)

Generally, a site is a parcel or a group of parcels that can accommodate a portion of the jurisdiction's RHNA. A jurisdiction must identify, as part of an inventory, sites within its boundaries (i.e., city limits or a county's unincorporated area)² that could have the potential for new residential development within the eight- or five-year timeframe of the housing element planning period.

Types of sites include:

- Vacant sites zoned for residential use.
- Vacant sites zoned for nonresidential use that allow residential development.
- Residentially zoned sites that are capable of being developed at a higher density (nonvacant sites, including underutilized sites).
- Sites owned or leased by a city, county, or city and county.
- Sites zoned for nonresidential use that can be redeveloped for residential use and a program is included to rezone the site to permit residential use.

Pending, approved, or permitted development:

Projects that have been approved, permitted, or received a certificate of occupancy since the beginning of the RHNA projected period may be credited toward meeting the RHNA allocation based on the affordability and unit count of the development. For these projects, affordability is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project (See Part E). For projects yet to receive their certificate of occupancy or final permit, the element must demonstrate that the project is expected to be built within the planning period.

Definition of Planning Period: The “Planning period” is the time period between the due date for one housing element and the due date for the next housing element (Government Code section 65588(f)(1).) For example, the San Diego Association of Governments’ 6th Cycle Planning Period is April 15, 2021 to April 15, 2029.

Definition of Projection Period: “Projection period” is the time period for which the regional housing need is calculated (Government Code section 65588(f)(2).). For example, the San Diego Association of Governments’ 6th Cycle Projection Period is June 30, 2020 to April 15, 2029.

Please note, sites with development projects where completed entitlements have been issued are no longer available for prospective development and must be credited towards the RHNA based on the affordability and unit count of the development. “Completed entitlements” means a housing development or project which has received all the required land use approvals or entitlements necessary for the issuance of a building permit. This

² In some cases, jurisdictions may want to include sites anticipated to be annexed in the planning period. Annexation is considered a rezoning effort to accommodate a shortfall of sites. For more information on annexation please see Part E, Step 3.

means that there is no additional action required to be eligible to apply and obtain a building permit.

Jurisdictions may choose to credit sites with pending projects since the beginning of the RHNA projection period towards their RHNA based on affordability and unit count within the proposed project but must demonstrate the units can be built within the remaining planning period. Affordability must be based on the projected sales prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project.

Census definition of a unit: A housing unit is a house, an apartment, a group of rooms, or a single room occupied or intended for occupancy as separate living quarters. Separate living quarters are those in which the occupants do not live and eat with other persons in the structure and which have direct access from the outside of the building or through a common hall. Living quarters of the following types are excluded from the housing unit definition: dormitories, bunkhouses, and barracks; quarters in predominantly transient hotels, motels, and the like, except those occupied by persons who consider the hotel their usual place of residence; quarters in institutions, general hospitals, and military installations, except those occupied by staff members or resident employees who have separate living arrangements.

Student/University Housing: Please be aware, college and university student housing may be considered noninstitutional group quarters and not a housing unit for purposes of meeting the RHNA. According to the census, college/university student housing includes residence halls and other buildings, including apartment-style student housing, designed primarily to house college and university students in group living arrangements either on or off campus. These facilities are owned, leased, or managed by a college, university, or seminary or can be owned, leased, or managed by a private company or agency. Residents typically enter into "by the bed" leases (i.e., single-liability leases). Another distinguishing factor is that the unit is not available for rent to non-students. For further information on whether university housing meets the definition of a housing unit, please contact the Department of Finance at (916) 323-4086.

Exempt entity-controlled sites (state excess sites, military, university, and tribal land)

HCD recognizes that the development of new housing on exempt entity sites (land controlled by exempt federal, state, or tribal entities) can meet a portion of a jurisdiction's RHNA. However, sites located on land controlled by exempt entities are analyzed differently because the jurisdiction may not have control over the planning, permitting, and decision-making processes of land owned by another public entity.

Sites controlled by exempt entities can be used to accommodate RHNA when documentation can be provided that demonstrates the likelihood that the planned housing will be developed within the current RHNA/housing element cycle. Adequate documentation can vary due to differences in the planning processes on land controlled by exempt federal, state, or tribal entities. The following are examples of documentation that demonstrates the likelihood of housing being developed on sites outside the control of a local government. In each of these examples, the units would have to meet the U.S. Census Bureau (Census) definition of a housing unit:

- Agreement with the entity controlling the land that grants the jurisdiction authority regarding approving, permitting, certifying occupancy, and/or reporting new units to the California Department of Finance.
- Documentation from the entity controlling the land that demonstrates planned housing has been approved to be built within the current RHNA cycle.
- Data pertaining to the timing of project construction and unit affordability by household income category.
- If the site is listed on the Department of General Services Real Estate Excess State Property map located [EO N-06-19 Affordable Housing Development webpage](#).

Step 2: Inventory of Sites

Government Code section 65583.2(b)

Provide a parcel specific inventory of sites that includes the following information for each site:

- ***NEW*** Assessor parcel number(s).
- Size of each parcel (in acres).
- General plan land use designation.
- Zoning designation.
- For nonvacant sites, a description of the existing use of each parcel (See Part D)
- ***NEW*** Whether the site is publicly owned or leased.
- Number of dwelling units that the site can realistically accommodate (See Part C)
- ***NEW*** Whether the parcel has available or planned and accessible infrastructure (Part A: Step 3).
- ***NEW*** The RHNA income category the parcel is anticipated to accommodate (See Part A: Step 5).
- ***NEW*** If the parcel was identified in a previous planning period site inventory (Part B: Step 1).

NEW Please note pursuant to Chapter 667, Statutes of 2019 (SB 6), the site inventory must be prepared using the standards, form, and definitions adopted by HCD. HCD has prepared a form and instructions for this purpose that includes space for the information above and commonly provided optional fields. Starting January 1, 2021, local governments will need to submit an electronic version of the site inventory to HCD on this form along with its adopted housing element.

NEW Pursuant to Chapter 664, Statutes of 2019 (AB 1486), at Government Code section 65583.2(b)(3), if a site included in the inventory is owned by the city or county, the housing element must include a description of whether there are any plans to sell the property during the planning period and how the jurisdiction will comply with the Surplus Land Act [Article 8 \(commencing with Section 54220\) of Chapter 5 of Part 1 of Division 2 of Title 5](#).

Step 3: Infrastructure Availability

Government Code section 65583.2(b)(5)(B)

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer, and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity to secure sufficient water, sewer, and dry utilities supply to support housing development on the site in time to make housing development realistic during the planning period. Dry utilities include, at minimum, a reliable energy source that supports full functionality of the

home and could also include access to natural gas, telephone and/or cellular service, cable or satellite television systems, and internet or Wi-Fi service.

If Yes: Provide an analysis in the housing element describing existing or planned water, sewer, and other dry utilities supply, including the availability and access to parcels on the site inventory, distribution facilities, general plan programs or other mandatory program or plan (including a program or plan of a public or private entity to secure water or sewer service) to support housing development on the site. The housing element must include sufficient detail to determine whether the service levels of water delivery/treatment systems and sewer treatment facilities are sufficient and have the capacity to accommodate development on all identified sites in order to accommodate the RHNA. For example, the water supply should be a reliable supply that meets federal and state drinking water standards.

Please note sites identified as available for housing for above moderate-income households can still be in areas not served by public sewer systems.

If No: Include a program in the housing element that ensures access and availability to infrastructure to accommodate development within the planning period. If this is not possible, the site is not suitable for inclusion in the site inventory or in a program of action identifying a site for rezoning.

Step 4: Map of Sites

Government Code section 65583.2(b)(7)

Provide a map that shows the location of the sites included in the inventory. While the map may be on a larger scale, such as the land use map of the general plan, the more detailed the map, the easier it will be to demonstrate the sites meet new requirements pursuant to Chapter 958, Statutes of 2018 (AB 686) as stated below.

Step 5: Determination of Consistency with Affirmatively Furthering Fair Housing

Government Code section 65583.2(a)

NEW Pursuant to AB 686, for housing elements due on or after January 1, 2021, sites must be identified throughout the community in a manner that affirmatively furthers fair housing opportunities (Government Code Section 65583(c)(10)).

Affirmatively Furthering Fair Housing means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency’s³

³ Public Agencies include the state, including every state office, officer, department, division, bureau, board, and commission, including the California State University, a city, including a charter city, county, including a charter county, city and county, and a redevelopment successor agency, a public housing authority created pursuant to the Housing Authorities Law, a public housing agency, and any other political subdivision of the state that is a grantee or subgrantee receiving funds provided by the United States Department of Housing and Urban Development (Government Code section 8899.5(a)(2)).

activities and programs relating to housing and community development." (Government Code section 8899.50(a)(1)).

For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income need are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Instead, sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing. One resource the jurisdiction could use when completing this analysis is the California Tax Credit Allocation/California Department of Housing and Community Development Opportunity Maps, which can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>. Particularly, the jurisdiction should consider the barriers and opportunities identified in its assessment of fair housing pursuant to Government Code section 65583(c)(10). HCD plans to release a technical assistance memo to assist jurisdictions in addressing AB 686 requirements in their housing element in the Summer of 2020.

Jurisdictions should also consider integrating this analysis with the requirements of Government Code 65302(h), as added by SB 1000 (Statutes of 2016), which requires the preparation and adoption of an Environmental Justice element or equivalent environmental justice-related policies, objectives, and goals throughout other elements of their general plan, to address the needs of disadvantaged communities. More information on Environmental Justice elements can be found on the [Governor's Office of Planning and Research Website](#).

Step 6: Sites by RHNA Income Category

Government Code section 65583.2(c)

NEW Identify which RHNA income category that each site in the inventory is anticipated to accommodate. On the site inventory, specify whether the site or a portion of the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing. Sites can accommodate units for more than one income category. However, the inventory should indicate the number of units of each income category, and together the total of units attributed to each income category may not exceed total units attributed to the site, so that no unit is designated for more than one income category. This requirement is particularly important because the No Net Loss Law (Government Code section 65863) requires adequate sites be maintained throughout the planning period to accommodate the remaining RHNA by income category. For more information, please consult the HCD's memo on [No Net Loss Law](#).

HCD Best Practices for selecting sites to accommodate the lower income RHNA:

When determining which sites are best suited to accommodate the RHNA for lower income households, the jurisdiction should consider factors such as:

- Proximity to transit.
- Access to high performing schools and jobs.
- Access to amenities, such as parks and services.
- Access to health care facilities and grocery stores.
- Locational scoring criteria for Low-income Housing Tax Credit (TCAC) Program funding.
- Proximity to available infrastructure and utilities.

- Sites that do not require environmental mitigation.
- Presence of development streamlining processes, environmental exemptions, and other development incentives.

Step 7: Environmental Constraints

Government Code section 65583.2(b)(4)

Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites. The housing element need only describe those environmental constraints where documentation of such conditions is available to the local government. This analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities. This information need not be identified on a site-specific basis. However, local governments will find it beneficial to describe site specific environmental conditions when demonstrating site suitability and realistic buildout capacity of each site, as these types of impediments to building must be considered when determining how many residential units can be developed on the site.

NEXT STEP:

- If the site is selected to accommodate its low or very-low income RHNA, move to Part B: Sites to Accommodate Low and Very-Low Income RHNA.
- If the site accommodates moderate or above-moderate RHNA, move to Part C: Capacity Analysis.

PART B: SITES TO ACCOMMODATE LOW AND VERY LOW-INCOME RHNA

Step 1: *NEW* Sites Used in Previous Planning Periods Housing Elements

Government Code section 65583.2(c)

Determine if the site identified to accommodate the low- and very low-income RHNA pursuant to Part A, Step 6 was used in the previous planning period⁴. Generally, previously identified sites refer to parcels that were identified in a previous housing element's site inventory to accommodate any portion of any income category of the jurisdiction's RHNA, as follows:

For a nonvacant site: Included in a prior planning period's housing element (e.g., 5th cycle housing element)

For a vacant site (see definition of vacant site on page 21): Included in two or more consecutive planning periods (e.g., 5th cycle and 4th cycle housing element)

If Yes: move to Step 1A

If No: move to Step 2

Unusual Circumstances

Sites rezoned or identified for rezoning to accommodate a RHNA shortfall

Previously identified sites can also include sites that were subject to a previous housing element's rezone program but that were ultimately not rezoned. For example: a previous housing element's rezone program to address a shortfall of sites for lower income households committed to rezone four acres to R-4 zoning, and identified five candidate sites for rezoning, A through E, and each site was two acres in size. If the program was completed in the prior planning period and four acres were rezoned, only those sites rezoned are considered "previously identified." However, if none or fewer than four acres were rezoned, all the non-rezoned sites identified as candidate sites would be considered as "previously identified."

Sites rezoned to a higher density as part of a general plan update (not needed to accommodate a shortfall)

Due to updates in the prior planning period to the general plan or other planning activities, such as the creation of a specific plan, some sites previously identified in the housing element may have been rezoned allowing a higher density, and therefore increasing the potential housing capacity of the site. Because the zoning characteristics of this site have changed, it can be considered a new site for the purposes of the housing element inventory. This is only the case if it was not utilized to accommodate a shortfall of sites to accommodate the RHNA.

⁴ Sites in unincorporated areas in a nonmetropolitan county without a micropolitan area are exempt from this step. This includes the unincorporated parts of Alpine, Amador, Calaveras, Colusa, Glenn, Mariposa, Modoc, Mono, Plumas, Sierra, Siskiyou, Trinity.

Step 1A:

Indicate in the housing element site inventory that this parcel was used in a prior housing element planning period.

Step 1B:

Include a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right at specified densities (see Step 2) for housing developments in which at least 20 percent of the units are affordable to lower income households. This program can be an overlay on these specific sites. Please be aware that the intent of this requirement is to further incentivize the development of housing on sites that have been available over one or more planning periods. The application of the requirement should not be used to further constrain the development of housing. As such, housing developments that do not contain the requisite 20 percent would still be allowed to be developed according to the underlying (base) zoning but would not be eligible for “by right” processing. However, the jurisdiction would have to make findings on the approval of that project pursuant to No Net Loss Law (Government Code section 65863) and proceed to identify an alternative site or sites pursuant to that law.

Definition of Use By Right (Government Code section 65583.2 (i))

By right means the jurisdiction shall not require:

- A conditional use permit.
- A planned unit development permit.
- Other discretionary, local-government review or approval that would constitute a “project” as defined in Section 21100 of the Public Resources Code (California Environmental Quality Act “CEQA”).

However, if the project requires a subdivision, it is subject to all laws, including CEQA.

This does not preclude a jurisdiction from imposing objective design review standards. However, the review and approval process must remain non discretionary and the design review must not constitute a “project” as defined in Section 21100 of the Public Resources Code. For example, a hearing officer (e.g., zoning administrator) or other hearing body (e.g., planning commission) can review the design merits of a project and call for a project proponent to make design-related modifications, but cannot exercise judgment to reject, deny, or modify the “residential use” itself. (See *McCorkle Eastside Neighborhood Group v. City of St. Helena* (2019) 31 Cal.App.5th 80.)

For reference, CEQA applies when a governmental agency can exercise judgment in deciding whether and how to carry out or approve a project. This makes the project “discretionary” (CEQA Guidelines, §15357.) Where the law requires a governmental agency to act on a project using fixed standards and the agency does not have authority to use its own judgment, the project is called “ministerial,” and CEQA does not apply. (CEQA Guidelines, §§ 15268(a), 15369.)

Sample Program:

Provide Adequate Sites for Lower Income Households on Nonvacant and Vacant Sites Previously Identified

The City of X will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower income households on sites identified in Table A to accommodate the lower income RHNA that was previously identified in past housing elements. Specifically, the City will rezone the nonvacant sites identified on Table A previously identified in the 5th cycle housing element, and the vacant sites identified on Table A as previously identified for both the 5th and 4th cycle housing elements.

Objective: Create opportunity for at least X units of rental housing for lower income households

Responsible Agency: Community Development Department

Timeline: Sites rezoned by (a specific date, no more than three years from the beginning of the planning period)

Funding Source(s): General fund

Step 2: Zoning Appropriate to Accommodate Low- and Very Low- Income RHNA
Government Code section 65583.2(c)(3)

Determine if the zoning on the site is appropriate to accommodate low- and very low-income (termed together as “lower”) housing.

The statute allows jurisdictions to use higher density as a proxy for lower income affordability, as long as certain statutory requirements are met. Parcels must be zoned to allow sufficient density to accommodate the economies of scale needed to produce affordable housing. To make this determination, the statute allows the jurisdiction to either demonstrate that the zoning allows a specific density set forth in the statute (default density)⁵ or to provide an analysis demonstrating the appropriateness of the zoned densities of the site identified to accommodate the lower RHNA.

Step 2A: Does the parcel’s zoning allow for “at least” the following densities?

- For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.
- For an unincorporated area in a nonmetropolitan county not included in the first bullet: sites allowing at least 10 units per acre.
- For a suburban jurisdiction: sites allowing at least 20 units per acre.
- For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.

“At least” means the density range allowed on the parcel by the zone has to include the default density. For example, if a jurisdiction has a default density of 30 units per acre and the zone allows for range of 24 – 35 units per acre, the zoning is considered appropriate to accommodate the RHNA for lower income households. This is different than the program standard outlined in Part E which requires a minimum of a specific density in the allowed

⁵ Sometimes called “Mullin densities” after the author of AB 2348, Statutes of 2004, which originated these requirements.

density range in the zone. To determine the default density for jurisdictions, please refer to [HCD Memorandum: Default Density Standard Option \(2010 Census Update\)](#).

If Yes: Move to Step 3

If No: Move to Step 2B

Step 2B: Can the analysis demonstrate the appropriateness of the zoning to accommodate housing?

Provide an analysis demonstrating how the allowed densities facilitate the development of housing to accommodate the lower income RHNA. The analysis shall include, but is not limited to, factors such as market demand, financial feasibility, and information based on development project experience within a zone or zones, or at densities that accommodate housing for lower income households.

Information gathered from local developers on densities ideal for housing development in the community and examples of recent residential projects that provide housing for lower income households is helpful in establishing the appropriateness of the zone. Other information could include land costs, market demand for various types of affordable housing, and the gap between typical market rents and subsidized rents. It is recognized that housing affordable to lower income households requires significant subsidies and financial assistance. However, for this analysis, identifying examples of subsidized housing projects alone is not sufficient to demonstrate the adequacy of a zone and/or density to accommodate the housing affordable to lower income households. In particular, identification of older project(s) or one-off projects that cannot be easily duplicated is not sufficient to demonstrate a development trend.

The analysis of “appropriate zoning” should not include residential buildout projections resulting from the implementation of a jurisdiction’s inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility.

If Yes: Move to Step 3

If No: Site is not appropriate to accommodate lower income. Reclassify pursuant to Part A, Step 5.

Housing Overlays

Affordable housing or zoning overlays are a zoning tool that allows jurisdictions to modify existing zoning to allow for or require certain types of residential development, or development at certain densities, on a parcel without modifying the standards of the underlying zoning district. Usually, they have specific requirements and conditions (e.g., a percentage of the development must be deed-restricted as affordable to lower income households for a specific number of years) that must be met in order for a developer to take advantage of the overlay. These are often combined with incentives to encourage developers to utilize the overlay. Jurisdictions use overlays to help promote a specific type of development, and to increase densities without having to go through a rezoning procedure on the actual parcel and can be more useful when issues such as density and affordable housing become contentious. To ensure the overlay is considered zoning and not just a development incentive, the overlay must demonstrate the following:

- There is no additional discretionary action needed above what is required in the base zone (i.e., a conditional use permit or other review) for a developer to take advantage of overlay.
- Development standards are consistent with those needed to allow for the density allowed under the overlay. Development standards for use exclusively in the overlay may be needed in order to ensure maximum allowable densities can be achieved.
- The developer can access State Density Bonus Law in addition to using the densities allowed in the overlay. For example, if the underlying zoning allows a maximum density of 15 units per acre, but the overlay allows a maximum density of 25 units per acre, and if the developer is using the overlay and wants to use State Density Bonus Law, the density bonus is calculated assuming the base density is 25 units per acre.

If the overlay has conditions such as an affordability requirement, incentives should be sufficient and available to make development feasible and more profitable than the underlying zoning.

For an affordable housing overlay, the element should describe affordability threshold requirements to utilize the overlay (i.e., percentage of units and levels of affordability which must be met to develop at the increased densities). Please note, the jurisdiction should talk with for-profit and nonprofit developers to determine an appropriate mix of incomes that make development feasible in their community. For example, a 100 percent affordability requirement may act as a constraint to using the overlay depending on the level of subsidy required per unit and the availability of funding to support the level of affordability or available incentives.

Step 3: Size of Sites

Government Code section 65583.2(c)(2)(A), (B), and (C)

NEW Is the size of the site appropriate to accommodate housing for lower income households?

To achieve financial feasibility, many assisted housing developments using state or federal resources are between 50 to 150 units. Parcels that are too small may not support the number of units necessary to be competitive and to access scarce funding resources. Parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location, or may add cost to a project by

requiring a developer to purchase more land than is needed, or render a project ineligible for funding. If the size of the site is smaller than one half acre or larger than 10 acres, the following analysis is required.

If the parcel is more than 0.5 acres or less than 10 acres, is the size of the site automatically considered appropriate to accommodate lower income RHNA?

Not necessarily. If the size of the parcel in combination with the allowable density and accompanying development standards cannot support a housing development affordable to lower income households, further analysis and programs may be needed to demonstrate the suitability of that site to accommodate the portion of the RHNA for lower income households.

Is the size of the parcel under 0.5 acres?

If Yes: Move to Step 3A

Is the size of the parcel over 10 acres?

If Yes: Move to Step 3B

If No to Both: Move to Part C: Capacity Analysis

Step 3A: Sites smaller than 0.5 acres

A parcel smaller than one half acre is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. While it may be possible to build housing on a small parcel, the nature and conditions (i.e., development standards) necessary to construct the units often render the provision of affordable housing infeasible. The housing element must consider and address the impact of constraints associated with small lot development on the ability of a developer to produce housing affordable to lower income households. To demonstrate the feasibility of development on this type of site, the analysis must include at least one of the following:

- An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.
- Evidence that the site is adequate to accommodate lower income housing. Evidence could include developer interest, potential for lot consolidation, densities that allow sufficient capacity for a typical affordable housing project, and other information that can demonstrate to HCD the feasibility of the site for development. For parcels anticipated to be consolidated, the housing element must include analysis describing the jurisdiction's role or track record in facilitating small lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for consolidation such as common ownership, and recent trends of lot consolidation. The housing element should include programs promoting, incentivizing, and supporting lot consolidations and/or small lot development.
- A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

The housing element must also describe existing and proposed policies or incentives the jurisdiction will offer to facilitate development of small sites. Examples of program incentives for lot consolidation include deferring fees specifically for consolidation, expediting permit processing, providing flexible development standards such as setback requirements, reduced parking or increased heights, committing resources for development of affordable housing on small sites, or increasing allowable density, lot coverage or floor area ratio.

Step 3B: Sites larger than 10 acres

Parcels larger than 10 acres are considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on such sites was successful during the prior planning period, or there is other evidence that the site is realistic and feasible for lower income housing.

Definition of a Large Site

For purposes of this requirement, “site” means that portion of the parcel designated to accommodate lower income housing needs. For example, a parcel greater than 10 acres in size could have to be split zoned, have an overlay zone with identified boundaries, or be identified in a specific plan that provides for subdivision of the parcel. If the specified boundaries of the site identified to accommodate the RHNA for lower income is less than 10 acres in size, then the large site analysis would not be required. However, the analysis must describe how the development will work on the site, including opportunities and timing for specific-plan development, further subdivision, or other methods to facilitate the development of housing affordable to lower income households on the identified site within the planning period.

To demonstrate the feasibility of development on this type of site, the analysis must include at least one of the following:

- An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.
- Evidence that the site is adequate to accommodate lower income housing. Evidence may include developer interest, proposed specific-plan development, potential for subdivision, the jurisdiction’s role or track record in facilitating lot splits, or other information that can demonstrate to HCD the feasibility of the site for development. The housing element should include programs promoting, incentivizing, and supporting lot splits and/or large lot development.
- A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

Specific Plans, Master Plan, and other Subdivisions

To utilize residential capacity in Specific Plan areas, areas under a Master Plan, or a similar multi-phased development plan, the housing element must identify specific sites by parcel number and demonstrate that the sites are available and suitable for development within the planning period. The analysis should include the following information:

- Identify the date of approval of the plans and expiration date.
- Identify approved or pending projects within these plans that are anticipated in the planning period, including anticipated affordability based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project.
- Describe necessary approvals or steps for entitlements for new development (e.g., design review, site plan review, etc.).
Describe any development agreements, and conditions or requirements such as phasing or timing requirements, that impact development in the planning period.

The housing element must also describe existing and proposed policies or incentives the jurisdiction will offer to facilitate development of large sites. Examples of facilitation include expedited or automatic approval of lot splits or creation of new parcels, waivers of fees associated with subdivision, or expedited processing or financial assistance with the development of infrastructure required to develop the site.

NEXT STEP:

- Move to Part C: Capacity Analysis

PART C: CAPACITY ANALYSIS

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to calculate the projected residential development capacity of the sites identified in the housing element that can be realistically be achieved. The housing element must describe the methodology used to make this calculation. Jurisdictions have two options to make this calculation.

- Utilize minimum densities (Step 1)
- Utilize adjustment factors (Step 2)

Step 1: Utilizing minimum densities to calculate realistic capacity of sites

Government Code section 65583.2(c)(1)

If the jurisdiction has adopted a law, policy, procedure, or other regulation that requires the development of a site to contain at least a certain minimum residential density, the jurisdiction can utilize that minimum density to determine the capacity of a site. For purposes of this analysis, the use of either gross or net acreage is acceptable but should be consistent with the standard the jurisdiction typically uses for determining allowable units for a residential development project. For example:

Site Description	Value
Size of site (Gross acreage)	3 acres
Zoning	Residential Multifamily
Allowable density	20 (required minimum) – 30 dwelling units per acre
Realistic capacity utilizing minimum	3 X 20 = 60 units

Please note, to meet this standard on a zone that allows for multiple uses, the general plan or zoning must require the specified minimum number of residential units on the identified sites regardless of overlay zones, zoning allowing nonresidential uses, or other factors potentially impacting the minimum density. Otherwise, the capacity of the site must be calculated using the factors outlined in Step 2.

Step 2: Utilizing factors to calculate realistic capacity of sites

Government Code section 65583.2(c)(2)

The housing element must describe the methodology used to determine the number of units calculated based on the following factors:

- Land use controls and site improvements requirements,
- *NEW* The realistic development capacity for the site,
- *NEW* Typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction,
- *NEW* The current or planned availability and accessibility of sufficient water, sewer, and dry utilities.

Applicable land-use controls and site improvement requirements

The analysis must consider the imposition of any development standards that impact the residential development capacity of the sites identified in the inventory. When establishing realistic unit capacity calculations, the jurisdiction must consider the cumulative impact of standards such as maximum lot coverage, height, open space, parking, on-site improvements such as sidewalks or easements, and floor area ratios. The analysis should consider any development standards or the cumulative effect of development standards that would limit the achievable density on a site. For example, if a mixed-use zone requires commercial on the ground floor and has a height limit of three stories along with lot coverage and other development standards, the density that can actually be achieved on that site might be less than the maximum allowable density.

The capacity of a site should also be adjusted for areas that cannot be developed due to environmental factors such as hazards, wetlands, or topography that cannot be mitigated. The capacity of sites subject to specific plans, overlays or other modifications of the base zoning should be adjusted to reflect those factors. For purposes of this analysis, it is recommended that the jurisdiction start with the gross acreage and adjust the buildable acreage accordingly to reach net buildable acreage.

Form Based Codes

To estimate capacity for sites in jurisdictions that have adopted form-based codes, the element should describe the relationship between general plan land-use designation and the form-based code and density assumptions used to determine capacity. Specifically, describe where residential development is allowed, how density requirements found within the general plan are incorporated, how the zoning designations under the form-based code relate to the land-use designations of the general plan, identify potential densities, and consider development standards such as bulk, height, and build-to requirements, buildings types, and use requirements. The element could include examples of recently built projects and densities to support the analysis.

Realistic development capacity for nonresidential, nonvacant, or overlay zoned sites

The capacity calculation must be adjusted to reflect the realistic potential for residential development capacity on the sites in the inventory. Specifically, when the site has the potential to be developed with nonresidential uses, requires redevelopment, or has an overlay zone allowing the underlying zoning to be utilized for residential units, these capacity limits must be reflected in the housing element. Factors used to make this adjustment may include the following:

- Performance standards mandating a specified portion of residential development in mixed use or nonresidential zones (e.g., residential allowed only above first floor commercial).
- The likelihood for residential development such as incentives for residential use, market demand, efforts to attract and assist developers, or allowance of 100 percent residential development.
- Local or regional residential development trends in the same nonresidential zoning districts.
- Local or regional track records, past production trends, or net unit increases/yields for redeveloping sites or site intensification. This estimate may be based on the rate at which similar parcels were developed during the previous planning period, with

- adjustments as appropriate to reflect new market conditions or changes in the regulatory environment. If no information about the rate of development of similar parcels is available, report the proportion of parcels in the previous housing element's site inventory that were developed during the previous planning period. For example, if past production trends indicate that two out of three similar sites were developed for residential use, and one out of three similar sites was developed for commercial use, an initial estimate of the proportion of new development which is expected to be residential would be two-thirds, i.e., 0.67.
- Local or regional track records, trends, or build out yields for redeveloping sites or site intensification.

In addition, the housing element should include monitoring programs with next-step actions to ensure sites are achieving the anticipated development patterns. The programs should identify modifications to incentives, sites, programs, or rezoning the jurisdiction will take should these strategies not yield the expected housing potential.

Typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction

While using typically built densities to determine realistic capacity has long been an option to be used as an adjustment factor, the statute now requires this factor to be adjusted based on approved project by affordability level. For example, if a site is identified to accommodate the lower income RHNA, it should use project densities for housing affordable to lower income households developed either locally or regionally to determine typical densities⁶. Using this adjustment factor may result in utilizing different capacity methodologies for above moderate-, moderate-, and lower income sites.

Current or planned availability and accessibility of sufficient water, sewer, and dry utilities

The capacity methodology must be adjusted to account for any limitation as a result of availability and accessibility of sufficient water, sewer, and dry utilities (i.e., if the capacity of the site could be limited because a development would have to use a septic system, if there are any septic tank requirements or restrictions that constrain capacity, or limitations on water hook-ups). See Part A, Step 3 for more information on infrastructure requirements.

Example Capacity Calculation

Here is an example of the actual capacity calculation for a particular site in the inventory. The methodology analysis must describe how each of these adjustments was generated per the analysis requirements above. The factors used below are based on the factors outlined in the statute. The percentages and how the factors are applied will vary depending on the unique circumstance in each jurisdiction.

⁶ In using this adjustment factor, because of the use of density bonus, it may be possible that trends demonstrate typical densities higher than the maximum allowable densities, especially for housing affordable to lower income households. On a case-by-case basis, it may be appropriate to utilize increased densities due to density bonuses when determining the adjustment factor in the capacity methodology.

Site Description	
Size of site	2.5 acres
Zoning	Residential Mixed-Use
Allowable density	20 – 45 dwelling units per acre
RHNA affordability	Lower income
Existing Use	Nonvacant, single storefront
Infrastructure availability	Yes, no constraints
Environmental constraints	None known

Capacity Factors	Adjustment	Reasoning
Land Use Controls and Site Improvements	95%	For net acreage due to on-site improvements including sidewalks, utility easement
Realistic capacity of the site	55%	55% adjustment based on past development trends for residential redevelopment in the residential mixed-use zones, and programs to incentivize development in this zone.
Typical densities	95%	Affordable housing projects are built out to almost maximum density
Infrastructure availability	No adjustment	Not applicable, no constraint
Environmental constraints	No adjustment	No known site constraint

Realistic capacity utilizing factors = $(2.5 \times 45)(.95)(.55)(.95) = 56$ units

Realistic Capacity = 56 Units

No Net Loss Law

In estimating realistic capacity on sites in the sites inventory, jurisdictions may want to consider No Net Loss Law. This law was amended by Chapter 367, Statutes of 2017 (Senate Bill 166), which requires sufficient adequate sites to be available at all times throughout the RHNA planning period to meet a jurisdiction's remaining unmet housing needs for each income category. To comply with the No Net Loss Law, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites according to the No Net Loss Law if a jurisdiction rezones a site or if the jurisdiction approves a project at a different income level than shown in the sites inventory. Lower density means fewer units than the capacity assumed in the site inventory.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, it is recommended the jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA. Jurisdictions can also create a buffer by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level.

NEXT STEP:

- If the parcel is nonvacant, including underutilized sites (see definition of vacant site on page 22), move to Part D: Nonvacant Sites Analysis
- If not, move to Part E: Determination of Adequate Sites

PART D: NONVACANT SITES

Local governments with limited vacant land resources or with infill and reuse goals may rely on the potential for new residential development on nonvacant sites, including underutilized sites, to accommodate their RHNA. Examples include:

- Sites with obsolete uses that have the potential for redevelopment, such as a vacant restaurant.
- Nonvacant publicly owned surplus or excess land; portions of blighted areas with abandoned or vacant buildings.
- Existing high opportunity developed areas with mixed-used potential.
- Nonvacant substandard or irregular lots that could be consolidated.
- Any other suitable underutilized land.

Local governments can meet other important community objectives to preserve open space or agricultural resources, as well as assist in meeting greenhouse gas emission-reduction goals, by adopting policies to maximize existing land resources and by promoting more compact development patterns or reuse of existing buildings.

Definition of a Vacant Site

A vacant site is a site without any houses, offices, buildings, or other significant improvements on it. Improvements are generally defined as development of the land (such as a paved parking lot, or income production improvements such as crops, high voltage power lines, oil-wells, etc.) or structures on a property that are permanent and add significantly to the value of the property.

Examples of Vacant Sites:

- No improvement on the site (other than being a finished lot).
- No existing uses, including parking lots.
- Underutilized sites are not vacant sites.
- Sites with blighted improvements are not vacant sites.
- Sites with abandoned or unoccupied uses are not vacant sites.

If the inventory identifies nonvacant sites to address a portion of the RHNA, the housing element must describe the realistic development potential of each site within the planning period. Specifically, the analysis must consider the extent that the nonvacant site's existing use impedes additional residential development, the jurisdiction's past experience converting existing uses to higher density residential development, market trends and conditions, and regulatory or other incentives or standards that encourage additional housing development on the nonvacant sites.

Step 1: Description of the nonvacant site

Government Code Section 65583.2(b)

As stated in Part A, the site inventory must describe the specific existing use on the site, such as a surplus school site, auto shop, restaurant, single family residence, nursery, etc. Additional details, such as whether the use is discontinued, land to value information, age and condition of the structure, known leases, developer or owner interest, whether the property is currently being marketed, degree of underutilization, etc., are useful for demonstrating the potential for the site to be redeveloped within the planning period (See Step 2).

Step 2: Nonvacant site analysis methodology

Government Code section 65583.2(g)(1)

Provide an explanation of the methodology used to determine the development potential. This methodology can be done on a site-specific basis by utilizing factors (e.g., common ownership, valuation, age, etc.) in common that demonstrate the potential for residential development within the planning period, or a combination of both approaches. The methodology shall consider factors including:

Existing Uses:

Include an analysis that demonstrates the extent to which existing uses may constitute an impediment to additional residential development. Among other things, this analysis includes considerations for the current market demand for the existing use, *NEW* an analysis of any known existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, and could include other market conditions that would encourage redevelopment of the property. For example, an analysis might describe an identified site as being developed with a 1960's strip commercial center with few tenants and expiring leases and, therefore, a good candidate for redevelopment, versus a site containing a newly opened retail center, an active Home Depot, the only grocery store in the city, etc. that is unlikely to be available for residential development within the planning period.

Development Trends:

The inventory analysis should describe development and/or redevelopment trends in the community as it relates to nonvacant sites, i.e., the rate at which similar sites have been redeveloped. This could include a description of the local government's track record and specific role in encouraging and facilitating redevelopment, adaptive reuse, or recycling to residential or more intensive residential uses. If the local government does not have any examples of recent recycling or redevelopment, the housing element should describe current or planned efforts (via new programs) to encourage and facilitate this type of development (e.g., providing incentives to encourage lot consolidation or assemblage to facilitate increased residential-development capacity). The results of the analysis should be reflected in the capacity calculation described in Part C, above.

Market Conditions:

Housing market conditions also play a vital role in determining the feasibility or realistic potential of nonvacant sites for residential development. The nonvacant sites analysis should include an evaluation of the impact of local market conditions on redevelopment or reuse strategies. For example, high land and construction costs, combined with a limited supply of available and developable land, may indicate conditions "ripe" for more intensive, compact and infill development or redevelopment and reuse.

Availability of Regulatory and/or other Incentives:

The analysis should describe existing or planned financial assistance, incentives or regulatory concessions to encourage residential development on nonvacant sites. Many local governments develop partnerships with prospective developers to assist in making redevelopment/reuse economically feasible. Examples of these incentives include:

- Organizing special marketing events geared towards the development community.
- Identifying and targeting specific financial resources.
- Allowing streamlined or by right development application processing for infill sites.
- Reducing appropriate development standards.

Absent a track record or development trends to demonstrate the feasibility of a recycling or redevelopment strategy, the housing element should describe existing or planned financial assistance or regulatory relief from development standards that will be provided sufficient to encourage and facilitate more intensive residential development on the identified nonvacant sites.

Step 3: *NEW* Reliance on nonvacant sites to accommodate more than 50 percent of the RHNA for lower income households

Government Code Section 65583.2(g)(2)

Determine if more than 50 percent of the lower income RHNA is on nonvacant sites.

- Calculate the sum of lower income RHNA capacity on vacant sites and other alternatives not related to capacity on nonvacant sites (e.g., accessory dwelling units, vacant sites to be rezoned (see Part E)).
- Subtract that sum from the total lower income RHNA to get the amount of RHNA needed to be accommodated on nonvacant sites.
- Determine if this number is greater than 50 percent of the RHNA.

Example calculation for a jurisdiction with a lower income RHNA of 500:

Adjustment Factor	Number of units
Proposed Lower Income Project	50
Accessory Dwelling Unit Capacity (affordable to lower)	15
Capacity on Vacant Sites	100
Total Capacity (not related to non-vacant sites)	165
RHNA on Nonvacant sites	500 - 165 = 335
Percentage of Lower Income RHNA accommodated on Nonvacant sites	335/500 = 77%

If Yes: Move to Step 3A

If No: Move to Step 4

Step 3A:

If a housing element relies on nonvacant sites to accommodate 50 percent or more of its RHNA for lower income households, the nonvacant site's existing use is presumed to impede additional residential development, unless the housing element describes findings based on substantial evidence that the use will likely be discontinued during the planning period. The housing element must include the following:

- As part of the resolution adopting the housing elements, findings stating the uses on nonvacant sites identified in the inventory to accommodate the RHNA for lower income is likely to be discontinued during the planning period and the factors used to make that determination. This can be included in the body or in the recital section of the resolution.

Example: WHEREAS, based on <name factors here (e.g., expiring leases, dilapidated building conditions, etc.)>, the existing uses on the sites identified in the site inventory to accommodate the lower income RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the housing element.

- The housing element should describe the findings and include a description of the substantial evidence they are based on.

In general, substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. An example of substantial evidence would be a nonvacant site with a grocery store and with a building lease expiring in a year, and evidence that the store has entered into a lease to relocate to another site subsequent to the lease expiring.

Examples of substantial evidence that an existing use will likely be discontinued in the current planning period include, but are not limited to:

- The lease for the existing use expires early within the planning period,
- The building is dilapidated, and the structure is likely to be removed, or a demolition permit has been issued for the existing uses,
- There is a development agreement that exists to develop the site within the planning period,
- The entity operating the existing use has agreed to move to another location early enough within the planning period to allow residential development within the planning period.
- The property owner provides a letter stating its intention to develop the property with residences during the planning period.

If multiple sites make up a common existing use and the same factors affect each of the sites, the same findings can be used for each of the sites (e.g., an abandoned shopping mall with sites under common ownership that will not be restored to commercial use located in an area where there is recent residential development). The "substantial evidence" would indicate the existing use will not impede further residential development or that the existing use will be discontinued during the planning period. In this type of situation, use of the same findings for each of the multiple sites would be appropriate.

However, the same finding for multiple sites in a specific area may not be appropriate if their characteristics widely vary. For example, nonvacant sites with differing existing uses and lacking in common ownership, whether contiguous or located in the same general area, may not rely on a generalized analysis. While the sites may be located in an area with common economic issues, individual owners may not wish to sell their property or redevelop their site with residential uses. In addition, each site's existing use, e.g., grocery store, retail shop, parking lot, and offices, may have lease agreements of different lengths of time or the owner may not wish to relocate or redevelop the site with a more intensive residential use. In this type of situation, use of the same findings for the multiple sites would not be appropriate.

Step 4: *NEW* Program and policy requiring replacement of existing affordable units
Government Code Section 65583.2(g)(3)

The housing element must include a program in the housing element and policy independent of the housing element requiring the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in Density Bonus Law (Government Code section 65915(c)(3).) Replacement requirements shall be required for sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- Occupied by low or very low-income households

For the purpose of this program "previous five years" is based on the date the application for development was submitted.

Please note, until 2025, pursuant to Government Code section 66300(d) (Chapter 654, Statutes of 2019 (SB 330)), an affected city or county shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met. A listing of affected cities and counties can be found at <https://www.hcd.ca.gov/community-development/accountability-enforcement/statutory-determinations.shtml>.

SAMPLE PROGRAM

Program X: Replacement Unit Program

XXXX will adopt a policy and will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions:

- currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and
- was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or
- subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- occupied by low or very low-income households

Funding: General Funds

Responsible Parties: Planning and Community Development Department

Objectives: In order to mitigate the loss of affordable housing units, require new housing developments to replace all affordable housing units lost due to new development.

Timeframes: The replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed, and local policy shall be adopted by <DATE>. End of Sample Program

NEXT STEP:

- Move to Part E: Determination of Adequate Sites

PART E: DETERMINATION OF ADEQUATE SITES

The last step in this process is a determination of whether the housing element demonstrates sufficient land suitable and available for residential development to meet the locality's housing need for each designated income level or if further program actions are required to accommodate a shortfall.

Step 1: Consider any alternative means of meeting the RHNA

Government Code section 65583.1

The housing element may satisfy its RHNA requirement through a variety of methods other than identifying sites. The following is a description of those alternative methods.

- Units permitted, built, entitled or pending: (See Part A, Step 1)
- Potential for accessory dwelling units (ADU) or junior accessory dwelling units (JADU): The jurisdiction can count the potential for the development of ADUs within the planning period. The analysis is based on the following factors:
 - the number of ADUs or JADUs developed in the prior planning period
 - community need and demand for these types of housing units
 - the resources and/or incentives available that will encourage the development of ADUs
 - the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses
 - the unit must meet the Census definition of a housing unit, which can be found on the U.S. Census Bureau website, and be reported to the Department of Finance as part of the annual City and County Housing Unit Change Survey
 - the anticipated affordability of these units. The purpose of this analysis is to determine the appropriate RHNA income category to be accommodated through ADU and JADU development.

Affordability can be determined in a number of ways. As an example, a community could survey existing ADUs and JADUs for their current market rents and consider other factors such as square footage, number of bedrooms, amenities, age of the structure and general location, including proximity to public transportation. Another method could examine current market rents for reasonably comparable rental properties to determine an average price per square foot in the community. This price can be applied to anticipated sizes of these units to estimate the anticipated affordability of ADUs and JADUs. Available regional studies and methodology on ADU affordability can also be a resource to determine the likely affordability mix for ADUs and JADUs.

- other relevant factors as determined by HCD.

In addition, the housing element must describe and analyze any currently adopted ordinance and other factors that could affect ADU and JADU development within the planning period. At a minimum, the housing element should analyze whether the ordinance conforms with state ADU and JADU requirements and any additional development standards (i.e., setbacks, maximum unit sizes, lot coverage, etc.) adopted by the local government, zones allowing ADUs, fees and exactions, and any other potential constraints impacting the development of ADUs and JADUs.

Impact of New Accessory Dwelling Unit Laws

Since 2017, the Legislature has passed a series of new laws that significantly increase the potential for development of new ADUs and JADUs by removing development barriers, allowing ADUs through ministerial permits, and requiring jurisdictions to include programs in their housing element that incentivize their development. As a result, using trend analysis when estimating the potential for development may not accurately reflect the increased potential for these units. To account for this increased potential, HCD recommends the following options when performing this analysis:

- Use the trends in ADU construction since January 2018 to estimate new production. This is a conservative option to only account for the effect of the new laws without local promotional efforts or incentives (safe harbor option).
- Where no other data is available, assume an average increase of five times the previous planning period construction trends prior to 2018. This option is a conservative estimate based upon statewide data on ADU development since the implementation of the new laws (safe harbor option).
- Use trends from regional production of ADUs.
- Include programs that aggressively promote and incentivize ADU and JADU construction.
- Other analysis (reviewed on a case-by-case basis).

Potential affordability of these units must still be calculated per the analysis outlined on the previous page. In addition to the above options, the element should also include a monitoring program that a) tracks ADU and JADU creation and affordability levels, and b) commits to a review at the planning cycle mid-point to evaluate if production estimates are being achieved. Depending on the finding of that review, amendments to the housing element may be necessary, including rezoning pursuant to Government Code 65583.2 (h)and (i).

- Alternative Adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be:
 - substantially rehabilitated
 - in a multifamily rental or ownership housing complex of three or more units that are converted from non affordable to affordable rental
 - preserved at levels affordable to low- or very low-income households, where the local government has provided those units with committed assistance

For more information on this option, please refer to HCD's [Building Blocks Webpage](#)

- Manufactured housing, manufactured housing park hook-ups, floating homes/live aboard berths: In certain circumstances a jurisdiction can utilize the potential for new manufactured housing either in a manufactured housing park or on large properties in rural areas, or new floating home/liveaboard berths with sewer and water hook ups. In cases of a manufactured home park or in floating home/liveaboard berth marinas, the jurisdiction may count new spaces with infrastructure hook-ups intended for permanent residential occupancy and reported to the Department of Finance. Potential for manufactured homes in rural areas should be analyzed using the same factors as those

for potential ADUs, including establishing the market rate affordability of the units and crediting them to the appropriate RHNA category. In addition, the analysis should indicate if appropriate water and sewer infrastructure is available to support the development.

- Former military housing: Sites that contain permanent housing units located on a military base undergoing closure or conversion as a result of action pursuant to the Defense Authorization Amendments and Base Closure and Realignment Act (Public Law 100-526), the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), or any subsequent act requiring the closure or conversion of a military base may be identified as an adequate site if the housing element demonstrates that the housing units will be available for occupancy by households within the planning period of the housing element. No sites containing housing units scheduled or planned for demolition or conversion to nonresidential uses shall qualify as an adequate site.
- In consultation with HCD, other alternatives may be considered, such as motel conversions, adaptive reuse of existing buildings, or legalization of units not previously reported to the Department of Finance.

Step 2: Determine whether there is sufficient capacity to accommodate the RHNA for the jurisdiction by income.

Government Code Section 65583(a)(3)

The following table is an example of that calculation:

Adjustment Factor	Very Low	Low	Moderate	Above Moderate
RHNA	300	200	165	465
Entitled, Permitted, or Constructed Project Projects	50	50	0	200
Accessory Dwelling Unit Potential	10	15	15	10
Adequate Sites Alternative Preservation	20	16		
Multifamily Residential R-3 (Vacant)	75	50		
Mixed Use MU (Nonvacant)	75	50	50	
Multifamily Residential (Vacant) R-2			75	
Single-Family (Vacant) R-1				200
Spring Valley Specific Plan			150	250
Total	230	181	290	660
Shortfall/Surplus	-70	-19	+125	+195

While the jurisdiction has sufficient sites to accommodate its RHNA for moderate- and above moderate-income units, it has a shortfall of 89 units to accommodate its lower income need. The jurisdiction would be required to include a program in the housing element to accommodate that shortfall.

If Yes: Congratulations, the site inventory analysis is complete

If No: Move to Step 3

Step 3: Adequate Sites Program

Government Code section 65583(f) and Government Code section 65583.2(h)

Where the inventory of sites does not identify adequate sites to accommodate the RHNA for lower income households, a program must be included to identify sites that can be developed for housing within the planning period. The housing element should include an inventory of potential sites for rezoning. Those sites must meet the adequate sites requirements in terms of the suitability and availability outlined above.

General Program Requirements

A jurisdiction's adequate sites program must accommodate 100 percent of the shortfall of sites necessary to accommodate the remaining housing need for housing for very low- and low-income households during the planning period and include the following components:

- Permit owner-occupied and rental multifamily uses by right for developments in which 20 percent or more of the units are affordable to lower income households. By right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval.
- Permit the development of at least 16 units per site.
- Ensure sites within suburban and metropolitan jurisdictions — as defined by Government Code Section 65583.2(c)(3)(B)(iii) and (iv) — permit a minimum of 16 dwelling units per acre for incorporated cities within nonmetropolitan/rural counties and nonmetropolitan counties with micropolitan areas or 20 dwelling units per acre for suburban and metropolitan jurisdictions.
- Ensure a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses, or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.

Timing

Rezones due to a shortfall from the current planning period:

A locality's ability to accommodate needed housing during the planning period requires designating appropriate zoning as early as possible. Generally, however, a rezoning should occur no later than three years and 120 days from the beginning of the planning period. A one-year extension to the deadline to complete required rezoning may be allowed if a local government has completed rezoning at sufficient densities to accommodate at least 75 percent of the units for very-low and low-income households. Also, the jurisdiction must determine after a public meeting that substantial evidence supports findings and adoption of a resolution that the rezone deadline was not met due to one of the following reasons:

- Action or inaction beyond the control of the local government of any other state, federal, or local agency.
- Infrastructure deficiencies due to fiscal or regulatory constraints.

- The local government must undertake a major revision to its general plan in order to accommodate the housing-related policies of a sustainable communities strategy or an alternative planning strategy adopted pursuant to Section 65080.

The jurisdiction must provide HCD a copy of the resolution and findings along with: - a detailed budget and schedule for preparation and adoption of required rezoning within one year of the adoption of the resolution, - plans for citizen participation, and - expected interim actions to complete the rezoning, and any revisions to the general plan (Government Code section 65583(f)).

Consequences for Failing to Complete Rezoning Deadline:

If a local government fails to complete all rezoning's by the prescribed deadline, a local government may not disapprove a housing development project⁷, nor require a conditional use permit, planned unit development permit, or other locally imposed discretionary permit, or impose a condition that would render the project infeasible, if the housing development project:

- Is proposed to be located on a site included in a housing element program to be rezoned.
- Complies with applicable objective general plan and zoning standards and criteria, including design review standards, described in the rezone program action.

However, any subdivision of the site is subject to the Subdivision Map Act.

A jurisdiction may disapprove a housing development or approve it upon the condition that the project be developed at a lower density only if it makes written findings supported by substantial evidence on the record that both of the following conditions exist:

- The housing development project would have a specific, adverse impact upon the public health or safety⁸.
- There is no feasible method to satisfactorily mitigate or avoid the adverse impact.

The local government may also be subject to enforcement actions by HCD, including a determination that the housing element no longer complies with the requirements of state law and referral to the Attorney General pursuant to Government Code section 65585(i) and (j).

⁷ "Housing development project" is defined a project to construct residential units for which the project developer provides sufficient legal commitments to the appropriate legal agency to ensure the continued availability and use of at least 49 percent of the housing units for very-low, low-, and moderate-income households with an affordable housing cost or affordable rent.

⁸ "Specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.

Housing Accountability Act and the Housing Element

The Housing Accountability Act (Government Code section 65589.5) establishes state overarching policy that a local government not deny, reduce the density of, or make infeasible housing development projects, emergency shelters, or farmworker housing that are consistent with objective local development standards and contribute to meeting housing need. Jurisdictions without a housing element in compliance with State Housing Element Law or without a complete site inventory are further limited in the ability to deny a housing development application.

Among other requirements (including those related to housing development regardless of affordability levels), the Housing Accountability Act states that a local agency shall not disapprove or condition approval in a manner that renders the housing development project infeasible, including through the use of design review standards, for development of an emergency shelter or a housing development project for very low, low-, or moderate-income households unless it makes written findings, based upon a preponderance of the evidence in the record, as to one of the following:

- The jurisdiction has adopted a housing element in substantial compliance with Housing Element Law and the jurisdiction has met or exceeded its share of the RHNA for the planning period for the income category proposed for the housing development project.
- The project would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to low- and moderate-income households or rendering the development of the emergency shelter financially infeasible.
- The denial of the project or imposition of conditions is required in order to comply with specific state or federal law, and there is no feasible method to comply without rendering the development unaffordable or rendering the development of the emergency shelter financially infeasible.
- The project is proposed on land zoned for agriculture or resource preservation, or which does not have adequate water or wastewater facilities to serve the project.
- The project is inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation, unless the housing development project is proposed on a site that is identified as suitable or available for very low, low-, or moderate-income households in the jurisdiction's housing element, or if the local agency has failed to identify in the inventory of land in its housing element sites that can be developed for housing within the planning period and are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels pursuant to Section 65584.

"Housing for very low, low-, or moderate-income households" means where at least 20 percent of the total units are or will be sold or rented to lower income households or 100 percent of the units will be sold or rented to persons and families of moderate income, or persons and families of middle income.

Rezoned due to an unaccommodated need from previous planning period⁹:

Pursuant to Government Code section 65584.09, if the jurisdiction failed to make adequate sites available to accommodate the regional housing need in the prior planning period, the jurisdiction must zone or rezone sites to accommodate any unaccommodated need within the first year of the planning period. If more than one year has lapsed since the beginning of the planning period, the housing element cannot be found in compliance with Housing Element Law until the required zoning or rezoning is complete and the housing element is amended to reflect the necessary rezoning.

Annexation

If the jurisdiction must rely on annexation to accommodate its RHNA, the housing element must include a program committing to completing the annexation within three years of the planning period. In addition, the housing element must also include an evaluation of the suitability of the annexed sites, including the following information:

- Consistency with Local Agency Formation Commission (LAFCO) policies
- Actions to pre-zone prior to annexation
- Descriptions of the zone, density, development standards and design requirements
- The anticipated housing capacity allowed by each site
- Timeline to complete annexation which is early enough in the planning period to facilitate development of annexed sites (e.g., within the first three years of the planning period)
- Analysis of the suitability and availability of sites, including identification of any sites currently under Williamson Act contracts
- Demonstrated compliance with the requirements of the adequate sites program requirements of Government Code section 65583.2, subdivisions (h) and (i)

Please note, if the potential for annexation was not included in the RHNA allocation methodology, a portion of the county's allocation may be transferred to the city pursuant to Government Code section 65584.07(d). This transfer of RHNA would require an amendment to the housing element to ensure that any additional RHNA can be accommodated on sites within the inventory.

⁹ Sometimes called the AB 1233 consequence.

Sample Rezone Program:

To accommodate the remaining lower-income RHNA of 89 units, the City of X will identify and rezone a minimum of 4.5 acres of vacant land to the R3 zoning district, allowing exclusively residential uses and a minimum of 20 units per acre to a maximum of 30 units per acre by June 30, 2024. Rezoned sites will permit owner-occupied and rental multifamily uses by right pursuant to Government Code section 65583.2(i) for developments in which 20 percent or more of the units are affordable to lower income households and will be selected from sites 20 through 30 in the parcel listing (Appendix A). As reflected in Appendix A, each site has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.

Objective: Create opportunity for at least 89 units of multifamily housing for lower income households

Responsible Agency: Community Development Department

Timeline: Sites rezoned by June 30, 2024

Funding Source(s): General fund

Other program ideas for increasing capacity or facilitating development on identified sites:

- Up-zone existing neighborhoods in areas of opportunity or in high quality neighborhood transit areas at appropriate densities to facilitate development of housing.
- Increase maximum allowable residential densities in existing residential, commercial, and mixed-use zones and modify development standards, such as height limitations to ensure maximum density can be achieved.
- Establish minimum densities — Designate minimum densities of development to ensure that existing available land is not underutilized.
- Allow and encourage mixed-use zoning — Permit housing in certain nonresidential zones either as part of a mixed-use project or as a standalone residential use.
- Rezone underutilized land from nonresidential to residential to expand the supply of available residential land.
- Institute flexible zoning — Allow various residential uses within existing nonresidential zones without requiring rezoning or conditional approvals.
- Redevelop and/or recycle underutilized existing land to more intensive uses.
- Convert obsolete, older public/institutional/commercial/industrial buildings to residential use through adaptive reuse and/or historic preservation.
- Over-zone — Create a surplus of land for residential development during the current planning period of at least 20 percent more than the locality's share of the regional housing need. Over-zoning compensates for urban land left vacant due to ownership and development constraints and creates a real surplus. A sufficient supply of land beyond the time frame of the housing element helps prevent land shortages from bidding up land costs.
- Allow and promote small and irregular-size lot development.

- Consolidate lots — Facilitate combining small residential lots into larger lots to accommodate higher-density development.
- Increase height limitations — At a minimum, allow three stories in multifamily zones.
- Increase Floor Area Ratios — Allow for larger buildings on smaller lots and/or more units per lot by reducing the floor area ratio (total lot area divided by the total building area).
- Identify publicly owned land suitable for affordable housing development and sell parcels for \$1 (with consideration of the Surplus Land Act as amended by AB 1486, Statutes of 2019).
- Facilitate development by encouraging staff outreach to owners of potential sites and affordable housing developers to discuss needs and constraints in the jurisdiction.
- Adopt incentives such as a super density bonus or by right approval for housing that meets community objectives, such as housing near transit, affordability, housing that meets the needs of special populations, etc.
- Adopt a specific plan that streamlines CEQA compliance.

Common Program Questions and Answers for Shortfall Zoning:

Q: How do I establish the density range for a rezone site?

A: The density range is set at the minimum density (either 16 or 20 dwelling units per acre, depending on the jurisdiction). While there is no specific maximum density requirement, the range must include the density that was identified as appropriate to accommodate housing affordable to lower-income households (Part B, Step 2).

However, jurisdictions should not set the minimum and maximum density range at the same density (e.g., 20 units per acre minimum as both a minimum and maximum density). If identifying a narrow density range, the housing element must analyze the range as a potential governmental constraint on housing development, including potential impacts resulting from site constraints, financial considerations, and other development factors.

Q: If a development is proposed with less than 20 percent affordability to lower income, can the jurisdiction approve it?

A: Yes, however, the project would not qualify for the by right provisions of this law unless the underlining zone already permitted housing by right. This, and all housing development projects, is subject to the Housing Accountability Act. In addition, the jurisdiction may be subject to No Net Loss Law provisions.

Q: How is the 20 percent calculated when State Density Bonus Law is added?

A: This 20 percent calculation is based upon the total number of units in the development including additional units provided by a density bonus. This calculation methodology is consistent with several other pieces of housing laws, including the Streamlined Ministerial Approval Process (Government Code section 65913.4) and the Housing Accountability Act.

ATTACHMENT 1: SUMMARY OF NEW LAWS REFERENCED IN THE GUIDEBOOK

[AB 1397, Low \(Chapter 375, Statutes of 2017\)](#): The law made a number of revisions to the site inventory analysis requirements of Housing Element Law. In particular, it requires stronger justification when nonvacant sites are used to meet housing needs, particularly for lower income housing, requires by right housing when sites are included in more than one housing element, and adds conditions around size of sites, among others.

[AB 686, Santiago \(Chapter 958, Statutes of 2018\)](#): The law ensures that public entities, including local governments, administer their programs relating to housing and urban development in a manner affirmatively to further the purposes of the federal Fair Housing Act and do not take any action that is materially inconsistent with its obligation to affirmatively further fair housing. It also requires that housing elements of each city and county promote and affirmatively further fair housing opportunities throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act, Government Code Section 65008, and any other state and federal fair housing and planning law. AB 686 requires jurisdictions to conduct an assessment of fair housing in the housing element, prepare the housing element site inventory through the lens of affirmatively furthering fair housing, and include program(s) to affirmatively further fair housing.

[SB 6, Beall \(Chapter 667, Statutes of 2019\)](#): Jurisdictions are required to prepare the site inventory on forms developed by HCD and send an electronic version with their adopted housing element to HCD. HCD will then send those inventories to the Department of General Services by December 31 each year. The law (?) authorizes HCD to review, adopt, amend, and repeal the standards, forms, or definitions to implement this subdivision and subdivision (a) of Section 65583.

[AB 1486, Ting \(Chapter 644, Statutes of 2019\)](#): The law expanded the definition of surplus land and added additional requirements on the disposal of surplus land. In addition, local agencies must send notices of availability to interested entities on a list maintained by HCD. This list and notices of availability are maintained on HCD's website. Local agencies must also send a description of the notice and subsequent negotiations for the sale of the land, which HCD must review, and within 30 days submit written finding of violations of law. Violations of the Surplus Land Act can be referred to the Attorney General. Finally, it adds a requirement in Housing Element Law for the jurisdiction to identify which of the sites included in the inventory are surplus property.

ATTACHMENT 2: GOVERNMENT CODE SECTION 65583.2

As of January 1, 2020

(a) A city's or county's inventory of land suitable for residential development pursuant to paragraph (3) of subdivision (a) of Section 65583 shall be used to identify sites throughout the community, consistent with paragraph (9) of subdivision (c) of Section 65583, that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels pursuant to Section 65584. As used in this section, "land suitable for residential development" includes all of the sites that meet the following standards set forth in subdivisions (c) and (g):

- (1) Vacant sites zoned for residential use.
- (2) Vacant sites zoned for nonresidential use that allows residential development.
- (3) Residentially zoned sites that are capable of being developed at a higher density, including sites owned or leased by a city, county, or city and county.
- (4) Sites zoned for nonresidential use that can be redeveloped for residential use, and for which the housing element includes a program to rezone the site, as necessary, rezoned for, to permit residential use, including sites owned or leased by a city, county, or city and county.

(b) The inventory of land shall include all of the following:

- (1) A listing of properties by assessor parcel number.
- (2) The size of each property listed pursuant to paragraph (1), and the general plan designation and zoning of each property.
- (3) For nonvacant sites, a description of the existing use of each property. If a site subject to this paragraph is owned by the city or county, the description shall also include whether there are any plans to dispose of the property during the planning period and how the city or county will comply with Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.
- (4) A general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis.
- (5) (A) A description of existing or planned water, sewer, and other dry utilities supply, including the availability and access to distribution facilities.
(B) Parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity providing water or sewer service, to secure sufficient water, sewer, and dry utilities supply to support housing development. This paragraph does not impose any additional duty on the city or county to construct, finance, or otherwise provide water, sewer, or dry utilities to parcels included in the inventory.
- (6) Sites identified as available for housing for above moderate-income households in areas not served by public sewer systems. This information need not be identified on a site-specific basis.
- (7) A map that shows the location of the sites included in the inventory, such as the land use map from the jurisdiction's general plan, for reference purposes only.

(c) Based on the information provided in subdivision (b), a city or county shall determine whether each site in the inventory can accommodate the development of some portion of its share of the regional housing need by income level during the planning period, as determined pursuant to Section 65584. The inventory shall specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing. A nonvacant site identified pursuant to paragraph (3) or (4) of subdivision (a) in a prior housing element and a vacant site that has been included in two or more consecutive planning periods that was not approved to develop a portion of the locality's housing need shall not be deemed adequate to accommodate a portion of the housing need for lower income households that must be accommodated in the current housing element planning period unless the site is zoned at residential densities consistent with paragraph (3) of this subdivision and the site is subject to a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households. An unincorporated area in a nonmetropolitan county pursuant to clause (ii) of subparagraph (B) of paragraph (3) shall not be subject to the requirements of this subdivision to allow residential use by right. The analysis shall determine whether the inventory can provide for a variety of types of housing, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. The city or county shall determine the number of housing units that can be accommodated on each site as follows:

(1) If local law or regulations require the development of a site at a minimum density, the department shall accept the planning agency's calculation of the total housing unit capacity on that site based on the established minimum density. If the city or county does not adopt a law or regulation requiring the development of a site at a minimum density, then it shall demonstrate how the number of units determined for that site pursuant to this subdivision will be accommodated.

(2) The number of units calculated pursuant to paragraph (1) shall be adjusted as necessary, based on the land use controls and site improvements requirement identified in paragraph (5) of subdivision (a) of Section 65583, the realistic development capacity for the site, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.

(A) A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.

(B) A site larger than 10 acres shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site can be developed as lower income housing. For purposes of this subparagraph, "site" means that portion of a parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision.

(C) A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

(3) For the number of units calculated to accommodate its share of the regional housing need for lower income households pursuant to paragraph (2), a city or county shall do either of the following:

(A) Provide an analysis demonstrating how the adopted densities accommodate this need. The analysis shall include, but is not limited to, factors such as market demand, financial feasibility, or information based on development project experience within a zone or zones that provide housing for lower income households.

(B) The following densities shall be deemed appropriate to accommodate housing for lower income households:

(i) For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.

(ii) For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 10 units per acre.

(iii) For a suburban jurisdiction: sites allowing at least 20 units per acre.

(iv) For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.

(d) For purposes of this section, a metropolitan county, nonmetropolitan county, and nonmetropolitan county with a micropolitan area shall be as determined by the United States Census Bureau. A nonmetropolitan county with a micropolitan area includes the following counties: Del Norte, Humboldt, Lake, Mendocino, Nevada, Tehama, and Tuolumne and other counties as may be determined by the United States Census Bureau to be nonmetropolitan counties with micropolitan areas in the future.

(e) (1) Except as provided in paragraph (2), a jurisdiction shall be considered suburban if the jurisdiction does not meet the requirements of clauses (i) and (ii) of subparagraph (B) of paragraph (3) of subdivision (c) and is located in a Metropolitan Statistical Area (MSA) of less than 2,000,000 in population, unless that jurisdiction's population is greater than 100,000, in which case it shall be considered metropolitan. A county, not including the City and County of San Francisco, shall be considered suburban unless the county is in an MSA of 2,000,000 or greater in population in which case the county shall be considered metropolitan.

(2) (A) (i) Notwithstanding paragraph (1), if a county that is in the San Francisco-Oakland-Fremont California MSA has a population of less than 400,000, that county shall be considered suburban. If this county includes an incorporated city that has a population of less than 100,000, this city shall also be considered suburban. This paragraph shall apply to a housing element revision cycle, as described in subparagraph (A) of paragraph (3) of subdivision (e) of Section 65588, that is in effect from July 1, 2014, to December 31, 2028, inclusive.

(ii) A county subject to this subparagraph shall utilize the sum existing in the county's housing trust fund as of June 30, 2013, for the development and preservation of housing affordable to low- and very low-income households.

(B) A jurisdiction that is classified as suburban pursuant to this paragraph shall report to the Assembly Committee on Housing and Community Development, the Senate Committee on

Housing, and the Department of Housing and Community Development regarding its progress in developing low- and very low income housing consistent with the requirements of Section 65400. The report shall be provided three times: once, on or before December 31, 2019, which report shall address the initial four years of the housing element cycle, a second time, on or before December 31, 2023, which report shall address the subsequent four years of the housing element cycle, and a third time, on or before December 31, 2027, which report shall address the subsequent four years of the housing element cycle and the cycle as a whole. The reports shall be provided consistent with the requirements of Section 9795.

(f) A jurisdiction shall be considered metropolitan if the jurisdiction does not meet the requirements for “suburban area” above and is located in an MSA of 2,000,000 or greater in population, unless that jurisdiction’s population is less than 25,000 in which case it shall be considered suburban.

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city’s or county’s past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

(2) In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.

(3) Notwithstanding any other law, and in addition to the requirements in paragraphs (1) and (2), sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control through a public entity’s valid exercise of its police power, or occupied by low or very low income households, shall be subject to a policy requiring the replacement of all those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall be consistent with those set forth in paragraph (3) of subdivision (c) of Section 65915.

(h) The program required by subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 shall accommodate 100 percent of the need for housing for very low and low-income households allocated pursuant to Section 65584 for which site capacity has not been identified in the inventory of sites pursuant to paragraph (3) of subdivision (a) on sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right

for developments in which at least 20 percent of the units are affordable to lower income households during the planning period. These sites shall be zoned with minimum density and development standards that permit at least 16 units per site at a density of at least 16 units per acre in jurisdictions described in clause (i) of subparagraph (B) of paragraph (3) of subdivision (c), shall be at least 20 units per acre in jurisdictions described in clauses (iii) and (iv) of subparagraph (B) of paragraph (3) of subdivision (c) and shall meet the standards set forth in subparagraph (B) of paragraph (5) of subdivision (b). At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted, except that a city or county may accommodate all of the very low and low-income housing need on sites designated for mixed uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

(i) For purposes of this section and Section 65583, the phrase "use by right" shall mean that the local government's review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Any subdivision of the sites shall be subject to all laws, including, but not limited to, the local government ordinance implementing the Subdivision Map Act. A local ordinance may provide that "use by right" does not exempt the use from design review. However, that design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Use by right for all rental multifamily residential housing shall be provided in accordance with subdivision (f) of Section 65589.5.

(j) Notwithstanding any other provision of this section, within one-half mile of a Sonoma-Marin Area Rail Transit station, housing density requirements in place on June 30, 2014, shall apply.

(k) For purposes of subdivisions (a) and (b), the department shall provide guidance to local governments to properly survey, detail, and account for sites listed pursuant to Section 65585.

(l) This section shall remain in effect only until December 31, 2028, and as of that date is repealed.

(Amended (as amended by Stats. 2018, Ch. 958, Sec. 3) by Stats. 2019, Ch. 664, Sec. 15.5. (AB 1486) Effective January 1, 2020. Repealed as of December 31, 2028, by its own provisions. See later operative version amended by Sec. 16.5 of Stats. 2019, Ch. 664.)

From: [David Kellogg](#)
To: Housing.Elements@HCD
Subject: Public Comment on Housing Element
Date: Friday, November 18, 2022 6:02:41 PM
Attachments: [PNG image](#),
[PNG image](#),
[JPEG image](#),
[JPEG image](#),
[JPEG image](#)

Nov 18, 2022

On behalf of David Kellogg (a Contra Costa County resident), 350 Contra Costa, Greenbelt Alliance, CaRLA, Scott O’Neil (a resident of Palo Alto), Watson Ladd (a resident of Berkeley), Marven Normal (a resident of San Bernadino), Dara Dadachanji (a resident of San Francisco), and George Grohwin (a resident of San Francisco), we provide the following comment on the Housing Element from GLENDALE.



Issue

- The Housing Element from GLENDALE fails to adequately analyze compliance with one of the state’s fundamental streamlining laws.
- Under PRC 21080.1 & 21080.2, a lead agency must determine if a housing development is exempt from CEQA within 30 days of completeness, or if an EIR or other CEQA document will be required.
- For CEQA-exempt housing, this CEQA determination then triggers a 60-day approval clock (with deemed approved remedies) under the Permit Streamlining Act. Thus, if state housing laws were followed, CEQA-exempt housing projects should generally receive approvals in about 120 days.
 1. 30 days to determine completeness
 2. 30 days for CEQA review
 3. 60 days for approval.
- GLENDALE does not appear to issue determinations of CEQA-exemption within 30 days of completeness. As a result, **builders and the public are denied the right to the timely approval of housing**. Additionally, the builders are forced into an unreasonable bargaining position, as they lack the “deemed approved” options they should have. This improperly empowers jurisdictions to treat builders arbitrarily in the entitlement process.
- Moreover, GLENDALE has no apparent good-faith basis for delaying CEQA-exemption determinations beyond the allowance of Public Resources Code 21080.1 & 21080.2. In

the vast majority of instances, these exemptions are uncontested and straightforward.

Recommendation

- The Housing Element from GLENDALE should include an analysis of compliance in its approval process with PRC 21080.1 & 21080.2.
- The Housing Element from GLENDALE should add a program to specify (i) who is responsible for making the CEQA determination of PRC 21080.1, specify (ii) that their decision will be made within the timeframe permitted by PRC 21080.2, and specify that (iii), when they determine a project is exempt from CEQA, their determination triggers the Permit Streamlining Act (PSA) 60-day deadline (Gov. Code 65950(a)(5)). If existing local practices or regulations are incompatible with these state laws, the program should commit to enacting reforms necessary to achieve compliance within a reasonable and definite timeline.

HCD Technical Assistance Letter

- The CEQA issues mentioned herein are discussed in the June 3, 2022 Technical Assistance letter sent to Berkeley by Shannan West, Housing Accountability Unit Chief (copy included below).
- In the letter, HCD notes that Berkeley had been issuing “recommendations” of CEQA-exemption and that the actual “determinations” were made more than 30 days beyond the completeness date. HCD notes that such practice was in violation of PRC 21080.1 & 21080.2 and “may act as a governmental constraint on housing.”

From: [Alex Khatchaturian](#)
To: [Zemaitaitis, Vilia](#)
Cc: [Krause, Erik](#); [Prasad, Hillary@HCD](#); [Calvert, Bradley](#); [Asp, Kristen](#); [Golanian, Roubik](#); [Garcia, Michael](#)
Subject: Re: Comments on Amended 6th Cycle Housing Element (Glendale)
Date: Friday, January 13, 2023 7:40:36 AM
Attachments: [Packet_20230112000414906.pdf](#)

Ms. Zemaitaitis,

The agenda packet for the upcoming January 18, 2023 planning commission meeting is attached. The planning commission will be asked to approve the minutes from the November 16, 2022 meeting (Agenda Item #4). The minutes incorrectly indicate no written public input was received by the city for the discussion over the 6th cycle housing element update. As you know, I submitted written comments on the matter, and you mentioned in your reply that my email and attachments will be distributed to the members of the planning commission for their consideration. Please explain why my comments are being excluded from the public record?

Thank you,
Alex Khatchaturian

On Wed, Nov 16, 2022 at 5:26 PM Zemaitaitis, Vilia <VZemaitaitis@gendaleca.gov> wrote:

Received.

The email and attachments will be distributed to the Planning Commission for their consideration.

Thank you.

From: Alex Khatchaturian <alexkhatchaturian@gmail.com>
Sent: Wednesday, November 16, 2022 5:10 PM
To: Krause, Erik <EKrause@gendaleca.gov>
Cc: Zemaitaitis, Vilia <VZemaitaitis@gendaleca.gov>; Prasad, Hillary@HCD
<Hillary.Prasad@hcd.ca.gov>; Calvert, Bradley <BCalvert@gendaleca.gov>; Asp, Kristen
<KAsp@gendaleca.gov>; Golanian, Roubik <RGolanian@gendaleca.gov>; Garcia, Michael
<MJGarcia@gendaleca.gov>
Subject: Comments on Amended 6th Cycle Housing Element (Glendale)

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr. Krause,

My review of the amended housing element was primarily focused on the city's analysis of

the fair housing implications related to the enforcement of its Just Cause and Retaliatory Evictions Ordinance, as codified in Chapter 9.30 of the municipal code.

Glendale currently does not and does not plan to enforce the tenant protection provisions of its Just Cause and Retaliatory Evictions Ordinance. I attached to this e-mail my correspondence with Councilmember Dan Brotman from two years ago in which he stated, after conferring with the City Attorney and city staff, that Glendale has elected to not enforce the tenant protection provisions of Chapter 9.30 of the municipal code.

Please note the Enforcement Procedures section of the ordinance (Chapter 9.30.055) states:

"The city, at its sole discretion, may choose to enforce the provisions of this chapter through administrative fines, administrative citations and any other administrative procedure set forth in Chapters 1.20 and 1.24 of the municipal code, as amended. The city's decision to pursue or not pursue enforcement of any kind shall not affect a tenant's rights to pursue civil remedies."

The amended Housing Element does not contain any commitment for the establishment of a tenant protections enforcement program. Nor does it contain any plan to remove discretion out of the enforcement process and place a ministerial duty on city staff to enforce the tenant protection provisions. Instead, in response to HCD's request for analysis on the fair housing implications related to the enforcement of the adopted ordinance, the amended Housing Element states:

"Enforcement is administered by the Community Development Department Housing staff, who try to resolve housing-related issues through informal mediation, informing the sides of their rights, and dispatching City resources where appropriate."

I attached page 401 of the amended housing element for reference.

The reality is, as the councilmember communicated unequivocally in his response to my question, the city does not enforce tenant protections. Moreover, as evidenced by the amended housing element, the city does not plan to enforce tenant protections. Instead, as I have personally experienced myself, city staff refer tenants to seek civil remedies when they call to report violations of tenant protection provisions. Informal mediation and educating landlords and tenants about their rights is not an effective enforcement mechanism for safeguarding tenant protections. Violations of tenant protections need to be enforced the way violations of our indigenous tree ordinance are enforced.

It is disheartening to see that city staff made no effort to address this issue, especially considering that two-thirds of Glendale residents are tenants. Unless Glendale implements an enforcement program that commits to safeguarding tenant protections without discretion, I do not think the city will be certified by HCD as compliant with state housing element law.

Thank you,

Alex Khatchaturian



A G E N D A
PLANNING COMMISSION
COUNCIL CHAMBERS
613 E. Broadway, 2nd Floor
Glendale, CA 91206

Meetings are broadcast live on Glendale TV, viewable on Spectrum Cable, channel 6, and AT&T U-verse, channel 99. Meetings are also streamed live in high definition (HD) on the city's webpage, glendaleca.gov/live, on [YouTube.com/myglendale](https://www.youtube.com/myglendale), and on Apple TV, Roku, and Amazon Fire devices using a free app called Screenweave and choosing "Glendale TV" from the menu. Meetings are also archived on the City Website for viewing anytime at glendaleca.gov/agendas. Call (818) 548-4013 for program schedules. DVDs of the proceedings are available for purchase in the City Clerk's Office. For public comments and questions during the meeting, call (818) 937-8100. Public comments on a specific agenda item will be taken when that agenda item is discussed. If you have any question about matters on the agenda, or requests for assistance, please contact the CDD Planning Division staff at (818) 548-2140 during regular business hours.

PLEASE TURN OFF CELLULAR PHONES WHILE INSIDE THE MEETING LOCATION

In compliance with the Americans with Disabilities Act (ADA) of 1990, auxiliary hearing aids, sign language translation, and Braille transcripts are available upon request. Assisted listening devices are available same-day upon request. At least 48 hours (or two business days) notice is required for requests regarding sign language translation and Braille transcription services. All documents related to open session items on this agenda that are received less than 72 hours prior to this meeting, and are public records, will be available for review in the Office of the City Clerk, 613 E. Broadway, RM 110, Glendale, CA 91206.

Translation services are provided for meetings through the use of bilingual staff for speakers who wish to utilize the service as available. Speakers should state their request by contacting the City Clerk's office at (818) 548-2090, at least 24 hours prior to the scheduled meeting. Please specify the language for which you require translation. The exclusive use of City provided interpreters is not required and persons are welcome to use their own interpreter or speak in their native language.

JANUARY 18, 2023 AT 5:00 PM

-
- 1. ROLL CALL – Chraghchian, Fuentes, Lee, Minassian, Shahbazian**
 - 2. REPORTS REGARDING POSTING OF AGENDA**
The Agenda for the January 18, 2023 Regular Meeting of the Glendale Planning Commission was Posted on January 11, 2023, on the Bulletin Board Outside City Hall.
 - 3. ELECTION OF CHAIRPERSON AND CHAIRPERSON PRO TEM**

4. APPROVAL OF MINUTES

a. Approval of Planning Commission Minutes from November 16, 2022.

5. ORAL COMMUNICATION

Discussion is limited to items not a part of this agenda. Each speaker is limited to 5 minutes. Planning Commission may question or respond to the speaker but there will be no debate or decision.

6. BOARD/COMMISSION MEMBER COMMENTS

7. OLD BUSINESS

a. ITEM:

3810-3816 4th Avenue

Tentative Parcel Map - PPM2113643 (GLN No. 1644)

- Note – This project will be taken off the Planning Commission meeting calendar and will be rescheduled and re-noticed.

PROJECT DESCRIPTION

Application to subdivide two residential lots into a total of three residential lots (Parcels A, B and C). The existing single-family dwelling on Parcel A will be maintained. Future single family residential development on the two new flag lots (Parcels B and C) will require approval by the Design Review Board.

ENVIRONMENTAL DETERMINATION

The project is categorically exempt from California Environmental Quality Act (CEQA) review under Section 15315 “Minor Land Division” because the project consists of the division of property in urbanized areas zoned for residential use into four or fewer parcels when division is in conformance with the General Plan and zoning, no variances or exceptions are required, all services and access to the proposed parcels to local standards are available, the parcel was not involved in the division of a larger parcel within the previous 2 years, and the parcel does not have an average slope greater than 20 percent.

8. NEW BUSINESS

9. COMMUNITY DEVELOPMENT DEPARTMENT UPDATES

10. ADJOURNMENT

MINUTES
REGULAR MEETING OF THE CITY OF GLENDALE
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING COMMISSION
CITY COUNCIL CHAMBERS
613 East Broadway, Second Floor, Glendale, CA 91206
WEDNESDAY, NOVEMBER 16, 2022
5:00 P.M.

5:05 p.m. - Chairperson Lee called to order the Regular Meeting of the Planning Commission in the City Council Chambers, 613 East Broadway, second floor, Glendale.

Present: Chraghchian
Lee
Minassian
Shahbazian

Absent: Fuentes

Community Development Department Staff

- Erik Krause, Deputy Director of Planning
- Vilia Zemaitaitis, Principal Planner
- Roger Kiesel, Senior Planner

Legal Department Staff

- Gillian van Muyden, Chief Asst. City Attorney
- Yvette Neukian, Principal Assistant City Attorney

2. REPORT REGARDING POSTING OF AGENDA

The agenda for this meeting was posted on Wednesday, November 10, 2022, on the Bulletin Board outside City Hall and on the City's web site.

3. APPROVAL OF MINUTES

- November 2, 2022 (Regular Meeting)

MOTION

Moved by Planning Commissioner Shahbazian, seconded by Planning Commissioner Chraghchian, that the minutes be approved as presented.

VOTE

Ayes: Chraghchian, Minassian Shahbazian, Lee
Noes: None
Absent: Fuentes
Abstain: None

4. ORAL COMMUNICATIONS: NONE.

5. BOARD/COMMISSIONERS COMMENTS: NONE.

6. OLD BUSINESS

(a) LOCATION: 3810-3816 4TH AVENUE

- Tentative Parcel Map Case Number PPM2113643
 - (Continued from April 20, May 18, June 15, and August 17, 2022)

APPLICANT: 2733 SFLA LLC, c/o Serge Tachdjian

ZONE: "R1-II" - (Low Density Residential Zone, Floor Area Ratio District II)

LEGAL DESCRIPTION: Portion of Lot 4, Block "N" of Crescenta Canada Tract in the City of Glendale, County of Los Angeles, as per Map recorded in Book 5, Pages 574 and 57 of Record of Surveys, and also known at Parcel 11, as per Map recorded in Book 18, Page 38 of Record of Surveys.

PROJECT DESCRIPTION

Application to subdivide two residential lots into a total of three residential lots (Parcels A, B and C). The existing single-family dwelling on Parcel A will be maintained. Future single family residential development on the two new flag lots (Parcels B and C) will require approval by the Design Review Board.

ENVIRONMENTAL DETERMINATION

The project is categorically exempt from California Environmental Quality Act (CEQA) review under Section 15315 "Minor Land Division" because the project consists of the division of property in urbanized areas zoned for residential use into four or fewer parcels when division is in conformance with the General Plan and zoning, no variances or exceptions are required, all services and access to the proposed parcels to local standards are available, the parcel was not involved in the division of a larger parcel within the previous 2 years, and the parcel does not have an average slope greater than 20 percent.

CASE PLANNER: Cassandra Pruett, Planner

STAFF

Staff announced that this case will not be heard today and will be continued to the next regularly scheduled Planning Commission hearing on January 18, 2023, without further public notice.

DISCUSSION BY COMMISSIONERS

Planning Commissioners made the following motion.

MOTION

Moved by Planning Commissioner Minassian, and seconded by Planning Commissioner Shahbazian, that Tentative Parcel Map Case Number PPM 2113643, located at 3810-3816 4th Avenue, will be continued to the regularly scheduled Planning Commission hearing on **January 18, 2023**, without further public notice.

VOTE

Ayes: Chraghchian, Minassian, Shahbazian Lee
Noes: None
Absent: Fuentes
Abstain: None

(7) NEW BUSINESS

a. LOCATION: AMERICANA AT BRAND

- ZONING CODE TEXT CASE NO. PZC 2110228 AND STATUTORY DEVELOPMENT AGREEMENT RELATING TO SIGNAGE IN THE ADVERTISING SIGNAGE OVERLAY ZONE

APPLICANT: The Americana at Brand, LLC

ZONE "DSP" - (Downtown Specific Plan) – TCSP (Town Center Specific Plan)

APN(s): 5642-014-069;-072;-074;-078;-079;-185;-186;-187;-189;-190;-193;-194;-195;-196;-197;-198;-199;-200;-201;-202;-951; and -952

PROJECT DESCRIPTION

The Americana at Brand has requested a Development Agreement to comply with GMC Section 30.26.100, including the provision of certain public benefits to the City, the Development Agreement term, and the regulation of signage in accordance with GMC Chapter 30.26 Advertising Signage Overlay Zone (ASOZ). Revisions to Chapter 30.26 include allowing freestanding signs (kiosks) and marquee (theater) signs to include non-accessory content and digital displays (animated signs).

ENVIRONMENTAL DETERMINATION

ENVIRONMENTAL DETERMINATION

An addendum to the previously adopted mitigated negative declaration (MND) was prepared for the proposed amendments to the ASOZ. As indicated in the Addendum, the proposed amendments to the ASOZ will not result in any new adverse impacts, nor increase the severity of any impacts identified in the MND adopted by City Council in March 2010.

STAFF

Mr. Kiesel stated that Community Development Department staff recommends that the Planning Commission find the proposed zone code text amendments are consistent with the City's General Plan and applicable Specific Plans (TCSP and DSP) and that the proposed amendment to the Development Agreement.

Further, staff recommends the Planning Commission consider the Addendum to the 2010 Mitigated Negative Declaration and prior 2013 Addendum prior to recommending approval of the requested zone change and DA amendment to the City Council.

Applicant

- Ms. Chris Robertson, applicant and consultant on the project, and representing the Americana At Brand, presented the case. She answered questions from the Planning Commissioners.

WRITTEN PUBLIC INPUT

In Favor: None
Interested Party: None.
In Opposition: None.

SPEAKING AT THE HEARING

In Favor: No one.
Interested Party: No one.
In Opposition: No one.

DISCUSSION BY COMMISSIONERS

Planning Commissioners discussed the project and made the following motion.

MOTION

Moved by Planning Commissioner Chraghchian, seconded by Commissioner Shahbazian, that upon consideration of the proposed amendments to the 2020 Development Agreement between the City of Glendale and the Americana at Brand, LLC ("DA"), and the proposed text amendment to Glendale Municipal Code Chapter 30.26 – Advertising Signage Overlay Zone (ASOZ), and after reviewing the records, files, reports, and all documentary evidence submitted with regard to said proposed amendments to the DA and proposed text amendment, and having also considered the proposed Addendum to the Final Mitigated Negative Declaration (MND) and prior 2013 Addendum to that MND, the Planning Commission hereby finds the proposed text amendments to the ASOZ are consistent with the City's General Plan, Town Center Specific Plan and Downtown Specific Plan, recommends that the City Council approve the proposed amendment to the 2020 development agreement, consider the addendum to the MND and 2013 Addendum, and adopt the proposed amendments to Title 30 of the Glendale Municipal Code pertaining to the ASOZ.

Adopted this 16th day of November, 2022.

VOTE

Ayes: Chraghchian, Minassian, Shahbazian, Lee
Noes: None
Absent: Fuentes
Abstain: None

7 b. LOCATION: CITYWIDE

- **UPDATE OF THE CITY'S HOUSING ELEMENT 2021 – 2029**
CASE NO. PGPA 2119840
(6th Cycle Housing Element)

APPLICANT: City of Glendale, Community Development Department

PROJECT DESCRIPTION

General Plan Amendment updating the City of Glendale's Housing Element, a document that outlines Glendale's housing policies. State law mandates periodic updates to the Housing Element, which was last updated in January 2014. This sixth update provides policies, programs, and actions to accommodate the City's share of Regional Housing Needs Assessment (RHNA). The Housing Element identifies sites to accommodate future projected housing growth need for the 2021-2029 planning period. The 6th Cycle Housing Element Update does not propose to change the zoning, density, or development regulations applicable to any sites to accommodate the City's Regional Housing Needs Allocation. The Planning Commission is asked to make a recommendation to Council concerning adoption of the 6th Cycle Housing Element. The 6th Cycle Housing Element was first adopted by City Council on February 1, 2022, and has been amended based on comments received by the California Department of Housing and Community Development (HCD).

ENVIRONMENTAL DETERMINATION

The proposed Project is exempt under State CEQA Guidelines §15061(b)(3) commonsense exemption, because the Project involves policies, programs, and actions to meet the City's RHNA allocation that either would not cause a significant effect on the environment or incorporates actions that have already been taken by the City.

STAFF

Staff Member Vilia Zemaitaitis introduced the project.

Staff Member Erik Krause summarized the project and added that the Planning Commission review the proposed amendments to the 6th Cycle Housing Element and make a recommendation to the City Council.

Mr. Krause introduced Ms. Amanda Tropiano, City's consultant on the proposed project and representing the consultant firm.

Mr. Krause stated that Community Development Department staff recommends that the Planning Commission recommend that the City Council adopt the amended 6th Cycle Housing Element – (2021-2029).

Applicant: City of Glendale.

WRITTEN PUBLIC INPUT

In Favor: None

Interested Party: None.

In Opposition: None.

SPEAKING AT THE HEARING

In Favor: No one.

Interested Party: No one.

In Opposition: No one.

DISCUSSION BY COMMISSIONERS

Planning Commissioners discussed the project and made the following resolution.

RESOLUTION

Moved by Planning Commissioner Shahbazian and seconded by Planning Commissioner Chraghchian, passed the following resolution.

RESOLUTION NO. 2022-0001

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF GLENDALE
RECOMMENDING APPROVAL OF THE 6th CYCLE HOUSING ELEMENT
(Case No. PGPA 2119840)

THE PLANNING COMMISSION OF THE CITY OF GLENDALE DOES HEREBY
RESOLVE AS FOLLOWS:

SECTION 1. The Planning Commission does hereby find and determine as follows:

- a. The Planning Commission reviewed the amended Cycle 6 Housing Element, previously adopted by City Council on February 1, 2022 and as amended to address comments received by California Department of Housing and Community Development (HCD).
- b. The Planning Commission held a duly noticed public hearing on November 16, 2022 to consider the Amended 6th Cycle Housing Element, previously adopted by City Council on February 1, 2022.
- c. The Planning Commission has determined that the proposed Project is exempt under State CEQA Guidelines §15061(b)(3) commonsense exemption, because the Project involves policies, programs, and actions to meet the City's RHNA allocation that either would not cause a significant effect on the environment or incorporates actions that have already been taken by the City. The project is further exempt pursuant to State CEQA Guidelines Section 15283 and California Government Code Section 65584(g).

SECTION 2. Based upon the foregoing, the Planning Commission resolves the following:

- a. Recommend to the City Council the approval of the amended Cycle 6 Housing Element, previously adopted by City Council on February 1, 2022 and as amended to address comments received by HCD (Case No. PGPA 2119840).

Adopted this 16th day of November 2022.

Signed by Chairperson Lee of the Planning Commission.

ATTEST: I, Kristen Asp, Commission Secretary, certify that the foregoing resolution was adopted by the Planning Commission of the City of Glendale, by a majority of the members thereof at a meeting held on the 16th day of November 2022 and that the same was adopted by the following vote:

Signed by Commission Secretary Kristen Asp.

VOTE

Ayes: Chraghchian, Minassian, Shahbazian, Lee

Noes: None

Abstain: None

Absent: Fuentes

8. COMMUNITY DEVELOPMENT DEPARTMENT UPDATES

- Staff Member Erik Krause informed the Planning Commissioners that the amended Housing Element will be presented to the City Council on December 6, 2022.

9. ADJOURNMENT

Chairperson Lee, adjourned the hearing at 6:30 p.m. All present were in favor.

CHAIRPERSON – PLANNING COMMISSION

EK:VZ:sm



CITY OF GLENDALE, CALIFORNIA REPORT TO THE PLANNING COMMISSION

AGENDA ITEM

Report: Tentative Parcel Map GLN 1644

File No./Case: PPM 2113643

Location: 3810 – 3816 4th Avenue

Assessor Parcel No: 5604-007-039

Owner/Applicant: 2733 SFA, LLC

Approved for January 18, 2023

ADMINISTRATIVE ACTION

Prepared by:

Roger Kiesel, AICP, Senior Planner

Reviewed by:

Kristen Asp, AICP, Principal Planner

SUMMARY:

Application to subdivide two residential lots into a total of three residential lots (Parcels A, B and C). The existing single-family dwelling on Parcel A will be maintained. Future single family residential development on the two new flag lots (Parcels B and C) will require approval by the Design Review Board.

**This project will be taken off the Planning Commission meeting calendar
and will be rescheduled and re-noticed.**

From: [Alex Khatchaturian](#)
To: Prasad, Hillary@HCD
Subject: Re: Housing Element Review; Sites Inventory
Date: Tuesday, January 3, 2023 6:49:02 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Sears Lower Income overstated by 374 units.pdf](#)
[Suitability of Nonvacant Sites \(AB 1397\).xlsx](#)
[Correspondence with Daniel Brotman Chapter 9.30 GMC.pdf](#)
[Amended 6th Cycle Housing Element page 401.pdf](#)
[Response from Philip Lanzafame dated 12.8.2020.pdf](#)

Ms. Prasad,

I would like to submit additional comments and information for your consideration during your review of Glendale's recently adopted 6th Cycle Housing Element Update.

Suitability of nonvacant sites (AB 1397)

As I mentioned previously in my email dated 12/29/2022, there are a number of properties designated in the Sites Inventory to have capacity for lower income units which currently have commercial uses that are presumed to impede additional residential development. The Housing Element does not present findings to substantiate that these uses are likely to be discontinued during the planning period. I attached a spreadsheet which lists some of these sites, in addition to the former Sears parcels where a 682 unit housing project has been proposed (only 69 lower income versus 443 represented in the housing element; see attached PDF for details).

Tenant Protections

Glendale does not and does not plan to enforce the tenant protection provisions of its Just Cause and Retaliatory Evictions Ordinance. I attached to this e-mail my correspondence with Councilmember Dan Brotman from two years ago in which he stated, after conferring with the City Attorney and City staff, that Glendale has elected to not enforce the tenant protection provisions of Chapter 9.30 of the municipal code.

Please note the Enforcement Procedures section of the ordinance (Chapter 9.30.055) states:

"The city, at its sole discretion, may choose to enforce the provisions of this chapter through administrative fines, administrative citations and any other administrative procedure set forth in Chapters 1.20 and 1.24 of the municipal code, as amended. The city's decision to pursue or not pursue enforcement of any kind shall not affect a tenant's rights to pursue civil remedies."

The amended Housing Element does not contain any commitment for the establishment of a

tenant protections enforcement program. Nor does it contain any plan to remove discretion out of the enforcement process and place a ministerial duty on city staff to enforce the tenant protection provisions. Instead, in response to HCD's request for analysis on the fair housing implications related to the enforcement of the adopted ordinance, the amended Housing Element states:

"Enforcement is administered by the Community Development Department Housing staff, who try to resolve housing-related issues through informal mediation, informing the sides of their rights, and dispatching City resources where appropriate."

I attached page 401 of the amended housing element for reference.

The reality is, as Councilmember Brotman communicated unequivocally in his response to my question, the city does not enforce tenant protections. Moreover, as evidenced by the amended housing element, the city does not plan to enforce tenant protections. Instead, city staff refer tenants to seek civil remedies when they call to report violations of tenant protection provisions. Informal mediation and educating landlords and tenants about their rights is not an effective enforcement mechanism for safeguarding tenant protections.

It is disheartening to see that city staff made no effort to address this issue, especially considering that two-thirds of Glendale residents are tenants. During the December 6, 2022 public hearing, Councilmember Devine asked the city's housing element consultant, Amanda Tropiano, if the revised draft adequately addressed HCD's concerns about the city's enforcement of tenant protections. Her response was:

"The city continues to maintain a policy that commits itself to implementing that provision and ordinance and we have provided additional analysis and clarification as to the process of how that ordinance is applied to instances where a resident or property owner may want to utilize the provisions of that ordinance. And so we have expanded that discussion in the background report. We have not recommended any changes to the way that the city writes that ordinance. You continue to be committed to implementing it effectively and we have just provided additional background and analysis."

This does not quite square with Councilmember Brotman's remarks that the city neither enforces nor plans on enforcing the tenant protection provisions of the ordinance. Moreover, the enforcement procedures section of the statute, which remains unchanged with no plan to amend it, clearly states that the city has discretion over enforcement. Unless Glendale implements an enforcement program that commits to safeguarding tenant protections without discretion, I do not think the city should be certified by HCD as compliant with state housing element law.

ADU Ordinance

The Accessory Dwelling Unit Handbook states:

"The preparation, adoption, amendment, and implementation of local ADU ordinances must be carried out consistent with Government Code Section 65852.150 and must not unduly constrain the creation of ADUs. Local governments adopting ADU ordinances should carefully weigh the adoption of zoning, development standards, and other provisions for impacts on the development of ADUs."

Section 65852.150 states that it is the California state legislature's intent for local ADU ordinances to encourage the development of accessory dwelling units. Therefore, any amendment to a local ADU ordinance should expand the potential capacity for ADUs, not impose a limitation or constraint towards the development of ADUs.

On November 15, 2022 the Glendale City Council adopted amendments to its ADU Ordinance to bring it in line with changes in state laws related to ADUs. One of the amendments pertains to the increased minimum height limits (SB 897). The amendments were adopted as recommended by staff, without any change to the existing ban on ADUs built over detached garages. The ban encompasses both ADU additions over existing detached garages, as well as new construction two-story garage/ADUs (garage lower level, living space upper level) even if the new building provides for minimum 4 feet interior setbacks.

With the amendment to its ADU ordinance, Glendale now allows two-story ADUs if certain conditions are met. These conditions are:

- (a) the new construction ADU must be 800 SF or less;
- (b) provide a minimum 4 feet interior setback;
- (c) have a maximum height of 18 feet (up to 20 feet if the roof is pitched to match the primary residence); and
- (d) the property must be located within 1/2 mile of a high-quality transit corridor.

However, under no circumstances may the lower level of the two-story ADU be a garage. In other words, the city will not allow a new construction detached ADU with a garage on the lower level and living space on top, even if all of the above conditions (a)-(d) are met. But the city will allow, without discretionary review, a detached two-story ADU composed entirely of living space that meets conditions (a)-(d).

Maintaining the ban on ADUs above detached garages circumvents the state's policy objective of encouraging the development of ADUs in the city. Why should it matter if the lower level is occupied living space or a garage for parking cars? Prohibiting detached two-story ADUs with a garage effectively defeats the purpose of SB 897, which is to create the potential for two-story ADUs by increasing the height limit in certain areas from 16 feet to 18-20 feet.

Two years ago, when the prohibition on second story ADU additions on top of detached garages was being considered for adoption by the city council, I asked Mr. Lanzafame, the

previous director of community development, for an explanation (I attached my letter with his response to this email). He told me the purpose of the ban was to eliminate out of scale projects that intrude on adjacent properties' privacy. Specifically, he wrote:

"Under the current code, we have been inundated with complaints of second story ADUs and out of scale, massive structures imposing on neighborhoods as well as intrusion on privacy in adjacent homes and yards. Given these circumstances, the proposed ordinance prescribes no above-garage or second story ADUs."

But if someone builds a two-story ADU under the above criteria, whether the lower level is a garage or living space does not change the scale or mass of the project or impact the privacy concerns raised by residents in the past. If anything, it would alleviate one of the concerns often cited by opponents of ADUs, which is cars ending up being parked on the street when garages are converted into ADUs.

During the discussion section of the November 15, 2022 public meeting, which begins at the 46 minute mark of the video presentation (link provided below), City Attorney Neukian remarked that community development staff continues to recommend to the City Council to keep the existing ban on ADUs over garages. Her comments begin at the 48 minute mark.

[City Council - 11/15/22 - YouTube \[youtube.com\]](#)

She mentioned that staff had "off the record" communication with HCD and was advised that there is no state requirement for the city to allow ADUs above garages. More importantly, she cited privacy concerns as the basis for the ban, since garages could be built with zero setback from the property line.

The only feasible way for one to build a two-story ADU over a garage is if the height is allowed to be at least 18-20 feet. (Before SB 897 this would not have been an option for Glendale residents, as the maximum height of any accessory structure, including ADUs, was capped at 15 feet.) Moreover, one of the conditions for being allowed to build at a height of 18-20 feet is for the new construction to provide a 4 feet interior setback. Therefore, the reasoning behind the ban, namely to avoid two-story buildings with no setback, is disingenuous.

It is evident that the basis for this arbitrary ban is to discourage the development of ADUs. The prohibition does not widen options or remove barriers to ADU development. There is no justification for it and I think the city should be compelled during the Housing Element review

process to provide a valid reason and justification, that is within the spirit of the state's ADU laws, for its decision to keep the ban, especially in areas of the city where SB 897 affords homeowners with the increased height limit with the intent of spurring ADU development.

A two-story ADU that provides 4 feet interior setbacks will have the same intrusive effect on adjacent neighbors whether the first floor is living space or a garage. Yet one is allowed and the other is not. Why? Because the city knows the one that is allowed is economically infeasible, hence will never get built; but the one that is prohibited, will be built if allowed.

The city should make a sincere effort to comply with the policy goals and objectives of the state and remove barriers to the development of two-story garage/ADUs. SB 897 will not result in the development of any additional ADUs in Glendale so long as there is a ban on ADUs above detached garages.

Thank you,
Alex Khatchaturian

On Fri, Dec 30, 2022 at 8:20 AM Prasad, Hillary <Hillary.Prasad@hcd.ca.gov> wrote:

Good morning,

HCD has received your comment and is taking it under consideration during our review.
Please reach out if you have any questions.

Thank you,


Hillary Prasad
Specialist, Housing Policy Division

Housing and Community Development
2020 W. El Camino Avenue, Suite 500 | Sacramento, CA 95833
Phone: 916.776.7545



[\[landlordtenant.dre.ca.gov\]](mailto:[landlordtenant.dre.ca.gov])

From: Alex Khatchaturian <alexkhatchaturian@gmail.com>
Sent: Thursday, December 29, 2022 3:30 PM
To: Brotman, Daniel <dbrotman@glendaleca.gov>
Cc: Prasad, Hillary@HCD <Hillary.Prasad@hcd.ca.gov>
Subject: Housing Element Review; Sites Inventory

Councilmember Brotman,

AB 1397 includes specific criteria for assessment of the realistic availability of nonvacant sites during the planning period. If nonvacant sites accommodate half or more of the lower income need (as is the case in Glendale), the housing element must describe findings based on substantial evidence that the existing use does not constitute an impediment for additional residential use on the site.

Specifically, Government Code 65583.2(g)(2) states:

"In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. **An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.**"

The HCD Site Inventory Guidebook (page 27), attached for reference, clarifies the "substantial evidence" standard of proof by stating:

"In general, substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. An example of substantial evidence would be a nonvacant site with a grocery store and with a building lease expiring in a year, and evidence that the store has entered into a lease to relocate to another site subsequent to the lease expiring."

Furthermore, the HCD Site Inventory Guidebook adds:

"Examples of substantial evidence that an existing use will likely be discontinued in the current planning period include, but are not limited to:

- The lease for the existing use expires early within the planning period.
- The building is dilapidated, and the structure is likely to be removed, or a demolition permit has been issued for the existing uses.
- There is a development agreement that exists to develop the site within the planning period.
- The entity operating the existing use has agreed to move to another location early enough within the planning period to allow residential development within the planning period.
- The property owner provides a letter stating its intention to develop the property with residences during the planning period."

The city must make its findings evidencing the suitability of the nonvacant sites available for public comment and review. If findings supporting the realistic development potential for certain lower income sites do not exist, as I believe is the case for the properties listed below, then the city should seek alternative sites that meet the criteria required by AB 1397.

1. Former site of the Sears building and nearby parking lots

216 N Central Ave (5642-015-056); 14 moderate, 14 above moderate

220 N Central Ave (5642-015-057); 15 moderate, 15 above moderate

201 W California Ave (5643-020-038); 16 moderate, 16 above moderate

309 N Orange St (5643-020-039); 30 moderate, 30 above moderate

212 W California (5642-015-045); 265 lower

236 N Central (5642-015-058); 178 lower

The Sites Inventory of the most recent draft of the Housing Element Update, adopted by the City Council on December 6, 2022, shows a total capacity of 443 lower income units at the current site of the Sears building (178) and the adjacent parking structure (265). On December 6, 2022, just hours before the City Council adopted the revised draft of the Housing Element Update, the City Council held a special meeting for stage I preliminary design review pertaining to the development proposed at the former Sears site.

During this presentation we learned that the developer, who has been communicating and working with city staff during the past year and a half, is proposing to build 682 units at the above-mentioned parcels, but only 69 will be made affordable to lower income individuals and families. The remaining 613 units are proposed to be above moderate and they will be leased at market rate.

City staff was aware of the project and it was stated multiple times during the meeting that they have been working with the developer for over a year and a half. It seems disingenuous to tell the state that a site has capacity for 443 lower income units when staff has been working with the developer for a year and a half and knows they plan to provide 69 affordable units, the minimum required by the city's inclusionary zoning law.

Moreover, during the meeting, council members were discussing the possibility of the Sears building being a historic resource. If there is sincere concern about preserving the building, the city should take into account the environmental impediments for housing development at this site and remove it from the Sites Inventory. It does not seem ethical to leave the site in the housing element in order to get credits towards the RHNA and then bring up potential historical resource concerns to deter the project from moving forward at public meetings.

Finally, everyone on the city council expressed a preference for the project to have a commercial or retail component, such as a restaurant. Please note that state law now allows for standalone residential development on commercial or even mixed use zoned sites.

The Sites Inventory needs to be revised to show the correct number of lower income (69) and above moderate (613) units proposed by the developer for the former Sears site.

2. 225 W Broadway (5642-002-056)

The Social Security Administration is a tenant in this building. Moreover, UnitedHealth has signed a long term lease for an Optum primary care clinic that would preclude redevelopment at this site during the 2021-2029 planning period.

The Sites Inventory shows this site as having the capacity for 250 lower income units. This site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

3. 6444 San Fernando Rd (5623-027-903)

The US Post Office is in this building. The Sites Inventory shows this site as having the capacity for 21 lower income units. This site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

4. 206 N Kenwood St (5642-017-901)

This site is occupied by Allan F. Daily High School. The Sites Inventory shows this site as having the capacity for 103 lower income units. Absent findings, based on substantial evidence, that the existing use will be discontinued during the current planning period, this site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

5. 831 N Pacific Ave (5636-006-024)

My family owns this property. We were never consulted by city staff or the city consultant about interest in redeveloping this property into multi-family housing. The property has a 25,000 SF building which is leased to Big Square. Earlier this year we signed a ten (10) year lease extension with the tenant. The lease expires 8/31/2032.

The Sites Inventory shows this site as having the capacity for 40 lower income units. This site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

6. 1124 E Broadway (5674-012-018)

Multi-tenant shopping center;

My family owns this property. We were never consulted by city staff or the city consultant about interest in redeveloping this property into multi-family housing. The property has multiple tenants with lease agreements extending beyond the planning period. The Sites Inventory shows this site as having the capacity for 24 lower income units. This site should be eliminated based on the suitability of nonvacant sites requirements of AB 1397.

7. 1122 E Broadway (5674-012-020)

CVS Pharmacy anchor for 1124 E Broadway

My family owns the "wings" of the strip mall (See #6 above). The CVS parcel is owned by another entity, but we share the parking lot. This site alone cannot be redeveloped without the "wings". Therefore, this site (capacity 47 lower income units) should also be eliminated.

In addition to the previously mentioned sites, there are a number of other properties

designated in the Sites Inventory to have capacity for lower income units which currently have commercial uses that are presumed to impede additional residential development. The Housing Element does not present any findings to substantiate that these uses are likely to be discontinued during the planning period

- a. 900 N Central (5644-013-043); 74 lower units

Crab Avenue Restaurant

- b. 311 W Los Feliz Rd (5640-018-019); 108 lower units

Vons anchored shopping center

- c. 1000 S Central Ave (5641-018-017); 82 lower units

JoAnn Fabrics

- d. 1000 N Brand Blvd (5644-011-022); 22 lower units

Citizens Business Bank

- e. 826 N Glendale Ave (5646-022-020); 27 lower units

Outpatient surgery center

- f. 717 E Colorado St (5674-018-041); 20 lower units

Car wash

In all, the above sites account for more than 1,200 lower income units. I sincerely feel that these are "dummy sites" with no realistic potential for turning over into multi-family housing. The city is trying hard to avoid rezoning, but with current zoning we do not have enough underutilized parcels to generate the number of housing units required by 2029.

I recommend the city to rezone to allow larger buildings on all parcels within 1/2 mile of the Glendale Metrolink station and the recently approved NoHo-Pasadena BRT. This will open up opportunities for the turnover of commercial sites into multi-family residential projects

and alleviate Glendale's housing shortage. In addition, generous development standards near mass transit will provide incentive for the development of affordable and lower-income units in Glendale's job-rich and high-resource neighborhoods. Glendale needs to take advantage of the future bus rapid transit line and rezone for higher density residential developments, especially areas north of the 134 freeway.

I will be submitting additional comments to HCD pertaining to recent amendments to the city's ADU Ordinance, which I believe do not encourage ADU development, and the city's decision to not enforce the tenant protection provisions of its Just Cause and Retaliatory Evictions Ordinance. As I have stated previously in my correspondence with city staff, the amended Housing Element does not contain any commitment for the establishment of a tenant protections enforcement program. Nor does it contain any plan to remove discretion out of the enforcement process and place a ministerial duty on city staff to enforce the tenant protection provisions.

I look forward to hearing back from you.

Thank you,

Alex Khatchaturian



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The owner of the seven (7) parcels in red, which was the former site of Sears department store, Sears auto center, and a parking structure has proposed to build 613 above moderate and 69 very low income units. On December 6, 2022 the Glendale City Council unanimously approved the Phase I design stage review per staff recommendation. City staff has been working closely with the developer during the past year and a half.

Nonetheless, the city represented two of these sites (APN: 5642-015-058, -045) as having capacity for 443 lower income units when they knew the proposed project would have a total of 69 lower income units. This is just one example of the numerous misrepresentations to HCD by the City of Glendale on the Sites Inventory in order to meet its RHNA allocation without having to rezone.

The Sites Inventory should be corrected to accurately reflect the number of lower income units proposed by the developer.

214 N Central Avenue was sold in April 2019 to Elevate Health Group (owner-user). The property was extensively renovated and the existing use, a primary care medical clinic, will most likely not discontinue during the 2021-2029 planning period. This property should be eliminated from the Sites Inventory.

I want to...



[Street Map](#)

5643-020-040

5643-020-039

5643-020-038

W California Ave

W California Ave

5642-015-058

5642-015-045

5642-015-057

5642-015-056

5642-015-055

N Orange St

0 100 200ft



Site Address	APN	Lower	Moderate	Above	Suitability on nonvacant sites
				Moderate	analysis (AB 1397)
214 N Central Ave	5642-015-055	0	14	14	The property was purchased by a medical group (Elevate Health) in 2019 and underwent extensive interior and exterior renovations for a primary care clinic.
216 N Central Ave	5642-015-056	0	14	14	Lower Income category overstated by 374 units. The owner of these sites has proposed to develop 613 above moderate and 69 very low income units. The city council approved Stage I design review on 12/6/2022 per staff recommendations.
220 N Central Ave	5642-015-057	0	15	15	
236 N Central Ave	5642-015-058	178	0	0	
212 W California Ave	5642-015-045	265	0	0	
201 W California Ave	5643-020-038	0	16	16	
309 N Orange St	5643-020-039	0	30	30	
225 W Broadway	5642-002-056	250	0	0	Office building occupied by Social Security Administration, UnitedHealth (Optum), and other tenants with lease agreements extending beyond planning period.
900 N Central Ave	5644-013-043	74	0	0	Crab Avenue restaurant
6444 San Fernando Rd	5623-027-903	21	0	0	United States Post Office facility
206 N Kenwood St	5642-017-901	103	0	0	Allan F Daily High School
831 N Pacific Ave	5636-006-024	40	0	0	Big Square; lease expires 8/31/2032
311 W Los Feliz Rd	5640-018-019	108	0	0	Vons anchored shopping center
1000 S Central Ave	5641-018-017	82	0	0	JoAnn's Fabric & Crafts (recent lease)
1000 N Brand Blvd	5644-011-022	22	0	0	Citizens Business Bank
826 N Glendale	5646-022-020	27	0	0	Outpatient surgery clinic
1124 E Broadway	5674-012-018	24	0	0	CVS anchored shopping center with shared parking and lease constraints
1122 E Broadway	5674-012-020	47	0	0	
717 E Colorado St	5674-018-041	20	0	0	Car wash

An existing use shall be presumed additional residential development findings based on substantial evidence that the use is likely to be discontinued during the planning period.

The Housing Element does not contain findings to support the realistic development potential for these income sites. The city should seek alternative lower income sites as eligible sites.

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Alex Khatchaturian <alexkhatchaturian@gmail.com>

Chapter 9.30 JUST CAUSE AND RETALIATORY EVICTIONS

9 messages

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@glendaleca.gov>

Wed, Sep 16, 2020 at 9:49 AM

Mr. Brotman,

The moratorium on evictions expires at the end of this month. Do you know if tenants faced with unlawful termination of their tenancy can rely on the City to enforce the provisions of Glendale Municipal Code Chapter 9.30? Or are tenants limited to pursue costly civil remedies, which puts them at a great disadvantage against landlords?

I understand the City has sole discretion over whether to pursue or not pursue enforcement of any kind. I am curious if there has been any discussion among members of the City Council regarding this matter.

Thank you,
Alex Khatchaturian

Brotman, Daniel <dbrotman@glendaleca.gov>
To: Alex Khatchaturian <alexkhatchaturian@gmail.com>

Wed, Sep 16, 2020 at 9:20 PM

Hi Alex,

The governor recently signed an eviction moratorium bill called AB 3380. It replaces our local ordinance. I'm sure you can find lots of information on the web, but here's a summary I was given.

- Full protections: Any rent missed between March 1 and August 31 will be converted to civil debt. (This means landlords can take tenants to small claims court for any missed rent – but they can't evict them for not paying it.)
- Protections with a caveat: For rents missed between Sept. 1 and January 31, tenants must pay 25% of rent within that period, or else they'll be open to eviction. The remaining 75% of their rent is treated as a civil debt, just like the provision for missed rent from between March 1 and August 31.
- More time: Also under the new law, the usual three-day-notice to evict that landlords post – mandatory before they go through the court process to evict a tenant – is now a 15-day-notice.
- How the process works for tenants: Once a landlord has posted a 15-day notice, a tenant can file with courts that they have a pandemic-related hardship. A tenant filing with the courts that they have a pandemic-related hardship must swear under penalty of perjury that they are enduring a pandemic-

related hardship. (This is a much higher bar than the attestation that was required under AB 1436). Additionally, if a tenant earns 130% of a county's Area Median Income or higher, a landlord can ask for them to produce proof of a pandemic-related financial hardship, like a layoff or wage-reduction notice from an employer.

- No more eviction moratoria at the local level: Eviction moratoria previously passed by cities and counties will be grandfathered in, but they won't be able to pass any extensions.
- Courts: Courts can begin processing evictions for non-payment of rent in non-COVID cases on October 5th.
- Property owners: The mortgage forbearance provisions for property owners that were in AB 1436 are not in the new bill.

It's pretty good news for tenants. Not great for landlords.

Regards,

Dan

From: Alex Khatchaturian <alexkhatchaturian@gmail.com>
Date: Wednesday, September 16, 2020 at 9:50 AM
To: "Brotman, Daniel" <dbrotman@Glendaleca.gov>
Subject: Chapter 9.30 JUST CAUSE AND RETALIATORY EVICTIONS

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Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@Glendaleca.gov>

Thu, Sep 17, 2020 at 6:41 AM

Mr. Brotman,

I am familiar with this new state law (AB 3088), but Glendale has a Just Cause Eviction Ordinance codified in Chapter 9.30 of municipal code. My question was whether the city will enforce the provisions of this ordinance, by assessing fines and penalties to landlords who do not comply. If a landlord attempts to evict a tenant without cause, in violation of city law, can the tenant rely on the city to enforce its laws, or does the tenant have to

pursue civil remedies at its own cost?

Glendale's ordinance, which was adopted last year, affords tenants with certain protections. But a lot of tenants cannot afford to retain counsel and initiate civil suits when they are wronged by their landlords. Most attorneys, understandably, won't represent tenants unless the lease provides the prevailing party attorney fees and costs.

I urge you to discuss enforcement of city laws protecting tenants, such as the Just Cause Eviction Ordinance, with the City Council and City staff. Is the city going to enforce Glendale Municipal Code Chapter 9.30?

Thank you,
Alex Khatchaturian
[Quoted text hidden]

Brotman, Daniel <dbrotman@glendaleca.gov>
To: Alex Khatchaturian <alexkhatchaturian@gmail.com>

Thu, Sep 17, 2020 at 7:33 AM

Hi Alex,

Sorry, I thought you were talking about the eviction moratorium. I will forward your question to our city attorney. I suspect the answer will be that we don't have resources to enforce but we'll see.

By the way, I brought up the idea of funding free or low cost legal support for tenants through a non-profit a couple months ago (when we were allocating Measure S funds). Unfortunately, I didn't get support from my colleagues. If this is a widespread issue, and if the lawyer who does pro-bono work for the Glendale Tenants Union is fully loaded, perhaps we can re-look at it.

Dan

Sent from my iPhone

On Sep 17, 2020, at 6:41 AM, Alex Khatchaturian <alexkhatchaturian@gmail.com> wrote:

[Quoted text hidden]

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@glendaleca.gov>

Thu, Sep 17, 2020 at 8:10 AM

Mr. Brotman,

I anticipate many landlords will seek alternatives to evict non-paying tenants, because the state has passed strong protections for tenants who are not paying rent. Instead of going after them for non-payment, they will seek just cause evictions, knowing that the city will not penalize them for noncompliance with local requirements. For example, a landlord can say he wants to remodel the unit, get an inflated estimate from a contractor showing the cost exceeds 8x the monthly rent (as required by the ordinance), obtain permits for the work, and demand the tenant vacate within 30 or 60 days. Once the tenant vacates, the landlord need not follow through; he can do minor cosmetic improvements and rent the unit at market price. The Glendale ordinance prohibits such bad faith practices, but if the City does not enforce it, the law has no teeth! Of course the evicted tenant can sue for wrongful eviction, but do you see the injustice here? The purpose of the just cause ordinance is to protect tenants, not allow landlords to use it as an alternative for evicting them. Moreover, a lot of tenants are not financially secure to engage in costly lawsuits.

I appreciate you validating my concerns, and I look forward to hearing back from you once you get a response

from the city attorney.

Thank you,
Alex Khatchaturian
[Quoted text hidden]

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@glendaleca.gov>

Mon, Sep 28, 2020 at 9:58 AM

Mr. Brotman,

I am following up to check if you received a response from the city attorney regarding the city's enforcement of the provisions of Chapter 9.30 of Glendale Municipal Code. Specifically, is the city going to assess fines and penalties to landlords who do not comply with Glendale's Just Cause Eviction Ordinance?

Thank you,
Alex Khatchaturian

[Quoted text hidden]

Brotman, Daniel <dbrotman@glendaleca.gov>
To: Alex Khatchaturian <alexkhatchaturian@gmail.com>

Mon, Sep 28, 2020 at 10:28 AM

I don't think I did. Will follow up.

[Quoted text hidden]

Alex Khatchaturian <alexkhatchaturian@gmail.com>
To: "Brotman, Daniel" <dbrotman@glendaleca.gov>

Sun, Oct 11, 2020 at 3:54 PM

Mr. Brotman,

I have not heard back from you. Please follow up regarding this matter. I want to know if the city is going to assess fines and penalties to landlords who do not comply with Glendale's Just Cause Eviction Ordinance.

Thank you,
Alex Khatchaturian

[Quoted text hidden]

Brotman, Daniel <dbrotman@glendaleca.gov>
To: Alex Khatchaturian <alexkhatchaturian@gmail.com>

Mon, Oct 12, 2020 at 2:32 PM

Hi Alex,

I finally had a conversation with staff about this. The direct answer is that we don't enforce and don't plan to. We do have a few people on staff that take calls and try to help informally, either by contacting landlord to explain the requirements or referring tenants to sources of free or low cost legal advice. Staff tells me there have been very few JC eviction related calls. Most calls relate to things like rent increases or relocation payments. I believe there have been a few retaliation related. Some calls to understand COVID protections, etc. This is all anecdotal and not based on hard data.

As I mentioned before, I like the idea of using some of our Measure S dollars to fund 3rd party tenant legal assistance, but that hasn't gotten support yet. I may ask again.

FYI, there's an item coming to Council/HA tomorrow afternoon regarding a potential Landlord-Tenant Commission. The report refers to Culver City's Landlord-Tenant Mediation Board; it's a forum for voluntary mediation but has not been very active as far as I know. I'm doubtful that something like this would bring much value here, but open to ideas.

[Quoted text hidden]

- Just Cause Eviction: Addresses the twelve (12) legal reasons for eviction and other issues relating to the termination of a tenancy.
- Relocation Assistance: -Tenants are eligible for relocation assistance when a tenant elects to vacate a unit in response to a rent increase that increases the rent by more than 7% of the rent that was in place at any time during the 12 month period preceding the effective date of the rent increase.
- Right to Lease: Requires landlords to offer a lease with a minimum term of 1 year to prospective tenants and current tenants who are issued rent increases.

The Rental Rights Program expands tenant protections found in the City's Just Cause Eviction, which was established in 2002, and works to: minimize displacement of tenants by requiring a landlord to have a "just cause" in order to terminate a tenancy and prohibiting retaliation for the exercise for designated rights; mitigate the impact of tenants who have to vacate their rental unit when they are unable to afford higher rent increases, when the unit requires eviction for major rehabilitation, or similar reasons, by providing relocation assistance; and address instability and substandard living conditions and services. Enforcement is administered by the Community Development Department Housing staff, who try to resolve housing-related issues through informal mediation, informing the sides of their rights, and dispatching City resources where appropriate. Independently, or through Housing staff's referral, the City Attorney's office will investigate allegations of retaliation and the City's prosecutor may file criminal charges where appropriate. As previously stated, this has only happened in a small number of cases since 2013; mediation/education efforts are typically successful in resolving the issue and there have been no prosecutions. The Rental Rights Program works in tandem with the State's Tenant Protection Act of 2019 to provide a rent cap and evictions protections for renters. These programs support fair housing efforts to reduce the risk of displacement, particularly for lower income renters and protected classes.

Research has shown that low-income renter populations are disproportionately exposed to environmental hazards and that housing tenure is a telling determinant of social vulnerability to disasters. Renters bear the brunt of the existing affordable housing shortage, and their adaptive capacity to cope and recover from the impacts of environmental hazards may be reduced due to systemic inequities and limited resources. As discussed in the Constraints section under Environmental Constraints, environmental hazards affecting residential development in the City include geologic and seismic conditions, as well as wildfire, which provide the greatest threat to the built environment, and aircraft accident. More than half of the City lies within Very High Fire Hazard Severity Zones (VHFHSZ). VHFHSZs in Glendale are located in the Verdugo Mountains and San Rafael Hills (generally north of Kenneth Road and Glenoaks Boulevard and south of the 210 Freeway) and San Gabriel Mountains (northern tip of the City). Residents living within these VHFHSZ areas are at risk of displacement due to wildfire. In order to reduce the risk, new development must comply with applicable City requirements for fuel modification zones, fire-safe site design principals, and other fire prevention activities. The Glendale Local Hazard Mitigation Plan and Glendale Safety Element contain details policies and programs to reduce risk to life and property due to hazards, including environmental hazards, and address on emergency preparedness and aviation disaster response. Liquefaction and other seismic-related issues are further addressed by the State Universal Building Code (UBC).

Regionally, much of Los Angeles County is designated as sensitive to displacement. Nearly every census tract in and around central (downtown) Los Angeles; along the I-110 Freeway; east Los Angeles; and in the Gateway Cities, is designated as a sensitive community. Coastal areas and western Los Angeles County (e.g., Beverly Hills, Malibu, Calabasas) are generally not designated sensitive. Most areas along I-110 between I-10 and I-405, and along I-105 receive a displacement typology of "Low-Income/Susceptible to Displacement". Downtown Los Angeles and neighborhoods to the north and west of Downtown (including Mid-City, Echo Park, and Highland Park) are undergoing "Advanced Gentrification" or "Early/Ongoing Gentrification". Generally, the same areas that are not designated sensitive (coastal areas and western Los Angeles County) are "Stable/Advanced Exclusive". Glendale exhibits similar patterns to the rest of the County, where areas with high real estate values are generally exclusive and areas with lower real estate values are at risk of displacement.



Alex Khatchaturian <alexkhatchaturian@gmail.com>

Proposed ADU ordinance

1 message

Lanzafame, Philip <PLanzafame@glendaleca.gov>

Tue, Dec 8, 2020 at 10:36 AM

To: "alexkhatchaturian@gmail.com" <alexkhatchaturian@gmail.com>

Cc: "Agajanian, Vrej" <VAgajanian@glendaleca.gov>, "Brotman, Daniel" <dbrotman@glendaleca.gov>, "Devine, Paula"

<PDevine@glendaleca.gov>, "Kassakhian, Ardashes" <AKassakhian@glendaleca.gov>, "Najarian, Ara"

<ANajarian@glendaleca.gov>, "Golianian, Roubik" <RGolianian@glendaleca.gov>, "Garcia, Michael"

<MJGarcia@glendaleca.gov>, "Asp, Kristen" <KAsp@glendaleca.gov>, "Neukian, Yvette" <YNeukian@glendaleca.gov>

Mr. Khatchaturian –

I am writing on behalf of Mayor Agajanian and the City Council in response to your email regarding ADU additions on top of detached garages.

While you may be correct that in some cases, an ADU could be designed to scale with the existing neighborhood, your proposal for exceptions to allow some above-garage ADUs and not others presents many problems. To determine whether or not a two-story garage/ADU is appropriate in mass/scale to the neighborhood would require design review consideration, a process we are prohibited from requiring. Further, it is a very subjective determination and would result in providing benefits to some owners and not others. These two circumstances really point to an ordinance that is an either-all-or-nothing proposition. Either we allow all ADUs above garages and risk experiencing out of scale projects that intrude on adjacent properties' privacy or we prohibit them altogether. Under the current code, we have been inundated with complaints of second story ADUs and out of scale, massive structures imposing on neighborhoods as well as intrusion on privacy in adjacent homes and yards. Given these circumstances, the proposed ordinance prescribes no above-garage or second story ADUs.

The item is on the agenda for consideration of adoption this evening. The City Council has received your comments and I invite you to participate in the discussion tonight. You can comment on the item by calling in during the meeting.

Very truly,



Philip Lanzafame, Director of Community Development
City of Glendale • 633 E. Broadway, #103 • Glendale, CA 91206
(818) 548-2140 • PLanzafame@GlendaleCA.gov

From: Alex Khatchaturian <alexkhatchaturian@gmail.com>
Sent: Friday, December 4, 2020 10:41 AM
To: Brotman, Daniel
Cc: Najarian, Ara; Kassakhian, Ardashes; Agajanian, Vrej; Devine, Paula
Subject: Proposed ADU ordinance

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Councilmembers,

Does the proposed ADU ordinance entirely prohibit ADU additions on top of detached garages? If so, I urge you to consider exceptions and not institute a blanket ban.

I appreciate your concern for the development of massive projects. But two story structures are not necessarily massive and they are common in our residential neighborhoods. If an ADU project can demonstrate that it will not be out of scale with the existing neighborhood, and furthermore provide for sufficient interior and rear setbacks and meet all other design criteria that would typically be applied to a non-ADU two-story project, why should the construction be prohibited?

A two-story detached garage/ADU allows for homeowners to keep using their garage for safely parking their cars. Also, almost all two-story detached garage/ADU projects involve rebuilding a new garage in compliance with current building and safety code to support the second story above. From a design perspective, two-story detached garage/ADU projects can look very nice and add to the character of our city. There are utility, safety, and design benefits to allowing for ADU additions on top of detached garages which I urge the city council to take into consideration.

There are other provisions in the proposed ordinance that some members of the city council feel have not been sufficiently deliberated upon. I hope you do not act in haste and you continue the discussion allowing more time for the community to input their thoughts and preferences.

Please hold off on the adoption of the ordinance as it was presented during the 12/1 city council meeting. If under state law, exceptions cannot be made due to the fact that the decisions have to be made ministerially on a non-discretionary basis, I urge you to continue allowing ADU additions on top of detached garages.

Thank you,

Alex Khatchaturian

land use element



City of glendale, California

planning division

land use element

CITY OF GLENDALE, CALIFORNIA
PLANNING DIVISION

Adopted: October 25, 1977
Revised: October 23, 1986

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July 4, 1987

Honorable Mayor and City Council
Chairman and Members of the Planning Commission
City Manager James M. Rez

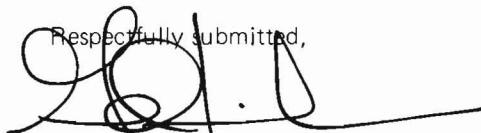
Ladies and Gentlemen:

The Planning Division is pleased to submit for your consideration a revision to the 1990 Land Use Element. This revision is necessary as a result of the City Council's adoption of the Land Use/Zoning Consistency implementation program in 1986 which involved major City-wide zone changes, adoption of a new zoning ordinance, and several Land Use Plan amendments. The revision also reflects all Land Use Element amendments and zone changes adopted by Council since 1977.

The Land Use Element is the primary element in the series of Comprehensive General Plan Elements mandated by the State of California. The purpose of this element is manifold in that it provides direction to the future physical, social, environmental, and economic activities of Glendale's population and designates the desired general distribution, location and extent of the significant uses of the land.

The City of Glendale and its citizens can take great pride in the fact that the City has maintained its status as one of the finest residential communities in California. Glendale has developed a diversified industrial base and achieved a leadership role in becoming a regional hub of commercial and financial activity.

The continued implementation of the Land Use Element will ensure Glendale's future growth and prosperity. While the element advocates a moderate growth policy, the primary aim is to achieve this end within the context of providing the community environmental protection of the highest quality.

Respectfully submitted,

Gerald J. Jamriska, A.I.C.P.
Director of Planning

CITY COUNCIL RESOLUTION NO. 20,938

WHEREAS, The City Council has conducted noticed public hearings pursuant to the provisions of Section 3-107 of the Glendale Municipal Code and Chapter 3, Title 7 of the Government Code of the State of California; and

WHEREAS, The City Council has accepted proposed General Plan Amendment Nos. 84-1, 85-1, 85-3, and 86-1 as they relate to the Land Use/Zoning Consistency Program; and

WHEREAS, the City Council has reviewed and considered all materials, communications, public testimony, maps and exhibits of current record on said General Plan Amendments; and

WHEREAS, The City Council has found subject General Plan Amendments to promote and protect the public health, safety, comfort, convenience and general welfare of the citizens of Glendale;

NOW, THEREFORE, BE IT RESOLVED by The Council of the City of Glendale that the Land Use Element Map of the General Plan is hereby amended as shown in the official City section sheet atlas entitled "1986 Amendments to the Land Use Element Map of the General Plan, Glendale, California." Said official City section sheet atlas is on file in the Planning Division office and by this reference made a part hereof.

Adopted this 25th day of March, 1986.



Jerold F. Milner
Jerold F. Milner, Mayor

ORDINANCE NO. 4720

BE IT ORDAINED BY THE COUNCIL OF THE CITY OF GLENDALE:

SECTION 1. A new official City-wide Zoning Map entitled "1986 Zoning and Height District Map, Glendale, California" is hereby adopted in connection with the Land Use/Zoning Consistency Program. Said official City section sheet atlas is on file in the planning division office and by this reference made a part hereof. Said official Zoning Map hereby supersedes and replaces the "1954 Use and Fire Zoning Map, Glendale, California" as amended.

Passed by the Council of the City of Glendale on the 25th day of March, 1986.



Jerold F. Milner
Jerold F. Milner, Mayor

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