

# **Public Comments**

## **Agenda Item #1**



*November 30, 2020*  
*City Council Special Meeting*

## Brooks, Elizabeth

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**From:** Sue Digre [REDACTED]  
**Sent:** Monday, November 30, 2020 3:05 PM  
**To:** Public Comment  
**Subject:** Fwd: Consent

**[CAUTION: External Email]**

----- Forwarded message -----

**From:** Sue Digre [REDACTED]  
**Date:** Mon, Nov 30, 2020, 2:48 PM  
**Subject:** Consent  
**To:** <[publiccomment@ci.pacifica.ca.us](mailto:publiccomment@ci.pacifica.ca.us)>

City Council 11 30 2020 7pm  
Agenda item :  
Council Priorities.  
Sue Digre

Outreach to the Public at large  
and  
the engagement of the Public at large is part of our Gen Plan.

Both should be a top priority every year.

It will take careful thought & discussion  
and  
then probably a committment to adequate funding will be essential.

Thank you.  
Sue Digre

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# **Public Comments**

## **Agenda Item #3**



*November 30, 2020*  
*City Council Special Meeting*

## Brooks, Elizabeth

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**From:** Brooks, Elizabeth  
**Sent:** Friday, November 13, 2020 12:23 PM  
**To:** Public Comment  
**Subject:** FW: PMC, State and Federal law allows for a legal denial of the WCF application at 1307 Redwood Way  
**Attachments:** 111020 Appealant Full Rebuttal of 091420 Attachment H.pdf

Thank You,  
Elizabeth

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**From:** Sunil Bhat [REDACTED]  
**Sent:** Tuesday, November 10, 2020 5:57 PM  
**To:** \_City Council Group <CityCouncil@ci.pacifica.ca.us>; Brooks, Elizabeth <brookse@ci.pacifica.ca.us>; Bigstyck, Tygarjas <bigstyckt@ci.pacifica.ca.us>; internal@cc4rt.com  
**Subject:** PMC, State and Federal law allows for a legal denial of the WCF application at 1307 Redwood Way

### **[CAUTION: External Email]**

Honorable Members of the City Council,

I have not heard any updates regarding an expanded alternate site analysis for UP-102-18, so I would like to reiterate that you as the City Council are well within your legal right to deny the "small cell" application on the public right-of-way in front of 1307 redwood way.

This is confirmed by applicant's lawyer, on page 3 of the "Applicant's Letter" (attachment H) from the 9/14 appeal hearing agenda where he states:

“The  
California Supreme Court has confirmed that telephone  
corporations maintain the right to erect telephone equipment in the  
public right-of-way  
**subject**  
**to local regulation based on aesthetic considerations**  
(*T-Mobile  
West LLC v. City and County of San Francisco*,  
No. S238001, 2019 WL 1474847 (Cal. Sup. Ct. April 4, 2019).”

Pacifica's Municipal Code clearly defines our current aesthetic standard for ALL WCFs:



Code

9- 4.2608(b)(1) All

wireless communication facilities shall, to

the maximum extent practicable,

incorporate best practices

to achieve

concealment and stealth of antennas,

equipment, and support structures. Further, all

wireless communications facilities shall be screened to the fullest extent possible and

**located to minimize visibility from surrounding areas and private or public rights-of-way.**

**In addition to the requirements of this subsection, wireless communications facilities within a private or public right-of-way shall conform to the standards of subsection (e)**

In a Residential Zoned area, "minimizing visibility from surrounding areas" is visibility from residential properties. Pacifica has approved two "Small Cell" WCFs, one AT&T (560 San Pedro Ave) and one Verizon (1450 Terra Nova Blvd) that both satisfy this standard as they are only visible from 0-2 properties. Repeater WCFs like those constructed in Vallemar are not relevant to this application, as they did not extend the height of the utility poles.

I have attached statement that addresses all 6 points in The applicants letter that outlined Verizon's threat of litigation, proving that none of these threats pose an actual risk of litigation to the city. Even so, for Verizon to sue the city to obtain a permit after the city council has demonstrated their will by denying that permit in good faith, is not very practical nor likely from Verizon's business perspective.

While the current PMC is sufficient for denial of this application, I have recommended and urge the council to create an even stronger aesthetic standard, first through an urgency ordinance defining protective setbacks from residential dwellings, followed by an official municipal code update regulating small cells by zoning. These are COMMERCIAL installations, and legally can be limited to industrial and commercial zones, as other CA municipalities like petaluma, fairfax, calababas and others have done.

I thank you for your time, please feel free to contact me with any questions

**Sunil Bhat D.O.**

[Osteopathictouch.com](http://Osteopathictouch.com)

Board Certified Osteopathic Family Medicine  
Board Certified Osteopathic Neuromusculoskeletal Medicine

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November 10, 2020

Via Email

TO:

Mayor Deirdre Martin

Mayor Pro Tem Sue Beckmeyer

Councilmembers Sue Vaterlaus, Mary Bier and Mike O'Neill

City of Pacifica City Council

170 Santa Maria Avenue Pacifica, California 94044

Re: Appeal of Application UP-102-18 Small Cell Wireless Facility, Right-of-Way at 1307 Redwood Way City Council Hearing, November 30, 2020

Dear Mayor Martin, Mayor Pro Tem Beckmeyer and Councilmembers:

Verizon Attorney Paul Albritton Submitted the "Applicant's Letter (Attachment H) for the 9/14 appeal, in which he stated a denial of the WCF application at 1307 Redwood Way is unlawful. **All Six points** he cited to make this claim are completely unfounded, including claims of violation of the TCA by prohibition of services or effective prohibition. Each of his claims, and the clear evidence against them, are detailed below.

The city's "risk" of litigation is purely based on these threats, therefore there is no true risk of litigation. Furthermore, it is very impractical and unlikely for the wireless carrier to pursue litigation seeking a permit that a city council denied in good faith.

These points can be referenced against Mr. Albritton's original letter (attachment H)

<https://pacificacityca.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=5687&MeetingID=1330>

**Point I - describes this facility. Its “thoughtful design” is subjective and relative**

**Point II - Incorrectly states the facility satisfies all Municipal code requirements**

**PMC § 9- 4.2608(b)(1)** states “All wireless communication facilities shall, to the maximum extent practicable, incorporate best practices to achieve concealment and stealth of antennas, equipment, and support structures. Further, all wireless communications facilities shall be screened **to the fullest extent possible and located to minimize visibility from surrounding areas and private or public rights-of-way. In addition to the requirements of this subsection, wireless communications facilities within a private or public right-of-way shall conform to the standards of subsection (e)”**

Pacifica has approved two small cells, one AT&T and one Verizon, one is visible from two private residences, and the other none. Both of these clearly satisfy Pacifica’s aesthetic standard explicitly stated above. A WCF atop the utility pole outside 1307 Redwood Way would be visible from a minimum of 30 homes.

**PMC § 9- 4.2608(e)(6)(ii)** states “Equipment facilities shall be located so as not to cause inconvenience to the public's use of the right-of-way,”

The public's use of the right-of-way is not just for travel, but includes their “quiet enjoyment of the streets” (*T-Mobile West LLC v. City and County of San Francisco*, No. S238001, 2019 WL 1474847 (Cal. Sup. Ct. April 4, 2019)

**PMC § 9- 4.2614(b)(2)** states “the information submitted proves that a feasible alternate site that would result in fewer visual impacts does not provide reasonable signal coverage”

**NONE of the 14 Alternate Sites submitted are presented in the record as having fewer visual impacts, nor is signal coverage mentioned for any of them.**

Verizon and the city have delayed this appeal hearing stating their desire to do an extended alternate site analysis. **No matter if their extended alternate site analysis satisfies PMC § 9- 4.2614(b)(2), The current site still**

**violates PMC § 9- 4.2608(b)(1).**

**Point III - Incorrectly implies that Verizon's right to use the public right of way is absolute.**

However Mr Albritton states on page 3 ¶ 3:

“The California Supreme Court has confirmed that telephone corporations maintain the right to erect telephone equipment in the public right-of-way **subject to local regulation based on aesthetic considerations** (*T-Mobile West LLC v. City and County of San Francisco*, No. S238001, 2019 WL 1474847 (Cal. Sup. Ct. April 4, 2019).”

Again, Pacifica has approved two small cells, one AT&T and one Verizon, one is visible from two private residences, and the other none. Both of these clearly satisfy Pacifica’s aesthetic standard explicitly stated in **PMC § 9- 4.2608(b)(1)**. A WCF atop the utility pole outside 1307 Redwood Way would be visible from a minimum of 30 homes.

**Point IV - Claims no Substantial Evidence was Provided for the Denial**

**IV (A) falsely states the facility complies with Pacifica’s aesthetic standard, which is detailed above in Point II .**

**IV (B) falsely states that Property Value Statements make reference to RF Emission**

Three real estate professionals who work extensively in the Pacifica market have provided professional statements confirming the clear hazard to surrounding Property Values and do not in any way mention or suggest RF emissions as a cause.

Mr. Albritton cites a “study” that was done in Santa Clara, a completely different real estate market to Pacifica’s, and holds no weight compared with these local professional statements.

**IV (C) falsely states there is a significant gap in coverage.**

As FCC 18-133 was upheld by the US supreme court this summer,

defining a significant gap in coverage is no longer relevant to WCF applications. However Verizon's characterization of a gap in coverage is inconsistent (Exhibits A-C), and does not fit the federal definition of significant.

The “effective prohibition” statute upheld by FCC 18-133 is still not violated by a denial of this application (see point V below)

**IV (D) falsely states that the application provides the least intrusive alternative in the right of way.**

No feasible, less visually impactful site was studied, so Verizon is in violation of § 9- 4.2614(b)(2), and their alternate site analysis was incomplete.

Even if they provide another alternate site in the right of way with less visual impacts, the current site is in violation of Pacifica’s aesthetic standard, PMC § 9- 4.2608(b)(1)

There are two water towers, one at the top of Fassler Ave and one off Big Sur Way that would provide alternative sites to satisfy PMC as well as provide a less intrusive remedy that could more effectively and efficiently close the larger coverage gap that exists, and be amenable to more powerful equipment with backup power. Oddstad city park is also another alternative location to be considered.

**Point V - Incorrectly claims a Denial would Constitute Unlawful Prohibition of Services.**

“a state or local legal requirement constitutes an effective prohibition if it ‘materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment.’” Applicant Letter - Attachment H page 8 ¶ 4

PMC aesthetic requirements have allowed an AT&T “small cell” at 560 San Pedro Ave, and a Verizon “small cell” at 1450 Terra Nova Blvd, which clearly demonstrates no prohibition of services or discrimination

**Point VI - Incorrectly claims a denial would constitute unreasonable discrimination against Verizon Wireless**

The 12 AT&T Use Permits from 2016 that Mr Albritton refers to in Vallemar cannot be compared to these “small cell” applications as they did not significantly increase the height of the PROW poles, and therefore did not significantly “increase their visibility from surrounding areas and PROWS” pursuant to PMC § 9- 4.2608(b)(1)

Again, the City has more recently approved “small cell” permits for both AT&T and Verizon in the public right-of-way

This evidence makes it clear that the City of Pacifica has the legal right to deny UP-102-18, as a large number of residents of Pacifica are asking you to do. While the current PMC is sufficient to deny this application outright, we ask the council to strengthen our city’s protections by placing an urgency order of a 1000ft setback of WCFs from residential dwellings until an official WCF ordinance update addressing new “small cell” technology is ratified.

Sincerely,

Handwritten signature in black ink, appearing to read "L.P. Bhat DO".

Sunil Bhat, DO

cc: Michelle Marchetta Kenyon, Esq.

Denise Bazzano, Esq.

Christian Murdock

Ranu Aggarwal

Bonny O'Connor

#### Schedule of Exhibits

Exhibit A : Verizon's coverage map shown to customers on their website

Exhibit B: Verizon's calculated coverage map submitted with the UP-96-18 appeal

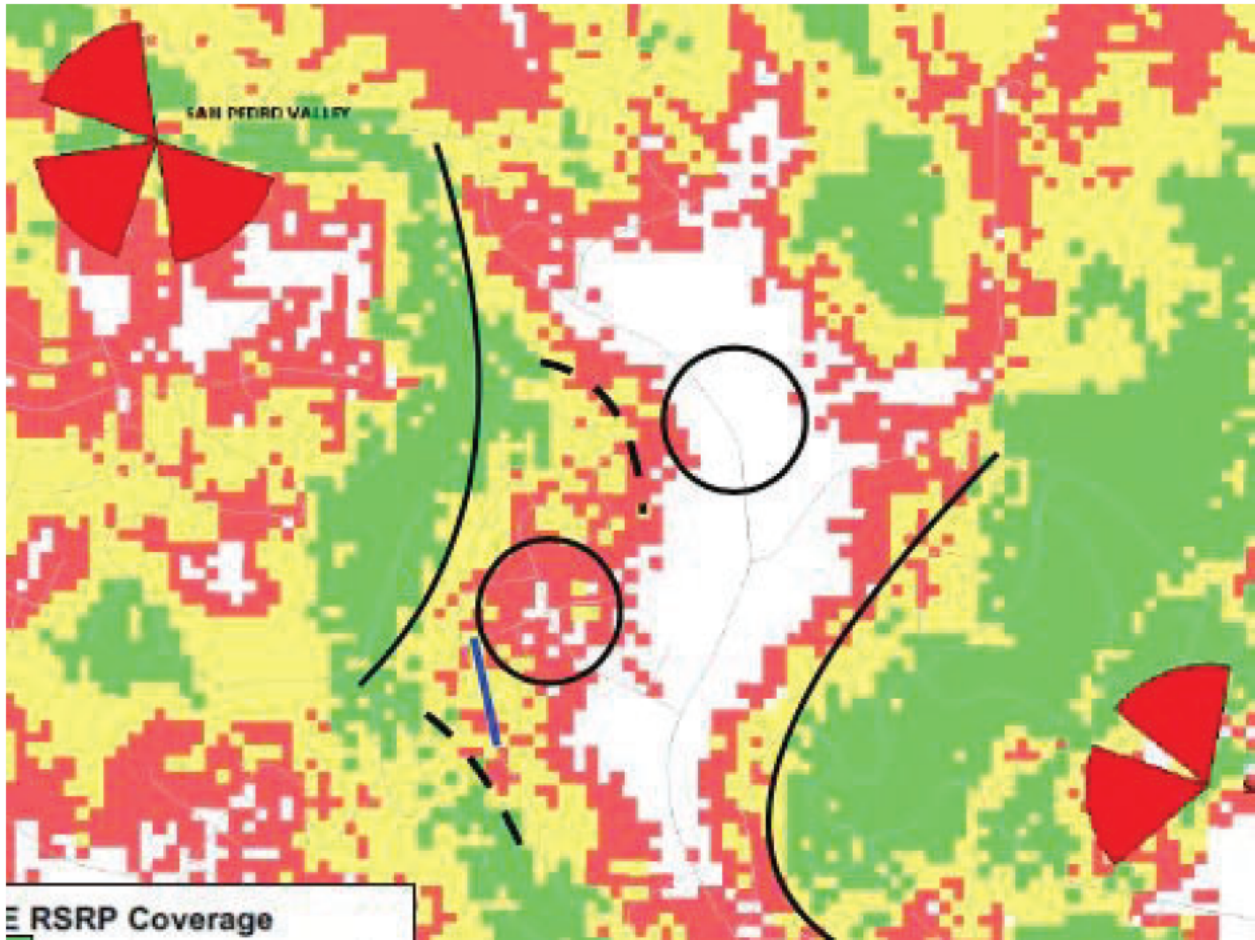
Exhibit C: Verizon's consumer measured coverage map submitted with UP-96-18

Exhibit D: one example of an alternate site, NCCWD water tower at Big Sur Way

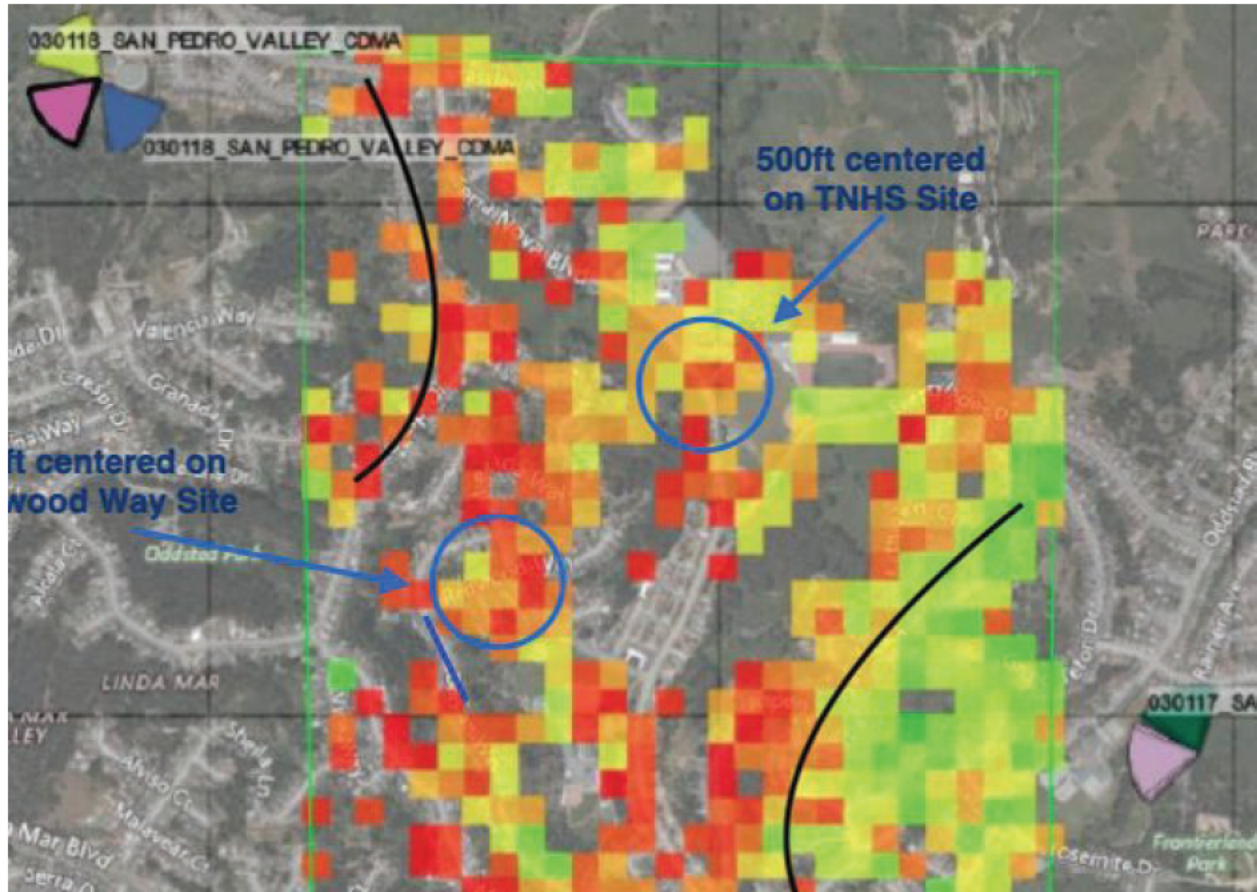




Exhibit A : Verizon’s coverage map shown to customers on their website

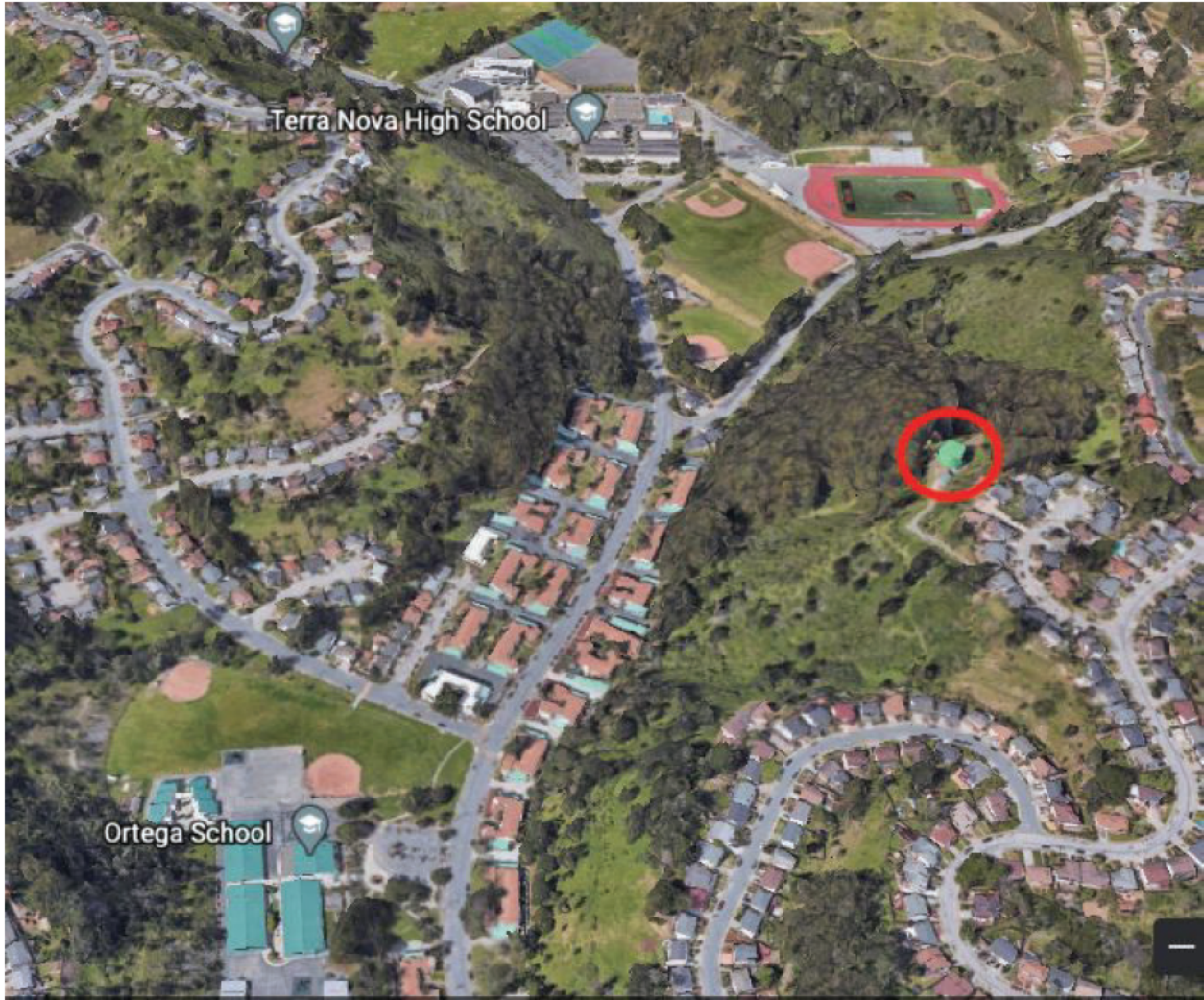


**Exhibit B: Verizon’s calculated coverage map submitted with the UP-96-18 appeal.** Circles are proposed/approved small cells at 1450 Terra Nova Blvd(upper) and 1307 Redwood Way (lower). Curved lines are ridgelines on crespí(left) and park pacífica (right). Blue line Banyan Way



**Exhibit C: Verizon's consumer measured coverage map submitted with UP-96-18.** Circles are proposed/approved small cells at 1450 Terra Nova Blvd(upper) and 1307 Redwood Way (lower). Curved lines are ridgelines on crespi(left) and park pacifica (right). Blue line Banyan Way





**Exhibit D: One example of an alternate site, NCCWD water tower at Big Sur Way.** This site satisfies PMC requirements of minimizing visual impact from surrounding areas and PROWS. It is also at a higher elevation to cover more of the coverage gap shown in Exhibits B and C. It would also be more amenable to more powerful equipment with backup power. Other alternate sites are the NCCWD water tower at the top of Fassler ave, and a site within Oddstad City Park.

## Brooks, Elizabeth

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**From:** Brooks, Elizabeth  
**Sent:** Friday, November 13, 2020 12:34 PM  
**To:** O'Connor, Bonny; Wehrmeister, Tina; Michelle Kenyon [BWS Law]; Sharma, Deepa; Woodhouse, Kevin  
**Cc:** Public Comment; Coffey, Sarah  
**Subject:** FW: 1334 Lerida does not satisfy aesthetic standards, or gap in coverage  
**Attachments:** verizon coverage maps park pacifica.pdf

Hello,

Forwarding for your information.

Thank You,  
Elizabeth

---

**From:** Sunil Bhat [REDACTED]  
**Sent:** Friday, November 13, 2020 8:07 AM  
**To:** \_City Council Group <CityCouncil@ci.pacifica.ca.us>; internal@cc4rt.com; Brooks, Elizabeth <brookse@ci.pacifica.ca.us>  
**Subject:** 1334 Lerida does not satisfy aesthetic standards, or gap in coverage

### **[CAUTION: External Email]**

Honorable Members of the City Council,

Verizon asked to delayed the original appeal hearing by 2 months to search for alternate sites, and now they present the exact same equipment, just one block down the street at 1334 Lerida Way. This is not sufficient.

Everything from the last email still pertains to this site proposal as well, most importantly:

1) it does not satisfy Pacifica's aesthetic standard defined by **PMC § 9- 4.2608(b)(1)** which both small cells previously approved by the city are pursuant to. This is sufficient legal grounds for denial, confirmed by the 2018 CA supreme court decision of t-mobile vs San Francisco.

2) it does not fill the gap in coverage presented by Verizon's maps. Therefore, more WCFs will need to be constructed nearby in the future. I have attached the maps again for your reference.

We are asking for smart planning, a minimum number of WCFs to close a defined coverage gap. We need a larger solution, that will have backup power.

I would appreciate confirmation of receipt of this message, and of course any thoughts or questions on this matter.

**Sunil Bhat D.O.**

  
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Board Certified Osteopathic Family Medicine

Board Certified Osteopathic Neuromusculoskeletal Medicine

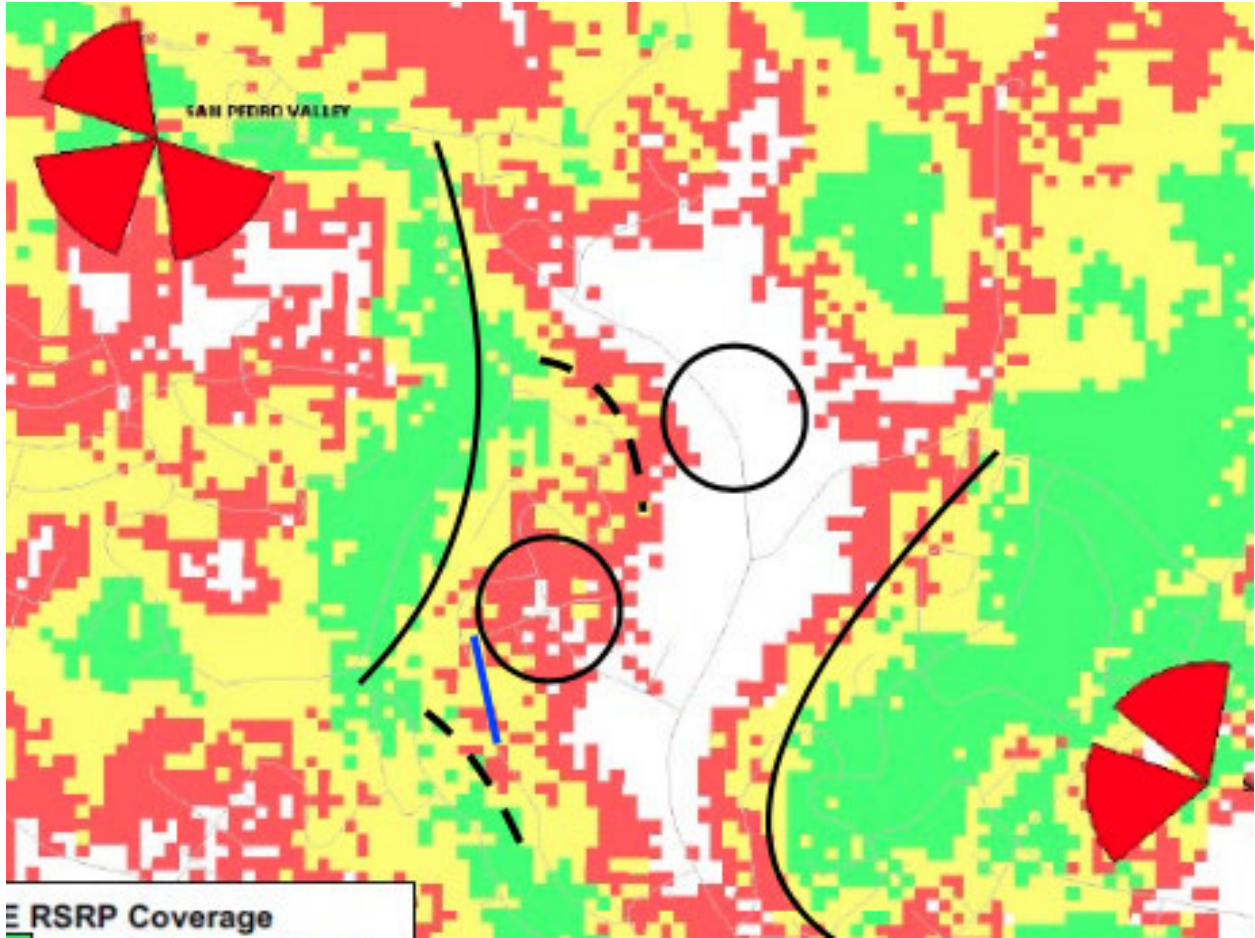
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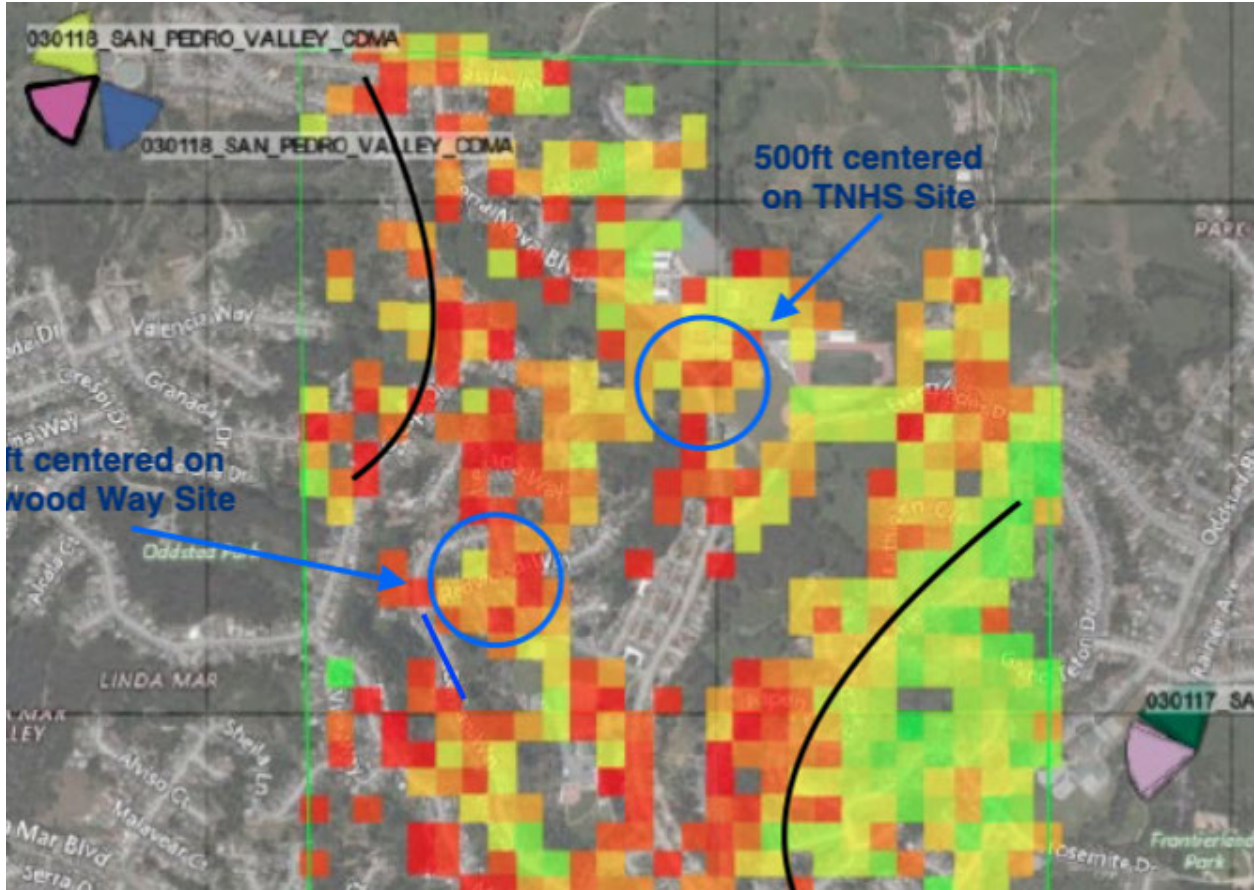
**Exhibit A : Verizon's coverage map shown to customers on their website**



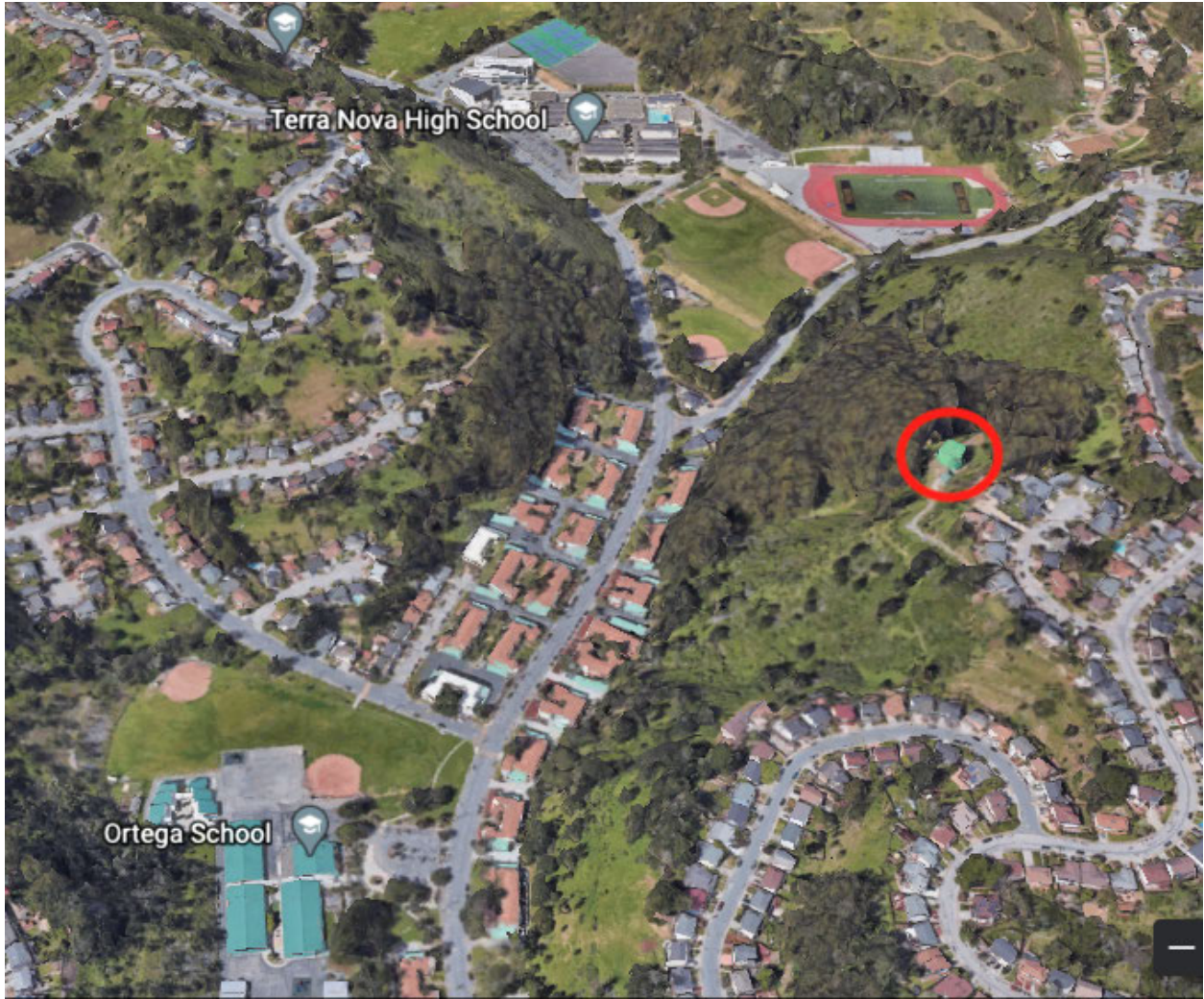


**Exhibit B: Verizon's calculated coverage map submitted with the UP-96-18 appeal.** Circles are proposed/approved small cells at 1450 Terra Nova Blvd(upper) and 1307 Redwood Way (lower). Curved lines are ridgelines on crespino(left) and park pacifica (right). Blue line Banyan Way





**Exhibit C: Verizon's consumer measured coverage map submitted with UP-96-18 appeal.** Circles are proposed/approved small cells at 1450 Terra Nova Blvd(upper) and 1307 Redwood Way (lower). Curved lines are ridgelines on crespita(left) and park pacifica (right). Blue line Banyan Way



**Exhibit D: One example of an alternate site, NCCWD water tower at Big Sur Way.** This site satisfies PMC requirements of minimizing visual impact from surrounding areas and PROWS. It is also at a higher elevation to cover more of the coverage gap shown in Exhibits B and C. It would also be more amenable to more powerful equipment with backup power. Other alternate sites are the NCCWD water tower at the top of Fassler ave, and a site within Oddstad City Park.

**Brooks, Elizabeth**

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**From:** RAY CONTI [REDACTED]  
**Sent:** Tuesday, November 24, 2020 6:12 PM  
**To:** Public Comment  
**Subject:** Cell Tower

**[CAUTION: External Email]**

My wife and I are against this projected deployment. Cell tower placement should be in a non-residential area. Pacifica has numerous places in open space that can and should accommodate a cell tower.

Please don't bow to corporate interests. This is our city and we should protect all its citizens.  
Ray Conti

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## Brooks, Elizabeth

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**From:** Jodi Guillotel [REDACTED]  
**Sent:** Wednesday, November 25, 2020 8:06 AM  
**To:** Public Comment  
**Subject:** 11/30 City Council Meeting Re: In opposition of Verizon application for Cellular tower at 1307 Redwood Way

**[CAUTION: External Email]**

Please deny the Verizon application at 1307 Redwood Way. There are clearly better locations for these intrusive cellular towers instead of on our driveways or in front of our homes. Please insist that Verizon seriously consider the water tower locations away from our homes that were offered up by cellular frequency specialists and the office of Jackie Speier. Please deny the cell tower application at Redwood Way that would be built just 15 feet from an infant's window and update our local ordinances now to protect the homes of all Pacifica residents. Thank you.

Jodi Guillotel

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## Brooks, Elizabeth

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**From:** Erin Pickett [REDACTED]  
**Sent:** Wednesday, November 25, 2020 8:45 AM  
**To:** Public Comment  
**Cc:** Heiko and Lena Ritter Koenig; \_City Council Group  
**Subject:** DENY VERIZON APPLICATION

### [CAUTION: External Email]

As a follow up to my letter on September 14th, 2020, please DENY the Verizon application to install a cell phone tower at 1307 Redwood Way.

This is a completely egregious and DANGEROUS act, to install a tower so close to where families live.

I would ask the city council members, would you want a tower installed in your front or backyard?

These towers emit extremely high levels of EMF's (electromagnetic frequencies) which are a known health hazard:

**"EMFs influence** metabolic processes in the human **body** and exert various biological effects on cells through a range of mechanisms. **EMF** disrupts the chemical structures of tissue since a high degree electromagnetic energy absorption can change the electric current in the **body** [23].Aug 2, 2017"  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6025786/>

These towers should be mandated to be installed far away, up on the hill, miles away from where anyone lives.

It is completely unethical to ignore the dangers of this tower, to toss aside the health and well being of families in this area, in order to accept money from a billion dollar organization.

DO NOT allow this tower to happen. PLEASE protect our beautiful town, and everyone in it.

Sincerely,

An extremely concerned citizen,

Erin Pickett  
Pacifica Resident

----- Forwarded Message -----

**From:** Erin Pickett [REDACTED]



To: citycouncil@ci.pacifica.ca.us <citycouncil@ci.pacifica.ca.us>

Cc: [REDACTED]

Sent: Monday, September 14, 2020, 11:20:39 AM PDT

Subject: DENY VERIZON APPLICATION

Dear City Council,

Please DENY the Verizon application to install a cell phone tower 17 feet away from a home in our town, at 1307 Redwood Way.

NO family should have to live so close to a cell tower, this is incredibly precarious and dangerous to everyone's health.

There are many other locations to place the towers, that are away from families homes.

Please do the right thing, and DENY this application, the EMF's (Electromagnetic Frequencies) that are generated from these towers are incredibly dangerous and unnecessary for the children and families in this community.

Thank you from a very concerned citizen,

Erin Pickett  
Alicante Drive, Pacifica  
[REDACTED]

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## Brooks, Elizabeth

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**From:** carol luhrs [REDACTED]  
**Sent:** Wednesday, November 25, 2020 11:51 AM  
**To:** Public Comment  
**Subject:** Verizon

**[CAUTION: External Email]**

I am writing in opposition to having a Verizon tower on or near the residential property at Redwood way, or any other residence. I certainly don't want it at my house. Do you want it at yours? I don't think that property tax payers should have their residential property usurped by profit making corporations even though those services are in the public interest. Verizon needs to figure out a way to deliver their service without causing problems for Pacifica residents and marring the beauty of our neighborhoods.  
Carol Luhrs, Everglades Drive

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**Brooks, Elizabeth**

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**From:** Meredith Scott [REDACTED]  
**Sent:** Wednesday, November 25, 2020 1:10 PM  
**To:** Public Comment  
**Subject:** Cellular Tower

**[CAUTION: External Email]**

Please deny the Verizon application at 1307 Redwood Way. There are clearly better locations for these intrusive cellular towers instead of on our driveways or in front of our homes. Please insist that Verizon seriously consider the water tower locations away from our homes that were offered up by cellular frequency specialists and the office of Jackie Speier. Please deny the cell tower application at Redwood Way that would be built just 15 feet from an infant's window and update our local ordinances now to protect the homes of all Pacifica residents. Thank you.

Meredith Scott  
[REDACTED] Pacifica, CA 94044

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**Brooks, Elizabeth**

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**From:** michelle comeau [REDACTED]  
**Sent:** Thursday, November 26, 2020 4:30 AM  
**To:** Public Comment  
**Subject:** 11/30 City Council Meeting Re: In opposition of Verizon application for Cellular tower at 1307 Redwood Way

**[CAUTION: External Email]**

To the City Council,  
Please deny the Verizon application at 1307 Redwood Way. There are clearly better locations for these intrusive cellular towers instead of on our driveways or in front of our homes. Please insist that Verizon seriously consider the water tower locations away from our homes that were offered up by cellular frequency specialists and the office of Jackie Speier. Please deny the cell tower application at Redwood Way that would be built just 15 feet from an infant's window and update our local ordinances now to protect the homes of all Pacifica residents.

Thank you.

Michelle Comeau

Homeowner [REDACTED]

Pacifica, Ca.

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**Brooks, Elizabeth**

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**From:** J Burton [REDACTED]  
**Sent:** Saturday, November 28, 2020 2:01 PM  
**To:** Public Comment  
**Subject:** Subject: 11/30 City Council Meeting Re: In opposition of Verizon application for Cellular tower at 1307 Redwood Way

**[CAUTION: External Email]**

Council Members:

Please deny the Verizon application at 1307 Redwood Way. There are clearly better locations for these intrusive cellular towers instead of on our driveways or in front of our homes. Please insist that Verizon seriously consider the water tower locations away from our homes that were offered up by cellular frequency specialists and the office of Jackie Speier. Please deny the cell tower application at Redwood Way that would be built just 15 feet from an infant's window and update our local ordinances now to protect the homes of all Pacifica residents.

Thank you

J K Burton  
Pacifica, CA

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**Brooks, Elizabeth**

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**From:** J Burton [REDACTED]  
**Sent:** Saturday, November 28, 2020 2:06 PM  
**To:** Public Comment  
**Subject:** Subject: 11/30 City Council Meeting Re: In opposition of Verizon application for Cellular tower at 1307 Redwood Way

**[CAUTION: External Email]**

Council Members:

Please deny the Verizon application at 1307 Redwood Way. There are clearly better locations for these intrusive cellular towers instead of on our driveways or in front of our homes. Please insist that Verizon seriously consider the water tower locations away from our homes that were offered up by cellular frequency specialists and the office of Jackie Speier. Please deny the cell tower application at Redwood Way that would be built just 15 feet from an infant's window and update our local ordinances now to protect the homes of all Pacifica residents.

Thank you  
Chris Jones  
Pacifica CA

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## Brooks, Elizabeth

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**From:** Julian Sproul [REDACTED]  
**Sent:** Sunday, November 29, 2020 6:13 AM  
**To:** Public Comment  
**Subject:** Constituent comment

[CAUTION: External Email]

Please deny the Verizon application at 1307 Redwood Way. There are clearly better locations for these intrusive cellular towers instead of on our driveways or in front of our homes. Please insist that Verizon seriously consider the water tower locations away from our homes that were offered up by cellular frequency specialists and the office of Jackie Speier. Please deny the cell tower application at Redwood Way that would be built just 15 feet from an infant's window and update our local ordinances now to protect the homes of all Pacifica residents. Thank you

Julian Sproul  
[REDACTED] Redwood Way

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## Brooks, Elizabeth

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**From:** [REDACTED]  
**Sent:** Sunday, November 29, 2020 10:18 PM  
**To:** Public Comment  
**Subject:** Hearing November 30'th cell tower appeal

### **[CAUTION: External Email]**

Dear Honorable City Council Members,

Please find in favor of the appeal to keep a small cell antenna from being installed on Redwood Way. The negative impact to values of nearby homes is a dear price to pay, while there are less intrusive ways of addressing dropped calls, if that's even what this is about.

The appeal postponement was to give Verizon time to seek a less intrusive location, but all they did was replace it with the runner-up, chosen with the same disregard of negative impacts.

The school district would have been notified, but in observing the lock-down, parents were not on campus to see a posting. Imagine parents returning to school and seeing that at Campus, or so near Campus, as Redwood Way is only slightly up the street. Both pole locations are close to the school and would require notification.

School proximity and desirability are big barometers in real estate, that has always been a fact. While Telecoms scramble to corner the market, the city's residents need protection. I hope City Council will let it be known tonight that you are within your rights to uphold the appeal, to deny the new location for similar unsuitability, and move to put an emergency stop on new applications while you get protective codes in place.

At Redwood Way and Lerida yesterday, you could see the stress and pressure building. Equipment went up in the night (including on Redwood Way). People don't know what it is, so they surmise it's the antenna they've been fighting, or related equipment. There's got to be more transparency and publicly accessible information.

In closing here is an article, a great read but if you scroll down to the pictures comparing what applicants claimed installments would look like, next to what it is after they load up with equipment they no longer need to apply for, that's what to expect. Verizon can rent pole position, go 15 feet above present pole level, and add bulk. On a person's front lawn, it would be devastating.

[Top 10 Things the Wireless Industry Doesn't Tell You about Small Cells](#)



**Top 10 Things the Wireless Industry Doesn't Tell You about Small Cells**

Think the wireless industry is being upfront about 5G and small cells? Here are the things you should know that...

Thank you so much for your consideration. I look forward to working with city council if there's anything I can do to further the protection of our homes, schools and skylines, while embracing new technologies in mutually beneficial ways.

Sincerely,

Linda Prisajni

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## Brooks, Elizabeth

---

**From:** Carmen [REDACTED]  
**Sent:** Monday, November 30, 2020 7:59 AM  
**To:** Public Comment  
**Subject:** Telecomm antenna's in our neighborhoods

### **[CAUTION: External Email]**

I have also emailed to: [citycouncil@ci.pacifica.ca.us](mailto:citycouncil@ci.pacifica.ca.us)

I am emailing again because I want to make sure my email is in the public comment category.

I am concerned about Verizon plans to put a cell antenna on a utility pole at 1307 Redwood Way, here in Pacifica.

Whether this is 4G or 5G, cell antennas should not be placed so close to our homes. There are hundreds of studies verifying the negative ill health effects from cell phones and antennas.

Telecom industry funded studies show no problem. But independent studies do, in fact, show serious harm.

And, of course, distance matters. So, having cell antennas so close to our homes causes serious health problems for all, and especially for children.

Here are links to studies and info:

<https://bioinitiative.org/>

<https://www.saferemr.com/>

Here at the International Appeal to Stop 5G, please see all the Scientists asking to stop 5G

<https://www.5gspaceappeal.org/scientists>

Please support H.R. 530, giving towns the ability to regulate cell antenna placement.

I realize that this technology is here to stay. but let's try our best to mitigate the dangers. Please consider denying cell antennas on utility poles on Pacifica streets. Follow the wise precedent of cities like Mill Valley and other countries that regulate exposure.

thank you, Carmen Pegan

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**Brooks, Elizabeth**

---

**From:** Suzanne L. [REDACTED]  
**Sent:** Monday, November 30, 2020 10:23 AM  
**To:** Public Comment  
**Subject:** Keep antennas far away from residences

[CAUTION: External Email]

Thank you,

Suzanne, Pacifica taxpaying resident

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**Brooks, Elizabeth**

---

**From:** Sasha Prisajni [REDACTED]  
**Sent:** Monday, November 30, 2020 11:21 AM  
**To:** Public Comment  
**Subject:** SMALL CELL APPEAL ON REDWOOD WAY

**[CAUTION: External Email]**

Dear Honorable City Council,

Please grant this appeal to stop the rise of small cell equipment. The intended Verizon undertaking will place these contraptions far too close to houses, bringing down property values but more importantly adversely affecting the health of those who live there. I am 25 years old, grew up in this area and would happily spend the rest of my life in this area, start a family, etc. and I feel it is my responsibility to preserve this area not just for the rest of my life, but for future generations as well.

The proposed Lerida location as an alternative is not really an alternative - as it still presents the same issues listed above. Please enact emergency ordinance tonight to prevent further applications for small cell equipment close to homes. The research is out there for those who choose to look: please, please, take this issue seriously.

Thank you for your time,

Sasha

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**Brooks, Elizabeth**

---

**From:** scott [REDACTED]  
**Sent:** Monday, November 30, 2020 12:12 PM  
**To:** Public Comment  
**Subject:** Verizon cell antennas...

**[CAUTION: External Email]**

We are still opposed to having cell antennas installed in our neighborhood. Please deny Verizon and others the right to do so, especially since we can't meet in person to discuss it at this time, and also because we need time to study any health related issues.

Sincerely,  
Scott Hill  
Pacifica

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**Brooks, Elizabeth**

---

**From:** Troy Walker [REDACTED]  
**Sent:** Monday, November 30, 2020 12:33 PM  
**To:** Public Comment  
**Subject:** Cell Antennas

**[CAUTION: External Email]**

Hi... I am in complete favor of this new, advanced technology. No reason to be scared of it and it didn't create covid-19.

Thank you for supporting this...

Troy Walker

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## Brooks, Elizabeth

---

**From:** Brian Casiday [REDACTED]  
**Sent:** Monday, November 30, 2020 12:49 PM  
**To:** Public Comment  
**Subject:** Cell Tower at 1307 Redwood Way

**[CAUTION: External Email]**

We would like to express our opposition to the construction of a cell tower so close to a residence, particularly, as in this case, close to a bedroom window. There are other options.

Brian Casiday  
Elisabeth Casiday  
[REDACTED] Pacifica

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## Brooks, Elizabeth

---

**From:** Patrick Mendoza [REDACTED]  
**Sent:** Monday, November 30, 2020 1:55 PM  
**To:** Public Comment  
**Subject:** Cell Phone towers in our homes and schools

**[CAUTION: External Email]**

It's my understanding that the basic responsibility of our city's government is to keep our residents safe. Allowing cellular companies to put their sources of constant radiation immediately next to our homes and schools would be a failure at a very basic level. It's pollution. Pollution hurts our health, it hurts our community, and a polluted community is worth less which hurts our property values. Please keep these out of our community, or at the very least keep it out of our yards, driveways, and schools!

Patrick Mendoza

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**Brooks, Elizabeth**

---

**From:** Lisa Pierra [REDACTED]  
**Sent:** Monday, November 30, 2020 2:00 PM  
**To:** Public Comment  
**Subject:** 11/30 Council Meeting Agenda Item 3

**[CAUTION: External Email]**

Dear City Council Members,

I'm writing to urge you to deny the installation of a Verizon small cell tower on Lerida Way. No laws exist requiring an installation in the right of way. Why can't Verizon use other equipment or better yet, a non right of way, such as the proposed water tower?

You have plenty of previous information, as to why this request is being made. Please do the right thing. Update our ordinances and act on the concern of your constituents.

I look forward to this evening's meeting and your response.

Best wishes,  
Lisa Pierra Tresca  
[REDACTED]  
Pacifica, CA 94044

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## Brooks, Elizabeth

---

**From:** Coffey, Sarah  
**Sent:** Monday, November 30, 2020 2:40 PM  
**To:** Public Comment  
**Subject:** FW: Agenda Item 3 - Appeal of Use Permit UP-102-18  
**Attachments:** 11.30.2020 Agenda Item 3 - UP-102-18 Comment Letter.pdf

---

**From:** Michael Keane [REDACTED]  
**Sent:** Monday, November 30, 2020 2:37 PM  
**To:** Martin, Deirdre <martind@ci.pacifica.ca.us>; Beckmeyer, Sue <beckmeyers@ci.pacifica.ca.us>; Vaterlaus, Sue <vaterlauss@ci.pacifica.ca.us>; Bier, Mary <bierm@ci.pacifica.ca.us>; O'Neill, Mike <o'neillm@ci.pacifica.ca.us>  
**Cc:** Coffey, Sarah <coffeys@ci.pacifica.ca.us>; Wehrmeister, Tina <twehrmeister@pacifica.gov>  
**Subject:** Agenda Item 3 - Appeal of Use Permit UP-102-18

### **[CAUTION: External Email]**

Mayor Martin and Members of the City Council:

I live at [REDACTED] across the street from the proposed new antenna and battery backup facility. I am concerned about the noise generated by the battery backup facility and the process associated with approving this location as an alternative to an appealed location.

The noise report prepared by Hammet and Edison, dated November 24, 2020, states that "noise from the heat exchanger is 65 dBA, at a reference distance of 1.5 meters." The report bases this information on a "Charles Industries Report" that is not included in the staff report and therefore cannot be reviewed by the community. I am not opposed to the installation of a new antennae and battery back up at the proposed location, but I am concerned that as currently described and disclosed it may not be in compliance with the draft General plan requirement of 65dBA. I am concerned about the noise that may be generated from this unit. As a resident approximately 70' away from this proposed facility I think it is reasonable to request that the applicant carefully vet this issue and assure that they are in compliance with the General Plan.

I respectfully request that Council continue this item and request that the applicant provide the supporting specifications of the heat exchanger and fans associated with the "Charles Cube-SC20942DP3" to confirm that the proposed new infrastructure will not exceed the allowable 65 dBA.

In addition to this CEQA related concern, I do not understand how an application for a cell antenna hundreds of feet from this location that was approved by the Planning Commission and appealed is now proposed for a new location with the added scope of a battery back up facility without a new application being filed. This new location should be a new application. If the council grants the appeal then the applicant should be required to file a new application for this proposed location, with the revised scope for full analysis and public review. It should not be a part of an alternative during the appeal process. At the very least this new location should be remanded to the Planning Commission for their review and approval as the deciding body for this location.

I think that there are other potential locations for this facility and believe that an application for whatever that proposed location is should be a new application for the Planning Commission to review.

Regards,

Michael Keaney



CC: Sarah Coffee, Tina Wehrmeister

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Michael Keaney  
[REDACTED]  
Pacifica, CA 94044

Re: Appeal of Use Permit UP-102-18

Mayor Martin and Members of the City Council:

I live at [REDACTED] across the street from the proposed new antenna and battery backup facility. I am concerned about the noise generated by the battery backup facility and the process associated with approving this location as an alternative to an appealed location.

The noise report prepared by Hammet and Edison, dated November 24, 2020, states that "noise from the heat exchanger is 65 dBA, at a reference distance of 1.5 meters." The report bases this information on a "Charles Industries Report" that is not included in the staff report and therefore cannot be reviewed by the community. I am not opposed to the installation of a new antennae and battery back up at the proposed location, but I am concerned that as currently described and disclosed it may not be in compliance with the draft General plan requirement of 65dBA. I am concerned about the noise that may be generated from this unit. As a resident approximately 70' away from this proposed facility I think it is reasonable to request that the applicant carefully vet this issue and assure that they are in compliance with the General Plan.

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I think that there are other potential locations for this facility and believe that a new application for whatever that proposed location is should be a new application for the Planning Commission to review.

Regards,



Michael Keaney  
[REDACTED]

CC: Sarah Coffee, Tina Wehrmeister

## Brooks, Elizabeth

---

**From:** David Picareta Moos [REDACTED]  
**Sent:** Monday, November 30, 2020 2:45 PM  
**To:** Public Comment  
**Subject:** Small cell appeal - Redwood Way

**[CAUTION: External Email]**

Dear City Council,

Please grant this appeal to stop the rise of small cell equipment. The intended Verizon undertaking will place these contraptions far too close to houses, bringing down property values but more importantly adversely affecting the health of those who live there.

The proposed Lerida location as an alternative is not really an alternative - as it still presents the same issues listed above. Please enact emergency ordinance tonight to prevent further applications for small cell equipment close to homes. The research is out there for those who choose to look: please please, take this issue seriously.

Thank you for your time,

David

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## Brooks, Elizabeth

---

**From:** Frances Prisajni [REDACTED]  
**Sent:** Monday, November 30, 2020 2:46 PM  
**To:** Public Comment  
**Subject:** Small Cell Appeal - Redwood Way

**[CAUTION: External Email]**

Dear Honorable City Council,

Please grant this appeal to stop the rise of small cell equipment. The intended Verizon undertaking will place these contraptions far too close to houses, bringing down property values but more importantly adversely affecting the health of those who live there. I am 24 years old, grew up in this area and would happily spend the rest of my life in this area, start a family, etc. and I feel it is my responsibility to preserve this area not just for the rest of my life, but for future generations as well.

The proposed Lerida location as an alternative is not really an alternative - as it still presents the same issues listed above. Please enact emergency ordinance tonight to prevent further applications for small cell equipment close to homes. The research is out there for those who choose to look: please, please, take this issue seriously.

Thank you for your time,

Frances

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## Brooks, Elizabeth

---

**From:** David Pimo [REDACTED]  
**Sent:** Monday, November 30, 2020 2:52 PM  
**To:** Public Comment  
**Subject:** Small cell appeal - Redwood Way

**[CAUTION: External Email]**

Dear City Council,

Please grant this appeal to stop the rise of small cell equipment. The intended Verizon undertaking will place these contraptions far too close to houses, bringing down property values but more importantly adversely affecting the health of those who live there.

The proposed Lerida location as an alternative is not really an alternative - as it still presents the same issues listed above. Please enact emergency ordinance tonight to prevent further applications for small cell equipment close to homes. The research is out there for those who choose to look: please please, take this issue seriously.

Thank you for your time,

David

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**Brooks, Elizabeth**

---

**From:** David Picareta Moos [REDACTED]  
**Sent:** Monday, November 30, 2020 2:52 PM  
**To:** Public Comment  
**Subject:** Small cell appeal - Redwood Way

**[CAUTION: External Email]**

Dear City Council,

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The proposed Lerida location as an alternative is not really an alternative - as it still presents the same issues listed above. Please enact emergency ordinance tonight to prevent further applications for small cell equipment close to homes. The research is out there for those who choose to look: please please, take this issue seriously.

Thank you for your time,

David

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## Brooks, Elizabeth

---

**From:** Coffey, Sarah  
**Sent:** Monday, November 30, 2020 3:18 PM  
**To:** Public Comment  
**Subject:** FW: 201130 Agenda Item 3 Appeal of Use permit UP-102-18 and Alternate Project location including additional equipment  
**Attachments:** [REDACTED] 201130 Agenda letter-11302020151316.pdf

---

**From:** Jason Rickson [REDACTED]  
**Sent:** Monday, November 30, 2020 3:16 PM  
**To:** Martin, Deirdre <martind@ci.pacifica.ca.us>; Beckmeyer, Sue <beckmeyers@ci.pacifica.ca.us>; Vaterlaus, Sue <vaterlauss@ci.pacifica.ca.us>; Bier, Mary <bierm@ci.pacifica.ca.us>; O'Neill, Mike <o'neillm@ci.pacifica.ca.us>  
**Cc:** Coffey, Sarah <coffeys@ci.pacifica.ca.us>; Wehrmeister, Tina <twehrmeister@pacifica.gov>  
**Subject:** 201130 Agenda Item 3 Appeal of Use permit UP-102-18 and Alternate Project location including additional equipment

**[CAUTION: External Email]**

Jason and Nancy Rickson  
[REDACTED]  
Pacifica, CA 94044

Mayor Martin and Members of the City Council

Re: Appeal of Use Permit UP-102-18 and Alternate Project Location including additional Equipment

My Wife and I are home owners at [REDACTED]. Our residence is located almost directly across the street from the proposed Small Cell antenna and Battery back-up cabinet. While we do not categorically oppose Cellular Data infrastructure, we do feel this installation is an erroneous response to the appeal of the Redwood Way Small Cell site. We respectfully urge the City Council to uphold the existing appeal for Redwood way and reconsider this alternate location proposal for the reasons listed below. It was helpful for us to review a neighboring community and their process of vetting Small Cell Wireless improvements. These documents can be found via the link below. Palo Alto thoughtfully considered the effects of these improvements on its residents and made sure Verizon would not inflict a visual or auditory blight upon them.

1. **Battery Back-up:** Capacity of this single device is measured in hours. Without implementing a series of small cell sites each with battery back-up this benefit is potentially meaningless.
2. **Coverage Map:** I failed to find the coverage map of our area in the agenda documents. Such a map shows the existing infrastructure and the planned expansion of equipment. What is the overall plan from Verizon and our city leaders? Make no mistake; this will be one of many devices added in the future.
3. **4G-5G:** I understand this cell will be a 4G device. I find it hard to believe that Verizon is not planning for the future and repurposing new sites to 5G service. Quote taken from City of Palo Alto Verizon Wireless Small Cell Project Description “Furthermore, the addition of these small cells will both meet the current coverage and capacity needs, as well as provide the road map to future technologies for the next generation of wireless capability to the community” .
4. **Benefit to the community:** Sure, if you are a Verizon customer. I’m certain Verizon does not offer its bandwidth to the other cellular carriers, whose clients also live in this community. What exactly is the benefit if only to a few subscribers.
5. **Noise:** Reviewing the Hammet and Edison noise report dated 11.24.20 I see their Executive Summary states the installation will “comply” with the city’s limits. There are no back up documents or calculations to illustrate how they arrived at that conclusion. The proposed cabinet has 5ea noise generating pieces of equipment all in the neighborhood of 66DBA ea. Beyond any of the cellular RF issues, I am very concerned with the potential for noise pollution on our very quiet street. The thought of having several “conversation level” devices humming away just feet from our neighboring homes is deeply distressing. Many of us leave our windows open all hours of the day, most of the year to enjoy our temperate climate. Indeed Palo Alto removed all battery back-up devices and any noise producing equipment from their Cluster 1 project.
6. **Aesthetics:** It is clear that Verizon and the city of Palo Alto had worked together to make sure the visual impact of these installations was taken into full account.. not just the proposed color of the cabinet and antenna. Quote “Beyond engineering criteria, pole selection is based on a thoughtful consideration of the surrounding environment in which the proposed small cell is located. Poles with existing favorable site features such as landscaping and tree foliage are prioritized to provide natural screening to reduce the visual impact of small cell attachments. Poles are selected to reduce the impact on views from streets as well as adjacent residences.” I feel that the City of Pacifica and Verizon owe our neighborhoods the same consideration. The Lerida Way location is stark and exposed, no matter what color you paint it. Further, Verizon installed a mock-up of the pole\antenna\battery cabinet for the Palo Alto citizens to review. Are there any similar installations in Pacifica?
7. **Planning approval:** Is it typical for project approval to be given to an alternate design when an appeal has been filed for a previously approved project of a different design at a different location? I would expect at a minimum the new proposed project would need to begin the process anew.

Jason and Nancy Rickson



CC: Sarah Coffee, Tina Wehrmeister

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Jason and Nancy Rickson

██████████  
Pacifica, CA 94044

Mayor Martin and Members of the City Council

Re: Appeal of Use Permit UP-102-18 and Alternate Project Location including additional Equipment

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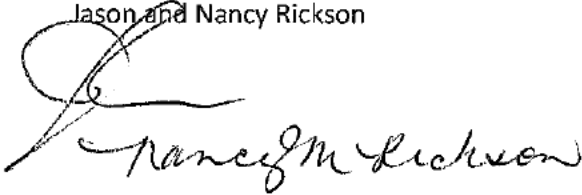
[https://www.cityofpaloalto.org/gov/topics/wireless\\_communication\\_facilities/faq.asp](https://www.cityofpaloalto.org/gov/topics/wireless_communication_facilities/faq.asp)

- **Battery Back-up:** Capacity of this single device is measured in hours. Without implementing a series of small cell sites each with battery back-up this benefit is potentially meaningless.
- **Coverage Map:** I failed to find the coverage map of our area in the agenda documents. Such a map shows the existing infrastructure and the planned expansion of equipment. What is the overall plan from Verizon and our city leaders? Make no mistake; this will be one of many devices added in the future.
- **4G-5G:** I understand this cell will be a 4G device. I find it hard to believe that Verizon is not planning for the future and repurposing new sites to 5G service. Quote taken from City of Palo Alto Verizon Wireless Small Cell Project Description "Furthermore, the addition of these small cells will both meet the current coverage and capacity needs, as well as provide the road map to future technologies for the next generation of wireless capability to the community" .
- **Benefit to the community:** Sure, if you are a Verizon customer. I'm certain Verizon does not offer its bandwidth to the other cellular carriers, whose clients also live in this community. What exactly is the benefit if only to a few subscribers.
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removed all battery back-up devices and any noise producing equipment from their Cluster 1 project.

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- **Planning approval:** Is it typical for project approval to be given to an alternate design when an appeal has been filed for a previously approved project of a different design at a different location? I would expect at a minimum the new proposed project would need to begin the process anew.

Jason and Nancy Rickson



Nancy M. Rickson

CC: Sarah Coffee, Tina Wehrmeister

## Brooks, Elizabeth

---

**From:** Coffey, Sarah  
**Sent:** Monday, November 30, 2020 3:23 PM  
**To:** Public Comment  
**Subject:** FW: Verizon pole proposal

-----Original Message-----

From: Wehrmeister, Tina  
Sent: Monday, November 30, 2020 3:21 PM  
To: Coffey, Sarah <coffeys@ci.pacifica.ca.us>; Brooks, Elizabeth <brookse@ci.pacifica.ca.us>  
Subject: FW: Verizon pole proposal

-----Original Message-----

From: Wehrmeister, Tina  
Sent: Monday, November 30, 2020 3:19 PM  
To: Linda Jonas [REDACTED]  
Subject: RE: Verizon pole proposal

Received. Thank you.

Tina Wehrmeister  
Planning Director/Asst. City Manager City of Pacifica [www.cityofpacifica.org](http://www.cityofpacifica.org)

-----Original Message-----

From: Linda Jonas [REDACTED]  
Sent: Monday, November 30, 2020 3:13 PM  
To: Wehrmeister, Tina <twehrmeister@pacifica.gov>  
Cc: Beckmeyer, Sue <beckmeyers@ci.pacifica.ca.us>; Vaterlaus, Sue <vaterlauss@ci.pacifica.ca.us>; Martin, Deirdre <martind@ci.pacifica.ca.us>; Woodhouse, Kevin <woodhousek@ci.pacifica.ca.us>; O'Neill, Mike <o'neillm@ci.pacifica.ca.us>; Bier, Mary <bierm@ci.pacifica.ca.us>  
Subject: Verizon pole proposal

[CAUTION: External Email]

After reading the materials and discussing with my husband and our neighbors, I feel like this is like a bait and switch to appease the other proposed location owners, the City and Verizon to rush this project, rather than taking necessary steps and ample time to figure out what's really going work best.

I think a great deal more needs to be discussed before you approve of tearing up my yard and putting the new pole there. We have concerns about noise, radiation and esthetic aspects, as well. It's bad enough to have the current utility pole inside the fence, but this proposal will make our yard/house a very ugly eyesore with that big box right there, to say nothing of the other issues.

We believe that better sites should be considered than right in front of a person's home, uprooting the driveway and the plantings. It would be very unsightly, without even looking at the other considerations. And it appears that more of the garden area inside our fence would be disrupted for replacement of an anchor wiring. That certainly does NOT sit well with us!

If the Planning Commission denied the appeal to place this new equipment on Redwood, then the entire plan needs to be revisited before trying to place it elsewhere. Then it needs to go BACK to the Commission for further discussion and review.

We'd be crazy to believe that, EVEN IF this work was done now, that it would be the last invasion of our property. Most likely Verizon would return to want further upgrades sometime down the road. I vote NO!

Why not consider the next pole downhill from our house? It's simply adjacent to a field, not in front of a home. Planting could be done around it for some camouflage to make it more appealing.

No matter whether that sight is an alternative or not, it's our feeling that, in fact, some other site needs to be considered than our front yard, irrespective of right of way issues.

We don't want our property devalued because of such an invasive eyesore smack in our front yard.

Thank you,  
Linda & Tom Jonas

Sent from my iPhone

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## Brooks, Elizabeth

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**From:** Coffey, Sarah  
**Sent:** Monday, November 30, 2020 3:29 PM  
**To:** Public Comment  
**Subject:** FW: Oppose Cell towers Near Residents Houses, A Possible Inequality

---

**From:** JUDITH G FIELD [REDACTED]  
**Sent:** Monday, November 30, 2020 3:28 PM  
**To:** \_City Council Group <CityCouncil@ci.pacifica.ca.us>; Coffey, Sarah <coffeys@ci.pacifica.ca.us>  
**Subject:** Oppose Cell towers Near Residents Houses, A Possible Inequality

**[CAUTION: External Email]**

Dear Mayor and City Council Representatives,

I am writing to express opposition to cell towers near Pacifica houses. How would it be decided who would live near a tower? This presents a gross inequality for those of us who are concerned about health risks from tower proximity. Pacifica is not a densely packed city, and there are open spaces where a limited number of towers could be added.

Thank you for your consideration of this opinion and for your work in representing citizens of Pacifica.

Judy Field  
Park Pacifica

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**Brooks, Elizabeth**

---

**From:** Kerry Anne Durkan [REDACTED]  
**Sent:** Monday, November 30, 2020 4:39 PM  
**To:** Public Comment  
**Subject:** CELL TOWERS

**[CAUTION: External Email]**

I do not want cell towers anywhere near homes or drive ways. Do not approve antennas.

Concerned Citizen @ [REDACTED] Pacifica, CA 94044

--

Kerry Anne Durkan  
[REDACTED]

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**Public Comments**  
**Received for Items not on the Agenda**



*November 30, 2020*  
*City Council Special Meeting*

**Brooks, Elizabeth**

---

**From:** Sue Digre [REDACTED]  
**Sent:** Monday, November 30, 2020 3:04 PM  
**To:** Public Comment  
**Subject:** Fwd: Nov 30 2020 City Council

**[CAUTION: External Email]**

----- Forwarded message -----

**From:** Sue Digre [REDACTED]  
**Date:** Mon, Nov 30, 2020, 2:57 PM  
**Subject:** Nov 30 2020 City Council  
**To:** <[publiccomment@ci.compacifica.ca.us](mailto:publiccomment@ci.compacifica.ca.us)>

City Council Nov 30 2020  
Public comment at orals.  
(I don't see orals on the agenda.)  
Sue Digre

Is there a state definition of what essential Municipal meetings are during COVID?

There seem to be an awful lot of extra meetings.

Outreach to the Public at large needs more funding to be assured that the Public at large is adequately notified  
AND  
have the ability to be adequately engaged.

Thank you & staff for your hard work.  
Sue Digre

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# **Public Comments Received Post-Deadline**



*Public Comments Received for the Following Meetings:*

*November 9, 2020*

*November 17, 2020*

*November 23, 2020*

**Brooks, Elizabeth**

---

**From:** Morgan Venable [REDACTED]  
**Sent:** Thursday, November 12, 2020 12:46 PM  
**To:** Public Comment  
**Subject:** Support for Pacfica Bike Park

**[CAUTION: External Email]**

Hi, I'm writing in support of the Pacfica Bike Park currently under planning consideration.

Bike parks are a fantastic community resource and increase the radness of any community. There is nothing better than kids and adults on bikes sharing public spaces in an inclusive, fun way. In a time of absurdly expensive admission to stuff like zoos and museums, bike parks provide great recreation opportunities for free - - public recreation should be! Kids should be tired, not bored.

Having lived in the Pacific NW previously, I can say with substantial personal experience that bike parks are beloved fixtures in every community that has them, and can also serve as a real draw for trade in local businesses, too.

Yay bikes!

Morgan Venable  
[REDACTED]

**CAUTION: This email originated from outside of the City of Pacfica. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.**

## Brooks, Elizabeth

---

**From:** O'Connor, Bonny  
**Sent:** Tuesday, November 17, 2020 3:18 PM  
**To:** Public Comment  
**Subject:** FW: Hi..comments re Sharp Pk

---

**From:** Sue Digre [REDACTED]  
**Sent:** Tuesday, November 17, 2020 3:17 PM  
**To:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>  
**Subject:** Hi..comments re Sharp Pk

### **[CAUTION: External Email]**

Nov 17 City Council sp meeting.  
Sue Digre.

Topic:  
Sharp Park Specific Plan.

It is concerning that we are not planning for the entire Palmetto Street , north to Manor

Instead of going to 55' ft buildings spread out the mixed use.

Use monies for Community planning for the whole of Palmetto instead of money on other things now such as Economic Dev Director .  
This is an economic Development endeavor.

Sharp Park Neighborhood has a section designated as Historical  
Enable it to be an destination & economic asset.

...

All of Sharp Park is a unique coastal community neighborhood. Keep the heights and ambiance and enable the whole street ato be an economic & destination asset.

Thanks.  
Sue Digre

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**Brooks, Elizabeth**

---

**From:** Sue Digre [REDACTED]  
**Sent:** Tuesday, November 17, 2020 3:33 PM  
**To:** Public Comment  
**Subject:** Comments:Sharp Pk SSpecific Plan

**[CAUTION: External Email]**

Nov 17 City Council sp meeting.  
Sue Digre.

Topic:  
Sharp Park Specific Plan.

Plan for the whole Palmetto Street. Include the north.  
Enable this unique coastal neighborhood to retain its ambiance , and to become a destination and an economic asset.

Sharp Park Neighborhood has a section designated as Historical.  
Enable and honor it.

...  
All of Sharp Park is a unique coastal community neighborhood. Keep the heights and ambiance.  
Include the north end. Spread out.

Thanks.  
Sue Digre

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## Brooks, Elizabeth

---

**From:** O'Connor, Bonny  
**Sent:** Tuesday, November 17, 2020 8:48 PM  
**To:** Public Comment  
**Subject:** FW: SPSP needs trees. Create tree vs no-tree visualizations.

-----Original Message-----

From: Curtis Kiest [REDACTED]  
Sent: Tuesday, November 17, 2020 7:45 PM  
To: O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>  
Subject: SPSP needs trees. Create tree vs no-tree visualizations.

[CAUTION: External Email]

Street trees will define the success or failure of any such project.

Please create Visualizations with and without trees (could be a toggle, or a side-to-side slider type visualization.

Trees have costs to plant, to maintain, and that they take up space that could be used for parking, etc.. So, trees are not free. But the supposed detriments brought up by the prior city manager that trees obscured the signage of the commercial properties is completely bogus. Also bogus is the idea that Palmetto is too close to the ocean to allow trees to grow - this is obviously untrue.

Thanks

Curt Kiest

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## Brooks, Elizabeth

---

**From:** O'Connor, Bonny  
**Sent:** Tuesday, November 17, 2020 8:49 PM  
**To:** Public Comment  
**Subject:** FW: Virtual Walkable SPSP

---

**From:** Curtis Kiest [REDACTED]  
**Sent:** Tuesday, November 17, 2020 7:40 PM  
**To:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>  
**Subject:** Virtual Walkable SPSP

**[CAUTION: External Email]**

Can staff create a virtual walkable neighborhood that we can walk thru, like street view in google maps? You obviously already have a virtual map with all existing (and proposed) buildings, that's how you were able to make the visualization video, so just make the virtual map available to us to walk thru. Thanks

Curt Kiest

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## Brooks, Elizabeth

---

**From:** O'Connor, Bonny  
**Sent:** Tuesday, November 17, 2020 9:19 PM  
**To:** Public Comment  
**Subject:** FW: Form Submission - Sharp Park Visualizations

---

**From:** Squarespace [mailto:form-submission@squarespace.info]  
**Sent:** Tuesday, November 17, 2020 4:31 PM  
**To:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>  
**Subject:** Form Submission - Sharp Park Visualizations

**[CAUTION: External Email]**

Sent via form submission from [Plan Pacifica](#)

**Email:** [REDACTED]

**Message:** Greetings, I am a current Sharp Park resident and have attended community meetings related to the SPSP. I have some concerns about the visualizations and plan in general:

--On page 8 of the City Council Agenda Report (Packet Page 11) for 11/17/2020, it is noted that the majority of respondents oppose increasing the current height restrictions of 35 feet. Yet, visualizations and accompanying documentation all include buildings over the current 35ft restrictions. Why? The current plan seems to be pushing increasing height on a community that opposes this change.

Also, I am not confident that the proposed: "Increasing maximum height to 45 feet south of San Jose Avenue, and to 45 feet north of San Jose Avenue (heights up to 55 feet may be allowed if housing affordable to low or moderate income persons will be constructed in excess of the City's Inclusionary Zoning requirements, or other significant public benefits will be provided by the developer)" will be implemented in good faith. I imagine developers will tend to cram affordable 1 bedroom studio apartments in 2nd and 3rd floors to obtain the exemption on height restrictions, to develop exclusive, luxury apartments on the upper floors with ocean and sunset views (while blocking other current residents from those views).

Since there seems to be a disparity between public opinion and planning policy on height restrictions, it appears we need a more systematic way of surveying Sharp Park residents on this issue that includes more public outreach.

--The visualizations include design elements that inherently bias opinions in favor of the new (much taller) developments. Why not present an alternative street view with increased vibrancy (colored awnings, outside



seating, trees) in a re-developed 35ft high version of Palmetto?

--There seems to be a general consensus from the community that favors "a quaint, mixed-residential feel" to a Palmetto mainstreet, yet the buildings in the visualizations could be from almost any strip-mall generic development in the nation. "Cold, blocky, uninviting" as one resident put it. For Palmetto, there have been comparisons with Carmel, Half Moon Bay, Sausalito, etc, alluding to the "craftsman" architectural style, yet this is completely absent from the current visualizations.

I would love to see visualizations of a 35ft maximum height Palmetto in the craftsman style, with vibrancy elements of trees, awnings, outdoor seating, greenery, etc. I think this is what the community prefers. It is not fair to give the residents of Sharp Park the choice between the "bleak" current view, and the "improved" view with tall buildings, awnings, trees, etc. seems like a trick, to be honest.

--Parking: There seems to be general agreement that a parking structure would be needed along with residential parking permits for on-street parking on east-west streets. A parking structure will be a major eyesore no matter where it is (unless it is underground). Where will the structure be located, and who will pay for it? Would fees be enough to recoup construction and maintenance costs? Will people park illegally or in other locations to avoid the fee (as they already do to avoid beach parking fees in Linda Mar)?

--There needs to be an honest and transparent discussion re: seawall improvements. Although it is a very bitter pill to swallow, king tides, 100 year storms, and sea level rise threaten the future of Beach Blvd. How much is the City of Pacifica willing to spend on erosion abatement and climate adaptation measures? I do not think expensive Beach Blvd improvements that conflict with recommendations from the coastal commission and environmental assessments should preclude improvements along Palmetto and other areas in Sharp Park/

Thanks for your attention,  
Matthew Warren

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## Brooks, Elizabeth

---

**From:** O'Connor, Bonny  
**Sent:** Monday, November 23, 2020 3:53 PM  
**To:** Public Comment  
**Subject:** FW: Vista Mar Project, Monterey Road and the Pacifica General Plan and Safety Element  
**Attachments:** Pacifica Climate Change letter.pdf

---

**From:** Elisa Lara Boles [REDACTED]  
**Sent:** Monday, November 23, 2020 3:50 PM  
**To:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>; Wehrmeister, Tina <wehrmeistert@ci.pacifica.ca.us>; Wehrmeister, Tina <wehrmeistert@ci.pacifica.ca.us>; Murdock, Christian <murdockc@ci.pacifica.ca.us>; Deepa <DSharma@bwslaw.com>; Bazzano, Denise <DBazzano@bwslaw.com>; Michelle Kenyon [BWS Law] <mkenyon@bwslaw.com>; Martin, Deirdre <martind@ci.pacifica.ca.us>; Beckmeyer, Sue <beckmeyers@ci.pacifica.ca.us>; Bier, Mary <bierm@ci.pacifica.ca.us>; O'Neill, Mike <o'neillm@ci.pacifica.ca.us>; Vaterlaus, Sue <vaterlauss@ci.pacifica.ca.us>; Woodhouse, Kevin <woodhousek@ci.pacifica.ca.us>  
**Cc:** Berman, Lauren <bermanl@ci.pacifica.ca.us>; Bigstyck, Tygarjas <bigstyckt@ci.pacifica.ca.us>; Ferguson, Alex <fergusona@ci.pacifica.ca.us>; Godwin, James <godwinj@ci.pacifica.ca.us>; Hauser, Samantha <hausers@ci.pacifica.ca.us>; Nibbelin, John < nibbelinj@ci.pacifica.ca.us>; Leal, David <leald@ci.pacifica.ca.us>  
**Subject:** RE: Vista Mar Project, Monterey Road and the Pacifica General Plan and Safety Element

### **[CAUTION: External Email]**

Dear Council Members, Mayor Martin, Planning Commissioners, City Manager and City Planning Staff,

Please find attached letter with my comments related to today's Vista Mar appeal at the City Council meeting and regarding the General Plan Safety Element Update more generally. The letter references a few others that have already been submitted, which you can access [here](#).

I look forward to the discussion tonight.

Sincerely,  
Elisa Boles

PhD Candidate | Environmental Fluid Mechanics Lab  
Civil and Environmental Engineering | Stanford University

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Elisabeth Lara Boles



Pacifica, CA 94044



November 23, 2020

Bonny O'Connor, Project Planner

Christian Murdock, Senior Planner

Tina Wehrmeister, Planning Director

Diedre Martin, Mayor

Sue Beckmeyer, Mayor Pro-Tem

Mary Bier, City Council Member

Michael O'Neill, City Councilmember

Sue Vaterlaus, City Council Member

Kevin Woodhouse, City Manager

Michelle Kenyon, City Attorney

cc: Pacifica Planning Commission Members

RE: Vista Mar Project, Monterey Road and the Pacifica General Plan and Safety Element

Dear Planning Staff and City Council,

I am a Ph.D. student at Stanford University studying climate science and environmental engineering, and am frankly very worried about the disregard of the impacts of climate change in Pacifica's General Plan and proposed General Plan Update. My family moved to Pacifica a year and a half ago, and in this short time we have learned of and personally experienced several examples of how the city infrastructure has been incapable of handling natural hazards that already occur. Delving into the history of the Vista Mar development has made this abundantly clear to me, and I hope that in reviewing this project tonight you will come to the same

conclusion. That said, testimonies from other residents around Pacifica are piling up as well. See the letters sent today (11.23.2020) about flooding from Toni Marie D'Amore and Lynn Adams and the letter (dated 11.18.2020) from Prof. Jerry Davis about landslides which references the slide in 1983 that killed three children on Oddstad Blvd. Remember too the apartment buildings on Esplanade that had to be torn down due to coastal erosion, displaced renters from 52 affordable housing units and costs to taxpayers of \$330,000 because the developer went bankrupt.<sup>1,2</sup>

As I am sure you are aware, climate change will only exacerbate these hazards. Along the California coast, it will cause sea level rise, increased erosion and landslides, greater fire risk and more intense flooding. These worrying long-term trends are compounded on natural variability at shorter timescales, such as seasonal rainfall, king tides and El Niño events. El Niño events are particularly disastrous for Pacifica as they produce intense rainfall which can create flooding and destabilize hillslopes, as well as raise sea surface heights and lead to increased storm surge and coastal erosion. After the most recent El Niño in 2016, the city was granted \$3.6 million in state and federal funds to repair damaged infrastructure, and it is expected that the replacement of five blocks of sea wall north of the pier will cost an additional \$10 million.<sup>1</sup> I would hope that this money goes towards infrastructure improvements that will not only mend damages, but also protect the city from more extreme events in the future.

However, analysis of the General Plan Update does not instill confidence that this will be the case. Current and historic hazards are not even properly accounted for in the General Plan Update, much less future risks. For the remainder of this letter, I would like to focus your attention on the draft Safety Element of the 2014 General Plan Update.

### **1) Slope Failure and Erosion:**

Figure 8-2 in the draft Safety Element of the General Plan Update is reproduced with additions below (Figure 1). The current maps are so devoid of real information that they are useless in assisting the city in determining hazard risks. This is corroborated by a November 18, 2020 email from Professor Jerry Davis of San Francisco State University who has extensively studied the historic slides in the San Pedro Creek watershed area.

In the July 29, 1982, Howard Donley Associates, Inc. report titled *Geological Investigation Landslide Type and Distribution and Mechanic Details of Nine Representative Failures*, commissioned by the city (referenced as HDAI report in the 1983 Seismic Safety and Safety Element), pages 18 and 19 (32 and 33 of the pdf), the author is very clear. He discusses the maps produced by the USGS and the San Mateo County Geotechnical Hazards Maps.

*“Both of these map sets emphasize large, bedrock type of slides although slides with a maximum dimension of 500 feet are plotted. Discussion of various types of slides are provided with these maps but nowhere is there shown a high risk relationship to the City of Pacifica. The engineering geologic practice prior to January 1982, has been to consider the slopes highly sensitive to erosion and surficial sloughing only. Nowhere in the geologic literature of Pacifica is there shown or depicted the threat of mass wasting*

*of overburden soils such as occurred in January, 1982. It is therefore our opinion that much of the published geologic hazard information affecting Pacifica is no longer valid for use in the City; a new set of landslide hazards maps should be produced for the area."*

In essence, the type of slide most common in Pacifica is not represented in the geologic maps the city uses for planning. The City has known that the geologic maps are inaccurate and not valid for use in reviewing proposed projects since 1982, and yet 32 years later, the 2014 Safety Element update still neglects to include this essential information!

The HDAI report did detailed geotechnical analyses of 9 of the largest slope failures out of the 475 that occurred in Pacifica in 1982. I have mapped these 9 slides on the draft 2014 Slope Failure and Coastal Erosion Map. Except for the Highway 1 slide, all of these landslides occur in areas noted as Not Landslide Prone or Few Landslides. The 1983 Oddstad slide that killed three children is in a "Not Landslide Prone Area", as are the more recent major bluff erosion areas of Linda Mar Beach and Esplanade.

The City of Pacifica appears to have been negligent in its lack of follow through on the 1982 recommendations in this report, putting the lives and property of Pacificans in potential danger as the documented risks of building in hazardous areas have not been properly assessed.

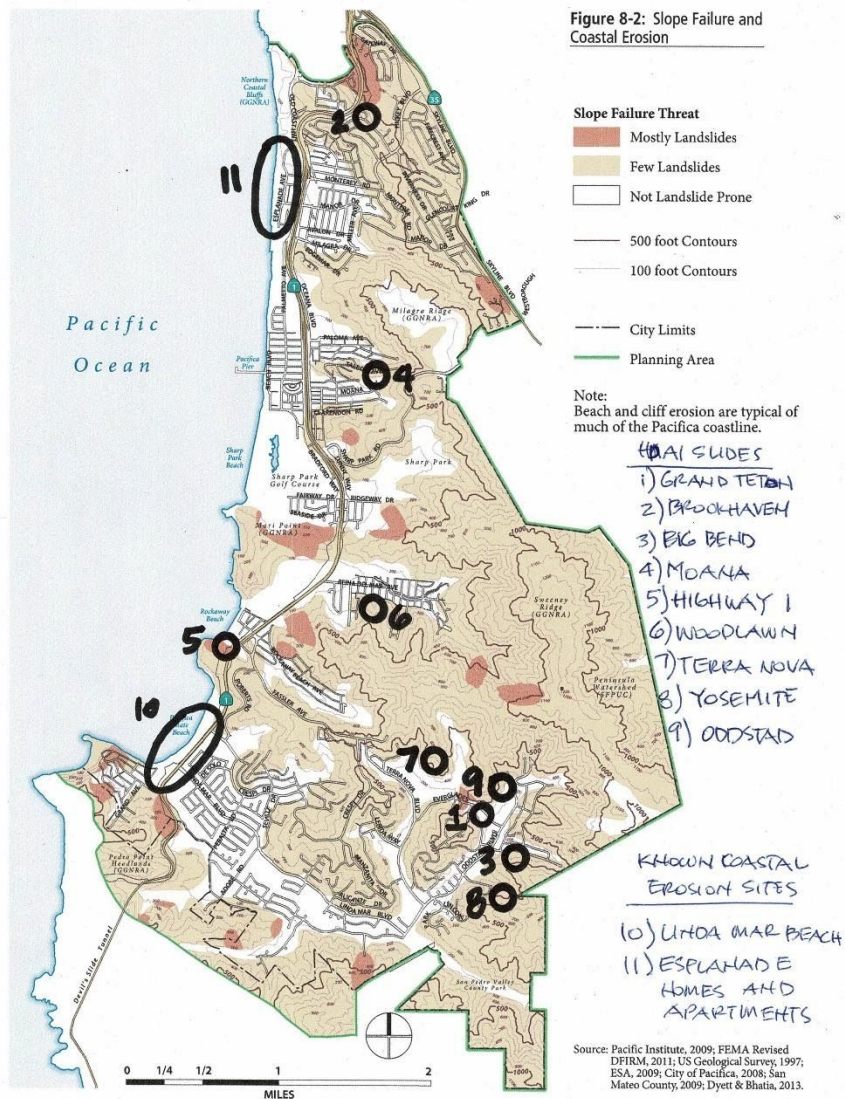


Figure 1: Figure 8-2 of the draft Safety plan reproduced with additions of noted slides and erosion sites from the HDAI 1982 report

## 2) Flooding

Figure 8-3 in the draft Safety Element shows only very limited flooding along the coasts and some stream banks, with long return periods. Regions marked with a 1% annual chance of flooding are expected to experience flooding about once every 100 years. Similarly to the previous section, our experiences and anecdotal evidence dating back to the 1980s are inconsistent with the flooding map in the Safety Element. As other neighbors have discussed in their letters, the region around Monterey road experiences flooding on an annual basis, and

during extreme El Niño events (which have recurred about every 15 years in recent history) the flooding has been catastrophic. This area is not even marked on the Safety Element map. Quoting from Richard Drury's letter dated 11.22.2020, "the current General Plan lacks accurate and up to date maps of flooding and flood related risks, and therefore lacks the information necessary to evaluate the safety implications of the proposed development." Additionally, in reviewing the hydrology report for the Vista Mar development, it came to our attention that the city drainage system plans are nearly devoid of accurate data.

### **3) Sea Level Rise:**

Although there is significant uncertainty in the amount of sea level rise we will see by the end of the century, the state of California has released clear guidance on planning for sea level rise.<sup>3</sup> The 2018 Update to the State of California Sea Level Rise Guidance (link in footnotes) suggests that any projects with lifespans beyond 2050 should consider the more extreme H++ sea level rise scenario, and that this scenario is particularly "*relevant to communities considering regional or general plans, climate action plans, local hazard mitigation plans, regional transportation plans, and other planning efforts, due to the interrelated nature of critical infrastructure, homes, businesses, etc.*" This corresponds to an increase in sea level of 10.2 feet (3.1 m) by 2100. The medium to high risk aversion projection is 5.7 - 6.9 feet (1.7 - 2.1 m) by 2100.

While sea level rise is not as relevant for the Vista Mar development, it was noted at the City Council meeting last week that no geotechnical or hydrological analyses of the Sharp Park area have yet been done prior to consideration of the Sharp Park Plan. The USGS's Our Coast Our Future project is a useful tool for visualizing the effects of different sea level rise and storm surge scenarios along the California coast. Figure 2 shows the results of 2 m of sea level rise and a 100 year storm surge event for the region of the Sharp Park. A significant portion of the proposed downtown development would be flooded in this medium-high risk scenario. Importantly, this does not take into consideration concurrent flooding from precipitation or local streams, which would also have to be factored in for El Niño events, for example. It seems the city is putting the cart before the horse in paying high priced consultant fees for development models that are not based on scientific facts.



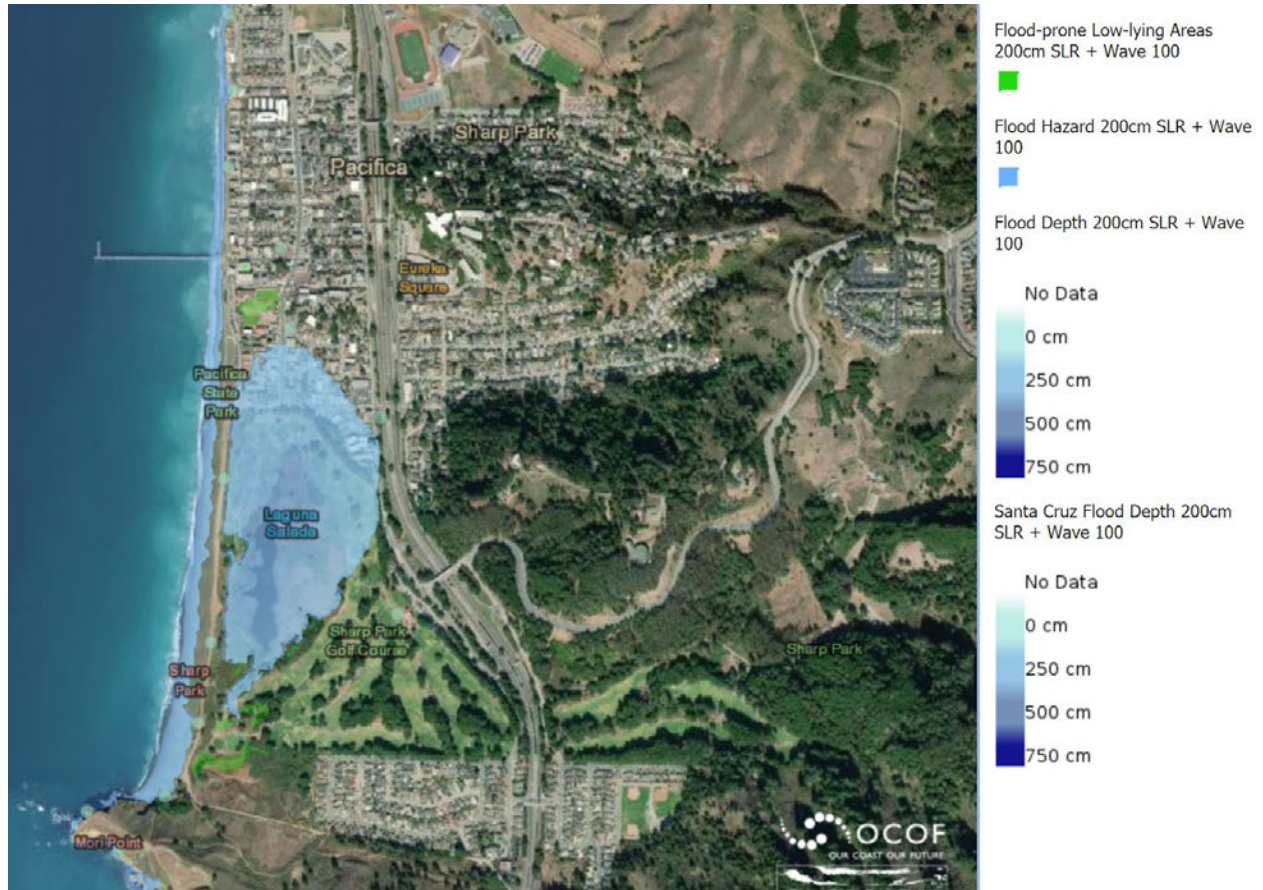


Figure 2: Our Coast Our Future flooding map for Sharp Park for the scenario of 2 m Sea Level Rise and a 100 year flood.<sup>4</sup>

I would suggest the City concentrate its efforts on updating the Safety Element that is out of compliance with state regulations before other potential zoning changes can be considered. Senate bill 379 that amended Section 65302 of the Government Code in 2015 requires the Safety Element to be reviewed and updated as necessary on or before January 1, 2022 to address climate adaptation and resiliency strategies. There is obviously a lot of work that needs to be done to meet this deadline, which is only 13 months away.

I recognize that there are major pressures on the city to provide more housing, but I urge the council to suspend new permits and construction until a full evaluation is completed of the hazards that the project could incur or create for surrounding properties. Performing this due diligence in advance of project approval will save time, money, and lives. I would be happy to use my expertise and connections to help the city develop more accurate maps and projections of climate change impacts.

Sincerely,

Elisa Boles



PhD Candidate | Environmental Fluid Mechanics Lab

Civil and Environmental Engineering | Stanford University



#### Citations:

1. Kinney, Aaron. Pacifica to demolish another clifftop apartment building. *Mercury News*. Published: December 14, 2016.  
<https://www.mercurynews.com/2016/12/14/pacifica-to-demolish-another-clifftop-buildin-g/>
2. Melendez, Lyanne. Crews demolish condemned Pacifica apartment complex. *ABC7 News*. Published: January 30, 2017.
3. <https://abc7news.com/news/crews-demolish-condemned-pacifica-apartment-complex/1728963/>
4. California Natural Resources Agency and California Ocean Protection Council. State of California Sea Level Rise Guidance: 2018 Update.  
[http://www.opc.ca.gov/webmaster/ftp/pdf/agenda\\_items/20180314/Item3\\_Exhibit-A\\_OP\\_C\\_SLR\\_Guidance-rd3.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OP_C_SLR_Guidance-rd3.pdf)
5. Our Coast Our Future. Interactive Flood Maps. Accessed November 23, 2020.  
<https://data.pointblue.org/apps/ocof/cms/index.php?page=flood-map>

## Brooks, Elizabeth

---

**From:** O'Connor, Bonny  
**Sent:** Monday, November 23, 2020 3:53 PM  
**To:** Public Comment  
**Subject:** FW: Vista Mar Project  
**Attachments:** 2.15.19 citys RFQ collusion.pdf; 7.8.15 tina general plan.pdf; PRA\_Response\_Gaffney\_20201117\_Final\_wDocs.pdf

---

**From:** Summer Lee [REDACTED]  
**Sent:** Monday, November 23, 2020 3:47 PM  
**To:** \_City Council Group <CityCouncil@ci.pacifica.ca.us>; Martin, Deirdre <martind@ci.pacifica.ca.us>; Beckmeyer, Sue <beckmeyers@ci.pacifica.ca.us>; Vaterlaus, Sue <vaterlauss@ci.pacifica.ca.us>; Bier, Mary <bierm@ci.pacifica.ca.us>; O'Neill, Mike <o'neillm@ci.pacifica.ca.us>; O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>  
**Subject:** Re: Vista Mar Project

**[CAUTION: External Email]**

Dear Council Members,

This letter addresses the issue of bias and credibility as entered into the public record by City Planner Christian Murdoch. From the records from the Oct 19th Planning Commission hearing:

“Sr Planner Murdock stated that it was relevant to consider, to only is the comment from an objective third party licensed professional or other qualified expert, but is there some potential bias that will benefit gain from providing the comments. He stated that a licensed professional who lives next door to a project and is opposed to the project, they may need to weigh the credibility of the professional opinion being rendered when there is also likely a significant personal benefit or impact from the project that could have influenced that professional opinion, and [that is] a practical example of what Asst. City Attorney Sharma is indicating as to weighing the credibility of that licensed professional’s opinion.”

In light of Murdock directing a governing body to disregard the public's input as well as expert opinion, I would like to enter into the administrative record the correspondence between the planning department and the Vista Mar project applicant and developer as evidence of irregular planning practice, not to mention bias and questionable credibility of the planning department.

The first attached document shows Tina Wehrmeister advising the applicant in anticipated neighbor opposition.

The second document shows during the bid process, the planning department lets the applicant choose the consultant doing the environmental review (the bid that was lowest cost and provided the least analysis).

A third document shows correspondence between the planning department and the applicant, where inside the subject of payments the planning department grants the applicant a meeting with the environmental consultant to address the consultant's response to expert comments casting doubt on their analysis.

Sincerely,  
Summer Lee

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## O'Connor, Bonny

---

**From:** John Kontrabecki [REDACTED]  
**Sent:** Friday, February 15, 2019 2:08 PM  
**To:** O'Connor, Bonny  
**Cc:** Javier Chavarria; Murdock, Christian  
**Subject:** Re: Monterey Road Environmental Review

Bonny-

Javier and I reviewed your email and the two consultant proposals. We believe it is premature to select the Metropolitan proposal because the Raney proposal does not have the same scope as the Metropolitan proposal. Until Raney has provided information that allows you to compare their with Metropolitan on an equal basis as to scope, no decision can be made.

We would like to meet with you to discuss both proposals in order to move this process forward. Javier will call you Monday morning to set a time for a meeting.

Thank you,

John

John Kontrabecki

TKG International  
[REDACTED]

*AIR - Raney.  
Noise - Raney \$\$\$*

---

**From:** "o'connorb@ci.pacifica.ca.us"  
**Date:** Thursday, February 14, 2019 at 5:30 PM  
**To:** John Kontrabecki  
**Cc:** Javier Chavarria , Christian Murdock  
**Subject:** RE: Monterey Road Environmental Review

Hi John and Javier,

On January 23, 2019, City staff released a request for scope, budget, and timeline to conduct the California Environmental Quality Act (CEQA) review for the 8-unit residential project on Monterey Road known as the Vista Mar Project. The request was sent to the City's two on-call environmental consultants, Raney Planning and Management, Inc. (Raney) and Metropolitan Planning Group (M-Group). The deadline to respond to the request was February 11, 2019 (5:00pm). On February 11, 2019, staff received two proposals, one from each of the on-call consultants.

Please find a copy of both proposals [HERE](#). The two proposals had comparable scopes-of-work to address the various environmental resources evaluated under CEQA, with the exception of four resources. Staff found that M-Group prepared a scope that would adequately analyze the potential impacts of the proposed project on the various environmental resources and the higher cost associated with the proposal was justified by their scope. Staff selected M-Group's proposal for the following reasons:

- 1. Aesthetics:** The proposed project will introduce a visual change to the current vacant steep slope, which will need to be analyzed. The M-Group proposal included the development of two visual simulations to analyze the project's potential impact on aesthetics. In comparison, Raney proposed to use pre-project photos and the applicant's developed project renderings to analyze impacts. Staff believes that M-Group's methodology will provide the adequate analysis to determine the potential impacts on aesthetics.
- 2. Cultural resources:** Access to information on cultural resources is limited to qualified professionals and academics. M-Group's proposals included a qualified subconsultant to perform the cultural and tribal resources work. In comparison, Raney's proposal did not discuss how they would address the cultural and tribal resources and no qualified in-house personnel was listed for the project. Therefore, staff believes that M-Group's

*M-group*

*M-group*

methodology will provide the adequate analysis to determine the potential impacts on cultural and tribal resources.

- M-group  
Raney*
3. **Biological resources:** A potential jurisdictional waterway was identified on the property in the applicant's provided 2007 biological assessment. M-Group proposed to have a subconsultant conduct a site visit and a peer review of the 2007 analysis to determine if the findings are still applicable. Additionally, M-Group provided an optional task to conduct a jurisdiction water determination. It is staff's understanding that the need for this optional task will be determined as part of the peer-review. In comparison, Raney proposed to have a subconsultant conduct a new analysis due to the age of the applicant's provided analysis. Additionally, Raney provided an optional task to conduct a peer review of the 2007 biological assessment instead of preparing a new analysis. Although, the scopes differed, staff found both of the methodologies adequate. However M-Group's proposal was more thoughtful as their recommended approach of peer reviewing the existing biological analysis is more cost efficient and their provided optional task would address a possible next step.
- Raney  
OK*
4. **Traffic:** Current traffic levels at intersections near the project, including Gateway Ave. and Hickey Blvd. and Manor Dr. and Oceana Blvd. are often backed up during commuting hours. The proposed project would increase the trips to these intersections. M-Group's proposals included a qualified subconsultant to conduct a traffic impact analysis. In comparison, Raney's proposal did not discuss how they would analyze the potential traffic impacts and no qualified in-house personnel was listed for the project.
5. **Cost:** There was an approximately \$20,000 costs difference between the two proposals. M-Group's higher proposed cost is associated with the traffic analysis (\$12,000), visual simulation (\$10,250), and cultural resources analysis (\$3,494) included in M-Group's proposal.
6. **Timeline:** Both proposals outlined a four month timeline from the notice to proceed.

M-Groups budget is \$62,332. The City's master fee schedule sets a 10 percent administration fee for consultant costs. Therefore, the overall cost will be \$68,565.20. After the funds are received from the applicant, staff can provide M-Group with a notice to proceed.

Please let me know if you have any questions.

Thanks,

Bonny

Bonny O'Connor, AICP

Associate Planner

Planning Department

City of Pacifica

1800 Francisco Blvd.

Pacifica, CA 94044

## Planning Intern

---

**From:** Wehrmeister, Tina  
**Sent:** Wednesday, July 08, 2015 3:17 PM  
**To:** [REDACTED]  
**Cc:** Planning Intern  
**Subject:** Vista Mar project  
**Attachments:** General Plan p.36.pdf

Thanks for coming in to meet with us Javier. To summarize the meeting and outcomes, we discussed the recent comment letter from staff and you were going to make some changes to the plans to address Code compliance issues including but not limited to:

1. Carefully reviewing and confirming that the project meets C-3 requirements.
2. Addressing private and common outdoor space requirements. Currently the table on the front of the plans and the plan notations do not match.
3. Addressing the distance requirements between buildings and submitting variance findings if necessary.

Staff committed to reviewing and making a final decision on the CEQA document. We have done that and have determined that an Initial Study will be required and the project cannot be exempted. This decision was based in part on the 2007 biology report that is part of the record for this site. This document states "An...unnamed onsite drainage channel,...was identified as having a defined bed and bank and appears to carry water for most if not all of the year." An Initial Study will take four to six months to prepare assuming the document will find that a Mitigated Negative Declaration is appropriate.

Also, and this is just for information, please read the highlighted section of the attached document. Any opposition WILL utilize this section to challenge the project so you should be prepared to defend how the project is consistent.

Tina Wehrmeister  
Planning Director  
City of Pacifica  
[www.cityofpacifica.org](http://www.cityofpacifica.org)



The pattern of development and automobile circulation in the Fairmont neighborhood is well developed and adequate to meet the needs of the minor infilling which will occur.

### **WESTVIEW-PACIFIC HIGHLANDS**

This large, predominantly single-family neighborhood is served by two elementary schools, San Andreas and Westview. Imperial Park and Horizon Garden provide open space. The San Andreas Fault crosses the northern half of the neighborhood. Water tanks located on the hill above Imperial Drive are a potential hazard to the homes below should they rupture during an earthquake.

Except for a large multiple-family development on the south side of Hickey at Skyline, the dominant land use is single-family residential. Low density residential use is designated for the vacant site at the southernmost tip of the neighborhood near Skyline and Sharp Park Road. Part of this southernmost site contains a superficial landslide which indicates the need for sensitive design and proper engineering for the proposed development and access. The corner of Skyline and Sharp Park Road should be developed in high density residential uses.

A gently sloping area off Miller Avenue is suitable for low density residential development. Because of its orientation, the residential area off Miller should be included in the adjacent East Edgemar-Pacific Manor neighborhood. The existing neighborhood boundary line is based on the 1970 Census Tract boundary. For current data analysis reasons, it is valuable to keep the area in the Westview-Pacific Highlands neighborhood. This should be re-evaluated when the boundaries are drawn for the subsequent Censuses. Detailed geologic and soils evaluation should also be required for this site.

On the southwestern boundary of the neighborhood, defined by Milagra Ridge County Park, the large vacant area is designated Open Space Residential. While this land is generally quite steep, detailed evaluation of soils, geology, slope and access could identify some buildable locations.

A large steep area along Monterey Road and Norfolk Place, between Norfolk and the rear of the single-family lots on Heathcliff, has been planned and zoned for low density residential development. Each site proposed for development should have a thorough geotechnical investigation. In recognition of the high visibility of the area, innovative design solutions should be proposed which minimize height, building mass, and retaining walls to the extent feasible. Buildings should be separated wherever possible in order to break up building mass, and adequate and appropriate landscaping should be used to soften the appearance of buildings.

A variety of types of housing are appropriate for the area, including apartments, condominiums, or other types of clustered housing. Provision of usable open space for play areas for children should be included in project design as much as possible. One major vacant parcel exists in this neighborhood, the Fairmont III School site. The site should be reserved for medium density residential land use with access limited to Skyline Boulevard.

The existing pattern of arterial and collector streets is well established in this neighborhood. Capacities are adequate to handle the proposed development which would essentially build-out this area. Access for



Scenic Pacifica  
Incorporated Nov. 22, 1957

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## CITY OF PACIFICA

170 Santa Maria Avenue • Pacifica, California 94044-2506  
[www.cityofpacifica.org](http://www.cityofpacifica.org)

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**MAYOR**  
Deirdre Martin

**MAYOR PRO TEM**  
Sue Beckmeyer

**COUNCIL**  
Sue Vaterlaus  
Mary Bier  
Mike O'Neill

November 17, 2020

Brian Gaffney

[REDACTED]  
Pacifica, CA 94044

Via Email: [REDACTED]

**Subject: Public Records Act Request re: City's Decision to File Notice of Determination for the Vista Mar Project**

Dear Mr. Gaffney

The City of Pacifica ("City") is in receipt of your California Public Records Act request ("Request"), which was received by the City Clerk's Office on November 9, 2020. A copy of your Request is enclosed for reference.

### COVID-19 Emergency Update

On March 2, 2020, the Governor of the State of California declared a State of Emergency. On March 16, 2020, the City Manager, acting as the Director of Emergency Services, issued a Proclamation of local emergency due to the COVID-19 pandemic. That Proclamation was ratified by the City Council on March 18, 2020, by Resolution No. 18-2020. On March 19, 2020, Governor Newsom issued Executive Order No. 33-20, ordering all Californians to shelter at home. The San Mateo County Health Officer has also issued public health Orders, the most recent of which is dated June 17, 2020.

As a result of these extraordinary events, the City has taken steps to comply with the State and County's Orders, by significantly reducing staffing, and closing City Hall to the public. Due to this closure and limited staffing resources, the City's ability to respond to all public records act requests have necessarily been delayed.

### Responsive Records

The City wishes to cooperate to the fullest extent possible with the Public Records Act (Government Code section 6250 *et seq.*). Under established California law, the City is obliged to comply with a request for a public record so long as the requester makes a specific and focused request for information, that information is maintained by the City in its ordinary course of business, the information is disclosable, and the record can be located with reasonable effort.

The Public Records Act provides for the inspection or copying of existing identifiable public records; it does not compel the City to create new records, lists, privilege logs, or reports in response to a request. The City is required to determine whether the request, in whole or in part, seeks copies of disclosable public records. Ordinarily, this determination must take place within ten (10) days of the City's receipt of the request.

The City has identified non-exempt, non-privileged records responsive to your Request. The responsive document is being provided with this response letter. The City has redacted certain portions of the documents which are exempt under the public interest exemption pursuant to Government Code section 6255 as the "public interest served by not disclosing the record[s] clearly outweighs the public interest served by disclosure of the record[s]."

This completes the response to your Request received by the City Clerk's Office on November 9, 2020. Should you have any questions, please contact me directly at 650-738-7307 or via email at [coffeys@ci.pacifica.ca.us](mailto:coffeys@ci.pacifica.ca.us) .

Sincerely,



Sarah Coffey  
City Clerk



LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation



November 9, 2020

City of Pacifica  
[connorb@ci.pacifica.ca.us](mailto:connorb@ci.pacifica.ca.us)  
[coffeys@ci.pacifica.ca.us](mailto:coffeys@ci.pacifica.ca.us)

**Re: Public Records Act Request**

Dear Ms. Coffey and Ms. O'Connor,

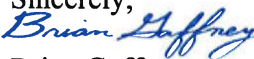
On behalf of our client, and pursuant to the California Public Records Act and the California Constitution, this office requests that the City of Pacifica (City) provide copies of:

All records related to the City's decision to file a Notice of Determination for the Vista Mar project (City File No. 2002-001) on October 20, 2020.<sup>1</sup>

**We prefer you release records in PDF for convenience and to expedite release.** Please email those records to this office. If certain responsive records exist only in hard copy, please advise as soon possible.

**We request that the City make documents available as promptly as they are available.** If documents are clearly disclosable and immediately available, release the records to this office immediately. If you must conduct a more extensive search, that search must not delay the prompt disclosure of what is available immediately.

We request that the City exercise its discretion and waive all duplication costs associated with this public interest request. If you decide to charge fees, you may charge actual duplication costs, but not costs associated with overhead or staff time. (Govt. Code § 6253, subd. (b).)

Sincerely,  
  
Brian Gaffney

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<sup>1</sup> The California Constitution guarantees the people the right of access to information concerning the conduct of the people's business and California statutes must be broadly construed where it furthers the people's right of access. (California Constitution, Article 1, Section 3, subd. (b).)

Public records requested here include any writing containing information relating to the conduct of the public's business **prepared, owned, used, or retained** by the agency regardless of form or characteristics. (Govt. Code § 6252, subd. (e), emphasis added.). "Records" include all documents, correspondence, including email; agency guidelines and policies; memoranda; agency Memoranda of Understanding; notices, comments, and responses to comments; biological, scientific, and other studies; reports; environmental analyses; surveys; timelines; charts; graphs; maps; analyses; data; meeting minutes and agendas; distribution lists; notes and transcripts of meetings and conversations; and any other relevant information, **whether in hard copy or electronic/computer format.**

## Coffey, Sarah

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**From:** Brian Gaffney [REDACTED]  
**Sent:** Monday, November 9, 2020 12:35 PM  
**To:** O'Connor, Bonny; Coffey, Sarah  
**Subject:** Public Records Request - City's decision to file a NOD for the Vista Mar project on October 20, 2020  
**Attachments:** PRA7 Pacifica 10.9.20 SENT.pdf

**[CAUTION: External Email]**

Please see the attached PRA request.  
Thank you.

--

Brian Gaffney  
LAW OFFICES OF BRIAN GAFFNEY APC

[REDACTED]  
Pacifica, CA 94044  
[REDACTED]

CONFIDENTIALITY NOTE: This and any accompanying pages contain information from LAW OFFICES OF BRIAN GAFFNEY APC which may be confidential and/or legally privileged. The information is intended to be for the sole use of the individual or entity named above. Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521. If you are not the intended recipient please contact the sender and destroy all copies of the communication

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## O'Connor, Bonny

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**From:** O'Connor, Bonny  
**Sent:** Tuesday, October 20, 2020 12:19 AM  
**To:** 'John Kontrabecki'; 'Javier Chavarria'  
**Cc:** Murdock, Christian; Pacifica Permit Tech  
**Subject:** RE: Vista Mar: Request for Funds

Hi John and Javier,

Congratulations on the outcome of tonight's hearing. As a result of the Planning Commission's action, staff will need to file a Notice of Determination (NOD) of a Mitigated Negative Declaration and submit filing fees to the County. Please provide the City with a check for \$2,456.75 ([\\$2,406.75 CDFW Fees + \\$50.00 County Clerk Processing Fees](#)) tomorrow (Tuesday) if possible. The NOD needs to be filed within 5 days of the decision and due to COVID-19, the Clerk's office is closed, so we will need to use the time to mail the NOD to the office. Please make the check for \$2,456.75 payable to San Mateo County Clerk-Recorder. The Check can be dropped off at the City's offices at 1800 Francisco Blvd. The office will be closed, but staff can collect the check through the mail slip.

Please let me know if you have any concerns.

Thanks,  
Bonny

---

**From:** O'Connor, Bonny  
**Sent:** Monday, October 19, 2020 4:04 PM  
**To:** 'John Kontrabecki' [REDACTED]; Javier Chavarria [REDACTED] >  
**Subject:** RE: Vista Mar: Request for Funds

Thank you, John

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**From:** John Kontrabecki [[mailto:\[REDACTED\]](#)]  
**Sent:** Monday, October 19, 2020 4:03 PM  
**To:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>; Javier Chavarria [REDACTED]  
**Subject:** Re: Vista Mar: Request for Funds

**[CAUTION: External Email]**

Bonney-

Payment made.

John

John Kontrabecki  
TKG International  
[REDACTED]

---

**From:** "o'connorb@ci.pacifica.ca.us" <o'connorb@ci.pacifica.ca.us>

**Date:** Friday, October 16, 2020 at 2:11 PM

**To:** John Kontrabecki <[REDACTED]>, Javier Chavarria <[REDACTED]>

**Subject:** RE: Vista Mar: Request for Funds

Hello John and Javier,

I wanted to follow up on my email below. Additionally, as a result of the additional assistance needed from Raney and their consultants, they have requested additional funds for the work they have performed and to cover the cost of them attending Monday's hearing.

Therefore we respectfully request the following funds:

- \$7,210 For City Staff and Attorney (*\$18,210 requested on 9/22/20, less the \$11,000 provided on 10/5/20*)
- \$3,215 For Raney and Subcontractors, breakdown and scope detailed below:
  - WRA - \$1,100 for providing responses to several other (beyond Smallwood's letter) sets of comments from various other entities and on subject matter other than birds and wildlife. Additional staff have had to spend time developing these responses and this effort has utilized the budget that was previously intended to pay for Brian's time participating in the upcoming hearing.
  - GeoCon - \$545 for hearing attendance (assumes 3 hours)
  - Raney - \$1,570 for the expansion the budget to cover our expenses for Response to Comments preparation of two additional comment letters regarding the Vista Mar IS/MND: one from Steven Bond and Associates, and one from Coast Ridge Ecology. In order to adequately address these comment letters, the City has requested that Raney prepare detailed and bracketed responses to both the Bond letter and the Coast Ridge Ecology letter.

Please submit \$10,425 to the City at your earliest opportunity. As you have used previously, the City has an electronic payment option at [https://www.cityofpacifica.org/depts/asd/finance/make\\_online\\_payment/default.asp](https://www.cityofpacifica.org/depts/asd/finance/make_online_payment/default.asp). Please be sure to reference Vista Mar Project (File No. 2002-001) in the appropriate field. Alternatively, a check made out to the City of Pacifica can also be accepted via mail.

Thank you,  
Bonny

---

**From:** O'Connor, Bonny

**Sent:** Friday, October 9, 2020 2:37 PM

**To:** 'John Kontrabecki' <[REDACTED]>

**Cc:** Javier Chavarria <[REDACTED]>

**Subject:** RE: Vista Mar: Request for Funds

Hi John and Javier,

Thank you for the provided funds. Please find attached a receipt for your records. However, we will need some additional funds as requested below as the City operates on a deposit system and not a billing system. Without available deposit to bill the City's costs against it, it may affect the City's ability to continue work on the project. The reimbursement agreement that Javier signed as part of the application for the project includes agreement to provide additional deposits as needed.

Thanks,  
Bonny

---

**From:** John Kontrabecki [REDACTED]  
**Sent:** Friday, October 2, 2020 2:48 PM  
**To:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>  
**Cc:** Javier Chavarria <[REDACTED]>  
**Subject:** Re: Vista Mar: Request for Funds

**[CAUTION: External Email]**

Bonny-

I just sent the City of Pacifica \$11,000 which represents the balance for staff and legal fees for the Vista Mar project.

John

John Kontrabecki  
**TKG International**

[REDACTED]

---

**From:** "o'connorb@ci.pacifica.ca.us" <o'connorb@ci.pacifica.ca.us>  
**Date:** Wednesday, September 23, 2020 at 3:40 PM  
**To:** John Kontrabecki [REDACTED]  
**Cc:** Javier Chavarria [REDACTED] >  
**Subject:** RE: Vista Mar: Request for Funds

Hi John,  
I'm happy to talk with you. I'm available until 4:30 today and then 5:30 to 7:30. I can see if Rod from Raney can join us if those times work. We would likely have more luck with Raney for a more immediate zoom call.  
Let me know and I can set up a Zoom meeting  
Bonny

---

**From:** John Kontrabecki [REDACTED]  
**Sent:** Wednesday, September 23, 2020 3:36 PM  
**To:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>  
**Subject:** Re: Vista Mar: Request for Funds

**[CAUTION: External Email]**

I would like to speak with you about both the SWAPE and Bond reports and the amount of the deposit.

Why are you estimating \$8,000 in legal fees? Given where we are in the process, it seems high to me and I am a lawyer.

Can we discuss this over the phone?

John

John Kontrabecki  
TKG International



---

**From:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>

**Date:** Wednesday, September 23, 2020 at 3:30 PM

**To:** John Kontrabecki <[REDACTED]>, Javier Chavarria <[REDACTED]>

**Subject:** RE: Vista Mar: Request for Funds

Hi John,

Raney is the City's consultant who has been hired to prepare an environmental document in accordance with the California Environmental Quality Act on the City's behalf. While you are welcomed to provide information to the City in response to the public comments received, we would prefer that the applicant not have direct contact with the consultant and to have information go through the City.

I appreciate your understanding.

In regards to the request for funds below, it would be helpful to receive the funds requested below, especially Raney's portion, as soon as possible to allow work to continue. They have not proceeded with the SWAPE or Bond work because the funds have not yet been approved.

If you would like to talk about anything, please let me know and I can be available for a call.

Thanks,

Bonny

---

**From:** John Kontrabecki <[REDACTED]>

**Sent:** Wednesday, September 23, 2020 1:52 PM

**To:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>; Javier Chavarria <[REDACTED]>

**Subject:** Re: Vista Mar: Request for Funds

**[CAUTION: External Email]**

Bonny-

I have read the three reports you have sent to me regarding the Vistamar project submitted in opposition to the approval of the project by the Planning Commission.

We would like to reach out directly to Raney to cooperate with them in any way they may require to assess and respond to these reports. May we have your permission to do so?

John

John Kontrabecki  
TKG International





**From:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>  
**Date:** Tuesday, September 22, 2020 at 5:27 PM  
**To:** John Kontrabecki <[REDACTED]>, Javier Chavarria <[REDACTED]>  
**Subject:** Vista Mar: Request for Funds

Hello Javier and John,

As expected, last night the Planning Commission continued your item to October 5, 2020. The continuance was requested to address public comments received on the project. Of the comments received, attached are two more comment letters that we will need support from our consultants to evaluate. As we previously discussed, the cost to process the Vista Mar Project has exceeded the amount of the deposits previously provided to the City for the project. Since your last provided deposit on Aug. 3, staff has spent time preparing for planning commission meetings, reviewing subsequent submittals of materials, preparing subsequent staff reports, and accepting and evaluating public comments received on the project. Currently, staff costs and legal costs are over the provided deposit amount. Funds remain in the Raney account, however as noted above, we are requiring further assistance from them due to public comments received on the project. Raney provided an estimate to address the Smallwood letter (previously provided to you) and the SWAPE letter(attached). We are still reviewing the Bond letter (attached) and will follow up if additional funds for Raney are necessary. In anticipation of the additional costs to be charged to the project we would like to request a check for \$28,435.75 to address the current overages and anticipated future costs. A breakdown of this number is provided below:

	Current Balance	Estimated Future Deposit
City Staff	<b>-\$10,219.75</b>	\$3,000.00
Legal Staff	<b>-\$6.00</b>	\$8,000.00
Raney Planning and Management	\$ 947.67	\$7,210.00 See attached breakdown
To address overages	\$ 10,225.75	
To address anticipated future costs		\$18,210.00

As you have used previously, the City has an electronic payment option at [https://www.cityofpacifica.org/depts/asd/finance/make\\_online\\_payment/default.asp](https://www.cityofpacifica.org/depts/asd/finance/make_online_payment/default.asp). Please be sure to reference Vista Mar Project (File No. 2002-001) in the appropriate field. Alternatively, a check made out to the City of Pacifica can also be accepted.

Please let me know if you have any questions.  
Thanks,  
Bonny

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## Brooks, Elizabeth

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**From:** O'Connor, Bonny  
**Sent:** Tuesday, November 24, 2020 9:36 AM  
**To:** Public Comment  
**Subject:** FW: Pacifica City Council 11/23/2020 - Vista Mar Project Appeal Comments  
**Attachments:** Vista Mar GHG Equivalency\_US EPA\_11-20-20.pdf; SWAPE 2020.11.23\_Vista Mar Comment Letter.pdf

**Importance:** High

---

**From:** John Mikulin [REDACTED]  
**Sent:** Tuesday, November 24, 2020 8:31 AM  
**To:** Martin, Deirdre <martind@ci.pacifica.ca.us>; Beckmeyer, Sue <beckmeyers@ci.pacifica.ca.us>; Bier, Mary <bierm@ci.pacifica.ca.us>; O'Neill, Mike <o'neillm@ci.pacifica.ca.us>; Vaterlaus, Sue <vaterlauss@ci.pacifica.ca.us>  
**Cc:** O'Connor, Bonny <o'connorb@ci.pacifica.ca.us>; [REDACTED]  
[REDACTED] Sarah Nell Mikulin [REDACTED]  
**Subject:** Pacifica City Council 11/23/2020 - Vista Mar Project Appeal Comments  
**Importance:** High

### [CAUTION: External Email]

Dear Pacifica City Council Members:

I write this message in follow up to yesterday's Council hearing regarding the proposed appeals of the Pacifica Planning Commission's approval of the Vista Mar development project.

As I stated during yesterday's public comment period, my wife (Nellie) and I are the owners of 376 Monterey Road in Pacifica. For several substantive, non-aesthetic reasons, we strongly support the need for a comprehensive Environmental Impact Report (EIR) for the Vista Mar site and the development proposed on that parcel.

I was appalled to witness the Pacifica City Attorney's dismissive statements aimed at subverting citizens' rights to a comprehensive EIR as required under CEQA. Ms. Kenyon made several arbitrary statements during the course of yesterday's meeting regarding, in her subjective determination, the superiority of environmental analyses conducted by entities representing the developer and City versus those conducted by experts commissioned by Pacifica property owners and residents. It is incredibly presumptuous for any local government representative to make such normative judgements as they relate the community's right to request an EIR for a proposed development. The record of decision for the proposed project clearly indicates conflicting expert opinions and analyses regarding the rigor and accuracy of the environmental, hydrological, and geological analyses conducted to date. Given this circumstance, an EIR is warranted under CEQA's rational basis test.

Additionally, I was personally offended by Councilmember Vaterlaus dismissive and inaccurate statements that Pacifica residents were opposing the Vista Mar project because we simply do not want to look at buildings. These comments disregard the substantive basis for the citizen challenges to the project, which are procedural and technical in nature, having nothing to do with NIMBY behaviors or leanings. The citizens are challenging

the basis upon which the environmental impact and safety determinations for this project are being made. The relief we request is more thorough analysis as is our right under state law. A local elected official should recognize this distinction, and not seek to discount and/or misconstrue the interests and legal rights of her constituents.

I have worked as an environmental professional since 2002, and have been personally involved in several NEPA and CEQA review processes in California. My expertise lies in air quality and greenhouse gas (GHG) analysis and emissions mitigation technologies. Notwithstanding the legitimate public safety concerns raised in the Boles and Cramer appeals, my individual concerns center around the lack of technical rigor presented in the Pacifica Planning Commission's Initial Study/Mitigated Negative Declaration (ISMND) with respect to emissions analysis (prepared by Rainey, January 2020 - see below). This document lacks sufficient technical detail to verify the accuracy of the emissions estimates provided. The analysis requires more data regarding the types, vintage and certified emissions tier of equipment planned for use during construction and operation, as well as the utilization factors for this equipment. The Rainey representative's response to these concerns during yesterday's Council hearing were disjointed and incoherent, and demonstrated a lack of comprehension of the analytical issues in question. Furthermore, the Vista Mar Mitigation Monitoring & Reporting Program (MMRP) includes no commitments to criteria pollutant or GHG emissions control. While the MND claims that the emissions impact of the project is less than significant, the project proponents should still be required to disclose their commitments to control emissions from the Vista Mar site. This is especially true for PM2.5 and PM10 emissions given the detrimental human health impacts associated with exposure to these pollutants at any measurable level. Taken on their own, these emissions concerns are reason enough to trigger an EIR for this project.

ISMND - See pp.23-30, 51-52 @ [https://files.ceqanet.opr.ca.gov/258447-2/attachment/H482tcOcvy4ZZyhTUZ0VqmaXGEg8\\_FwsGB7ky3bdTALsZMquxYUGVa0Ls6LHG1u995I9e\\_H2kCMycp2k0](https://files.ceqanet.opr.ca.gov/258447-2/attachment/H482tcOcvy4ZZyhTUZ0VqmaXGEg8_FwsGB7ky3bdTALsZMquxYUGVa0Ls6LHG1u995I9e_H2kCMycp2k0)

MMRP - <http://pacificacityca.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=5875&MeetingID=1335>

The City is making a potentially irrevocable and catastrophic decision based on less than all the facts, and has actively attempted to thwart the public's right to more information through the development of a thorough EIR. I appreciate the efforts of the Pacifica Planning Department to address comments made to date, but again, the record of decision remains replete with expert contention regarding the environmental impact analysis for the Vista Mar project. Be aware that CEQA requires disclosure of these elements if/when judicial review is requested.

We thank you again for your consideration of this matter, and assure you that this will not be the final word on the proposed Visa Mar development.

Sincerely,

John & Nellie Mikulin

[REDACTED]  
Pacifica, California 94044

[REDACTED]

---

**From:** John Mikulin [REDACTED]  
**Sent:** Monday, November 23, 2020 9:02 AM  
**To:** o'connorb@ci.pacifica.ca.us <o'connorb@ci.pacifica.ca.us>

Cc: Sarah Nell Mikulin [REDACTED]

Subject: Pacifica City Council 11/23/2020 - Vista Mar Project Appeal Comments

Dear Pacifica City Council Staff:

We are property owners and full-time residents in Pacifica, and we are writing to voice our strong opposition to the proposed Vista Mar development project. We urge the Pacifica City Council to reconsider the Pacifica Planning Commission's uninformed decision to allow the Vista Mar project to be constructed without a thorough safety and environmental impact analysis.

There is a rational basis to conclude that there are significant seismic, hydrological, biological, air quality, and climate change impacts associated with the proposed project, and therefore a complete Environmental Impact Report is warranted.

Based on the Pacifica Planning Commission's existing record of decision, the negative impacts of the proposed Vista Mar development project include:

- 1) Creating safety hazards for roadways and properties adjacent to the proposed development site due to increased seismic, erosion, and flood risk;
- 2) Destroying and significantly degrading existing wetlands, riparian areas, habitat, and open space;
- 3) Destroying heritage Monterey Pine trees;
- 4) Increasing local air pollution via project construction and operation through the use of additional heavy-duty diesel vehicles and equipment, light-duty gasoline vehicles, and fugitive dust emissions (i.e., increases in PM2.5, PM10, NOx, VOC and CO). Note that the Pacifica Planning Commission's Mitigated Negative Declaration (prepared by Rainey, January 2020 - see URL below) lacks sufficient technical detail to verify the accuracy of the emissions estimates provided. The analysis requires more data regarding the types and vintage of equipment used during construction and operation, as well as the utilization factors for this equipment; and [https://files.ceqanet.opr.ca.gov/258447-2/attachment/H482tcOcvy4ZZyhTUZ0VqmaXGEg8\\_FwsGB7ky3bdTALsZMquxYUGVa0Ls6LHG1u995I9e\\_H2kCMycp2k0](https://files.ceqanet.opr.ca.gov/258447-2/attachment/H482tcOcvy4ZZyhTUZ0VqmaXGEg8_FwsGB7ky3bdTALsZMquxYUGVa0Ls6LHG1u995I9e_H2kCMycp2k0)  
<https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health>  
<https://oehha.ca.gov/air/health-effects-diesel-exhaust>  
<https://oehha.ca.gov/air/air-pollution-and-childrens-health-fact-sheet-oehha-and-american-lung-association>
- 5) Increase greenhouse gas (GHG) emissions (current estimate = 471.2 MT/CO2e - see commenter supplemental GHG analysis in attached .pdf) and vehicle miles traveled in Pacifica/San Mateo County in conflict with existing California statutes including SB 32 (2016) and SB 375 (2008).  
[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201520160SB32](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32)  
[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=200720080SB375](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375)

We implore the Pacifica City Council to deny the request to construct this ill-conceived and poorly sited residential development project, at least until the environmental and public safety hazards associated with the proposal can be thoroughly analyzed and shared with the community. Allowing this project to proceed absent these elements is fraught with legal and safety risk for both the City of Pacifica and the developer. Furthermore, as stated above, there is rational basis to conclude that the parcel in question is unfit for development given the reasonable likelihood of significant safety hazards and irreparable environmental impacts that development activities would engender.

We thank you for your consideration of these comments as you seek to better align Pacifica's public decision making with existing statutory requirements, public safety, and rational thought.

Sincerely,

\_\_\_\_\_  
John & Nellie Mikulin

██████████  
Pacifica, California 94044

11/23/2020 Agenda - [http://pacificacityca.iqm2.com/Citizens/Detail\\_Meeting.aspx?ID=1335](http://pacificacityca.iqm2.com/Citizens/Detail_Meeting.aspx?ID=1335)

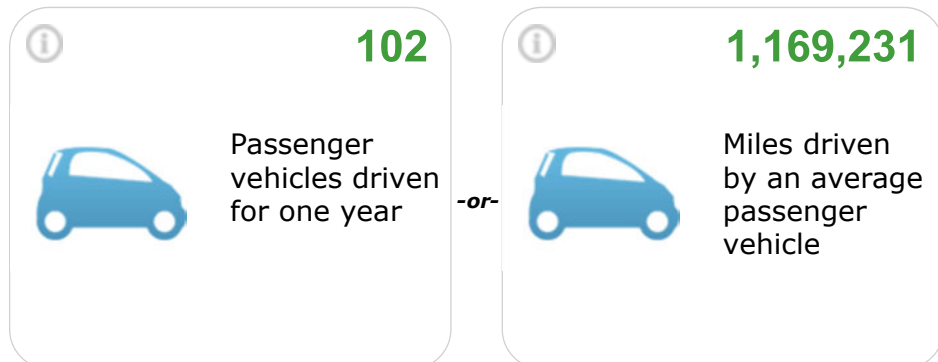
**CAUTION: This email originated from outside of the City of Pacifica. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.**

## Equivalency Results [How are they calculated?](#)

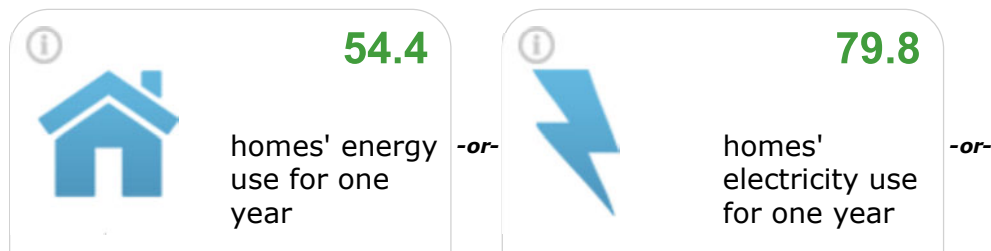
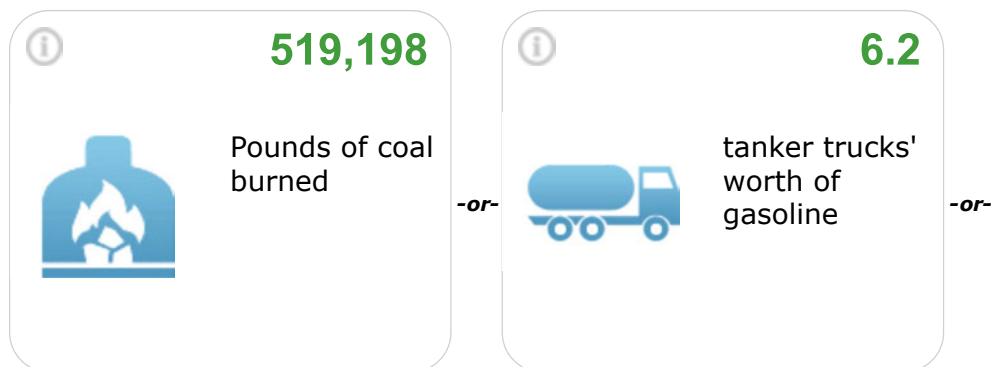
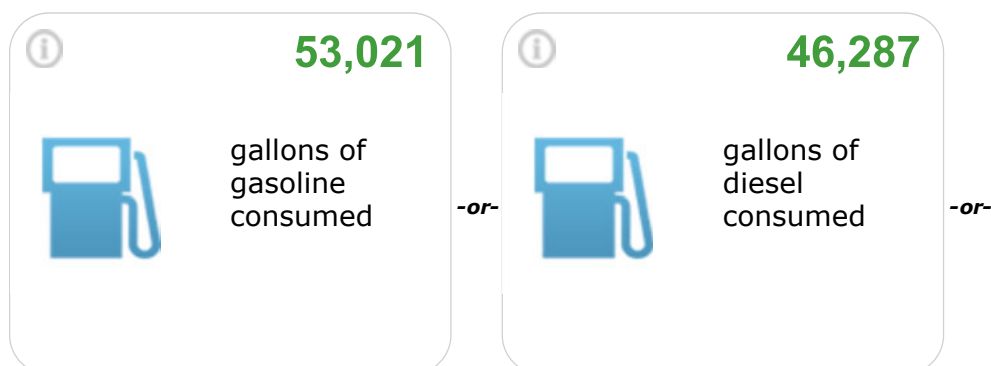
The sum of the greenhouse gas emissions you entered above is of Carbon Dioxide Equivalent. This is equivalent to:

471 Metric Tons


### Greenhouse gas emissions from




### CO<sub>2</sub> emissions from







 **2.6**



railcars' worth  
of coal burned

 **1,091**



barrels of oil  
consumed

-or-

-or-

 **19,263**



propane  
cylinders used  
for home  
barbeques


 **0.0001**




coal-fired  
power plants  
in one year

-or-

-or-

 **60,093,183**




number of  
smartphones  
charged


### Greenhouse gas emissions avoided by

 **160**



Tons of waste  
recycled  
instead of  
landfilled

 **22.9**



Garbage  
trucks of  
waste recycled  
instead of  
landfilled

-or-

-or-

 **20,049**



 **0.102**



-or-

-or-



waste recycled instead of landfilled



running for a year



**17,901**



Incandescent lamps switched to LEDs

### Carbon sequestered by



**7,791**



tree seedlings grown for 10 years

-or-



**615**



acres of U.S. forests in one year

-or-



**3.2**



acres of U.S. forests preserved from conversion to cropland in one year



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November 23, 2020

Bonny O'Connor, Associate Planner  
City of Pacifica Planning Department  
1800 Francisco Blvd.  
Pacifica, CA 94044  
o'connorb@ci.pacifica.ca.us

**Subject: Comments on the Vista Mar Project (SCH No. 2020019032)**

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Dear Ms. O'Connor,

We have reviewed the September 2020 Errata Sheet ("Errata"), as well as the Raney Response to Comments (Attachment N to the October 2020 Planning Commission Staff Report) ("RTC"), for the Vista Mar Project ("Project") located in the City of Pacifica ("City"). After our review of the Errata and RTC, we find that the Errata and RTC are insufficient in addressing our concerns regarding the Project's air quality, health risk, and greenhouse gas impacts. As we asserted in our September 16<sup>th</sup> comment letter, an EIR should be prepared to adequately evaluate the Project's potential impacts.

## **Air Quality**

In our September 16<sup>th</sup> comment letter, we identified several issues with the January 2020 Initial Study – Mitigated Negative Declaration's ("IS/MND") air model (California Emissions Estimator Model, "CalEEMod")<sup>1</sup> that artificially reduced the Project's construction and operational emissions. After review of the Errata and RTC, we found that the Errata and RTC fail to address all our concerns and maintain that the IS/MND's CalEEMod model is flawed and fails to accurately estimate the Project's criteria air pollutant emissions. As such, we find the IS/MND and Errata to be inadequate and maintain that an EIR should be prepared to adequately evaluate the Project's local and regional air quality impacts. Until a proper air quality analysis is conducted, the Project should not be approved.

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<sup>1</sup> <http://caleemod.com/>



### *Unsubstantiated Changes to Architectural Coating Construction Phase Length*

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND's CalEEMod model included an unsubstantiated change to the Project's anticipated architectural coating construction phase length. Review of the Errata and RTC demonstrate that the Project still fails to justify or correct this modeling error. As discussed below, we find the IS/MND and Errata to be inadequate and maintain that the air quality impact significance determination is unsubstantiated.

Regarding the unsubstantiated change to the default architectural coating construction phase length, the RTC states:

"As noted in the CalEEMod User Guide, where project-specific information is known, the user should override the default values. Because project-specific information was provided by the applicant, the default construction phase lengths were adjusted to match the actual anticipated construction schedule for the project. Thus, the information used within the IS/MND represents a more accurate depiction of project construction as opposed to the CalEEMod defaults that are approximately 280 miles away from the project site. Considering that the construction phase lengths used in the emissions modeling are project specific, the commentator's comparison of the percentage increase in phase lengths from the CalEEMod default values does not provide useful information regarding the accuracy of the emissions analysis prepared for the project.

With regard to the architectural coating phase in particular, it is common practice for architectural coatings to be applied throughout the construction phase as needed. For instance, a retaining wall constructed early in the construction process may require architectural coating or sealing, prior to construction of other on-site structures. Once construction begins on the units, components of each unit would be finished at separate times, some such components may require coating prior to completion of the next task or unit. Thus, the assumption that architectural coating would occur throughout the construction phase is reasonable.

Nevertheless, in response to the comment, Page 13 of the IS/MND has been updated, as shown below, to provide greater clarity regarding the construction phasing:

While the exact timing and length of each phase cannot be determined at this time, the following phase lengths have been assumed for the purposes of this analysis based on available project information:

- Site preparation: two weeks;
- Grading: two months;
- Paving: one week; and
- Building construction: 14 months-; and
- Architectural Coating: 14 months

The foregoing revision clarifies the inputs used in the emissions modeling and reproduces information that was available in Appendix A of the 1S/MND. The foregoing changes do not affect the analysis presented within the IS/MND” (RTC p. 40).

However, this justification is insufficient for three reasons. First, the RTC’s claim that “project-specific information was provided by the applicant” is unsubstantiated. As stated in our September 16<sup>th</sup> comment letter, the IS/MND failed to mention or address any changes to the architectural coating phase of construction whatsoever. Second, the Errata’s claim that “it is common practice for architectural coatings to be applied throughout the construction phase as needed” is unsubstantiated. Without providing any sources or evidence to substantiate this claim, we are unable to verify the changes to the architectural coating phase in the model. Third, simply because the IS/MND was revised to state that the Project’s air quality analysis *assumes* an architectural coating phase length of 14 months, this does not justify the revised architectural coating phase length. Regarding altering default data, the CalEEMod User’s Guide states:

“CalEEMod was designed with default assumptions supported by substantial evidence to the extent available at the time of programming. The functionality and content of CalEEMod is based on fully adopted methods and data. However, CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, *provided that the information is supported by substantial evidence as required by CEQA*” (emphasis added).<sup>2</sup>

As you can see in the excerpt above, only Project-specific information “supported by substantial evidence” should replace the CalEEMod default values. Here, since the IS/MND simply assumes an architectural coating phase length of 14 months, without providing any substantial evidence to support this phase length, we cannot verify the revised value. As such, we maintain our September 16<sup>th</sup> comment, and still conclude that the IS/MND and Errata’s CalEEMod models are incorrect and the less-than-significant air quality impact conclusion should not be relied upon.

### *Unsubstantiated Change to Acres of Grading Value*

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND’s CalEEMod model included unsubstantiated reductions to the Project’s acres of grading values. Review of the RTC demonstrates that the Project still fails to justify or correct this modeling error. As discussed below, we find the IS/MND and Errata to be inadequate and maintain that the air quality impact significance determination is unsubstantiated.

Regarding the unsubstantiated changes to the default acres of grading values, the RTC states:

“With regard to grading CalEEMod assumes that grading of the site would occur both during the site preparation phase and the grading phase. The default CalEEMod values assumed that 16.5

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<sup>2</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4), p. 12.

acres would be graded during the project grading phase, while 5.50 acres would be graded during the site preparation phase. For the proposed project, grading is only anticipated to occur during the grading phase and the CalEEMod inputs were adjusted accordingly. Thus, based on the 0.7-acre area of the site that would be graded, the default values were adjusted to reflect that grading would not occur during the site preparation phase (site preparation grading changed from 5.50 acre default to zero acres), but that grading would occur during the grading phase over a 0.7 acre portion of the site (grading phase grading area changed from 16.50 acre default to 0.7 acres). As noted by the commenter, the area to be graded was presented in the IS/MND on page 24, and the source of the grading information was noted in CalEEMod as the project applicant.

Contrary to the commenter's assertion, the text quoted from the CalEEMod User Guide does not serve to demonstrate an insufficiency regarding the analysis presented in the IS/MND. The length and width of the grading area were not used in determining the area-of grading; rather, only the total area to be graded, as provided by the project applicant, was used to determine the area to be graded during the grading phase of the project. The text emphasized by the commenter appears to expressly condone the use of the total area to be graded as a means of determining the amount of grading needed on the site. Furthermore, the grading phase is assumed to occur over two months, with multiple pieces of equipment working within the site for the duration of the grading phase. A two-month grading period with multiple pieces of equipment working within the site, represents a reasonable, if not conservative, approach to analysis for grading a total of 0.7 acres" (RTC p. 40-41).

However, this justification is incorrect. As discussed in our September 16<sup>th</sup> comment letter and stated in the CalEEMod User's Guide, the dimensions of the grading site have *no impact* on the acres of grading value. Thus, the RTC's claim that a "0.7-acre-area of the site" would be graded does not substantiate the changes.

Furthermore, while the RTC states that "[t]he length and width of the grading area were not used in determining the area-of grading; rather, only the total area to be graded," and that "[a] two-month grading period with multiple pieces of equipment working" correlates with "a reasonable, if not conservative, approach," these claims are unsupported. As the total area to be graded is calculated based on the dimensions of the grading site, the Errata's claim that the length and width were not used, but rather "only the total area to be graded" is incorrect and unsubstantiated. Without substantial evidence to support the reductions to default acres of grading values in the models, we cannot verify the revised values. As such, we maintain our September 16<sup>th</sup> comment, and still conclude that the IS/MND, Errata and RTC's CalEEMod models are incorrect and the less-than-significant air quality impact conclusion should not be relied upon.

### *Unsubstantiated Change to Default CO<sub>2</sub> Intensity Factors*

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND's CalEEMod model included an unsubstantiated change to the default CO<sub>2</sub> intensity factor. Review of the Errata and RTC demonstrate

that the Project still fails to justify or correct this modeling error. As discussed below, we find the IS/MND, Errata and RTC to be inadequate and maintain that the air quality impact significance determination is unsubstantiated.

Regarding the unsubstantiated reduction of the default CO<sub>2</sub> intensity factor, the RTC states:

“The State’s Renewable Portfolio Standards (RPS) are a legislative requirement mandating that public utilities source a certain percentage of their retail electricity from renewable sources. Producing electricity from renewable sources reduces the GHG emissions intensity of electricity, thus reducing the amount of GHG emissions released per unit of energy consumed. The default values for the emissions intensity of PG&E electricity in CalEEMod are based on values from the year 2008.<sup>3</sup> Since that time, PG&E has increased the proportion of electricity produced by renewable sources from 14 percent<sup>4</sup> to 39 percent by the year 2018,<sup>5</sup> which is the most recent year for which data is currently available. PG&E will be required to continue increasing the renewable content of their electricity in-line with the RPS eventually reaching 60 percent renewable energy content by the year 2030. Because compliance with RPS is a legislative requirement, PG&E is required to achieve the renewable electricity generation benchmarks established by the RPS. Thus, the incorporation of reduced electricity emissions factors in the emissions modeling is justified” (RTC p. 41-42).

However, this justification is incorrect for two reasons. First, as demonstrated in the excerpt above, the RTC claims that PG&E has increased the proportion of renewables by 25% since CalEEMod was last updated.<sup>3</sup> However, as stated in our previous letter, the IS/MND’s CalEEMod model included a 58% reduction to the default CO<sub>2</sub> intensity factor. Thus, based on the RTC’s claim that PG&E has increased the proportion of renewables by 25% since CalEEMod was last updated, this reduction is overestimated by 33%.<sup>4</sup> Second, as stated in our previous comment letter, simply because the State has these goals does not mean that they will be achieved locally at the Project site. The RTC fails to address this issue, and as a result, we maintain that the revised CO<sub>2</sub> intensity factor is unsupported. As previously stated, this unsubstantiated reduction presents an impediment to accurately determining air quality impacts, as CalEEMod uses the CO<sub>2</sub> intensity factor to calculate the Project’s greenhouse gas (“GHG”) emissions associated with electricity use.<sup>5</sup> As such, we maintain our September 16th comment, and still conclude that the IS/MND, Errata and RTC’s CalEEMod models are incorrect and the less-than-significant air quality impact conclusion should not be relied upon.

### *Unsubstantiated Changes to Fireplace Values*

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND’s CalEEMod model included unsubstantiated changes to the Project’s anticipated fireplace values. Review of the Errata and RTC demonstrate that the Project still fails to justify or correct this modeling error. As discussed below, we

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<sup>3</sup> Calculated: 39% - 14% = 25%

<sup>4</sup> Calculated: 58% - 25% = 33%

<sup>5</sup> “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: <http://www.caleemod.com/>, p. 17.

find the IS/MND, Errata and RTC to be inadequate and maintain that the air quality impact significance determination is unsubstantiated.

Regarding the unsubstantiated changes to the Project's anticipated number of fireplaces, the RTC states:

"According to applicant provided information, the proposed residences would not include the installation of wood-fired hearths or fireplaces. Thus, the number of wood fireplaces and the amount of wood burned within the project site were adjusted to zero. Applicant provided information was cited within the CalEEMod outputs as the reason for the change to the emissions modeling inputs. Nevertheless, in response to the comment, page 24 of the IS/MND is hereby revised as follows:

Accordingly, the proposed project's modeling assumes the following project and/or site-specific information:

- Construction would begin in April 2020;
- Construction would occur over an approximately 16-month period;
- The CO2 intensity factor was adjusted to reflect the PG&E's progress towards the State renewable portfolio standards goal by the operational year (anticipated to be 2021);
- A total of 0.7 acres of land would be graded;
- A total of 100 CY of material would be exported during site prep and 3,000 CY during grading;
- The proposed residences would not include wood-burning hearths or fireplaces;
- Project would exceed Title 245 by 15%;
- 24kWh of on-site renewable energy would be used;
- Water conservation strategies would be applied to 30 percent of indoor and 60 percent of outdoor water use; and
- The proposed project's required compliance with the 2016 Building Energy Efficiency Standards listed in the California Building Standards Code was assumed.

Based on the above, only minor text changes are required to the IS/MND, and the analysis presented within the IS/MND remains valid" (RTC p. 43).

However, this justification is insufficient for several reasons. First, while the RTC states that "applicant provided information" substantiates the reductions to default fireplace values, this supposed "information" was not disclosed in the IS/MND. As previously stated in our September 16<sup>th</sup> comment letter, we are unable to verify these changes the model, because the IS/MND failed to provide this information. Second, simply because the IS/MND was revised to state that the Project's air quality analysis assumes that the proposed residences would not include fireplaces, this does not justify the omission of fireplaces in the model. Regarding altering default data, the CalEEMod User's Guide states:

"CalEEMod was designed with default assumptions supported by substantial evidence to the extent available at the time of programming. The functionality and content of CalEEMod is

based on fully adopted methods and data. However, CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA” (emphasis added).<sup>6</sup>

As you can see in the excerpt above, only Project-specific information “supported by substantial evidence” should replace the CalEEMod default values. Here, while the IS/MND was updated to state that the modeling “assumes” these features, the IS/MND and Errata fail to provide any meaningful or substantial evidence to support this claim. As such, we maintain our September 16th comment, and still conclude that the IS/MND, Errata and RTC’s CalEEMod models are incorrect and the less-than-significant air quality impact conclusion should not be relied upon.

### *Incorrect Application of Operational Mitigation Measures*

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND’s CalEEMod models incorrectly included several mobile, energy-, and water-related operational mitigation measures. Specifically, the IS/MND’s models incorrectly included the following mitigation measures: “Improve Pedestrian Network,” “Exceed Title 24,” “Kilowatt Hours of Renewable Electricity Generated,” “Percent of Electricity Use Generated with Renewable Energy,” and “Apply Water Conservation Strategy.” Review of the Errata and RTC demonstrate that the Project still fails to justify or omit the unsubstantiated operational mitigation measures. As discussed below, we find the IS/MND and Errata to be inadequate and maintain that the IS/MND’s air quality significance determination should not be relied upon.

Regarding the inclusion of the operational mitigation measures, the RTC states:

“Generally, the mitigation measures apply to mobile emissions, energy consumption, and water consumption. However, for each measure it is important to note that due to the limitations of the CalEEMod software, it is sometimes necessary to apply inherent site design and project features in the “mitigation” tabs of CalEEMod, even if those measures are not necessarily mitigation under CEQA. For instance, as noted on page 24 of the IS/MND, the project, as proposed, was designed to exceed the energy efficiency requirements within the 2016 California Building Code (CBC) by 15 percent. In addition, the project was anticipated to include on-site renewable energy generation systems (solar panels), and would include water conservation strategies to reduce indoor water consumption by 30 percent and outdoor water consumption by 60 percent. Methods for applying the foregoing project characteristics are either impractical or not possible in CalEEMod. Therefore, all of the project characteristics mentioned above were applied in the “mitigation” tabs of CalEEMod, despite the measures being part of the design of the project” (emphasis added) (RTC p. 43).

However, the RTC’s justification for the inclusion of the above-mentioned operational mitigation measures is insufficient. Simply because the Errata claims these inputs are “project characteristics” or

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<sup>6</sup> “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](http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4), p. 12.

“project features” and “not necessarily mitigation” does not justify their inclusion in the model. According to the Association of Environmental Professionals (“AEP”) *CEQA Portal Topic Paper* on mitigation measures:

*“By definition, mitigation measures are not part of the original project design. Rather, mitigation measures are actions taken by the lead agency to reduce impacts to the environment resulting from the original project design. Mitigation measures are identified by the lead agency after the project has undergone environmental review and are above-and-beyond existing laws, regulations, and requirements that would reduce environmental impacts”* (emphasis added).<sup>7</sup>

The guidance goes on to state:

*“While not “mitigation”, a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact”* (emphasis added).<sup>8</sup>

As you can see in the excerpts above, project design features are not mitigation measures and may be eliminated from the Project’s design. Thus, since the above-mentioned operational mitigation measures included in the IS/MND, Errata and RTC’s CalEEMod models are not included as mitigation measures, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. As a result, we maintain our September 16th comment, and still conclude that the inclusion of the above-mentioned operational mitigation measures in the model is incorrect, and the IS/MND, Errata and RTC’s CalEEMod models should not be relied upon to determine Project significance.

### Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND failed to adequately evaluate the proposed Project’s potential health risk impacts. Review of the Errata and RTC demonstrate that the Project still fails to adequately evaluate the Project’s potential health risk impacts. As discussed below, we find the Errata and RTC to be inadequate and maintain that the IS/MND’s less-than-significant impact conclusion regarding the Project’s health risk impact should not be relied upon for the following three reasons:

- (1) The IS/MND, Errata and RTC fail to prepare a construction health risk assessment;
- (2) The IS/MND, Errata and RTC fail to prepare an operational health risk assessment; and
- (3) SWAPE’s screening-level analysis indicates significant adverse health risks impacts.

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<sup>7</sup> “CEQA Portal Topic Paper Mitigation Measures.” AEP, February 2020, available at: <https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 5.

<sup>8</sup> “CEQA Portal Topic Paper Mitigation Measures.” AEP, February 2020, available at: <https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 6.

### *1) Failure to Prepare a Construction HRA*

Regarding the IS/MND's omission of a construction health risk assessment ("HRA"), the RTC states:

"Pages 28 through 29 of the IS/MND present a discussion of the limited duration of potential exposure, as well as the existing regulations that would reduce the emission of DPM. For instance, project construction would be limited to a one to two-year period, and all off-road equipment operating at the site would be subject to the In-Use Off-Road Diesel Vehicle Regulation, which requires increasingly stringent emissions standards be met by off-road equipment. Thus, nearby receptors would not be exposed to emissions from on-site construction equipment for a substantial amount of time, and emissions from on-site construction equipment must be reduced in compliance with the existing statewide regulations related to off-road diesel vehicles. A common surrogate for DPM is PM<sub>2.5</sub>, which was estimated as part of the CalEEMod emissions estimates prepared for the IS/MND and revised herein. As demonstrated in this response to comments, exhaust emissions PM<sub>2.5</sub> would be released at a maximum rate of 0.88 lbs/day, which is far below the BAAQMD's thresholds for significance for exhaust-related PM<sub>2.5</sub>. While BAAQMD's threshold of significance is not necessarily meant to serve as a threshold for DPM emissions, the fact that total exhaust related PM<sub>2.5</sub> emissions would be far below the BAAQMD's thresholds of significance provides an indication of the comparative scope of emissions that would occur due to the proposed project. Based on the above, the amount of DPM emitted during on-site construction activity would be low, and given the dispersive nature of DPM, the ultimate dosage at any nearby receptor location would be limited. Furthermore, the period of time during which DPM emissions would occur is relatively limited. Because health risks are a result of dosage and exposure duration, the IS/MND concluded that the proposed Project would not result in significant health risks related to project construction" (RTC p. 46-47).

However, this justification is insufficient for two reasons. First, just because sensitive receptors "would not be exposed to emissions from on-site construction equipment for a substantial amount of time," and "emissions from on-site construction equipment must be reduced in compliance with the existing statewide regulations" does not justify the omission of a quantified construction HRA. As previously stated in our September 16<sup>th</sup> comment letter, construction of the Project will produce emissions of DPM, a human carcinogen, through the exhaust stacks of construction equipment over a construction period of approximately 18 months (Initial Study p. 13). Without making a reasonable effort to connect the Project's construction-related DPM emissions and the potential health risk impacts posed to nearby sensitive receptors, the IS/MND, Errata and RTC fail to demonstrate that health risk impacts associated with Project construction would be less-than-significant. Second, we agree with the RTC's statement that the BAAQMD threshold for PM<sub>2.5</sub> emissions is not meant to serve as a threshold for DPM emissions. However, the RTC's claim that "the fact that total exhaust related PM<sub>2.5</sub> emissions would be far below the BAAQMD's thresholds of significance provides an indication of the comparative scope of emissions that would occur due to the proposed project" is incorrect. We maintain that the BAAQMD PM<sub>2.5</sub> threshold does not apply to DPM emissions, nor does it connect these emissions to potential health risk impacts. Thus, the RTC's conclusion that "the proposed Project would not result in significant



health risks related to project construction” is incorrect and unsubstantiated. As such, we reiterate our September 16<sup>th</sup> comment that an EIR should be prepared, making a reasonable effort to connect the Project’s construction-related DPM emissions and the potential health risk impacts posed to nearby receptors.

Furthermore, the RTC states:

“SWAPE's claim that the "OEHHA document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors" is misleading. The quoted text from SWAPE's comment cites page 8-18, within Section 8.2.10, of the OEHHA guidance document as the source of this information; however, page 8-18 does not contain such a recommendation. Rather, page 8-18 includes recommendations related to how to conduct a health risk assessment (HRA) for short-term projects, not whether or not short-term projects should be evaluated if such projects exceed two-months. The likely source of SWAPE's claim is presented in the following quoted text from page 8-18 the OEHHA Guide:

Due to the uncertainty in assessing cancer risk from very short-term exposures, we do not recommend assessing cancer risk for projects lasting less than two months at the MEIR. We recommend that exposure from projects longer than 2 months but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months). Exposure from projects lasting more than 6 months should be evaluated for the duration of the project. In all cases, for assessing risk to residential receptors, the exposure should be assumed to start in the third trimester to allow for the use of the ASFs (OEHHA, 2009). Thus, for example, if the District is evaluating a proposed 5-year mitigation project at a hazardous waste site, the cancer risks for the residents would be calculated based on exposures starting in the third trimester through the first five years of life.

Based on the quoted text above, SWAPE appears to misconstrue the OEHHA's recommendation that projects shorter than two months not be analyzed, as direction that all projects longer than two months be analyzed” (RTC p. 47).

However, this justification is similarly insufficient, as the RTC is incorrect in stating that our September 16<sup>th</sup> comment letter misrepresented OEHHA guidance. Rather, the OEHHA- referenced excerpt further demonstrates our claim that the Project’s anticipated 18-month construction schedule, which is greater than two-months, indicates that the Project should conduct an HRA, as “[e]xposure from projects lasting more than 6 months should be evaluated for the duration of the project.” As such, the RTC fails to justify the omission of a quantified construction HRA, and we maintain our September 16<sup>th</sup> comment, and still conclude that the Project’s health risk impacts have been inadequately evaluated.

## *2) Failure to Prepare an Operational HRA*

Regarding the IS/MND’s omission of an operational HRA, the RTC states:

“On page 28 the IS/MND correctly states: "The proposed townhouses would not involve any land uses or operations that would be considered major sources of TACs, including DPM. As such, the project would not generate any substantial pollutant concentrations during operations." The determination that project operations would not result in substantial TAC emissions was made based on the common sources of TACs included in the California Air Resource Board's Air Quality and Land Use Handbook: A Community Health Perspective (Handbook), as well as Raney's professional judgement regarding typical activities associated with residential developments. The CARB's Handbook includes land uses such as chrome plating facilities, gas dispensing facilities, certain dry cleaners, freeways and high traffic roads, distribution centers, and rail yards as typical sources of TACs. Residential uses, such as those included in the proposed project, involve none of the TAC producing activities that occur in association with the CARB identified TAC emitting land uses. The commenter is correct that operation of the project would involve approximately 76 vehicle trips per day; however the CARB does not consider roadways to be major sources of TACs unless the roadway experiences at least 50,000 vehicles per day. Monterey Road does not experience roadway traffic anywhere close to this volume of vehicles, and the addition of project related traffic would not result in a substantial amount of increased TAC emissions from operation of Monterey Road. Moreover, the limited amount of TAC emissions that would be generated by the anticipated 76 daily vehicle trips would be distributed throughout the atmosphere over the entire length of each vehicle trip. As a result, a single receptor would not be exposed to even the relatively minor concentration of TACs generated by all of the anticipated project-related daily vehicle trips. Finally, the majority of passenger vehicles are gasoline-powered, with only small percentages of passenger vehicles being diesel or electrically powered. Gasoline and electric vehicles do not release DPM, which is the pollutant that SWAPE ultimately claims would be released during project operations. Thus, it is unlikely that DPM would be emitted by project-related vehicles, and if a future resident on site happens to own a diesel vehicle, emissions from that vehicle would be minimal, because passenger vehicle DPM emissions are much less than emissions from heavy-duty equipment or heavy-duty diesel trucks, and would be dispersed throughout the path of travel of the vehicle” (RTC p. 48).

However, this justification is insufficient. Review of the California Air Resources Board's ("CARB") *Air Quality Land Use Handbook: A Community Health Perspective* ("Handbook") demonstrates that the Handbook only specifies "common" sources of TACs, as stated in the RTC. However, simply because the Project would not involve common sources of TACs does not provide any detailed or meaningful information which correlates the Project's operational air emissions with the resulting health impacts of Project operations. Nor does this unsupported conclusion justify the omission of a quantified operational HRA whatsoever. Thus, by failing to provide a quantified HRA for Project operation, the IS/MND, Errata and RTC fail to adequately evaluate the potential health risk impacts posed to nearby, existing sensitive receptors.

Furthermore, the RTC's claim that "the CARB does not consider roadways to be major sources of TACs unless the roadway experiences at least 50,000 vehicles per day" is incorrect and unsubstantiated. Rather, the CARB's Handbook asserts:

"Avoid sitting new sensitive land uses within 500 feet of a freeway, urban roads within 100,000 vehicles/day, or rural roads with 50,000 vehicles/day."<sup>9</sup>

As you can see in the excerpt above, the RTC's claim misrepresents CARB guidance. As such, the fact that the proposed Project generates less than 50,000 vehicle trips per day fails to substantiate the Project's omission of a quantified operational HRA. As such, we reiterate our September 16<sup>th</sup> comment that an EIR should be prepared, making a reasonable effort to connect the Project's operational DPM emissions and the potential health risk impacts posed to nearby receptors.

Furthermore, the RTC states:

"The foregoing consideration of potential operational sources of TACS associated with the project demonstrates that the proposed project would not result in substantial TAC emissions over the lifetime of the project. Considering the contents of the OEHHA guide discussed above, OEHHA does not require that a HRA be prepared for each and every project; rather, HRAs need only be prepared where a significant source of TACs has been identified. In the case of the proposed project, an operational source of TACs does not exist and has not been identified by SWAPE. Therefore, while the project would not operate over an extended period of time, project operations would not result in TAC emissions or substantial health risks to any nearby receptors and an operational HRA is not required.

With regard to SWAPE's third claim, because the project was determined not to result in the substantial release of TACs, the project would not have the potential to result in health risks to nearby receptors, and a detailed HRA does not need to be prepared in order to determine that the project would not exceed the BAAQMD's specific numeric thresholds of significance" (RTC p. 48-49).

However, this justification is similarly insufficient. The RTC's claim that "HRAs need only be prepared where a significant source of TACs has been identified," further supports our recommendation that a quantified operational HRA be prepared, as our screening-level HRA demonstrated a significant TAC-related impact. Specifically, SWAPE's September 16<sup>th</sup> screening-level HRA indicated an estimated lifetime cancer risk of 200 in one million for nearby, existing sensitive receptors, which would significantly exceed the BAAQMD's numeric threshold of 10 in one million. As such, we recommend the preparation of an HRA, as our September 16<sup>th</sup> comment letter indicated that the Project has the potential to be a significant source of TACs.

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<sup>9</sup> "Air Quality Land Use Handbook: A Community Health Perspective." CARB, April 2005, *available at*: <https://ww3.arb.ca.gov/ch/handbook.pdf>, p. 4, Table 1-1.

### 3) Screening-Level Analysis Demonstrates Significant Impacts

As previously stated, SWAPE's September 16<sup>th</sup> screening-level HRA indicated an estimated lifetime cancer risk of 200 in one million for nearby, existing sensitive receptors, which would exceed the BAAQMD's numeric threshold of 10 in one million, demonstrating that the proposed Project would result in a potentially significant adverse health risk impact. Regarding SWAPE's screening-level analysis, the RTC states:

"In order to prepare a screening-level HRA SWAPE prepared a CalEEMod run that differed significantly from the CalEEMod run prepared for the proposed project. As discussed in Response to Comments 2-2 through 2-9 the emissions estimation prepared for the proposed project required only minor revisions, which resulted in small changes to the estimated emissions levels. The changes implemented by SWAPE, such as the use of default construction phase lengths and grading areas, as well as changes to the energy intensity factor and project design characteristics are not justified and have likely been implemented to artificially increase project-related emissions. For instance, the land uses applied by SWAPE in CalEEMod include an "enclosed parking structure," two separate "city park" land uses, and single-family housing. The total acreage of these land uses adds up to 1.40 acres, despite the fact that the project site is only 1.2 acres, and only 0.7 acres would be disturbed with implementation of the project. Increasing the acreage of the site would likely increase emissions from construction and operation of the project" (RTC p. 49).

As you can see in the excerpt above, the RTC claims that the changes implemented by SWAPE were unjustified and SWAPE's model incorrectly assumed that the Project site would be 1.40 acres. However, these justifications for the RTC's failure to address the Project's potentially significant adverse health risk impacts indicated by SWAPE's screening-level HRA are insufficient for three reasons. First, the RTC's argument that SWAPE's overestimation of the Project's lot acreage resulted in overestimated emissions, is incorrect. Rather, as emissions in CalEEMod are calculated and dispersed across the total area (acreage) of the Project site, overestimating the site acreage would result in *decreased* emissions. As such, this claim by the RTC demonstrates that emissions, and thus potentially significant adverse health risk impacts, may be higher than indicated in SWAPE's CalEEMod model. Second, as discussed above, we reiterate the applicability of our September 16<sup>th</sup> comments on the IS/MND's CalEEMod model. As such, the RTC's claim that the changes implemented by SWAPE were unjustified is incorrect. Third, we prepared an updated screening-level HRA (attached hereto) relying upon emission estimates from the Errata (Table 3 & 4), which still demonstrates a potentially significant adverse health risk impact. Thus, regardless of the use of SWAPE's updated model or the RTC's model, Project emissions and health risk impacts are potentially significant.

The RTC goes on to state:

"DPM is the solid material in diesel exhaust, because more than 90% of such material is less than one micrometer in diameter, DPM is a subset of the PM2.5 category of pollutants.<sup>10</sup> Despite DPM being a subset of PM2.5, SWAPE has used PM10 as a proxy to estimate emissions of DPM. PM10 includes larger size classes of particles, those particles equal or less than 10

micrometer in diameter, as well as the smaller classes included in PM2.5. By assuming all PM10 emissions represent DPM, SWAPE has inflated the amount of DPM emissions occurring due to the project. For instance, according to SWAPE's own conclusion modeling, maximum annual exhaust emissions of PM10 would be 0.0764 tons per year (tons/yr) while maximum annual emissions of PM2.5 would be 0.0729 tons/yr. Given the sensitive nature of DPM emissions and dispersion analyses, even a slight discrepancy in the total emissions can lead to large changes in health risks. Without further justification for the use of PM10 rather than the more accurate PM2.5, the veracity of SWAPE's conclusions regarding project-related health risks is further diminished.

Despite review of SWAPE's CalEEMod outputs, the method by which SWAPE arrives at an estimate of 153 pounds of DPM emitted over the construction period is unclear. Without the ability to replicate SWAPE's assumptions regarding DPM emissions, the accuracy of the emissions calculations used by SWAPE in the HRA, and the resulting estimation of health risks, cannot be verified" (RTC p. 50).

As you can see in the excerpt above, the RTC claims that SWAPE assumed that "all PM10 emissions represent DPM" is incorrect. As described in our September 16<sup>th</sup> comment letter, SWAPE relied upon the exhaust PM<sub>10</sub> emissions, rather than all PM<sub>10</sub> emissions, as claimed by the RTC, to represent DPM. Furthermore, the RTC states that we should have instead utilized PM<sub>2.5</sub> emissions to represent DPM instead. However, the RTC fails to provide any sources or substantial evidence to support the recommendation of PM<sub>2.5</sub> emissions; thus we cannot verify this alternative methodology. Furthermore, we prepared an updated screening-level HRA (attached hereto) relying upon exhaust PM<sub>2.5</sub> estimates from the CalEEMod output files available in the Errata, which still demonstrates a potentially significant adverse health risk impact. Thus, regardless of the use of exhaust PM<sub>2.5</sub> or exhaust PM<sub>10</sub> estimates, Project emissions and health risk impacts are potentially significant.

Finally, the RTC states:

"As discussed in Response to Comment 2-10, and on page 28 of the IS/MND, the project would not involve operational sources of DPM. Because SWAPE has not identified any operational sources of DPM, interpretation of the CalEEMod estimated emissions of PM10 lacks justification. PM10 is any particulate matter that is less than 10 micrometers in diameter; thus, PM10 includes a wide variety of potential particles including compounds that are directly emitted or those that form through chemical reactions in the atmosphere. With no clear course of DPM related to the project, assuming that the estimate of PM10 emissions generated by CalEEMod represents DPM lacks support. Despite the lack of specifically identified operational sources of DPM, SWAPE states that "A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles...was used to simulate instantaneous plum dispersion upon release." Residential uses do not involve the use of operational equipment with exhaust stacks that release DPM or heavy-duty vehicles. SWAPE does not provide support for why this highly unusual use of equipment with exhaust stacks or heavy-duty vehicles would occur during project operations, thus rendering the commenter's

assumption that operational emissions of DPM would occur unsupported. Such inputs are better suited to the analysis of a construction project, and the use of unsupported modeling parameters would return erroneous estimates of emissions dispersion and resulting concentrations” (RTC p. 50-51).

As you can see in the excerpt above, the RTC claims that “SWAPE has not identified any operational sources of DPM.” However, this claim fails to recognize both SWAPE and the RTC’s identification of operational DPM sources for the proposed Project. Specifically, as acknowledged previously, SWAPE’s screening-level analysis demonstrates a combined construction and operational increased cancer risk of 200 in one million. Without conducting a Project-specific HRA, SWAPE’s HRA is the only *quantified* analysis regarding cancer-related health risk impacts for the proposed Project and thus, demonstrates that there are potentially significant adverse impacts. While the RTC goes on to state that “[r]esidential uses do not involve the use of operational equipment with exhaust stacks that release DPM or heavy-duty vehicles,” this directly contradicts the RTC’s previous claim that the Project would generate approximately 76 daily vehicle trips. More so, the IS/MND, Errata and RTC’s CalEEMod models demonstrate that the fleet mix associated with these daily vehicle trips would include heavy-duty trucks, which produce DPM emissions. As such, the RTC’s claim that the Project would not produce significant health risk impacts is unsubstantiated.

Finally, according to CEQA Guidelines § 15064.4(b), if there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, a full CEQA analysis must be prepared for the project. As SWAPE’s September 16<sup>th</sup> screening-level HRA (which is the only quantified HRA that has been conducted for the proposed Project) demonstrates potentially significant adverse impacts, a full CEQA analysis – in the form of an EIR - should be prepared for the Project to include a quantified analysis of the Project’s anticipated health risk impacts, and mitigation should be implemented where necessary, per CEQA Guidelines.

### Updated Screening-Level Analysis Demonstrates Significant Impacts

To evaluate the potential health risk impacts posed by Project construction and operation to nearby existing sensitive receptors, SWAPE prepared an updated screening-level HRA utilizing exhaust PM<sub>2.5</sub> estimates available in the Errata’s CalEEMod output files. The results of our assessment as described below, demonstrate that the proposed Project would result in a potentially significant adverse health risk impact not previously identified or addressed by the IS/MND.

As previously stated in our September 16<sup>th</sup> comment letter, in order to conduct our screening-level risk assessment we relied upon AERSCREEN, which is a screening level air quality dispersion model.<sup>10</sup> The model replaced SCREEN3, and AERSCREEN is included in the OEHHA<sup>11</sup> and the California Air Pollution

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<sup>10</sup> U.S. EPA (April 2011) AERSCREEN Released as the EPA Recommended Screening Model, [http://www.epa.gov/ttn/scram/guidance/clarification/20110411\\_AERSCREEN\\_Release\\_Memo.pdf](http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf)

<sup>11</sup> OEHHA (February 2015) Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments, <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>.

Control Officers Associated (“CAPCOA”)<sup>12</sup> guidance as the appropriate air dispersion model for Level 2 health risk screening assessments (“HRSA”). A Level 2 HRSA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.

Based on the annual PM<sub>2.5</sub> exhaust estimates from the Errata’s CalEEMod output files, we prepared a preliminary HRA of the Project’s construction and operational health risk impacts to residential sensitive receptors. Consistent with recommendations set forth by OEHHA, we assumed residential exposure begins during the third trimester stage of life. The Agenda’s CalEEMod model indicates that construction activities will generate approximately 158 pounds of DPM over the 525-day construction period. The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project construction, we calculated an average DPM emission rate by the following equation:

$$Emission\ Rate\ \left(\frac{grams}{second}\right) = \frac{157.6\ lbs}{525\ days} \times \frac{453.6\ grams}{lbs} \times \frac{1\ day}{24\ hours} \times \frac{1\ hour}{3,600\ seconds} = 0.001576\ g/s$$

Using this equation, we estimated a construction emission rate of 0.001576 grams per second (“g/s”). Subtracting the 525-day construction period from the total residential duration of 30 years, we assumed that after Project construction, the sensitive receptor would be exposed to the Project’s operational DPM for an additional 28.56 years, approximately. The Project’s operational CalEEMod emissions, calculated by subtracting the existing emissions from the proposed Project, indicate that operational activities will generate approximately 10 pounds of DPM per year throughout operation. Applying the same equation used to estimate the construction DPM rate, we estimated the following emission rate for Project operation:

$$Emission\ Rate\ \left(\frac{grams}{second}\right) = \frac{10.24\ lbs}{365\ days} \times \frac{453.6\ grams}{lbs} \times \frac{1\ day}{24\ hours} \times \frac{1\ hour}{3,600\ seconds} = 0.000147\ g/s$$

Using this equation, we estimated an operational emission rate of 0.000147 g/s. Construction and operational activity was simulated as a 1.2-acre rectangular area source in AERSCREEN with dimensions of 81 by 60 meters. A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project site. EPA guidance suggests that in screening procedures, the annualized average

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<sup>12</sup> CAPCOA (July 2009) Health Risk Assessments for Proposed Land Use Projects, [http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA\\_HRA\\_LU\\_Guidelines\\_8-6-09.pdf](http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf).

concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10%.<sup>13</sup> While the closest residential sensitive receptor is located less than 5 meters away, the MEIR is located approximately 50 meters from the Project site, according to the AERSCREEN output files. The single-hour concentration estimated by AERSCREEN for Project construction is approximately 7.628  $\mu\text{g}/\text{m}^3$  DPM at approximately 50 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.7628  $\mu\text{g}/\text{m}^3$  for Project construction at the MEIR. For Project operation, the single-hour concentration estimated by AERSCREEN is 0.7129  $\mu\text{g}/\text{m}^3$  DPM at approximately 50 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.7129  $\mu\text{g}/\text{m}^3$  for Project operation at the MEIR.

We calculated the excess cancer risk to the MEIR using applicable HRA methodologies prescribed by OEHHA. In our updated CalEEMod model (attached hereto), we utilized the construction schedule included in the Errata's CalEEMod model. Consistent with this schedule, the annualized average concentration for construction was used for the entire third trimester of pregnancy (0.25 years) and the first 1.19 years of the infantile stage of life (0 – 2 years). The annualized averaged concentration for operation was used for the remainder of the 30-year exposure period, which makes up the remainder of the infantile stage of life, and the entire child and adult stages of life (2 – 16 years) and (16 – 30 years), respectively.

Consistent with OEHHA, as recommended by SCAQMD, BAAQMD, and SJVAPCD guidance, we used Age Sensitivity Factors ("ASFs") to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution.<sup>14, 15, 16, 17</sup> According to this guidance, the quantified cancer risk should be multiplied by a factor of ten during the third trimester of pregnancy and during the first two years of life (infant) as well as multiplied by a factor of three during the child stage of life (2 – 16 years). Furthermore, in accordance with the guidance set forth by OEHHA, we used the 95<sup>th</sup> percentile

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<sup>13</sup> "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised." EPA, 1992, available at: [http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019\\_OCR.pdf](http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf); see also "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf> p. 4-36.

<sup>14</sup> "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>.

<sup>15</sup> "Draft Environmental Impact Report (DEIR) for the Proposed The Exchange (SCH No. 2018071058)." SCAQMD, March 2019, available at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2019/march/RVC190115-03.pdf?sfvrsn=8>, p. 4.

<sup>16</sup> "California Environmental Quality Act Air Quality Guidelines." BAAQMD, May 2017, available at: [http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en), p. 56; see also "Recommended Methods for Screening and Modeling Local Risks and Hazards." BAAQMD, May 2011, available at: <http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx>, p. 65, 86.

<sup>17</sup> "Update to District's Risk Management Policy to Address OEHHA's Revised Risk Assessment Guidance Document." SJVAPCD, May 2015, available at: <https://www.valleyair.org/busind/pto/staff-report-5-28-15.pdf>, p. 8, 20, 24.



breathing rates for infants.<sup>18</sup> Finally, according to BAAQMD guidance, we used a Fraction of Time At Home (“FAH”) value of 0.85 for the 3<sup>rd</sup> trimester and infant receptors, 0.72 for child receptors, and 0.73 for the adult receptors.<sup>19</sup> We used a cancer potency factor of 1.1 (mg/kg-day)<sup>-1</sup> and an averaging time of 25,550 days. The results of our calculations are shown below.

**The Maximally Exposed Individual at an Existing Residential Receptor**

Activity	Duration (years)	Concentration (ug/m3)	Breathing Rate (L/kg-day)	Cancer Risk without ASFs*	ASF	Cancer Risk with ASFs*
Construction	0.25	0.7628	361	8.8E-07	10	8.8E-06
<b>3rd Trimester Duration</b>	<b>0.25</b>			<b>8.8E-07</b>	<b>3rd Trimester Exposure</b>	<b>8.8E-06</b>
Construction	1.19	0.7628	1090	1.3E-05	10	1.3E-04
Operation	0.81	0.07129	1090	8.1E-07	10	8.1E-06
<b>Infant Exposure Duration</b>	<b>2.00</b>			<b>1.3E-05</b>	<b>Infant Exposure</b>	<b>1.3E-04</b>
Operation	14.00	0.07129	572	6.2E-06	3	1.9E-05
<b>Child Exposure Duration</b>	<b>14.00</b>			<b>6.2E-06</b>	<b>Child Exposure</b>	<b>1.9E-05</b>
Operation	14.00	0.07129	261	2.9E-06	1	2.9E-06
<b>Adult Exposure Duration</b>	<b>14.00</b>			<b>2.9E-06</b>	<b>Adult Exposure</b>	<b>2.9E-06</b>
<b>Lifetime Exposure Duration</b>	<b>30.00</b>			<b>2.3E-05</b>	<b>Lifetime Exposure</b>	<b>1.6E-04</b>

\* We, along with CARB and SCAQMD, recommend using the more updated and health protective 2015 OEHHA guidance, which includes ASFs.

As demonstrated in the table above, the excess cancer risk to adults, children, infants, and during the 3<sup>rd</sup> trimester of pregnancy at the MEIR located roughly 50 meters away, utilizing age sensitivity factors, over the course of Project construction and operation, are approximately 2.9, 19, 130, and 8.8 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), utilizing age sensitivity factors, is approximately 160 in one million. **The infant, child, and lifetime cancer risks all exceed the BAAQMD threshold of 10 in one million, thus resulting in a potentially significant adverse health risk impact not previously addressed or identified by the IS/MND, Errata, or RTC.** Results without age sensitivity factors are presented in the table above, although we **do not** recommend

<sup>18</sup> “Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics ‘Hot Spots’ Information and Assessment Act,” June 5, 2015, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588-risk-assessment-guidelines.pdf?sfvrsn=6>, p. 19.

“Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>

<sup>19</sup> “Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines.” BAAQMD, January 2016, available at: [http://www.baaqmd.gov/~media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines\\_clean\\_jan\\_2016-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016-pdf.pdf?la=en)

utilizing these values for health risk analysis. Regardless, the excess cancer risk posed to adults, children, infants, and during the third trimester of pregnancy at the MEIR, located approximately 50 meters away, over the course of Project construction and operation, without age sensitivity factors, are approximately 2.9, 6.2, 13, and 0.88 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years) at the MEIR, without age sensitivity factors, is approximately 23 in one million. **The infant and lifetime construction and operational cancer risks, without using age sensitivity factors, all exceed the BAAQMD threshold of 10 in one million, thus resulting in a potentially significant adverse health risk impact not previously addressed or identified by the IS/MND, Errata or RTC.** While we recommend the use of age sensitivity factors, these health risk impacts exceed the BAAQMD threshold regardless.

An agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. Our analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection. The purpose of the screening-level construction and operational HRA shown above is to demonstrate the link between the proposed Project's emissions and the potential health risk. As previously stated in our September 16<sup>th</sup> comment letter, **our screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant adverse health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used.** Therefore, since our screening-level construction HRA indicates a potentially significant adverse impact, an EIR should include a reasonable effort to connect the Project's air quality emissions and the potential health risks posed to nearby receptors. Thus, an EIR should include a quantified air pollution model as well as an updated, quantified refined health risk assessment which adequately and accurately evaluates health risk impacts associated with both Project construction and operation.

## Greenhouse Gas

### Failure to Adequately Evaluate Greenhouse Gas Impacts

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND estimated that the Project would result in net annual construction-related greenhouse gas ("GHG") emissions of 381.27 metric tons of CO<sub>2</sub> equivalents per year ("MT CO<sub>2</sub>e/year") and net annual operational GHG emissions of 94.58 MT CO<sub>2</sub>e/year. As a result, the IS/MND concluded that the Project's GHG emissions would not exceed the BAAQMD bright-line threshold of 1,100 MT CO<sub>2</sub>e/year. Review of the Errata and RTC demonstrates that the proposed Project still fails to adequately evaluate the Project's anticipated GHG impacts. As discussed below, we maintain that the IS/MND, Errata and RTC's GHG analyses, as well as the subsequent less-than-significant impact conclusion, are incorrect for the following two reasons:

- (1) The IS/MND, Errata and RTC's GHG analyses rely upon an incorrect and unsubstantiated air model; and
- (2) The IS/MND, Errata and RTC's GHG analyses rely upon an outdated threshold.

#### *(1) Incorrect and Unsubstantiated Quantitative GHG Analysis*

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND's quantitative GHG analysis relied upon an incorrect and unsubstantiated air model. Regarding our September 16<sup>th</sup> comment, the RTC states:

“As discussed in Response to Comments 2-6 and 2-9, an updated CalEEMod emissions estimation has been prepared to remove the transit-related mitigation and correct an error related to the number of haul trucks required during project construction. As such, page 51 and 52 of the IS/MND are hereby revised as follows:

Construction of the proposed project was anticipated to occur over approximately 16 months with total emissions of ~~381.27~~381.34 MTCO<sub>2</sub>e/yr. Operational emissions were determined to equal ~~94.58~~89.86 MTCO<sub>2</sub>e/yr. Consequently, even if project operational and construction emissions were considered together, the total GHG emissions of ~~475.85~~471.20 MTCO<sub>2</sub>e/yr would be well below BAAQMD's threshold of 1,100 MTCO<sub>2</sub>e/yr. Therefore, neither construction nor operation of the proposed project would be anticipated to result in significant emissions of GHGs.

As shown in the above revisions, the changes to the emissions modeling made in response to the comments results in only minor changes to the estimate of emissions presented in the IS/MND” (RTC p. 51).

However, this response is insufficient, because the IS/MND, Errata and RTC continue to utilize and incorrect and unsubstantiated air model to estimate the Project’s GHG emissions. While the Errata includes an updated CalEEMod model, as referenced above, the model continues to include incorrect and unsubstantiated input parameters, as discussed in the “Unsubstantiated Input Parameters Used to Estimate Project Emissions” section of this letter. As a result, we find the Errata and RTC to be inadequate and maintain that the IS/MND, Errata and RTC’s GHG analyses are incorrect and unsubstantiated. Thus, we maintain our September 16th comment, and still conclude that a Project-specific EIR should be prepared, using correct, project-specific modeling to adequately assess and mitigate the Project’s GHG impact.

### *(2) Use of an Incorrect Threshold*

As discussed in our September 16<sup>th</sup> comment letter, the IS/MND’s quantitative GHG analyses relied upon an outdated threshold. Regarding the use of an outdated threshold, the RTC states:

“As stated on page 51 of the IS/MND, the analysis presented in the IS/MND relies on BAAQMD's adopted thresholds of significance at the time that the environmental analysis of the project was prepared. In the absence of any other adopted thresholds or any formally adopted guidance from BAAQMD for the analysis of GHG emission beyond the year 2020, BAAQMD's adopted thresholds of significance for project-level operational GHG emissions of 1,100 MTCO<sub>2</sub>e/yr or 4.6 MTCO<sub>2</sub>e/yr per service population were deemed appropriate for use in the IS/MND. In fact, on February 25, 2020, BAAQMD re-posted their CEQA thresholds of significance, and continued to include the foregoing GHG emissions thresholds. Although BAAQMD has reissued their adopted GHG thresholds, BAAQMD has not yet published guidance stating that such thresholds are outdated or inapplicable. In the absence of published guidance regarding the use of alternative thresholds of significance, BAAQMD’s thresholds remain applicable.

Despite the recent promulgation of BAAQMD's GHG thresholds of significance, in response to the comment, project-related GHG emissions may be considered in light of the commenter's suggested thresholds. Prior to comparison of project emissions to the commenter's suggested thresholds, it should be noted that the commenter does not provide any methodology used to calculate their suggested threshold of 660 MT/CO<sub>2</sub>e/yr, nor does the commenter site any communication or guidance from BAAQMD suggesting that BAAQMD has endorsed these thresholds. Considering the lack of methodology or BAAQMD support for the suggested threshold, consideration of the commenter's suggested threshold is provided for informational purposes only" (RTC p. 52-53).

However, this justification is insufficient for three reasons.

First, as acknowledged by the RTC, the BAAQMD's bright line and screening thresholds of 1,100 MT CO<sub>2</sub>e/year and 4.6 MT CO<sub>2</sub>e/SP/year were developed for the year 2020, based on AB 32, and thus, only apply to projects that will be operational by 2020.<sup>20</sup> Considering that the proposed Project has yet to be approved, and it is November of 2020, these thresholds are outdated and do not apply to the proposed Project.

Second, according to the Association for Environmental Professionals ("AEP") *Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*,

"Once the state has a full plan for 2030 (which is expected in 2017), and then a project with a horizon between 2021 and 2030 should be evaluated based on a threshold using the 2030 target."<sup>21</sup>

As demonstrated above, the proposed Project, which has a horizon between 2021 and 2030, should have been evaluated based on a threshold using the 2030 target, despite the fact that the BAAQMD has not explicitly stated that these thresholds are outdated and inapplicable. Rather, to conduct the most conservative analysis and evaluate the Project's consistency with the state's 2030 GHG reduction target, the IS/MND and Errata should have utilized the 2030 "Substantial Progress" thresholds of 660 MT CO<sub>2</sub>e and of 2.6 MT CO<sub>2</sub>e/SP/year to evaluate the Project's emissions.

Third, the RTC's claim that SWAPE failed to "provide any methodology used to calculate" the "substantial progress" threshold of 660 MT CO<sub>2</sub>e is incorrect. Rather, our September 16<sup>th</sup> comment letter provided *five* sources, indicating that numerous other projects within the BAAQMD have utilized this threshold. Furthermore, each of these sources relied upon the above-referenced AEP *Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*, which discloses the assumptions, calculations, and methodology underlying these

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<sup>20</sup> "California Environmental Quality Act Air Quality Guidelines." BAAQMD, May 2017, available at: [http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en), p. D-20 – D-22.

<sup>21</sup> "Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California." Association of Environmental Professionals (AEP), October 2016, available at: [https://califaep.org/docs/AEP-2016\\_Final\\_White\\_Paper.pdf](https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf), p. 40.

thresholds. As such, the RTC's claim is incorrect, as we did provide adequate sources and substantiation for these thresholds. As such, we reiterate the applicability of the updated "substantial progress" thresholds and recommend that the Project not be approved until an EIR is prepared to adequately compare the Project's emissions to the proper threshold based on the most recent guidance available.

Disclaimer: SWAPE has received limited discovery regarding this project. 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,

A handwritten signature in blue ink that reads "Matt Hagemann".

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

A handwritten signature in blue ink that reads "Paul Rosenfeld".

Paul E. Rosenfeld, Ph.D.

Start date and time 11/20/20 10:58:08

AERSCREEN 16216

Vista Mar Construction

Vista Mar Construction

----- DATA ENTRY VALIDATION -----

METRIC

ENGLISH

\*\* AREADATA \*\*

Emission Rate:	0.158E-02 g/s	0.125E-01 lb/hr
Area Height:	3.00 meters	9.84 feet
Area Source Length:	81.00 meters	265.75 feet
Area Source Width:	60.00 meters	196.85 feet
Vertical Dimension:	1.50 meters	4.92 feet
Model Mode:	URBAN	
Population:	38759	
Dist to Ambient Air:	1.0 meters	3. feet

\*\* BUILDING DATA \*\*

No Building Downwash Parameters

\*\* TERRAIN DATA \*\*

No Terrain Elevations

Source Base Elevation: 0.0 meters 0.0 feet

Probe distance: 5000. meters 16404. feet

No flagpole receptors

No discrete receptors used

\*\* FUMIGATION DATA \*\*

No fumigation requested

\*\* METEOROLOGY DATA \*\*

Min/Max Temperature: 250.0 / 310.0 K -9.7 / 98.3 Deg F

Minimum Wind Speed: 0.5 m/s

Anemometer Height: 10.000 meters

Dominant Surface Profile: Urban

Dominant Climate Type: Average Moisture

Surface friction velocity (u\*): not adjusted

DEBUG OPTION ON

AERSCREEN output file:

2020.11.20\_VistaMar\_RTC\_Construction.out

\*\*\* AERSCREEN Run is Ready to Begin

No terrain used, AERMAP will not be run

\*\*\*\*\*

SURFACE CHARACTERISTICS & MAKEMET

Obtaining surface characteristics...



Using AERMET seasonal surface characteristics for Urban with Average Moisture

Season	Albedo	Bo	zo
Winter	0.35	1.50	1.000
Spring	0.14	1.00	1.000
Summer	0.16	2.00	1.000
Autumn	0.18	2.00	1.000

Creating met files aerscreen\_01\_01.sfc & aerscreen\_01\_01.pfl

Creating met files aerscreen\_02\_01.sfc & aerscreen\_02\_01.pfl

Creating met files aerscreen\_03\_01.sfc & aerscreen\_03\_01.pfl

Creating met files aerscreen\_04\_01.sfc & aerscreen\_04\_01.pfl

Buildings and/or terrain present or rectangular area source, skipping probe

FLOWSECTOR started 11/20/20 10:58:54

\*\*\*\*\*

Running AERMOD

Processing Winter

Processing surface roughness sector 1

\*\*\*\*\*

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 5

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 10

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 15

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 20

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 25

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 30

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 8

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 35

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 9

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 40

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Running AERMOD

Processing Spring

Processing surface roughness sector 1

\*\*\*\*\*

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 5

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 10

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 15

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 20

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 25

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 30

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 8

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 35

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 9

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 40

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Running AERMOD

Processing Summer

Processing surface roughness sector 1

\*\*\*\*\*

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 5

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 3



AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 10

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 15

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 20

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 25

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***** WARNING MESSAGES *****  
*** NONE ***
```

\*\*\*\*\*

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 30

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***** WARNING MESSAGES *****  
*** NONE ***
```

\*\*\*\*\*

Processing wind flow sector 8

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 35

```
***** WARNING MESSAGES *****  
*** NONE ***
```

\*\*\*\*\*

Processing wind flow sector 9

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 40

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Running AERMOD

Processing Autumn

Processing surface roughness sector 1

\*\*\*\*\*

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 5

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 10

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 15

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 20

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 25

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 30

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 8

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 35

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 9

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 40

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

FLOWSECTOR ended 11/20/20 10:59:06

REFINE started 11/20/20 10:59:06

AERMOD Finishes Successfully for REFINE stage 3 Winter sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

REFINE ended 11/20/20 10:59:07

\*\*\*\*\*

AERSCREEN Finished Successfully

With no errors or warnings

Check log file for details

\*\*\*\*\*

Ending date and time 11/20/20 10:59:09

Concentration		Distance		Elevation	Diag	Season/Month		Zo sector		Date			
H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O	LEN	Z0	BOWEN	ALBEDO	REF	WS	HT
REF	TA	HT											
	0.52116E+01		1.00	0.00	25.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.67397E+01		25.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
*	0.76487E+01		48.00	0.00	35.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.76280E+01		50.00	0.00	35.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.42712E+01		75.00	0.00	35.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.28800E+01		100.00	0.00	25.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.21774E+01		125.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.17246E+01		150.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.14116E+01		175.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.11853E+01		200.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.10142E+01		225.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.88217E+00		250.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.77689E+00		275.00	0.00	5.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.69181E+00		300.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.62146E+00		325.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.56256E+00		350.00	0.00	0.0			Winter		0-360		10011001	
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	

310.0	2.0											
	0.51278E+00	375.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.47006E+00	400.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.43313E+00	425.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.40113E+00	450.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.37286E+00	475.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.34790E+00	500.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.32553E+00	525.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.30560E+00	550.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.28775E+00	575.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.27156E+00	600.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.25693E+00	625.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.24362E+00	650.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.23150E+00	675.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.22037E+00	700.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.21011E+00	725.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.20063E+00	750.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0
310.0	2.0											
	0.19184E+00	775.00	0.00	0.0		Winter	0-360	10011001				





0.10653E+00	1200.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.10356E+00	1225.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.10073E+00	1250.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.98028E-01	1275.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.95452E-01	1300.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.92990E-01	1325.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.90636E-01	1350.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.88383E-01	1375.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.86226E-01	1400.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.84158E-01	1425.00	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.82175E-01	1450.00	0.00	20.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.80270E-01	1475.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.78442E-01	1500.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.76684E-01	1525.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.74994E-01	1550.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.73367E-01	1574.99	0.00	25.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		
310.0 2.0						
0.71800E-01	1600.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.	6.0 1.000 1.50	0.35	0.50	10.0		

310.0	2.0											
	0.70290E-01	1625.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.68834E-01	1650.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.67430E-01	1675.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.66075E-01	1700.00	0.00	15.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.64766E-01	1725.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.63501E-01	1750.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.62279E-01	1775.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.61097E-01	1800.00	0.00	25.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.59953E-01	1824.99	0.00	15.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.58845E-01	1850.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.57773E-01	1875.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.56734E-01	1900.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.55727E-01	1924.99	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.54750E-01	1950.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.53803E-01	1975.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.52884E-01	2000.00	0.00	35.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.51992E-01	2025.00	0.00	5.0		Winter	0-360	10011001				



0.40052E-01	2449.99	0.00	25.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.39499E-01	2475.00	0.00	5.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.38959E-01	2500.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.38432E-01	2525.00	0.00	5.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.37917E-01	2550.00	0.00	25.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.37414E-01	2575.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.36922E-01	2600.00	0.00	20.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.36442E-01	2625.00	0.00	20.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.35972E-01	2650.00	0.00	15.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.35513E-01	2675.00	0.00	25.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.35063E-01	2700.00	0.00	20.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.34624E-01	2725.00	0.00	10.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.34194E-01	2750.00	0.00	20.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.33773E-01	2775.00	0.00	10.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.33361E-01	2800.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.32957E-01	2825.00	0.00	5.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.32562E-01	2850.00	0.00	35.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0

310.0	2.0											
	0.32175E-01	2875.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.31796E-01	2900.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.31425E-01	2925.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.31061E-01	2950.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.30704E-01	2975.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.30355E-01	3000.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.30012E-01	3025.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.29676E-01	3050.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.29346E-01	3074.99	0.00	20.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.29023E-01	3100.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.28705E-01	3125.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.28394E-01	3150.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.28089E-01	3174.99	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.27789E-01	3200.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.27494E-01	3225.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.27205E-01	3250.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.26921E-01	3275.00	0.00	20.0		Winter	0-360	10011001				



0.22782E-01	3700.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.22573E-01	3725.00	0.00	15.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.22368E-01	3750.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.22165E-01	3775.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.21966E-01	3800.00	0.00	20.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.21770E-01	3825.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.21577E-01	3849.99	0.00	15.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.21386E-01	3875.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.21199E-01	3900.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.21015E-01	3925.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.20833E-01	3950.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.20654E-01	3975.00	0.00	5.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.20477E-01	4000.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.20304E-01	4025.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.20132E-01	4050.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.19964E-01	4075.00	0.00	5.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.19797E-01	4100.00	0.00	35.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0



310.0	2.0											
	0.19633E-01	4125.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.19472E-01	4150.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.19312E-01	4175.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.19155E-01	4200.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.19001E-01	4225.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.18848E-01	4250.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.18697E-01	4275.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.18549E-01	4300.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.18402E-01	4325.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.18258E-01	4350.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.18115E-01	4375.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17974E-01	4400.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17836E-01	4425.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17699E-01	4450.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17564E-01	4475.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17430E-01	4500.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17299E-01	4525.00	0.00	0.0		Winter	0-360	10011001				



0.15300E-01	4950.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.15195E-01	4975.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.15091E-01	5000.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					

Start date and time 11/20/20 10:59:22

AERSCREEN 16216

Vista Mar Operation

Vista Mar Operation

----- DATA ENTRY VALIDATION -----

METRIC

ENGLISH

\*\* AREADATA \*\*

Emission Rate:	0.147E-03 g/s	0.117E-02 lb/hr
Area Height:	3.00 meters	9.84 feet
Area Source Length:	81.00 meters	265.75 feet
Area Source Width:	60.00 meters	196.85 feet
Vertical Dimension:	1.50 meters	4.92 feet
Model Mode:	URBAN	
Population:	38759	
Dist to Ambient Air:	1.0 meters	3. feet

\*\* BUILDING DATA \*\*

No Building Downwash Parameters

\*\* TERRAIN DATA \*\*

No Terrain Elevations

Source Base Elevation: 0.0 meters 0.0 feet

Probe distance: 5000. meters 16404. feet

No flagpole receptors

No discrete receptors used

\*\* FUMIGATION DATA \*\*

No fumigation requested

\*\* METEOROLOGY DATA \*\*

Min/Max Temperature: 250.0 / 310.0 K -9.7 / 98.3 Deg F

Minimum Wind Speed: 0.5 m/s

Anemometer Height: 10.000 meters

Dominant Surface Profile: Urban

Dominant Climate Type: Average Moisture

Surface friction velocity (u\*): not adjusted

DEBUG OPTION ON

AERSCREEN output file:

2020.11.20\_VistaMar\_RTC\_Operation.out

\*\*\* AERSCREEN Run is Ready to Begin

No terrain used, AERMAP will not be run

\*\*\*\*\*

SURFACE CHARACTERISTICS & MAKEMET

Obtaining surface characteristics...

Using AERMET seasonal surface characteristics for Urban with Average Moisture

Season	Albedo	Bo	zo
Winter	0.35	1.50	1.000
Spring	0.14	1.00	1.000
Summer	0.16	2.00	1.000
Autumn	0.18	2.00	1.000

Creating met files aerscreen\_01\_01.sfc & aerscreen\_01\_01.pfl

Creating met files aerscreen\_02\_01.sfc & aerscreen\_02\_01.pfl

Creating met files aerscreen\_03\_01.sfc & aerscreen\_03\_01.pfl

Creating met files aerscreen\_04\_01.sfc & aerscreen\_04\_01.pfl

Buildings and/or terrain present or rectangular area source, skipping probe

FLOWSECTOR started 11/20/20 11:00:08

\*\*\*\*\*

Running AERMOD

Processing Winter

Processing surface roughness sector 1

\*\*\*\*\*

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 5

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 10

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*



\*\*\*\*\*

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 15

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 20

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 25

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 30

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 8

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 35

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 9

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector 40

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Running AERMOD

Processing Spring

Processing surface roughness sector 1

\*\*\*\*\*

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 5

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 10

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 15

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 20

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 25

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 30

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 8

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 35

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 9

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector 40

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Running AERMOD

Processing Summer

Processing surface roughness sector 1

\*\*\*\*\*

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 5

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 10

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 15

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 20

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 25

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***** WARNING MESSAGES *****  
*** NONE ***
```

\*\*\*\*\*

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 30

```
***** WARNING MESSAGES *****  
*** NONE ***
```

\*\*\*\*\*

Processing wind flow sector 8

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 35

```
***** WARNING MESSAGES *****  
*** NONE ***
```

\*\*\*\*\*

Processing wind flow sector 9

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector 40



\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Running AERMOD

Processing Autumn

Processing surface roughness sector 1

\*\*\*\*\*

Processing wind flow sector 1

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 2

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 5

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 3

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 10

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 4

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 15

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 5

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 20

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 6

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 25

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 7

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 30

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 8

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 35

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\*

Processing wind flow sector 9

AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector 40

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

FLOWSECTOR ended 11/20/20 11:00:21

REFINE started 11/20/20 11:00:21

AERMOD Finishes Successfully for REFINE stage 3 Winter sector 0

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*

\*\*\* NONE \*\*\*

REFINE ended 11/20/20 11:00:22

\*\*\*\*\*

AERSCREEN Finished Successfully

With no errors or warnings

Check log file for details

\*\*\*\*\*

Ending date and time 11/20/20 11:00:24

Concentration		Distance		Elevation	Diag	Season/Month		Zo sector		Date			
H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O	LEN	Z0	BOWEN	ALBEDO	REF	WS	HT
REF	TA	HT											
	0.48709E+00		1.00	0.00	25.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.62991E+00		25.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
*	0.71487E+00		48.00	0.00	35.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.71293E+00		50.00	0.00	35.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.39919E+00		75.00	0.00	35.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.26918E+00		100.00	0.00	25.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.20351E+00		125.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.16119E+00		150.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.13193E+00		175.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.11078E+00		200.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.94791E-01		225.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.82450E-01		250.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.72610E-01		275.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.64658E-01		300.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.58084E-01		325.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0												
	0.52579E-01		350.00	0.00	0.0		Winter		0-360		10011001		
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50	10.0	

310.0	2.0										
	0.47925E-01	375.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.43933E-01	400.00	0.00	5.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.40481E-01	425.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.37491E-01	450.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.34849E-01	475.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.32516E-01	500.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.30425E-01	525.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.28562E-01	550.00	0.00	5.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.26894E-01	575.00	0.00	10.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.25380E-01	600.00	0.00	5.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.24013E-01	625.00	0.00	5.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.22769E-01	650.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.21636E-01	675.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.20596E-01	700.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.19638E-01	725.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.18752E-01	750.00	0.00	0.0		Winter	0-360	10011001			
-1.30	0.043	-9.000	0.020	-999.	21.		6.0	1.000	1.50	0.35	0.50 10.0
310.0	2.0										
	0.17930E-01	775.00	0.00	0.0		Winter	0-360	10011001			



0.99568E-02	1200.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.96790E-02	1225.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.94144E-02	1250.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.91620E-02	1275.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.89212E-02	1300.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.86911E-02	1325.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.84711E-02	1350.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.82605E-02	1375.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.80589E-02	1400.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.78656E-02	1425.00	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.76803E-02	1450.00	0.00	20.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.75023E-02	1475.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.73314E-02	1500.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.71671E-02	1525.00	0.00	10.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.70091E-02	1550.00	0.00	20.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.68571E-02	1574.99	0.00	25.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.67106E-02	1600.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0



310.0	2.0											
	0.65695E-02	1625.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.64334E-02	1650.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.63022E-02	1675.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.61755E-02	1700.00	0.00	15.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.60532E-02	1725.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.59350E-02	1750.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.58207E-02	1775.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.57103E-02	1800.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.56033E-02	1825.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.54999E-02	1850.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.53996E-02	1875.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.53025E-02	1900.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.52084E-02	1924.99	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.51171E-02	1950.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.50286E-02	1975.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.49427E-02	2000.00	0.00	35.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.48593E-02	2025.00	0.00	5.0		Winter	0-360	10011001				



0.37434E-02	2449.99	0.00	25.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.36917E-02	2475.00	0.00	5.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.36412E-02	2500.00	0.00	15.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.35920E-02	2525.00	0.00	0.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.35439E-02	2550.00	0.00	25.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.34968E-02	2575.00	0.00	5.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.34509E-02	2600.00	0.00	0.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.34060E-02	2625.00	0.00	5.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.33621E-02	2650.00	0.00	15.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.33191E-02	2675.00	0.00	0.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.32771E-02	2700.00	0.00	0.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.32360E-02	2725.00	0.00	20.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.31958E-02	2750.00	0.00	20.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.31565E-02	2775.00	0.00	0.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.31180E-02	2800.00	0.00	10.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.30803E-02	2824.99	0.00	35.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0
310.0	2.0						
0.30434E-02	2850.00	0.00	0.0	Winter	0-360	10011001	
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50	0.35 0.50 10.0

310.0	2.0											
	0.30072E-02	2875.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.29718E-02	2900.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.29371E-02	2925.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.29030E-02	2950.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.28697E-02	2975.00	0.00	40.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.28370E-02	3000.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.28050E-02	3025.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.27736E-02	3050.00	0.00	5.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.27428E-02	3075.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.27125E-02	3100.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.26829E-02	3125.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.26538E-02	3150.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.26252E-02	3174.99	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.25972E-02	3200.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.25697E-02	3225.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.25427E-02	3250.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.25162E-02	3275.00	0.00	20.0		Winter	0-360	10011001				



0.21293E-02	3700.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.21098E-02	3725.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.20905E-02	3750.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.20716E-02	3775.00	0.00	25.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.20530E-02	3800.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.20347E-02	3825.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.20166E-02	3849.99	0.00	15.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.19988E-02	3875.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.19813E-02	3900.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.19641E-02	3925.00	0.00	5.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.19471E-02	3950.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.19304E-02	3975.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.19139E-02	4000.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.18976E-02	4025.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.18816E-02	4050.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.18659E-02	4075.00	0.00	0.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0
310.0 2.0						
0.18503E-02	4100.00	0.00	25.0	Winter	0-360	10011001
-1.30 0.043 -9.000 0.020 -999. 21.				6.0 1.000 1.50	0.35	0.50 10.0

310.0	2.0											
	0.18350E-02	4125.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.18199E-02	4150.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.18050E-02	4175.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17903E-02	4200.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17758E-02	4225.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17616E-02	4250.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17475E-02	4275.00	0.00	15.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17336E-02	4300.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17199E-02	4325.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.17064E-02	4350.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16931E-02	4375.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16800E-02	4400.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16670E-02	4425.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16542E-02	4450.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16416E-02	4475.00	0.00	0.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16291E-02	4500.00	0.00	10.0		Winter	0-360	10011001				
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	
310.0	2.0											
	0.16168E-02	4525.00	0.00	0.0		Winter	0-360	10011001				





0.14300E-02	4950.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.14202E-02	4975.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					
0.14105E-02	5000.00	0.00	0.0	Winter	0-360	10011001
-1.30	0.043	-9.000	0.020	-999.	21.	6.0 1.000 1.50 0.35 0.50 10.0
310.0	2.0					

## Brooks, Elizabeth

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**From:** Coffey, Sarah  
**Sent:** Monday, November 30, 2020 8:58 AM  
**To:** Public Comment  
**Subject:** FW: Email from the City Web Site (11/23/2020 City Council Meeting Agenda Item No. 10)

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**From:** Josh Richman [REDACTED]  
**Sent:** Sunday, November 29, 2020 8:41 PM  
**To:** \_City Council Group <CityCouncil@ci.pacifica.ca.us>; Coffey, Sarah <coffeys@ci.pacifica.ca.us>  
**Subject:** Email from the City Web Site

**[CAUTION: External Email]**

Dear City Council Members,

In reference to trees near 24 Salada Ave in Sharp Park, please do not allow the owner or developers to cut them down. It is completely possible to build and avoid killing decades old trees. These trees can be seen in the historical images of when Pacifica was first being populated, they have lived for generations and if they are cut down we can never replace them. Please encourage and enforce building with nature. They are visible from my house and like most in Pacifica, we live here to be close to nature. Thank you and we trust you will do the right thing.

Respectfully,  
Josh

P.S.  
Neuroimaging study provides new details on the link between stress reduction and green urban landscapes  
<https://www.psypost.org/2020/11/neuroimaging-study-provides-new-details-on-the-link-between-stress-reduction-and-green-urban-landscapes-58662>

Joshua M. Richman  
UX Design Research & Strategy  
[REDACTED] | [joshrichman.com](http://joshrichman.com)

USER EXPERIENCE | HUMAN FACTORS | VISUALIZATION

**CAUTION: This email originated from outside of the City of Pacifica. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.**