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April 16, 2025

VIA EMAIL

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Re: Comment on Vista Santo Domingo Rezone and Plan Amendment (Project No. PRJ-1110197); Planning Commission Agenda Item 2

Dear Honorable Commissioners, Ms. Osborn, and Ms. Lowe:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the project known as Vista Santo Domingo including all actions referring or related to a proposed General Plan Amendment to change the land use designation of a vacant 5.58-acre project site from Residential-Medium to Light Industrial and a rezone to change the zone from RM-2-4 (Residential Medium) to IL-1-1 (Industrial-Light), located southeast of the current terminus of Vista Santo Domingo and Exposition Way and north and west of Innovative Drive, on Assessor Parcel Numbers 645-050-4400 in San Diego ("Project"), to be heard as agenda Item 2 at the Planning Commission's April 19, 2025 meeting.

SAFER objects to the City's reliance on an Addendum to the Otay Mesa Community Plan Program Environmental Impact Report Number 30330/304032 (SCH No.2004651076), certified by the San Diego City Council on March 11, 2014 ("PEIR"). Under the California Environmental Quality Act ("CEQA"), an addendum is not appropriate because the Project is not within the scope of the prior program EIR and there is new information available since certification of the 2014 EIR indicating new significant impacts and/or the availability of new mitigation measures. Because the Project would allow for uses such as industrial and commercial uses that were not previously allowed, the Project is outside the scope of the Otay Mesa Community Plan EIR. The Project contemplates a significant change in land use designation and rezoning, and thus additional information is needed to comply with CEQA. Therefore, SAFER requests that the Planning Commission refrain from taking any action on the Project at this time and, instead, direct staff to prepare an initial study for the Project, followed by a project-specific EIR or negative declaration as required by CEQA.

I. The Project Requires an EIR or Negative Declaration Because the Project Is Not Within the Scope of the Otay Mesa Community Plan Program EIR.

After a program EIR has been certified, "[l]ater activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared." (14 CCR § 15168(c).) Where a program EIR addresses anticipated activities within the program, policy or plan, an agency may determine the later project is "within the scope of the project covered by the program EIR." CEQA Guidelines ("Guidelines") section 15168(c)(2) provides "[i]f the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required." (14 CCR § 15168(c)(2).)

"Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record." (*Id*.) The examples of factors provided in section 15168(c)(2) emphasize that the terms of a program EIR are largely determinative of whether a subsequent project falls within its scope:

> Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

(14 CCR § 15168(c)(2).)

Where there is no evidence that a later project was contemplated at the time of the program EIR, the later project is not within the scope of the program EIR. (*Save Our Access*, *supra*, 92 Cal.App.5th at 859 [ordinance removing 30-foot height limit could not rely on program EIR that did not contemplate structures over 30 feet]; *Natural Resources Defense*

Council, Inc. v. City of Los Angeles (2002) 103 Cal.App.4th 268, 281-82 [project could not rely on program EIR that did not contemplate project as one of the series of action in the program]; *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1320-21 [mining project could not rely on program EIR that analyzed project site as agricultural].)

Where a later project is not "either the same as or within the scope of the project, program, or plan described in the program EIR," then the agency must "determine whether the later project might cause significant environmental effects that were not fully examined in the initial program EIR." (*Save Our Access*, *supra*, 92 Cal.App.5th at 845 [quoting *Sierra Club*, *supra*, 6 Cal.App.4th at 1321 and *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937, 960 (*San Mateo Gardens*)].) If the project may result in previously unstudied impacts, then an EIR is required for the project. (*Save Our Access*, *supra*, 92 Cal.App.5th at 859 [citing *San Mateo Gardens*, *supra*, 1 Cal.5th at 960].) The fair argument standard of review applies to this inquiry, under which "deference to the agency's determination is not appropriate and its decision not to require an EIR can be upheld only when there is no credible evidence to the contrary." (*Sierra Club*, *supra*, 6 Cal.App.4th at 1317-18.)

The City cannot rely on an addendum because the Project is not within the scope of the Otay Mesa Community Plan EIR. An addendum is only appropriate where substantial evidence supports a determination that the project is "either the same as or within the scope of the project . . . described in the program EIR." (See *Save Our Access*, *supra*, 92 Cal.App.5th at 845 [quoting *Sierra Club*, *supra*, 6 Cal.App.4th at 1321.) Here, the Project changes the general plan and zoning to now allow new industrial uses and others not previously allowed in the Residential-Medium land use designation and Residential Medium zoning. Because there are now dozens of uses that were not previously allowed and were not analyzed in the Program EIR, the Project is not "within the scope" of the prior EIR. The City is required to prepare an initial study to determine whether an EIR or negative declaration is required for the Project.

II. The Project Requires an EIR Because there is Substantial Evidence that the Project May Have a Significant Air Quality Impact.

Because the Project is not within the scope of the PEIR, the question then becomes whether the Project might cause significant environmental impacts that were not examined in the PEIR.

Here, the Project will result in significant air quality impacts that were not analyzed in the PEIR. First, the Addendum inadequately evaluates diesel particulate matter emissions. The Addendum acknowledges that industrial uses permitted under the proposed zoning could emit toxic air contaminants, including diesel particulate matter ("DPM"), which is a component of diesel exhaust classified as a toxic air contaminant by the California Air

Resources Board ("CARB") and is known to cause cancer and other serious health effects.[1] DPM specifically consists of fine particles emitted by diesel and contains a complex mixture of toxic compounds with greater potential to cause adverse health effects.[2]

Despite the Addendum identifying sensitive receptors 190-feet north of the Project site, the Addendum does not include a quantified construction or operational health risk assessment ("HRA").[3] The Addendum further asserts that the proposed zoning changes would not result in any new impacts than those identified in the PEIR.[4] This analysis is inadequate, for several reasons.

The omission of a construction and operational HRA makes the Addendum's analysis inconsistent with CEQA's requirement to make a substantial effort to connect a project's air quality impacts to potential health consequences.[5] The Addendum also fails to adhere to the California Department of Justice ("CA DOJ") guidelines, which recommend that all potential warehouse projects prepare a quantitative HRA in accordance with the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California.[6] Therefore, an EIR must be prepared to include a comprehensive HRA in order to ensure compliance with relevant legal and administrative guidance.

The Project will result in a potentially significant health risk impact. SWAPE conducted a preliminary HRA of the Addendum and Project's construction and operational health risk impact to nearby sensitive receptors using the annual particulate matter exhaust estimates from the "Vista Santa Domingo – Light Industrial" model's output files, included in Appendix A to the Addendum.[7] The Addendum states that there are residential receptors located 190-feet from the Project site.[8]

The San Diego County Air Pollution Constrol District ("SPAPCD") cancer risk level is 10 in one million.[9] SWAPE calculates that the excess cancer risks for infants and children at the nearest sensitive receptor, over the course of Project construction and operation, are approximately 52.7 and 43.3 in one million, respectively. The excess cancer risk over the course of the receptor lifetime (30 years) is approximately 104 in one million. These each exceed the SDAPCD limits. This represents a potentially significant impact which is not

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[1] "Summary: Diesel Particulate Matter Health Impacts." CARB, available at: https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts.
[2] "Overview: Diesel Exhaust & Health." CARB, available at: https://ww2.arb.ca.gov/resources/overview-dieselexhaust-and-health.
[3] Addendum, p. 25.
[4] Id. at 26.
[5] Ex. A, at 2; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502.
[6] Ex. A, at 2; "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." CA DOJ, available at: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-bestpractices.pdf, p. 6.
[7] Addendum, Appendix A, p. 49.
[8] Addendum, pp. 25-26.
[9] Ex. A, at 6.

addressed or identified in the Addendum or associated documents. This s analysis is substantial evidence that the construction and operation of the Project site may have a significant impact on human health .[10] An EIR should be prepared to provide comprehensive HRA and reevaluate the health risk impacts that may result from future development.

III. Even if the Project Were Within the Scope of the Precise Plan EIR, the City Lacked Substantial Evidence to Approve the Project's Addendum.

Even if the Project were within the scope of the PEIR, the City still erred in approving the Addendum due to a lack of substantial evidence to support a determination that there is no new information, changed circumstances, or new feasible mitigation measures since the Community Plan EIR was prepared ten years ago.

Pursuant to Guidelines section 15164, an addendum to previously certified EIR is only appropriate where "some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." (14 CCR § 15164(a).) Pursuant to Guidelines section 15162, an addendum is not appropriate and a subsequent EIR is required if, *inter alia*, "[n]ew information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified" shows either that (1) the project will have significant impacts not discussed in the previous EIR or that previously identified significant impacts would be substantially more severe or (2) mitigation measures, which were previously found to be infeasible or are considerably different than the measures discussed in the previous EIR, would reduce significant impacts. (14 CCR § 15162(a)(3).) Where a later project is within the scope of previous program EIR, an agency's determination that a subsequent EIR is not required under Guidelines section 15162 and that an addendum is permissible is reviewed under the substantial evidence standard. (*Olen Properties*, *supra*, 93 Cal.App.5th at 280.)

A. The City lacked substantial evidence to conclude that no new information showed that the Project would result in new significant impacts.

As discussed above, the Project would result in significant impacts that were not addressed in the PEIR. These impacts are based on new information that was not known and could not have been known when the City adopted the PEIR.

The construction-related human health impacts from diesel particulate matter (DPM) emissions could not have been previously known, as the Addendum proposes a complete change in zoning and land use designations—from Residential Medium to Light Industrial. This represents a substantial shift in potential impacts, which the PEIR could not have anticipated, as it did not evaluate the effects of Light Industrial projects.

[10] Id.

Moreover, the Addendum does not attempt to connect air quality impacts to human health outcomes, likely because the PEIR never contemplated the land use changes proposed. Consequently, the range of uses now allowed under the new zoning was not—and could not have been—addressed in the original PEIR. Therefore, the air quality impacts introduced by the Addendum constitute new information that was not available prior to 2014.

Each of the above impacts are based on new information that was not known and could not have been known when the City adopted the PEIR. Therefore, the City should conduct an EIR for the Project.

B. The City lacked substantial evidence to conclude that the Project did not require any new mitigation measures.

An addendum is not allowed where new information shows that mitigation measures, which either (1) were previously infeasible or (2) are considerably different from measures analyzed in the previous EIR, would substantially reduce a significant impact on the environment but the project proponents decline to adopt the mitigation measures. (14 CCR § 15162(a)(3)(C), (D).)

CEQA requires the Addendum to include all feasible mitigation measures to reduce the Project's emissions. Here, there are mitigation measures which are considerably different from measures analyzed in the 2014 FEIR, due to the drastic change in zoning and land use designations proposed in the Addendum. SWAPE suggests the following mitigation measures to reduce the DPM emissions associated with the Project construction and operation:

- CARB Recommendations[11]
    - Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
    - Implement, and plan accordingly for, the necessary infrastructure to support the zero and nearzero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
    - Require all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine.

[11] "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers." CARB, August 2023, available at: https://ww2.arb.ca.gov/sites/default/files/2023-08/CARB%20Comments%20-%20NOP%20for%20the%20%20Oak%20Valley%20North%20Project%20DEIR.pdf;

  - Requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
  - Require all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen oxides standard starting in the year 2022.
  - Require all construction equipment and fleets to be in compliance with all current air quality regulations.
  - Require tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
  - Require all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units ("TRU") or auxiliary power units.
  - Requiring all TRUs entering the project-site be plug-in capable.
  - Requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project.
  - Require future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
  - Require all heavy-duty trucks entering or on the project site to be zero-emission vehicles, and be fully zero-emission. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP). Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.
  - Restrict trucks and support equipment from idling longer than two minutes while on site.

- CA DOJ recommendations:[12]
  - Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
  - Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hookups to the power grid rather than use of diesel-fueled generators to supply their power.
  - Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
  - Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
  - Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.

[12] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

  - Running conduit to designated locations for future electric truck charging stations.
  - Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
  - Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
  - Requiring all stand-by emergency generators to be powered by non-diesel fuel.
- South Coast Air Quality Management District ("SCAQMD") recommendations:[13]
  - Clearly mark truck routes with signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
  - Design future projects such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Project site.
  - Design future projects such that any truck check-in point is inside the Project site to ensure no trucks are queuing outside.
  - Design future projects to ensure that truck traffic inside the Project site is as far away as feasible from sensitive receptors.
  - Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Project site.

Here, the changes in land use and zoning necessitate the above mitigation measures, which differ from those proposed in the FEIR. Therefore, an addendum is not appropriate. The City should conduct an EIR to evaluate the potential environmental impacts of the Addendum.

IV. Subsequent CEQA Review Is Required for Impacts Not Mitigated to Less Than Significant in the Community Plan Program EIR.

The 2014 PEIR admitted that several impacts were not mitigated to a level of insignificance, including air quality, greenhouse gas emissions, noise, transportation/circulation, and utilities.

The City acknowledges these are significant and unavoidable impacts, but argues that because the proposed Project would not result in any new or more severe impacts to the environment beyond what was previously evaluated and disclosed as part of the EIR, no additional environmental review is required for the Project.

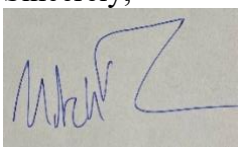
In the case of *Communities for a Better Environ. v. Calif. Resources Agency* (2002) 103 Cal.App.4th 98, 122-125, the court held that when a "first tier" EIR admits a

[13] "Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project)." SCAQMD, April 2024, available at: https://www.aqmd.gov/docs/defaultsource/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8, p. 3 - 4.

significant, unavoidable environmental impact, then the agency must prepare second tier EIRs for later projects to ensure that those unmitigated impacts are "mitigated or avoided." (*Id*. [citing 14 CCR § 15152(f)].) The court reasoned that the unmitigated impacts were not "adequately addressed" in the first tier EIR since they were not "mitigated or avoided." (*Id*.)Thus, significant effects disclosed in first tier EIRs will trigger second tier EIRs unless such effects have been "adequately addressed," in a way that ensures the effects will be "mitigated or avoided." (*Id*.) Such a second tier EIR is required, even if the impact still cannot be fully mitigated and a statement of overriding considerations will be required. The court explained, "The requirement of a statement of overriding considerations is central to CEQA's role as a public accountability statute; it requires public officials, in approving environmentally detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support." (*Id*. at 124-125.)

Thus, since the PEIR admitted numerous significant, unmitigated impacts, a second tier EIR is now required to determine if mitigation measures can now be imposed to reduce or eliminate those impacts. If the impacts still remain significant and unavoidable, a statement of overriding considerations will be required.

Sincerely,



Mitchell E. Thielemann
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EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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April 14, 2025

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Subject: Comments on the Vista Santo Domingo Project (SCH No. 2004051076)

Dear Mr. Thielemann,

We have reviewed the January 2025 Addendum to an Environmental Impact Report ("Addendum") for the Vista Santo Domingo Project ("Project") located in the City of San Diego. The Addendum proposes a rezoning from the land use designation RM-2-4 ("Residential–Medium") to IL-1-1 ("Industrial–Light"), suggesting the future construction of a light industrial warehouse.

Our review concludes that the Addendum insufficiently assesses the potential health risks of a future project. Potential health risk associated with both construction and operation may therefore be underestimated and unaddressed. We recommend that an Environmental Impact Report ("EIR") be prepared to reassess these potential health risks and identify appropriate mitigation measures, if necessary.

Air Quality

Diesel Particulate Matter Emissions Inadequately Evaluated

The Addendum acknowledges that industrial uses permitted under the proposed zoning could emit toxic air contaminants, including diesel particulate matter ("DPM"), which is a component of diesel exhaust classified as a toxic air contaminant by the California Air Resources Board ("CARB") and is known to cause cancer and other serious health effects.[1] While particulate matter refers to a broad category of airborne particles from various sources, DPM specifically consists of fine particles emitted by diesel

[1] "Summary: Diesel Particulate Matter Health Impacts." CARB, *available at:* https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts.

engines and contains a complex mixture of toxic compounds with greater potential to cause adverse health effects.[2]

Although the Addendum identifies there are sensitive receptors located 190-feet north of the Project site, the Addendum does not include a quantified construction or operational health risk assessment ("HRA") (p. 25). It further asserts that the proposed zoning changes would not result in any new impacts than those identified in the 2014 FEIR for the Otay Mesa Community Plan (p. 26).

In our opinion, due to its omission of a construction an operational HRA, the Addendum's analysis is inconsistent with CEQA's requirement to make a substantial effort to connect a project's air quality impacts to potential health consequences.[3] The analysis also fails to align with the California Department of Justice ("CA DOJ") guidelines, which recommend that all potential warehouse projects prepare a quantitative HRA in accordance with the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California.[4] An EIR therefore should be prepared to include an comprehensive HRA to ensure compliance with the most relevant guidance. The resulting excess cancer risk should then be compared to the SDAPCD threshold of 10 in one million.[5]

Screening-Level Analysis Demonstrates Potentially Significant Health Risk Impact

We conducted the following health risk assessment to quantify the Project's potential health risk using AERSCREEN, a screening-level air quality dispersion model. AERSCREEN uses limited site-specific data to estimate the maximum potential concentrations of air contaminants that could affect nearby sensitive receptors.[6] If AERSCREEN suggests a possible air quality hazard, we recommend that a more detailed modeling analysis be completed prior to the approval of the proposed rezoning.

We prepared a preliminary HRA of the Project's construction and operational health risk impact to nearby sensitive receptors using the annual particulate matter 10 exhaust estimates from the "Vista Santo Domingo - Light Industrial" model's output files, included in Appendix A to the Addendum (pp. 49). Consistent with OEHHA's recommendations, we assumed exposure begins during the third trimester stage of life.[7] The Addendum's construction CalEEMod emissions indicate that construction activities will generate approximately 122 pounds of DPM over the 419-day construction period.[8] The

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[2] "Overview: Diesel Exhaust & Health." CARB, *available at:* https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

[3] "Sierra Club v. County of Fresno." Supreme Court of California, December 2018, a*vailable at:* https://law.justia.com/cases/california/supreme-court/2018/s219783a.html.

[4] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." CA DOJ, *available at*: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf, p. 6.

[5] "Rule 1210. Toxic Air Contaminant Health Risks – Public Notification and Risk Reduction." SDAPCD, February 2025, *available at:* https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-1210.pdf.

[6] "Air Quality Dispersion Modeling - Screening Models," U.S. EPA, *available at:* https://www.epa.gov/scram/air-quality-dispersion-modeling-screening-models.

[7] "Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-18.

[8] See Attachment A for health risk calculations.

AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. We calculated an average DPM emission rate to account for the by variability in equipment usage and truck trips over Project construction by using the following equation:

$$\text{Emission Rate } \left(\frac{\text{grams}}{\text{second}}\right) = \frac{121.5 \text{ lbs}}{419 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3{,}600 \text{ seconds}} = \mathbf{0.00152\ g/s}$$

We estimated a construction emission rate of 0.00152 grams per second ("g/s"). Subtracting the 419-day construction period from the total 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 28.85 years. The Addendum's operational CalEEMod emissions indicate that operational activities will generate approximately 60 pounds of DPM per year during operation. Applying the same equation used to estimate the construction DPM rate, we estimated the following emission rate for Project operation:

$$\text{Emission Rate } \left(\frac{\text{grams}}{\text{second}}\right) = \frac{60 \text{ lbs}}{365 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3{,}600 \text{ seconds}} = \mathbf{0.000863\ g/s}$$

We estimated an operational emission rate of 0.000863 g/s. Construction and operation were simulated as a 5.58-acre rectangular area source in AERSCREEN, with approximate dimensions of 213- by 106-meters. A release height of three meters was selected to represent the height of stacks of 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 population of San Diego was obtained from U.S. 2023 Census data.[9]

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project Site. United States Environmental Protection Agency ("U.S. EPA") guidance suggests that in screening procedures, the annualized average concentration of an air pollutant to be estimated by multiplying the single-hour concentration by 10%.[10] The Addendum states that there are residential receptors located 190 feet, or approximately 57 meters, from the Project site, as previously mentioned (p. 25, 26). According to the AERSCREEN output files, however, the maximally exposed individual receptor ("MEIR") would be located 100 meters from the Project site. The single-hour concentration estimated by AERSCREEN for Project construction is therefore 2.108 µg/m^3 DPM at around 100 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.2108 µg/m^3 for Project construction at the MEIR. For Project operation, the single-hour concentration estimated by AERSCREEN is 1.195 µg/m^3 DPM at approximately 100 meters

[9] "San Diego." U.S. Census Bureau, 2023, *available at:* https://datacommons.org/place/geoId/0666000?q=San+Diego%2C+CA%2C+USA.
[10] "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised." U.S. EPA, October 1992, *available at:* https://www.epa.gov/sites/default/files/2020-09/documents/epa-454r-92-019_ocr.pdf.

downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.1195 µg/m^3 for Project operation at the MEIR.[11]

We calculated the excess cancer risk to the MEIR using applicable HRA methodologies prescribed by OEHHA, as recommended by SDAPCD.[12] Guidance from OEHHA and CARB recommends the use of a standard point estimate approach, including high-point estimate (i.e. 95th percentile) breathing rates and age sensitivity factors ("ASF") to account for the Increased sensitivity to carcinogens during early-in-life exposure and accurately assess risk for susceptible subpopulations such as children. The applicable exposure parameters, such as the daily breathing rates, exposure duration, ASFs, fraction of time at home ("FAH"), and exposure frequency used for the various age groups in our screening-level HRA are as follows:

Exposure Assumptions for Individual Cancer Risk

Age Group	Breathing Rate (L/kg-day)[13]	Age Sensitivity Factor[14]	Exposure Duration (years)	Fraction of Time at Home[15]	Exposure Frequency (days/year)[16]	Exposure Time (hours/day)
3rd Trimester	361	10	0.25	1	350	24
Infant (0 – 2)	1090	10	2	1	350	24
Child (2 – 16)	572	3	14	1	350	24
Adult (16 – 30)	261	1	14	0.73	350	24

The procedure requires the incorporation of several discrete variants to effectively quantify dose per age group for the inhalation pathway. Contaminate dose is then multiplied by the cancer potency factor

[11] See Attachment B for AERSCREEN output files.
[12] "Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (HRAs)." SDAPCD, July 2022, *available at:* https://www.sdapcd.org/content/dam/sdapcd/documents/permits/air-toxics/Hot-Spots-Guidelines.pdf.
[13] "Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics 'Hot Spots' Information and Assessment Act." SCAQMD, October 2020, available at: http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines.pdf?sfvrsn=19, p. 19; see also "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.
[14] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-5 Table 8.3.
[15] "Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (HRAs)." SDAPCD, July 2022, available at: https://www.sdapcd.org/content/dam/sdapcd/documents/permits/air-toxics/Hot-Spots-Guidelines.pdf, p. 4.
[16] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 5-24.

in units of inverse dose expressed in milligrams per kilogram per day (mg/kg/day^{-1}) to derive the cancer risk estimate. The following dose algorithm was used to assess exposure assumptions:

$$\text{Dose}_{\text{AIR,per age group}} = \text{C}_{\text{air}} \times \text{EF} \times \left[\frac{\text{BR}}{\text{BW}}\right] \times \text{A} \times \text{CF}$$

where:

Dose_{AIR} = dose by inhalation (mg/kg/day), per age group
C_{air} = concentration of contaminant in air (µg/m3)
EF = exposure frequency (number of days/365 days)
BR/BW = daily breathing rate normalized to body weight (L/kg/day)
A = inhalation absorption factor (default = 1)
CF = conversion factor (1x10-6, µg to mg, L to m3)

We used the following equation to calculate the overall cancer risk per appropriate age group:

$$\text{Cancer Risk}_{\text{AIR}} = \text{Dose}_{\text{AIR}} \times \text{CPF} \times \text{ASF} \times \text{FAH} \times \frac{\text{ED}}{\text{AT}}$$

where:

Dose_{AIR} = dose by inhalation (mg/kg/day), per age group
CPF = cancer potency factor, chemical-specific (mg/kg/day)$^{-1}$
ASF = age sensitivity factor, per age group
FAH = fraction of time at home, per age group (for residential receptors only)
ED = exposure duration (years)
AT = averaging time period over which exposure duration is averaged (always 70 years)

Consistent with the 419-day construction schedule, the annualized average concentration for construction was used for the entire third trimester of pregnancy (0.25 years) and the first 0.90 years of the infantile stage of life (0 – 2 years). The annual annualized average concentration for operation was used for the remainder of the 30-year exposure period, which makes up the latter 1.10 years of the infantile stage of life, as well as the entire child (2 – 16 years) and adult stages of life (16 – 30 years). The results of our calculations are shown in the table below.

The Maximally Exposed Individual at an Existing Residential Receptor

Age Group	Emissions Source	**Duration** (years)	**Concentration** (ug/m3)	Cancer Risk
3rd Trimester	Construction	0.25	0.2108	2.87E-06
	Construction	*0.90*	*0.2108*	*3.11E-05*
	Operation	*1.10*	*0.1195*	*2.16E-05*
Infant (0 - 2)	Total	2		5.27E-05

Child (2 - 16)	Operation	14	0.1195	4.33E-05
Adult (16 - 30)	Operation	14	0.1195	4.80E-06
Lifetime		**30**		**1.04E-04**

The excess cancer risks for the 3rd trimester of pregnancy, infants, children, and adults at the nearest sensitive receptor, over the course of Project construction and operation, are approximately 2.87, 52.7, 43.3, 4.8 in one million, respectively. The excess cancer risk over the course of the receptor lifetime (30 years) is approximately 104 in one million. The infant, child, and lifetime cancer risks exceed the SDAPCD of 10 in one million, resulting in a potentially significant impact, not previously addressed or identified in the Addendum or associated documents.

Our screening-level HRA represents a conservative analysis and demonstrates the potential correlation between emissions from a future project resulting from the rezoning and its potential adverse health risks. The U.S. EPA recommends the use of a screening-level analysis as the first phase of a tiered approach to conducting exposure assumptions, as outlined in their Exposure Assessment Guidelines.[17] Screening-level analyses that exceed the cancer risks indicate a need for further evaluation with more developed modeling to determine significance. Our screening-level analysis suggests that the construction and operation of an industrial park on the Project site could lead to significant health risks. We reaffirm that an EIR should be prepared to provide comprehensive HRA and reevaluate the health risk impacts that could result from future development.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

If impacts are estimated to be significant through further analysis, the Addendum should include all feasible mitigation measures to reduce the Project's emissions, as required by CEQA.[18] The CalEEMod User's Guide states that the methods for mitigating DPM emissions include the use of "alternative fuel, electric equipment, diesel particulate filters, oxidation catalysts, newer tier engines, and dust suppression."[19]

To reduce the DPM emissions associated with Project construction and operation, we advise that the Addendum consider several mitigation measures (see list below).

[17] "Guidelines for Exposure Assessment." U.S. Environmental Protection Agency, 1992, *available at:* https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=15263.
[18] "Guidance on Frequently Questioned Topics in Roadway Analysis for the California Environmental Quality Act (CEQA)." CEQA, February 2018, *available at*: https://www.aqmd.gov/docs/default-source/ceqa/handbook/roadway-ceqa-guidance_v10.pdf, p. 2.
[19] "Calculation Details for CalEEMod." CAPCOA, May 2021, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6, Appendix A, p. 60.

CARB recommends: [20]

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
- Require all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine.
- Requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
- Require all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen oxides standard starting in the year 2022.
- Require all construction equipment and fleets to be in compliance with all current air quality regulations.
- Require tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
- Require all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units ("TRU") or auxiliary power units.
- Requiring all TRUs entering the project-site be plug-in capable.
- Requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project.
- Require future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
- Require all heavy-duty trucks entering or on the project site to be zero-emission vehicles, and be fully zero-emission. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP). Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.
- Restrict trucks and support equipment from idling longer than two minutes while on site.

[20] "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers." CARB, August 2023, *available at*: https://ww2.arb.ca.gov/sites/default/files/2023-08/CARB%20Comments%20-%20NOP%20for%20the%20%20Oak%20Valley%20North%20Project%20DEIR.pdf; Attachment A, p. 5 – 8.

The CA DOJ suggests:[21]

- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by non-diesel fuel.

The South Coast Air Quality Management District ("SCAQMD") recommends: [22]

- Clearly mark truck routes with signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
- Design future projects such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Project site.
- Design future projects such that any truck check-in point is inside the Project site to ensure no trucks are queuing outside.
- Design future projects to ensure that truck traffic inside the Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Project site.

[21] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

[22] "Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project)." SCAQMD, April 2024, *available at*: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8, p. 3 - 4.

Although the proposed Project falls under the jurisdiction of the SDAPCD, the SCAQMD provides a comprehensive list of mitigation measures that can be applicable to projects in other regions, including this one.

We have provided several mitigation measures to reduce DPM emissions from future development under the Addendum, developed from reliable sources such as the CA DOJ, CARB, and SCAQMD. In our opinion, an EIR should be prepared to include an updated health risk analysis, to align with CEQA, CA DOJ, and U.S. EPA standards and guidance, ensuring that mitigation measures are implemented to reduce emissions to the maximum extent feasible, if necessary.

Disclaimer

SWAPE has received limited documentation 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,

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

Paul E. Rosenfeld, Ph.D.

Attachment A: Health Risk Calculations
Attachment B: AERSCREEN Output Files
Attachment C: Matt Hagemann CV
Attachment D: Paul Rosenfeld CV

Construction					
2025			**Total**		
Annual Emissions (tons/year)	0.06		Total DPM (lbs)	121.4794521	
Daily Emissions (lbs/day)	0.328767123		Total DPM (g)	55103.07945	
Construction Duration (days)	365		Emission Rate (g/s)	0.001522117	
Total DPM (lbs)	120		Release Height (meters)	3	
Total DPM (g)	54432		Total Acreage	5.58	
Start Date	1/1/2025		Max Horizontal (meters)	212.52	
End Date	1/1/2026		Min Horizontal (meters)	106.26	
Construction Days	365		Initial Vertical Dimension (meters)	1.5	
2026			Setting	Urban	
Annual Emissions (tons/year)	0.005		Population	1,388,320	
Daily Emissions (lbs/day)	0.02739726		Start Date	1/1/2025	
Construction Duration (days)	54		End Date	2/24/2026	
Total DPM (lbs)	1.479452055		Total Construction Days	419	
Total DPM (g)	671.0794521		Total Years of Construction	1.15	
Start Date	1/1/2026		Total Years of Operation	28.85	
End Date	2/24/2026				
Construction Days	54				

Operation	
Emission Rate	
Annual Emissions (tons/year)	0.03
Daily Emissions (lbs/day)	0.164383562
Total DPM (lbs)	60
Emission Rate (g/s)	0.000863014
Release Height (meters)	3
Total Acreage	5.58
Max Horizontal (meters)	212.52
Min Horizontal (meters)	106.26
Initial Vertical Dimension (meters)	1.5
Setting	Urban
Population	1,388,320

The Maximally Exposed Individual at an Existing Residential Receptor				
Age Group	**Emissions Source**	**Duration** (years)	**Concentration** (ug/m3)	**Cancer Risk**
3rd Trimester	Construction	0.25	0.2108	2.87E-06
	Construction	*0.90*	*0.2108*	*3.11E-05*
	Operation	*1.10*	*0.1195*	*2.16E-05*
Infant (0 - 2)	Total	2		5.27E-05
Child (2 - 16)	Operation	14	0.1195	4.33E-05
Adult (16 - 30)	Operation	14	0.1195	4.80E-06
Lifetime		**30**		**1.04E-04**

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TITLE: Vista Santo Domingo, Construction

********** AREA PARAMETERS **********

SOURCE EMISSION RATE:	0.152E-02	g/s	0.121E-01	lb/hr
AREA EMISSION RATE:	0.674E-07	g/(s-m2)	0.535E-06	lb/(hr-m2)
AREA HEIGHT:	3.00	meters	9.84	feet
AREA SOURCE LONG SIDE:	212.52	meters	697.24	feet
AREA SOURCE SHORT SIDE:	106.26	meters	348.62	feet
INITIAL VERTICAL DIMENSION:	1.50	meters	4.92	feet
RURAL OR URBAN:	URBAN			
POPULATION:	1388320			
INITIAL PROBE DISTANCE =	5000.	meters	16404.	feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** FLOW SECTOR ANALYSIS **********

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFACE ROUGHNESS	1-HR CONC (ug/m3)	RADIAL (deg)	DIST (m)	TEMPORAL PERIOD
1*	1.000	2.108	5	100.0	WIN

* = worst case diagonal

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	10	10	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50

HT	REF TA	HT
10.0	310.0	2.0

********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	1.655	2525.00	0.2430E-01

25.00	1.790	2550.00	0.2397E-01
50.00	1.903	2575.00	0.2366E-01
75.00	2.023	2600.00	0.2335E-01
100.00	2.108	2625.00	0.2304E-01
125.00	1.740	2650.00	0.2274E-01
150.00	1.179	2675.00	0.2245E-01
175.00	0.9377	2700.00	0.2217E-01
200.00	0.7780	2725.00	0.2189E-01
225.00	0.6601	2750.00	0.2162E-01
250.00	0.5704	2775.00	0.2135E-01
275.00	0.4998	2800.00	0.2109E-01
300.00	0.4432	2825.00	0.2084E-01
325.00	0.3973	2850.00	0.2059E-01
350.00	0.3586	2875.00	0.2034E-01
375.00	0.3263	2900.00	0.2010E-01
400.00	0.2986	2925.00	0.1987E-01
425.00	0.2749	2950.00	0.1964E-01
450.00	0.2544	2975.00	0.1941E-01
475.00	0.2362	3000.00	0.1919E-01
500.00	0.2201	3025.00	0.1897E-01
525.00	0.2059	3050.00	0.1876E-01
550.00	0.1933	3075.00	0.1855E-01
575.00	0.1820	3100.00	0.1835E-01
600.00	0.1717	3125.00	0.1815E-01
625.00	0.1624	3150.00	0.1795E-01
650.00	0.1540	3175.00	0.1776E-01
675.00	0.1462	3200.00	0.1757E-01
700.00	0.1392	3225.00	0.1738E-01
725.00	0.1327	3250.00	0.1720E-01
750.00	0.1267	3275.00	0.1702E-01
775.00	0.1212	3300.00	0.1684E-01
800.00	0.1160	3325.00	0.1667E-01
825.00	0.1112	3350.00	0.1650E-01
850.00	0.1068	3375.00	0.1633E-01
875.00	0.1026	3400.00	0.1617E-01
900.00	0.9877E-01	3425.00	0.1601E-01
925.00	0.9516E-01	3450.00	0.1585E-01
950.00	0.9177E-01	3475.00	0.1569E-01
975.00	0.8858E-01	3500.00	0.1554E-01
1000.00	0.8559E-01	3525.00	0.1539E-01
1025.00	0.8276E-01	3550.00	0.1524E-01
1050.00	0.8008E-01	3575.00	0.1510E-01
1075.00	0.7756E-01	3600.00	0.1495E-01
1100.00	0.7517E-01	3625.00	0.1481E-01
1125.00	0.7291E-01	3650.00	0.1467E-01
1150.00	0.7075E-01	3675.00	0.1454E-01
1175.00	0.6869E-01	3700.00	0.1440E-01
1200.00	0.6674E-01	3725.00	0.1427E-01
1225.00	0.6489E-01	3750.00	0.1414E-01
1250.00	0.6312E-01	3775.00	0.1401E-01

1275.00	0.6144E-01	3800.00	0.1389E-01
1300.00	0.5983E-01	3825.00	0.1376E-01
1325.00	0.5830E-01	3850.00	0.1364E-01
1350.00	0.5683E-01	3875.00	0.1352E-01
1375.00	0.5543E-01	3900.00	0.1340E-01
1400.00	0.5408E-01	3925.00	0.1329E-01
1425.00	0.5279E-01	3950.00	0.1317E-01
1450.00	0.5156E-01	3975.00	0.1306E-01
1475.00	0.5037E-01	4000.00	0.1295E-01
1500.00	0.4923E-01	4025.00	0.1284E-01
1525.00	0.4814E-01	4050.00	0.1273E-01
1550.00	0.4708E-01	4075.00	0.1262E-01
1575.00	0.4607E-01	4100.00	0.1252E-01
1600.00	0.4509E-01	4125.00	0.1241E-01
1625.00	0.4415E-01	4149.99	0.1231E-01
1650.00	0.4325E-01	4175.00	0.1221E-01
1675.00	0.4237E-01	4200.00	0.1211E-01
1700.00	0.4153E-01	4225.00	0.1201E-01
1725.00	0.4071E-01	4250.00	0.1192E-01
1750.00	0.3993E-01	4275.00	0.1182E-01
1775.00	0.3917E-01	4300.00	0.1173E-01
1800.00	0.3843E-01	4325.00	0.1163E-01
1825.00	0.3772E-01	4350.00	0.1154E-01
1850.00	0.3703E-01	4375.00	0.1145E-01
1875.00	0.3636E-01	4400.00	0.1136E-01
1900.00	0.3571E-01	4425.00	0.1127E-01
1925.00	0.3508E-01	4450.00	0.1119E-01
1950.00	0.3446E-01	4475.00	0.1110E-01
1975.00	0.3402E-01	4500.00	0.1102E-01
2000.00	0.3344E-01	4525.00	0.1094E-01
2025.00	0.3288E-01	4550.00	0.1085E-01
2050.00	0.3233E-01	4575.00	0.1077E-01
2075.00	0.3180E-01	4600.00	0.1069E-01
2100.00	0.3128E-01	4625.00	0.1061E-01
2125.00	0.3078E-01	4650.00	0.1054E-01
2150.00	0.3029E-01	4675.00	0.1046E-01
2175.00	0.2981E-01	4700.00	0.1038E-01
2200.00	0.2935E-01	4725.00	0.1031E-01
2225.00	0.2890E-01	4750.00	0.1023E-01
2250.00	0.2846E-01	4775.00	0.1016E-01
2275.00	0.2803E-01	4800.00	0.1009E-01
2300.00	0.2761E-01	4825.00	0.1002E-01
2325.00	0.2721E-01	4850.00	0.9946E-02
2350.00	0.2681E-01	4875.00	0.9876E-02
2375.00	0.2643E-01	4900.00	0.9807E-02
2400.00	0.2605E-01	4924.99	0.9739E-02
2425.00	0.2568E-01	4950.00	0.9672E-02
2450.00	0.2532E-01	4975.00	0.9605E-02
2475.00	0.2498E-01	5000.00	0.9540E-02
2500.00	0.2463E-01		

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	2.129	2.129	2.129	2.129	N/A
DISTANCE FROM SOURCE	107.00 meters				
IMPACT AT THE AMBIENT BOUNDARY	1.655	1.655	1.655	1.655	N/A
DISTANCE FROM SOURCE	1.00 meters				

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TITLE: Vista Santo Domingo, Operations

********** AREA PARAMETERS **********

SOURCE EMISSION RATE:	0.863E-03	g/s	0.685E-02	lb/hr
AREA EMISSION RATE:	0.382E-07	g/(s-m2)	0.303E-06	lb/(hr-m2)
AREA HEIGHT:	3.00	meters	9.84	feet
AREA SOURCE LONG SIDE:	212.52	meters	697.24	feet
AREA SOURCE SHORT SIDE:	106.26	meters	348.62	feet
INITIAL VERTICAL DIMENSION:	1.50	meters	4.92	feet
RURAL OR URBAN:	URBAN			
POPULATION:	1388320			
INITIAL PROBE DISTANCE =	5000.	meters	16404.	feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** FLOW SECTOR ANALYSIS **********
25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFACE ROUGHNESS	1-HR CONC (ug/m3)	RADIAL (deg)	DIST (m)	TEMPORAL PERIOD
1*	1.000	1.195	5	100.0	WIN

* = worst case diagonal

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	10	10	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50

HT	REF TA	HT
10.0	310.0	2.0

********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	0.9383	2525.00	0.1378E-01

25.00	1.015	2550.00	0.1360E-01
50.00	1.079	2575.00	0.1341E-01
75.00	1.147	2600.00	0.1324E-01
100.00	1.195	2625.00	0.1307E-01
125.00	0.9869	2650.00	0.1290E-01
150.00	0.6688	2675.00	0.1273E-01
175.00	0.5318	2700.00	0.1257E-01
200.00	0.4412	2725.00	0.1241E-01
225.00	0.3743	2750.00	0.1226E-01
250.00	0.3235	2775.00	0.1211E-01
275.00	0.2834	2800.00	0.1196E-01
300.00	0.2513	2825.00	0.1182E-01
325.00	0.2253	2850.00	0.1167E-01
350.00	0.2033	2875.00	0.1154E-01
375.00	0.1850	2900.00	0.1140E-01
400.00	0.1693	2925.00	0.1127E-01
425.00	0.1559	2950.00	0.1114E-01
450.00	0.1443	2975.00	0.1101E-01
475.00	0.1339	3000.00	0.1088E-01
500.00	0.1248	3025.00	0.1076E-01
525.00	0.1168	3050.00	0.1064E-01
550.00	0.1096	3075.00	0.1052E-01
575.00	0.1032	3100.00	0.1041E-01
600.00	0.9738E-01	3125.00	0.1029E-01
625.00	0.9211E-01	3150.00	0.1018E-01
650.00	0.8732E-01	3175.00	0.1007E-01
675.00	0.8293E-01	3199.99	0.9963E-02
700.00	0.7892E-01	3225.00	0.9857E-02
725.00	0.7524E-01	3250.00	0.9754E-02
750.00	0.7185E-01	3275.00	0.9652E-02
775.00	0.6872E-01	3300.00	0.9552E-02
800.00	0.6579E-01	3325.00	0.9454E-02
825.00	0.6308E-01	3350.00	0.9357E-02
850.00	0.6055E-01	3375.00	0.9262E-02
875.00	0.5820E-01	3400.00	0.9169E-02
900.00	0.5601E-01	3425.00	0.9078E-02
925.00	0.5396E-01	3450.00	0.8988E-02
950.00	0.5204E-01	3475.00	0.8900E-02
975.00	0.5023E-01	3500.00	0.8813E-02
1000.00	0.4853E-01	3525.00	0.8727E-02
1025.00	0.4693E-01	3550.00	0.8643E-02
1050.00	0.4541E-01	3575.00	0.8561E-02
1075.00	0.4398E-01	3600.00	0.8479E-02
1100.00	0.4263E-01	3625.00	0.8399E-02
1125.00	0.4134E-01	3650.00	0.8321E-02
1150.00	0.4012E-01	3675.00	0.8243E-02
1175.00	0.3895E-01	3700.00	0.8167E-02
1200.00	0.3785E-01	3724.99	0.8092E-02
1225.00	0.3680E-01	3750.00	0.8019E-02
1250.00	0.3579E-01	3775.00	0.7946E-02

1275.00	0.3484E-01	3800.00	0.7875E-02
1300.00	0.3393E-01	3825.00	0.7804E-02
1325.00	0.3306E-01	3849.99	0.7735E-02
1350.00	0.3223E-01	3875.00	0.7667E-02
1375.00	0.3143E-01	3900.00	0.7600E-02
1400.00	0.3067E-01	3925.00	0.7534E-02
1425.00	0.2994E-01	3950.00	0.7468E-02
1450.00	0.2924E-01	3975.00	0.7404E-02
1475.00	0.2856E-01	4000.00	0.7341E-02
1500.00	0.2792E-01	4025.00	0.7279E-02
1525.00	0.2730E-01	4050.00	0.7217E-02
1550.00	0.2670E-01	4075.00	0.7157E-02
1575.00	0.2612E-01	4100.00	0.7097E-02
1600.00	0.2557E-01	4125.00	0.7038E-02
1625.00	0.2504E-01	4150.00	0.6980E-02
1650.00	0.2452E-01	4175.00	0.6923E-02
1675.00	0.2403E-01	4200.00	0.6867E-02
1700.00	0.2355E-01	4225.00	0.6811E-02
1725.00	0.2309E-01	4250.00	0.6757E-02
1750.00	0.2264E-01	4275.00	0.6703E-02
1775.00	0.2221E-01	4300.00	0.6649E-02
1800.00	0.2179E-01	4325.00	0.6597E-02
1825.00	0.2139E-01	4350.00	0.6545E-02
1850.00	0.2100E-01	4375.00	0.6494E-02
1875.00	0.2062E-01	4400.00	0.6443E-02
1900.00	0.2025E-01	4425.00	0.6394E-02
1925.00	0.1989E-01	4450.00	0.6345E-02
1950.00	0.1954E-01	4475.00	0.6296E-02
1975.00	0.1929E-01	4500.00	0.6248E-02
2000.00	0.1896E-01	4525.00	0.6201E-02
2025.00	0.1864E-01	4550.00	0.6155E-02
2050.00	0.1833E-01	4575.00	0.6109E-02
2075.00	0.1803E-01	4600.00	0.6063E-02
2100.00	0.1774E-01	4625.00	0.6018E-02
2125.00	0.1745E-01	4650.00	0.5974E-02
2150.00	0.1717E-01	4675.00	0.5931E-02
2175.00	0.1690E-01	4700.00	0.5887E-02
2200.00	0.1664E-01	4725.00	0.5845E-02
2225.00	0.1639E-01	4750.00	0.5803E-02
2250.00	0.1614E-01	4775.00	0.5761E-02
2275.00	0.1589E-01	4800.00	0.5720E-02
2300.00	0.1566E-01	4825.00	0.5680E-02
2325.00	0.1543E-01	4850.00	0.5640E-02
2350.00	0.1520E-01	4875.00	0.5600E-02
2375.00	0.1499E-01	4900.00	0.5561E-02
2400.00	0.1477E-01	4924.99	0.5523E-02
2425.00	0.1456E-01	4950.00	0.5484E-02
2450.00	0.1436E-01	4975.00	0.5447E-02
2475.00	0.1416E-01	5000.00	0.5410E-02
2500.00	0.1397E-01		

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	1.208	1.208	1.208	1.208	N/A

DISTANCE FROM SOURCE 107.00 meters

IMPACT AT THE AMBIENT BOUNDARY	0.9383	0.9383	0.9383	0.9383	N/A

DISTANCE FROM SOURCE 1.00 meters

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

Opposition to the 12-Unit ADU Project at 1441 Woodrow Avenue, San Diego, CA 92114

Negative Impacts on Safety and Privacy in the Neighborhood

April 13, 2025

Noel R. Avilucea
1560 Woodrow Avenue
San Diego, CA 92114

City of San Diego
202 C Street
San Diego, CA 92101

Dear San Diego City Planning Commission,

I am writing to express my strong opposition to the proposed 12-unit Accessory Dwelling Unit (ADU) project at 1441 Woodrow Avenue in San Diego, CA 92114. This project has raised significant concerns among residents regarding its potential adverse effects on the safety and privacy of our neighborhood. Below, I delineate the key negative impacts associated with the project.

Safety Concerns

Increased Traffic

The addition of twelve new units is anticipated to result in a substantial increase in traffic flow within the neighborhood. This escalation can lead to heightened risks of accidents, particularly in a residential area where children play and pedestrians traverse.

Emergency Response Delay

The proliferation of vehicles on the road may impede emergency services such as fire trucks and ambulances, potentially delaying their response times. In a crisis situation, such delays could have severe ramifications.

Parking Issues

With twelve additional units, the demand for parking will rise significantly. The neighborhood may experience overcrowded streets and illegal parking, leading to blockages and reduced accessibility for residents and emergency services.

Crime Rates

Higher population density often correlates with increased crime rates. The influx of new residents can strain local law enforcement resources, potentially compromising the safety of the existing community.

Privacy Concerns

Overlooking and Noise

The construction of multiple units will result in taller structures that may overlook existing homes, thereby infringing on the privacy of current residents. Additionally, the increased population density can lead to more noise, disrupting the tranquil environment of the neighborhood.

Loss of Green Space

The development of additional units will likely necessitate the utilization of land that was previously green space or open areas. The loss of these spaces can negatively impact the aesthetic value of the neighborhood and reduce areas where residents can enjoy outdoor activities in privacy.

Community Character

A sudden increase in population and the presence of new buildings can alter the existing character of the community. The sense of familiarity and privacy that residents currently enjoy may be compromised as the neighborhood becomes more crowded and less personal.

Conclusion

While the need for additional housing is acknowledged, the negative impacts on the safety and privacy of the neighborhood at 1441 Woodrow Avenue in San Diego are substantial. Increased traffic, parking issues, emergency response delays, potential rise in crime rates, loss of green space, and disruptions to the existing community character are all valid concerns that require careful consideration. It is imperative to address these factors and explore alternative solutions that balance the need for housing with the preservation of community safety and privacy.

Thank you for considering my opposition. I trust that you will take these concerns seriously and act in the best interest of our community.

Sincerely,

Noel R. Avilucea

April 11, 2025

To: Whom it may concern

Re: PRJ-1128933, Bonus ADU, (6) new 2-STORY buildings for ADUs.

Located at 1441 Woodrow Av, San Diego, CA, 92114, located within Council District 4, SD County Supervisor District 4, 79th District, District 52

The residents in the Jamacha Community and the Jamacha Neighborhood Council are opposing this 12 unit Bonus ADU **outlier project** noted above on a parcel# 5767010100 that is 11,100 sq. ft. in a RS 1-7 zone.

Our area is definitely does not qualify for Bonus ADUs. We request that the City of San Diego Bonus ADU program, be revised to ensure that it meets the same standards as the CA State ADU program for all RS 1-7 zones, and to comply with CA State Transit Priority Zones and Sustainable Development Areas. Furthermore, the Bonus ADU program is unfairly targeting our culturally diverse, lower income Jamacha Community.

This large project is being built in a RS 1-7 single family zone. This is a very quiet, single-family neighborhood, with single story homes. This project will harm our community by destroying the community character. The increased density without infrastructure is a risk to our safety.

Our Jamacha Community does not meet the conditions of a Transit Priority Area (TPA), as bus #4 is our only transit route and none of our 18 bus stops connect with any other bus routes and no bus stop exists on Woodrow Ave. In addition, the nearest Transit Station is more than a half mile distance from 1441 Woodrow Ave and the majority of Jamacha.

We do not meet the conditions of a Sustainable Development Area; we only have a limited number of entry level minimal wage job opportunities. The City of San Diego has failed to provide a proper environmental analysis of the Sustainable Development Area.

Furthermore, the PRJ-1128933, 1441 Woodrow Ave. has an application dated 1/2/2025, with misinformation about the property in question. (see applicant's responses below)

Historic Designation- The applicant's response below is false.

Does your proposed construction include work on a site containing buildings or structures **45 years old or older** in which there will be a change to the exterior of the existing buildings or structures?

No- The fact is that the existing house was built in 1965 and is **60 years old**.

Code Enforcement – The applicant's response below is Inaccurate.

Is there a code enforcement violation case on this site? **No**

The applicant's response "NO" above is false and should have been **YES**.

There is a current Get It Done complaint #05179845, as well as past complaints. The Code Enforcement has been visiting this property for years, see case CE-0517505, assigned to Mr. Val Sanchez, (619) 533- 3433. The home was condemned, and both the Fire Department and San Diego Police Department have visited multiple times. The existing home was declared inhabitable and a fire hazard.

PROJECT INFORMATION- The applicant's response below describing the project is false.

DSD Defined Scope:

SKYLINE-PARADISE HILLS, Combination building permit propose ADU bonus program.(1) new SFD 1-STORY building and (6) new 2-STORY buildings for **ADUs added to empty lot.** Model A - are for building 2,3,4 (3) buildings, (6) ADUS added to the rear of the property. Model B - are for BULDING 5,6,7 (3) buildings, (6) ADUS added to the rear of the property. Model C - are for building 1, (1) SFD.

The fact is, that as of today, an existing home, and a large shed are currently on this property. Please see the photos below: No Trespassing/Letter of Agency, and house with curb number, and backyard which prove that the property **is not an empty lot**.

AFFORDABLE HOUSING COMPLIANCE- None of the responses stated Yes, though the applicant's project information lists ADU Bonus program.

In closing, we feel that the Application for 1441 Woodrow Ave project is invalid. Please comply with our concerns about the applicant's misinformation in the application and halt this unwanted project as soon as possible before any construction commences.

Sincerely,

On behalf of the Jamacha Neighborhood Council,

Dorene Dias Pesta, Founder and Interim Chairperson

Printed	Signature	Address
Rodrigo GONZALEZ		7105 Lisbon St
DIANE MOSS	Diane Moss	1002 Woodrow Ave
Carol J. Turner	Carol J. Turner	6857 Jamacha Rd,
Shirley HUGHES	Shirley Hughes	1431 Woodrow Ave.
Sandra Hawthorne	Sandra Hawthorne	7433 Jamacha Rd. SD 92114
Marie Kristine Razon	Marie	1426 Woodrow Ave.
Silva, Julian	Julian	1426 Woodrow Ave S.D. CA 92114
Alaciel Haddad	ALACIEL HADDAD	7119 Lisbon St
Noel Avilucea	Noel Avilucea	1560 Woodrow Ave. SD 92114
CRUMP, ALAN	Alan Crump	510 CADMAN ST. SD 92114
Holly Hedgecock	Holly	1509 Woodrow Ave., S.D. 92114
Terrence P. Pesta	Terrence P. Pesta	7465 Minerva Dr. 92114
Rodney TILK	Tilk	7581 Viewcrest DR 92114
James A. Black	James A. Black	1557 Woodrow Ave. 92114
Lilia C Black	Lilia C Black	1557 Woodrow Ave 92114
SONIA FREEMAN	Sonia Freeman	1442 WOODROW AVE 92114
BEN KELMAN	Ben K	6839 Jamacha Rd. 92114
Dosene R Dias	Dosene R Dias	7465 Minerva Dr. 92114

The members of the Jamacha Neighborhood Council, listed above, support this letter and oppose the project at 1441 Woodrow Avenue.

Signed on April 9, 2025

Verified by Terrence Pesta (Interim Secretary)

Terrence P. Pesta


NO
TRESPASSING
Letter of Agency on file with:
SAN DIEGO POLICE DEPARTMENT
1441 Woodrow Ave.
1241

NO

TRESPASSING

Letter of Agency on file with

SAN DIEGO POLICE DEPARTMENT

1441 Woodrow Ave.

Report suspicious activity to San Diego Police Department at 531-2000

Property managed by:
Source Group Realty (858) 999-0070

Jordan Z. Marks, San Diego County - Assessor

Property Address: **1441 WOODROW AVE SAN DIEGO CA 92114-3336**

General Information

Parcel # (APN):	**576-701-01-00** Open Map
Owner:	See Full Detail
Mailing Address:	**3952 CLAIREMONT MESA BLVD #D SAN DIEGO CA 92117**
Legal Description:	**TR 4747 LOT 103***
Use Type:	**RESID. SINGLE FAMILY**
Tax Rate Area:	**008-024**

Full Detail $14.95 Add to Cart

PLEASE NOTE: If a field is empty on this page, there is no data available, ar the field will also be empty on the Full Detail property report.

Assessment

Total Value:	**$257,026**	Year Assd:	**2024**
Land:	**$110,785**	Zoning:	See Full Detail
Structures:	**$146,241**	Use Code:	See Full Detail
Other:		Census Tract:	See Full Detail
% Improved:	See Full Detail	Price/SqFt:	See Full Detail
Exempt Amt:	**$7,000**		
HO Exempt:	**Y**		

Sale History

	Sale 1	Sale 2	Sale 3	Transfer
Document Date:	**05/08/2024**			See Full Detail
Document Number:	**0114810**			See Full Detail
Document Type:	See Full Detail			
Transfer Amount:	**$495,000**			
Seller (Grantor):				

Property Characteristics

Bedrooms:	**4**	Fireplace:		Units:	See Full Detail
Baths (Full):	**2**	A/C:		Stories:	
Baths (Half):		Heating:		Quality:	
Total Rooms:		Pool:		Building Class:	
Bldg/Liv Area:	**1,299**	Park Type:		Condition:	
Lot Acres:	**0.254**	Spaces:	See Full Detail	Site Influence:	
Lot SqFt:	**11,100**	Garage SqFt:		Timber Preserve:	
Year Built:				Ag Preserve:	
Effective Year:	See Full Detail				

**The information provided here is deemed reliable, but is not guaranteed.

Additional reports on this property

Impact of Council Resolution to Limit Bonus ADU Program in Low Density RS Zones

Neighbors For A Better San Diego

April 17, 2025

March 4 Council Resolution

1) Request City Staff to return to City Council within 90 days with an action item to remove applicability of the ADU Density Bonus program from the San Diego Municipal Code, conforming the local ADU Bonus Program to state-mandated ADU regulations for single-family zoned parcels in RS-1-1, RS-1-2, RS-1-3, RS-1-4, RS-1-8, RS-1-9, RS-1-10, and RS-1-11 zoned parcels; and

2) Request the City Planning Department to bring forward revisions to the ADU Density Bonus program including, but not limited to, those provided in the February 28, 2025, memorandum to the Land Use and Housing Committee for consideration.

Breakdown by Single-Family Zones (RS)

- Over half of all Bonus ADU projects are in RS-1-7
  - 43% of total Bonus ADUs are produced in RS-1-7 zones

ZONE	# PROJECTS	% PROJECTS	# ADUs	% ADUs	ADUs Per Project
RS-1-2	2	0.7%	39	2.5%	3 to 36
RS-1-4	1	0.4%	2	0.1%	2
RS-1-6	6	2.1%	46	2.9%	3 to 16
RS-1-7	**145**	**51.4%**	**680**	**42.8**	**1 to 37**
RS-1-14	7	2.5%	25	1.6%	2 to 8
TOTAL RS	**161**	**57.1%**	**792**	**49.9%**	**1 to 37**
ALL ZONES	282	100%	1588	100%	1 to 37

Impact of March 4 Council Resolution

Exclude Bonus ADUs in RS zones with minimum lot sizes of 10,000 sf

- RS-1-1, 1-2, 1-3, 1-4, 1-8, 1-9, 1-10, 1-11
- Only RS-1-2 and RS-1-4 have had Bonus ADUs projects
- Would have affected 1% (3 of 282) of Bonus ADU projects

ZONE	# PROJECTS	% PROJECTS	# ADUs	% ADUs
RS-1-1	0	0	0	0
RS-1-2	2	0.7%	39	2.5%
RS-1-3	0	0	0	0
RS-1-4	1	0.4%	2	0.1%
RS-1-8	0	0	0	0
RS-1-9	0	0	0	0
RS-1-10	0	0	0	0
RS-1-11	0	0	0	0
TOTAL IMPACT	3	1.1%	41	2.6%
ALL ZONES	282	100%	1588	100%

Conclusion

Excluding RS zones with minimum 10,000 sf lots only affects a small percentage of projects.

Most large projects are on RS-1-7 zoned lots and require more extensive consideration than is alluded to in the February 28 Vonblum memo.

Thank you!

Danna Givot
Neighbors For A Better San Diego
Better4SD@gmail.com
NFABSD.org

Revision of Bonus ADU Program

Neighbors For A Better San Diego

April 17, 2025

March 4 Council Resolution

1) Request City Staff to return to City Council within 90 days with an action item to remove applicability of the ADU Density Bonus program from the San Diego Municipal Code, conforming the local ADU Bonus Program to state-mandated ADU regulations for single-family zoned parcels in RS-1-1, RS-1-2, RS-1-3, RS-1-4, RS-1-8, RS-1-9, RS-1-10, and RS-1-11 zoned parcels; and

2) Request the City Planning Department to bring forward revisions to the ADU Density Bonus program including, but not limited to, those provided in the February 28, 2025, memorandum to the Land Use and Housing Committee for consideration.

Basis for Resolution

February 28 memo from Planning Director Vonblum promising:

“As part of the 2025 Land Development Code Update process, we plan to share information on our webpage, hold public workshops, receive input, and then bring the item forward for a recommendation from the Community Planners Committee and Planning Commission, prior to presenting the item to Land Use and Housing Committee, and then the City Council. We estimate that this process will allow us to begin the hearing process this Summer.”

Scheduled May 1 hearing doesn't fulfill this promise

Land Development Code Update going directly to Planning Commission without public exposure or input

- **NO code matrix or proposed code provided to public**
- **NO public workshops**
- **NO presentation to Community Planners Committee**

Neighbors For A Better San Diego submitted 9 ADU recommendations to the 2025 LDC update which we would have been able to re-present and receive feedback on under the normal LDC update process.

Recommendation

The 90 day deadline for the first part of the March 4 Resolution shouldn't short circuit full consideration of the second part of the Resolution.

We urge the City to continue with the full Land Development Code Update process for the remaining ADU proposals (separately and parallel to the non-ADU items of the 2025 Land Development Code Update).

Thank you!

Geoffrey Hueter
Neighbors For A Better San Diego
Better4SD@gmail.com
NFABSD.org

NEIGHBORS for a BETTER SAN DIEGO