

Norwood Townhomes Project Revisions to ISMND and Responses to Comments Received on the Initial Study/Mitigated Negative Declaration

The Initial Study/Mitigated Negative Declaration (IS/MND) for the Norwood Townhomes Project (proposed project) was circulated for public comment from August 31, 2022 to September 29, 2022. Written comments were received as follows:

Date	Commenter
9/6/2022	S. Wright, Resident*
9/19/2022	Karen Huss, Sacramento Metropolitan Air Quality Management District
9/22/2022	Lisa G. Schimpf, Resident
9/22/2022	Lisa G. Schimpf, Resident
9/22/2022	Lisa G. Schimpf, Resident
9/22/2022	Anonymous, Resident
9/26/2022	Satwinder Dhatt, California Department of Transportation
9/27/2022	Gavin McCreary, Department of Toxic Substances Control
9/29/2022	Peter Minkel, Central Valley Regional Water Quality Control Board
*Note: This comment letter consisted of a blank email, and, thus, will not be addressed.	

The written comments are attached. The comments are acknowledged by the City and have been considered as part of the project planning and its implementation. The comments received did not identify any new significant effect, increase in severity of an impact identified in the IS/MND, or any significant new information. Recirculation of the IS/MND is not required.

The responses below include responses to each comment letter submitted regarding the proposed project. Where revisions to the IS/MND text are required in response to a comment, new text is double underlined and deleted text is ~~struck through~~.

Response to Karen Huss, Sacramento Metropolitan Air Quality, 9/19/22: Thank you for participating in the public review process of the IS/MND. In response to the commenter's suggested correction, page 18 of the IS/MND is hereby revised as follows:

The SVAB is currently designated as nonattainment for the NAAQS 8-hour ozone standard and the CAAQS for both 1-hour and 8-hour O₃ standard. The SVAB is also currently designated as nonattainment for ~~both NAAQS and the~~ CAAQS 24-hour PM₁₀ standards. In addition, the SVAB is currently designated as nonattainment for the NAAQS 24-hour PM_{2.5} standard. The air basin is designated as unclassified or in attainment for the remaining criteria air pollutants (SMAQMD 2019).

As noted on pages 26 and 27 of the IS/MND, the project would be required to implement the SMAQMD's Basic Construction Emission Control Practices (BCECP). The City will require implementation of the BCECP through a condition of project approval.

In response to the comment, Mitigation Measure 2-1 is hereby revised as follows:

2-1 Prior to the initiation of ground disturbance, the project applicant shall show on the plans via notation that the contractor shall ensure that the heavy-duty off-road vehicles (50 horsepower or more) to be used in the construction project, including owned, leased, and subcontractor vehicles, shall not generate PM_{2.5} emissions in excess of 0.0512 tons PM_{2.5} per year. The PM_{2.5} reduction shall be achieved by requiring a combination of

engine Tier 4 off-road construction equipment or the use of hybrid, electric, or alternatively fueled equipment. Additionally, prior to ground disturbance, the project applicant shall submit an equipment list to the City of Sacramento Community Development Department and the SMAQMD that demonstrates that the foregoing PM_{2.5} reduction goal would be achieved.

In addition, all off-road equipment working at the construction site must be maintained in proper working condition according to manufacturer's specifications. Idling shall be limited to five minutes or less in accordance with the Off-Road Diesel Fueled Fleet Regulation as required by CARB. Portable equipment over 50 horsepower must have either a valid District Permit to Operate (PTO) or a valid statewide Portable Equipment Registration Program (PERP) placard and sticker issued by CARB.

At the conclusion of project construction, the project applicant shall submit an updated (as required) equipment list to the City of Sacramento Community Development Department and the SMAQMD documenting compliance with this measure. The aforementioned requirements shall be noted on Grading Plans and submitted for review and approval by the City of Sacramento Community Development Department.

The AERMOD and HARP results were erroneously excluded from Appendix A; however, as noted on page 93 of the IS/MND, all technical studies were available upon request during the public review period. The results are included as an attachment to this document for informational purposes.

Response to Lisa G. Schimpf, Resident, 9/22/22: Several comment letters were received from Ms. Schimpf with substantially identical comments. Thank you for participating in the public review process of the IS/MND.

Regarding the commenter's concern about flooding risks, as discussed on page 58 of the IS/MND, the project site is designated as Zone X, which is applied to areas of 0.2 percent annual chance flood, areas of one percent annual chance flood with average depths of less than one foot, or with drainage areas less than one square mile, and areas protected by levees from one percent annual chance flood. Because the project site is located within in area of minimal flood hazard, flooding of the project site is not a substantial concern. In compliance with the City's standard Conditions of Approval, a project-specific drainage study was prepared for the proposed project. Page 60 of the IS/MND states, "According to the project-specific drainage study, the proposed drainage system would convey surface drainage to various drainage inlets located throughout the site. [...]" A number of source control measures would be included, consistent with the *Stormwater Quality Design Manual for the Sacramento Region* such as trash capture devices, storm drain inlet markings and signage, and low impact development control measures. Implementation of the proposed project would be required to comply with all applicable policies and regulations set by the City's General Plan and the City Code." Therefore, flooding concerns were adequately addressed in the IS/MND.

Regarding the commenter's concerns about the on-site wetland, as discussed on page 34 of the IS/MND, although four seasonal wetlands were identified on the project site, none were determined to be capable of providing a habitat for any protected species. Wetlands were further addressed in Mitigation Measure 3-5, on page 35 of the IS/MND, which states that "If the Regional Water Quality Control Board and/or the U.S. Army Corps of Engineers determines that the wetlands and non-wetland waters are regulated under State and federal laws, the project applicant shall obtain the required permits and implement any required compensation for the loss

of waters of the U.S. and/or waters of the State.” Therefore, impacts related to preservation of protected wetlands were adequately addressed in the IS/MND. In addition, Mitigation Measures 3-1 and 3-2, found on pages 34 and 35 of the IS/MND, are sufficient to avoid any impacts to protected wildlife species that may occur.

The final comment, regarding the presence of security and privacy walls on-site, is not a CEQA issue, and does not address the adequacy of the IS/MND. As part of the development process, the proposed project would undergo Site Plan and Design Review. As part of the Site Plan and Design Review, the City would consider topics such as security and privacy walls. In addition, the proposed project’s impacts related to aesthetics are addressed on pages 15 and 16 of the IS/MND. As discussed therein, the proposed project would not substantially degrade the existing visual character of the project site or its surroundings. The comment has been noted for the record, and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Anonymous, Resident, 9/22/22: Regarding concerns related to density, as stated on page 12 of the IS/MND, the proposed project would be within the allowed density of the site’s land use and zoning designation.

Regarding concerns about increased traffic, as discussed on page 75 of the IS/MND, the proposed project is consistent with the land use designation for the site in the 2035 General Plan. As such, the Master EIR included an analysis of the increase in traffic associated with buildout of the project site. The proposed project would not increase traffic volumes from what has been anticipated in the 2035 General Plan. Therefore, the IS/MND concluded that a less-than-significant impact related to an increase in vehicle trips would occur.

Regarding concerns about school impaction, page 69 of the IS/MND states that the increase in students associated with buildout of the site has been addressed in the 2035 General Plan EIR. As stated within the General Plan EIR, all impacts on schools are considered to be less than significant with payment of the State Department of Education Development Fee. As a result, with implementation of education development fees and policies within the General Plan, the proposed project’s impacts on schools were determined to be less than significant.

Regarding concerns related to the provision of parks, as stated on page 72 of the IS/MND, given the project’s consistency with the Parks and Recreation Master Plan and the City’s General Plan, and the required payment of the Park Development Impact Fee, implementation of the proposed project was determined to result in a less-than-significant impact related to parks and recreational facilities.

The commenter’s general opposition to the proposed project has been noted for the record, and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Satwinder Dhatt, California Department of Transportation, 9/26/22: Thank you for participating in the public review process of the IS/MND. The letter states that the California Department of Transportation does not have any comments on the proposed project. In addition, the comment contains a request for the project applicant to provide the Department of Transportation with copies of any further actions regarding the proposed project. The comment does not address the adequacy of the IS/MND, has been noted for the record, and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Gavin McCreary, Department of Toxic Substances Control, 9/27/22: Thank you for participating in the public review process of the IS/MND. In response to the commenter's suggestion regarding the presence of an underground storage tank on-site, Mitigation Measure 8-1, on page 57 of the IS/MND, is hereby revised as follows:

8-1 *During grading and construction activities, if underground storage tanks (USTs) are encountered, the applicant shall obtain a permit from the Sacramento County Environmental Management Department and hire a licensed contractor to properly remove the UST, subject to review and approval by the Sacramento County Environmental Management Department, and to the satisfaction of the Department of Toxic Substances Control (DTSC) or the Regional Water Quality Control Board (RWQCB). If soils suspected of being contaminated are encountered in association with the USTs, the soils shall be removed in accordance with ~~Regional Water Quality Control Board (RWQCB)~~ guidelines. Further remediation, if necessary, and disposal of the soils shall be conducted in accordance with State and federal guidelines, subject to verification by the Community Development Department.*

The Department of Toxic Substances Control expressed concern about the potential presence of asbestos and lead on the project site. It is anticipated that lead levels would be present in soil throughout the urbanized area of Sacramento due to the use of lead in gasoline for many years, as well as in paint and other materials generally found in an urbanized area. These background levels, while somewhat elevated, do not exceed federal or State regulatory levels that would require additional action. In the case of any project site on which the City identifies specific uses that may lead to site-specific lead contamination, such as prior auto repair or garage facilities, the City would implement site-specific response.

As stated on page 21 of the IS/MND, the project would be required to comply with all applicable SMAQMD rules and regulations. SMAQMD District Rule 403 – Fugitive Dust requires that projects take every reasonable precaution to not cause or allow emissions of fugitive dust from being airborne beyond the project site during construction activities. Sacramento City Code Section 15.40.050 – Control of Dust and Mud further enforces precautions to disallow airborne dust from spreading beyond the project site. Both are existing requirements for the proposed project which would ensure that, although hazardous materials are not likely to be present on-site, should hazardous materials become airborne during construction activities, such materials would not be allowed to spread beyond the project site.

The Department of Toxic Substances Control suggests that further studies could be carried out to determine the extent to which the project site has been contaminated. As stated on page 55 of the IS/MND, a Phase I Environmental Site Assessment has been conducted for the project site, which, along with the Mitigation Measures set forth in the IS/MND, address the commenter's suggestion.

The Department of Toxic Substances Control commented on potential effects of demolition. The proposed project does not include any demolition activities.

In response to the commenter's concern about proper sampling of imported soil used to backfill excavated areas, Mitigation Measure 6-1, on page 49 of the IS/MND, requires that a design-level geotechnical report for the project site be prepared, which would ensure compliance with applicable City construction standards, including requirements for suitable fill materials.

The comment alluded to potential effects of historic agricultural activity. As stated on page 13 of the IS/MND, the project site has not historically and is not currently used for agricultural purposes.

Response to Peter Minkel, Central Valley Regional Water Quality Control Board, 9/29/22:

Thank you for participating in the public review process of the IS/MND. The comment provides background information regarding applicable regulations and required permits. The comment does not address the adequacy of the IS/MND, has been noted for the record, and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

ATTACHMENT A
COMMENT LETTERS

From: [Ron Bess](#)
To: swrightroblacommunity1@yahoo.com
Subject: RE: Notice of Availability/Intent for the Norwood Homes Project (Z21-086)
Attachments: [image001.gif](#)

Hello,

There were no comments in this email. How can I assist you?

Thanks,

Ron Bess
City of Sacramento
Community Development Department
Environmental Planning Services Division
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811
Rbess@cityofsacramento.org

From: s wright <swrightroblacommunity1@yahoo.com>
Sent: Wednesday, August 31, 2022 8:12 PM
To: Ron Bess <RBess@cityofsacramento.org>
Subject: Re: Notice of Availability/Intent for the Norwood Homes Project (Z21-086)

[Sent from Yahoo Mail on Android](#)

On Wed, Aug 31, 2022 at 8:38 AM, Ron Bess
<RBess@cityofsacramento.org> wrote:



Good Morning Everyone,

This email is to inform you that the City of Sacramento, Community Development Department, as Lead Agency, has issued a **Notice of Availability/Intent to Approve the Norwood Homes Project (Z21-086)**.

The Comment Period is from August 31, 2022, to September 29, 2022.

The document is now available for public review and comment. The NOA/I is available, along with the Mitigated Negative Declaration and Appendices at the City's Community Development Department webpage at:

<http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>

Comments are invited from all interested parties. Written comments on the Mitigated Negative Declaration should be submitted to the following address **NO LATER THAN 4:00 pm on Thursday, September 29, 2022**. All comments should be submitted via email or mailed to:

Ron Bess, Associate Planner

City of Sacramento

Community Development Department

Environmental Planning Services

300 Richards Blvd. 3rd Floor

Sacramento, CA 95811

(916) 808-8272

Rbess@cityofsacramento.org



September 19, 2022

Ron Bess
Associate Planner
Community Development Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Subject: Norwood Townhomes Mitigated Negative Declaration (Z21-086, SMAQMD# SAC202102807)

Dear Ron Bess:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Mitigated Negative Declaration (MND) for the Norwood Townhomes project under the California Environmental Quality Act (CEQA). This project is a request to construct 48 single-unit residents on a 3.75-acre site southeast of the intersection of Main Avenue and Norwood Avenue in the North Sacramento Community Plan area. The project requires approval of a Tentative Subdivision Map, and Site Plan and Design Review. Sac Metro Air District offers the following recommendations on air quality and climate considerations for project implementation and CEQA review, consistent with methods recommended in our *Guide to Air Quality Assessment in Sacramento County*¹ (CEQA Guide).

Air Quality

The Existing Air Quality section of the MND indicates the Sac Valley Air Basin does not attain the Federal 24-hour particulate matter (PM₁₀) standards. Please update this statement since the Sac Metro Air District does attain the Federal 24-hour PM₁₀ standard² (page 18).

The MND uses our non-zero thresholds of significance for particulate matter emissions, which requires implementation of our Basic Construction Emission Control Practices³ (BCECP). Sac Metro Air District recommends the inclusion of our BCECP as a mitigation measure in the MND, condition of approval or design feature to ensure the practices are implemented (page 21).

Mitigation measure 2-1 is included to reduce exposure to diesel particulate matter from project construction activities (pages 26-27). Sac Metro Air District recommends the City expand the mitigation to require the proponent/contractor to submit an equipment list to the City and Sac Metro Air District prior to construction that demonstrates the measure will be achieved. Additionally, the

¹ <https://www.airquality.org/Businesses/CEQA-Land-Use-Planning/CEQA-Guidance-Tools>

² <https://www.airquality.org/air-quality-health/air-quality-pollutants-and-standards>

³ <https://www.airquality.org/LandUseTransportation/Documents/Ch3BasicEmissionControlPracticesBMPSFinal7-2019.pdf>

proponent/contractor should be required to submit an equipment list at the conclusion of construction to document compliance.

Tables 5 and 6 report results from the analysis of potential health risks related to diesel particulate exposure with and without mitigation. The tables and the figure 5 map reference “see Appendix A” for AERMOD and HARP information supporting the analysis, but currently Appendix A only includes CalEEMod reports. For full disclosure, Sac Metro Air District recommends the City include additional information supporting the health risk analysis in Appendix A.

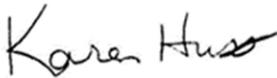
Greenhouse Gas Emissions

Sac Metro Air District commends the inclusion of our greenhouse gas thresholds Tier 1 best management practices and mitigation measure 7-1 to ensure implementation (page 53).

Conclusion

Thank you for your attention to our comments. If you have any questions, please contact me at khuss@airquality.org or 279-207-1131.

Sincerely,



Karen Huss

Associate Air Quality Planner / Analyst

cc: Paul Philley, AICP, Program Supervisor, Sac Metro Air District
Molly Wright, AICP, Associate Air Quality Planner / Analyst, Sac Metro Air District
Zach Dahla, City of Sacramento Associate Planner

Ron Bess, Associate Planner
Zach Dahla, Associate Planner
300 Richards Blvd
Sacramento, Ca 95811

9/22/22

Norwood North LLC
7225 26th St
Rio Linda, CA 95673

Re: Norwood Homes (Z21-086)
(APN) 237-0040-001
4790 Norwood Ave.

I reside at 424 Main Ave, Sacramento Ca 95838 and the Norwood Homes (Z21-086) is right next to my families property.

My concern is:

1) Flooding: We have been told for over 80 years that there is a NATURAL DRAIN that runs east of our property, towards the west, through our property and into the field next to our property. Logic tells me that if this natural drain is BLOCKED and RAISED at the Norwood Homes Z21-086 Project, natural drain water will be blocked resulting in flooding at 424 Main Ave.

1a) And if flooding does occur to property at 424 Main Ave and any other properties, will the County, City & Developers take responsibility for any resulting damages to my property or my neighbors property as you should. Know water is excluded under Homeowner's Insurance Policy.

1b) We were always told by County that there was a natural "Wet Land" & we could never block the flow of water from our property to the Norwood Property.

Ron Bess, Associate Planner
Zach Nable, Associate Planner
300 Richards Blvd
Sacramento, Ca 95811

9/22/22
+ Norwood North LLC
7225 26th St
Rio Linda, CA 95673

Re: Norwood Homes (221-086)
(APN) 237-0640-001
4790 Norwood Ave.

2a) What action is being taken to protect this "Hot Land" area? I see fly in every water and rest there.

3) Another big concern is what security & privacy walls are being built to protect our property, myself and my family?

This property has been in our family for over 80 years and I now currently own it. ~~(the)~~
In all this time it has NEVER flooded or even came close to flooding.

With this project I'm very concerned about the safety for myself, my family & my property.

Sincerely,

Lisa G Schimpf
424 Main Ave
Sacramento, CA 95838
916-524-2912
l.g.s2760@gmail.com

P. 2 of 2

Ron Bess, Associate Planner
Zach Dahla, Associate Planner
300 Richards Blvd
Sacramento, Ca 95811

9/22/22

Norwood North LLC
7225 26th St
Rio Linda, CA 95673

Re: Norwood Homes (Z21-086)
(APN) 237-0040-001
4790 Norwood Ave.

I reside at 424 Main Ave, Sacramento Ca 95838 and the Norwood Homes (Z21-086) is right next to my families property.

My concern is:

1) Flooding: We have been told for over 80 years that there is a NATURAL DRAIN that runs east of our property, towards the west, through our property and into the field next to our property. Logic tells me that if this natural drain is BLOCKED and RAISED at the Norwood Homes Z21-086 Project, natural drain water will be blocked resulting in flooding at 424 Main Ave.

1a) And if flooding does occur to property at 424 Main Ave and any other properties, will the County, City & Developers take responsibility for any resulting damages to my property or my neighbors property as you should know water is excluded under Homeowner's Insurance Policy.

1b) We were always told by County that there was a natural "Wet Land" & we could never block the flow of water from our property to the Norwood Property.

Ron Bess, Associate Planner
Zach Nable, Associate Planner
300 Richards Blvd
Sacramento, Ca 95811

9/22/22
+ Norwood North LLC
7225 26th St
Rio Linda, CA 95673

Re: Norwood Homes (221-086)
(APN) 237-0640-001
4790 Norwood Ave.

2a) What action is being taken to protect this "Hot Land" area? I see fly in every water and rest there.

3) Another big concern is what security & privacy walls are being built to protect our property, myself and my family?

This property has been in our family for over 80 years and I now currently own it. ~~(the)~~
In all this time it has NEVER flooded or even came close to flooding.

With this project I'm very concerned about the safety for myself, my family & my property.

Sincerely,

Lisa G Schimpf
424 Main Ave
Sacramento, CA 95838
916-524-2912
l.g.2760@gmail.com

P. 2 of 2

From: [lg_july](#)
To: [Ron Bess](#); [Zachary Dahla](#)
Subject: Project Norwood Homes (Z21-086); Parcel Number: 237-0040-001
Date: Thursday, September 22, 2022 8:31:43 PM

I reside at 424 Main Ave, Sacramento, CA 95838 and the Norwood Homes (Z21-086) is right next to my families property. My concern is:

1). FLOODING: We have been told for over 80 years that there is a NATURAL DRAIN that runs east of our property, towards the west, through our property and into the field next to our property. Logic tells me that if this natural drain is BLOCKED and RAISED at the Norwood Homes Z21-086 Project, natural drain water will be blocked resulting in flooding at 424 Main Ave.

1a) And if flooding does occur to property at 424 Main Ave and any other properties, will the County, City, and Developer take the responsibility for any resulting damages to my property or my neighbors property as you should know surface water is excluded under Homeowner's Insurance Policy.

1b) We were always told by County that there was a natural "Wet Land" and we could never block the flow of water from our property to the Norwood Property.

2a) What action is being taken to protect this "Wet Land Area"? Geese fly in every winter and rest there.

3) Another big concern is what security and privacy walls are being built to protect our property, myself and my family?

This property has been in our family for over 80 years and I now currently own it. In all this time it has NEVER flooded or even came close to flooding.

With this project, I'm very concerned about the safety for myself, my family and my property.

Sincerely,
Lisa G. Schimpf
424 Main Ave
Sacramento, CA. 95838
916-524-3912
lgj2760@gmail.com

Sent from my iPhone

Thank you for reaching out
I would like to vote against

this Project (Assessor's Parcel #
237-0040-001-0000)

It is a small area for 48 houses

& it will cause lot of traffic
impaction, school impaction.

There is no Park near by for
these houses.

Resident of

11 Poinsettia Ct

Thanks!

From: [Dhatt, Satwinder K@DOT](mailto:Dhatt.Satwinder.K@DOT) on behalf of D3.Local.Development@DOT
To: [Ron Bess](mailto:Ron.Bess)
Cc: [Arnold, Gary S@DOT](mailto:Arnold.Gary.S@DOT)
Subject: Norwood Homes Project (Z21-086)
Date: Monday, September 26, 2022 11:55:55 AM

Hi Ron,

Thank you for including California Department of Transportation in the review process for the Norwood Homes Project. We wanted to reach out and let you know we have no comments at this time.

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

Should you have questions please contact me, Local Development Review, Equity and System Planning Coordinator, by phone (530) 821-8261 or via email at D3.local.development@dot.ca.gov.

Thank you!

Satwinder Dhatt
Local Development Review, Equity and System Planning
California Department of Transportation, District 3
(530) 821-8261



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

September 27, 2022

Mr. Ron Bess
Associate Planner
City of Sacramento
Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
RBess@cityofsacramento.org

MITIGATED NEGATIVE DECLARATION FOR NORWOOD TOWNHOMES
PROJECT (Z21-086) – DATED AUGUST 29, 2022 (STATE CLEARINGHOUSE
NUMBER: 2022080709)

Dear Mr. Bess:

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Norwood Townhomes Project (Z21-086) (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the MND:

1. The Hazards section of the MND states that a Phase I Environmental Site Assessment (ESA) performed for the site conducted a search for Recognized Environmental Concerns (RECs). The Phase I ESA did not identify any RECs on or in the immediate vicinity of the subject property that would likely pose a significant impact. However, the Phase I ESA identified the presence of a single-family residence and farm on the northwestern portion of the Project site from approximately 1937 until 1984. The Phase I concluded that the potential exists for a heating oil underground storage tank near the location of the former

residence. Additionally, the Phase I ESA describes other potential issues from the former residence that include lead based paint and asbestos containing materials. A State of California environmental regulatory agency such as DTSC or Regional Water Quality Control Board (RWQCB), or a qualified local agency that meets the requirements of [Assembly Bill 304 \(AB304\)](#) should provide regulatory concurrence that the site is safe for construction and the proposed use.

2. In instances in which releases of hazardous wastes/substances have occurred or may occurred, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The MND should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
3. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the MND.
4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 [Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers.](#)
5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the

imported materials be characterized according to DTSC's 2001 [Information Advisory Clean Imported Fill Material](#).

6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the MND. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 [Interim Guidance for Sampling Agricultural Properties \(Third Revision\)](#).

DTSC appreciates the opportunity to comment on the MND. Should you choose DTSC to provide oversight for any environmental investigations, please visit DTSC's [Site Mitigation and Restoration Program](#) page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at [DTSC's Brownfield website](#).

If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,



Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

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

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Central Valley Regional Water Quality Control Board

29 September 2022

Ron Bess
City of Sacramento
Community Development Department
300 Richards Boulevard
Sacramento, CA 95811
rbess@cityofsacramento.org

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, NORWOOD TOWNHOMES PROJECT, SCH#2022080709, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 31 August 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Norwood Townhomes Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:
https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

ATTACHMENT B
AERMOD RESULTS

AERMOD Model Options

Model Options

Pathway	Keyword	Description	Value
CO	TITLEONE	Project title 1	Norwood Townhomes
CO	TITLETWO	Project title 2	
CO	MODELOPT	Model options	DFAULT,CONC,NODRYDPLT,NOWETDPLT
CO	AVERTIME	Averaging times	1,ANNUAL
CO	URBANOPT	Urban options	
CO	POLLUTID	Pollutant ID	PM25 H1H
CO	HALFLIFE	Half life	
CO	DCAYCOEF	Decay coefficient	
CO	FLAGPOLE	Flagpole receptor heights	1.8
CO	RUNORNOT	Run or Not	RUN
CO	EVENTFIL	Event file	F
CO	SAVEFILE	Save file	F
CO	INITFILE	Initialization file	
CO	MULTYEAR	Multiple year option	N/A
CO	DEBUGOPT	Debug options	N/A
CO	ERRORFIL	Error file	F
SO	ELEVUNIT	Elevation units	METERS
SO	EMISUNIT	Emission units	N/A
RE	ELEVUNIT	Elevation units	METERS
ME	SURFFILE	Surface met file	C:\Users\bshea\Desktop\METEOR~1\SACINT~1.SFC
ME	PROFFILE	Profile met file	C:\Users\bshea\Desktop\METEOR~1\SACINT~1.PFL
ME	SURFDATA	Surf met data info.	93225 2014
ME	UAIRDATA	U-Air met data info.	23230 2014
ME	SITEDATA	On-site met data info.	
ME	PROFBASE	Elev. above MSL	8.23
ME	STARTEND	Start-end met dates	
ME	WDROTATE	Wind dir. rot. adjust.	
ME	WINDCATS	Wind speed cat. max.	
ME	SCIMBYHR	SCIM sample params	
EV	DAYTABLE	Print summary opt.	N/A
OU	EVENTOUT	Output info. level	N/A

OU	DAYTABLE	Print summary opt.
----	----------	--------------------

Source Parameter Tables

All Sources

Source ID / Pollutant ID	Source Type	Description	UTM		Elev.	Emiss. Rate	Emiss. Units	Release Height
			East (m)	North (m)	(m)			(m)
K25Y1001	VOLUME		634311.9	4279457.2	0	0.00188889	(g/s)	5
K25Y1002	VOLUME		634311.9	4279520.8	0	0.00188889	(g/s)	5
K25Y1003	VOLUME		634311.9	4279584.4	0	0.00188889	(g/s)	5

Volume Sources

Source ID / Pollutant ID	Description	UTM		Elev.	Emiss. Rate	Release Height	Init. Lat. Dim.	Init. Vert. Dim.
		East (m)	North (m)	(m)	(g/s)	(m)	(m)	(m)
K25Y1001		634311.9	4279457.2	0	0.00188889	5	29.59	1
K25Y1002		634311.9	4279520.8	0	0.00188889	5	29.59	1
K25Y1003		634311.9	4279584.4	0	0.00188889	5	29.59	1

BREEZE AERMOD Model Results

Max. Annual (4 YEARS) Results of Pollutant: PM25 (ug/m**3)

Group ID	High	Avg. Conc.	UTM		Elev. (m)	Hill Ht. (m)	Flag Ht. (m)	Rec. Type	Grid ID
			East (m)	North (m)					
ALL	1ST	0.18464	634370.40	4279550.70	0.00	0.00	1.80	DC	
	2ND	0.18166	634370.40	4279555.70	0.00	0.00	1.80	DC	
	3RD	0.17761	634310.40	4279649.90	0.00	0.00	1.80	DC	
	4TH	0.17596	634315.40	4279649.90	0.00	0.00	1.80	DC	
	5TH	0.17228	634320.40	4279649.90	0.00	0.00	1.80	DC	
	6TH	0.16677	634325.40	4279649.90	0.00	0.00	1.80	DC	
	7TH	0.16396	634335.40	4279644.90	0.00	0.00	1.80	DC	
	8TH	0.16310	634310.40	4279654.90	0.00	0.00	1.80	DC	
	9TH	0.16289	634305.40	4279654.90	0.00	0.00	1.80	DC	
	10TH	0.16251	634375.40	4279550.70	0.00	0.00	1.80	DC	

Highest Results of Pollutant: PM25

Avg. Per.	Grp ID	High	Type	Val	Units	Date	UTM		Elev. (m)	Hill Ht. (m)	Flag Ht. (m)	Rec. Type	Grid ID
						YYMMDDHH	East (m)	North (m)					
1-HR	ALL	1ST	Avg. Conc.	7.29010	ug/m**3	18121317	634341.40	4279399.20	0.00	0.00	1.80	DC	

Summary of Total Messages

#	Message Type
0	Fatal Error Message(s)
6	Warning Message(s)
996	Informational Message(s)
43680	Hours Were Processed
452	Calm Hours Identified
544	Missing Hours Identified (1.25 Percent)

Error & Warning Messages

Msg. Type	Pathway	Ref. #	Description
WARNING	CO	W276	Special proc for 1h-NO2/SO2 24hPM25 NAAQS disabled PM25 H1H
WARNING	CO	W363	Multiyr 24h/Ann PM25 processing not applicable for PM25 H1H

WARNING	ME	W186	THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
---------	----	----------------------	---

www.breeze-software.com

*HARP - HRACalc v21081 4/20/2022 3:18:44 PM - Cancer Risk - Input File: C:\Users\bshea\Desktop\HAI

INDEX	GRP1	GRP2	POLID	POLABBRE\CONC	RISK_SUM	SCENARIO	DETAILS
1			9901	DieselExhP 0.18464	3.28E-05	1YrCancer	*

PIG_RISK	CHICKEN_F	EGG_RISK	1ST_DRIVE	2ND_DRIVE	PASTURE_(FISH_CONC	WATER_CONC	
0.00E+00	0.00E+00	0.00E+00	NA	NA	0.00E+00	0.00E+00	0.00E+00	

*HARP - HRACalc v21081 4/20/2022 3:18:44 PM - Chronic Risk - Input File: C:\Users\bshea\Desktop\HA

INDEX	GRP1	GRP2	POLID	POLABBRE\CONC	SCENARIO	CV	CNS
1			9901	DieselExhP 0.18464	NonCancer	0.00E+00	0.00E+00

RP\Norwood_HRAInput.hra

IMMUN	KIDNEY	GILV	REPRO/DE	RESP	SKIN	EYE	BONE/TEET	ENDO
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.69E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00

BLOOD	ODOR	GENERAL	DETAILS	INH_CONC	SOIL_DOSE	DERMAL_D	MMILK_DC	WATER_DC
0.00E+00	0.00E+00	0.00E+00	*	1.85E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00

FISH_DOSE	CROP_DOS	BEEF_DOSE	DAIRY_DOSE	PIG_DOSE	CHICKEN_C	EGG_DOSE	1ST_DRIVE	2ND_DRIVE
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	INHALATIO	NA

3RD_DRIVE PASTURE_(FISH_CONC WATER_CONC			
NA	0.00E+00	0.00E+00	0.00E+00

*HARP - HRACalc v21081 4/20/2022 3:18:44 PM - Acute Risk - Input File: C:\Users\bshea\Desktop\HAR

INDEX	GRP1	GRP2	POLID	POLABBRE\	CONC	SCENARIO	CV	CNS
1			9901	DieselExhP	7.2901	NonCancer	0.00E+00	0.00E+00

BLOOD	ODOR	GENERAL
0.00E+00	0.00E+00	0.00E+00

AERMOD Model Options

Model Options

Pathway	Keyword	Description	Value
CO	TITLEONE	Project title 1	Norwood Townhomes
CO	TITLETWO	Project title 2	
CO	MODELOPT	Model options	DFAULT,CONC,NODRYDPLT,NOWETDPLT
CO	AVERTIME	Averaging times	1,ANNUAL
CO	URBANOPT	Urban options	
CO	POLLUTID	Pollutant ID	PM25 H1H
CO	HALFLIFE	Half life	
CO	DCAYCOEF	Decay coefficient	
CO	FLAGPOLE	Flagpole receptor heights	1.8
CO	RUNORNOT	Run or Not	RUN
CO	EVENTFIL	Event file	F
CO	SAVEFILE	Save file	F
CO	INITFILE	Initialization file	
CO	MULTYEAR	Multiple year option	N/A
CO	DEBUGOPT	Debug options	N/A
CO	ERRORFIL	Error file	F
SO	ELEVUNIT	Elevation units	METERS
SO	EMISUNIT	Emission units	N/A
RE	ELEVUNIT	Elevation units	METERS
ME	SURFFILE	Surface met file	C:\Users\bshea\Desktop\METEOR~1\SACINT~1.SFC
ME	PROFFILE	Profile met file	C:\Users\bshea\Desktop\METEOR~1\SACINT~1.PFL
ME	SURFDATA	Surf met data info.	93225 2014
ME	UAIRDATA	U-Air met data info.	23230 2014
ME	SITEDATA	On-site met data info.	
ME	PROFBASE	Elev. above MSL	8.23
ME	STARTEND	Start-end met dates	
ME	WDROTATE	Wind dir. rot. adjust.	
ME	WINDCATS	Wind speed cat. max.	
ME	SCIMBYHR	SCIM sample params	
EV	DAYTABLE	Print summary opt.	N/A
OU	EVENTOUT	Output info. level	N/A

OU	DAYTABLE	Print summary opt.
----	----------	--------------------

Source Parameter Tables

All Sources

Source ID / Pollutant ID	Source Type	Description	UTM		Elev.	Emiss. Rate	Emiss. Units	Release Height
			East (m)	North (m)	(m)			(m)
K25Y1001	VOLUME		634311.9	4279457.2	0	0.000573629	(g/s)	5
K25Y1002	VOLUME		634311.9	4279520.8	0	0.000573629	(g/s)	5
K25Y1003	VOLUME		634311.9	4279584.4	0	0.000573629	(g/s)	5

Volume Sources

Source ID / Pollutant ID	Description	UTM		Elev.	Emiss. Rate	Release Height	Init. Lat. Dim.	Init. Vert. Dim.
		East (m)	North (m)	(m)	(g/s)	(m)	(m)	(m)
K25Y1001		634311.9	4279457.2	0	0.000573629	5	29.59	1
K25Y1002		634311.9	4279520.8	0	0.000573629	5	29.59	1
K25Y1003		634311.9	4279584.4	0	0.000573629	5	29.59	1

BREEZE AERMOD Model Results

Max. Annual (4 YEARS) Results of Pollutant: PM25 (ug/m**3)

Group ID	High	Avg. Conc.	UTM		Elev. (m)	Hill Ht. (m)	Flag Ht. (m)	Rec. Type	Grid ID
			East (m)	North (m)					
ALL	1ST	0.05607	634370.40	4279550.70	0.00	0.00	1.80	DC	
	2ND	0.05517	634370.40	4279555.70	0.00	0.00	1.80	DC	
	3RD	0.05394	634310.40	4279649.90	0.00	0.00	1.80	DC	
	4TH	0.05344	634315.40	4279649.90	0.00	0.00	1.80	DC	
	5TH	0.05232	634320.40	4279649.90	0.00	0.00	1.80	DC	
	6TH	0.05065	634325.40	4279649.90	0.00	0.00	1.80	DC	
	7TH	0.04979	634335.40	4279644.90	0.00	0.00	1.80	DC	
	8TH	0.04953	634310.40	4279654.90	0.00	0.00	1.80	DC	
	9TH	0.04947	634305.40	4279654.90	0.00	0.00	1.80	DC	
	10TH	0.04935	634375.40	4279550.70	0.00	0.00	1.80	DC	

Highest Results of Pollutant: PM25

Avg. Per.	Grp ID	High	Type	Val	Units	Date	UTM		Elev. (m)	Hill Ht. (m)	Flag Ht. (m)	Rec. Type	Grid ID
						YYMMDDHH	East (m)	North (m)					
1-HR	ALL	1ST	Avg. Conc.	2.21390	ug/m**3	18121317	634341.40	4279399.20	0.00	0.00	1.80	DC	

Summary of Total Messages

#	Message Type
0	Fatal Error Message(s)
6	Warning Message(s)
996	Informational Message(s)
43680	Hours Were Processed
452	Calm Hours Identified
544	Missing Hours Identified (1.25 Percent)

Error & Warning Messages

Msg. Type	Pathway	Ref. #	Description
WARNING	CO	W276	Special proc for 1h-NO2/SO2 24hPM25 NAAQS disabled PM25 H1H
WARNING	CO	W363	Multiyr 24h/Ann PM25 processing not applicable for PM25 H1H

WARNING	ME	W186	THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
---------	----	----------------------	---

www.breeze-software.com

*HARP - HRACalc v21081 4/20/2022 3:32:12 PM - Cancer Risk - Input File: C:\Users\bshea\Desktop\HAI

INDEX	GRP1	GRP2	POLID	POLABBRE\CONC	RISK_SUM	SCENARIO	DETAILS
1			9901	DieselExhP 0.05607	9.97E-06	1YrCancer	*

PIG_RISK	CHICKEN_F	EGG_RISK	1ST_DRIVE	2ND_DRIVE	PASTURE_(FISH_CONC	WATER_CONC	
0.00E+00	0.00E+00	0.00E+00	NA	NA	0.00E+00	0.00E+00	0.00E+00	

*HARP - HRACalc v21081 4/20/2022 3:32:12 PM - Chronic Risk - Input File: C:\Users\bshea\Desktop\HA

INDEX	GRP1	GRP2	POLID	POLABBRE\	CONC	SCENARIO	CV	CNS
1			9901	DieselExhP	0.05607	NonCancer	0.00E+00	0.00E+00

RP\Norwood Mit_HRAInput.hra

IMMUN	KIDNEY	GILV	REPRO/DE	RESP	SKIN	EYE	BONE/TEET	ENDO
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.12E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00

BLOOD	ODOR	GENERAL	DETAILS	INH_CONC	SOIL_DOSE	DERMAL_D	MMILK_DC	WATER_DC
0.00E+00	0.00E+00	0.00E+00	*	5.61E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00

FISH_DOSE	CROP_DOS	BEEF_DOSE	DAIRY_DOS	PIG_DOSE	CHICKEN_C	EGG_DOSE	1ST_DRIVE	2ND_DRIVE
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	INHALATIO	NA

3RD_DRIVE PASTURE_(FISH_CONC WATER_CONC			
NA	0.00E+00	0.00E+00	0.00E+00

*HARP - HRACalc v21081 4/20/2022 3:32:12 PM - Acute Risk - Input File: C:\Users\bshea\Desktop\HAR

INDEX	GRP1	GRP2	POLID	POLABBRE\	CONC	SCENARIO	CV	CNS
1			9901	DieselExhP	2.2139	NonCancer	0.00E+00	0.00E+00

BLOOD	ODOR	GENERAL
0.00E+00	0.00E+00	0.00E+00