

Appendix F

Greenhouse Gas Assessment

Greenhouse Gas Emissions Assessment
956 Seward Project
City of Los Angeles, California



Expect More. Experience Better.

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Appendix A: Greenhouse Gas Emissions Data

LIST OF ABBREVIATED TERMS

AB	Assembly Bill
CARB	California Air Resource Board
CCR	California Code of Regulations
CalEEMod	California Emissions Estimator Model
CEQA	California Environmental Quality Act
CALGreen Code	California Green Building Standards Code
CPUC	California Public Utilities Commission
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CFC	Chlorofluorocarbon
cy	cubic yard
CAA	Federal Clean Air Act
FR	Federal Register
GHG	greenhouse gas
HCFC	Hydrochlorofluorocarbon
HFC	Hydrofluorocarbon
LCFS	Low Carbon Fuel Standard
CH ₄	Methane
MMTCO ₂ e	million metric tons of carbon dioxide equivalent
MTCO ₂ e	metric tons of carbon dioxide equivalent
NHTSA	National Highway Traffic Safety Administration
NF ₃	nitrogen trifluoride
N ₂ O	nitrous oxide
PFC	Perfluorocarbon
SB	Senate Bill
SCAB	South Coast Air Basin
South Coast AQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Government
Sf	square feet or square foot
SF ₆	sulfur hexafluoride
TAC	toxic air contaminants
U.S. EPA	U.S. Environmental Protection Agency

1 INTRODUCTION

This report documents the results of a Greenhouse Gas Emissions Assessment completed for the 956 Seward Project (“Project” or “Proposed Project”). The purpose of this Greenhouse Gas Emissions Assessment is to evaluate the Project’s potential construction and operational emissions and determine the level of impact on the environment.

1.1 Project Location

The Project Site is located at 936-962 North Seward Street and 949-959 North Hudson Avenue within the Hollywood community of the City of Los Angeles (City); see [Exhibit 1: Regional and Vicinity Map](#).

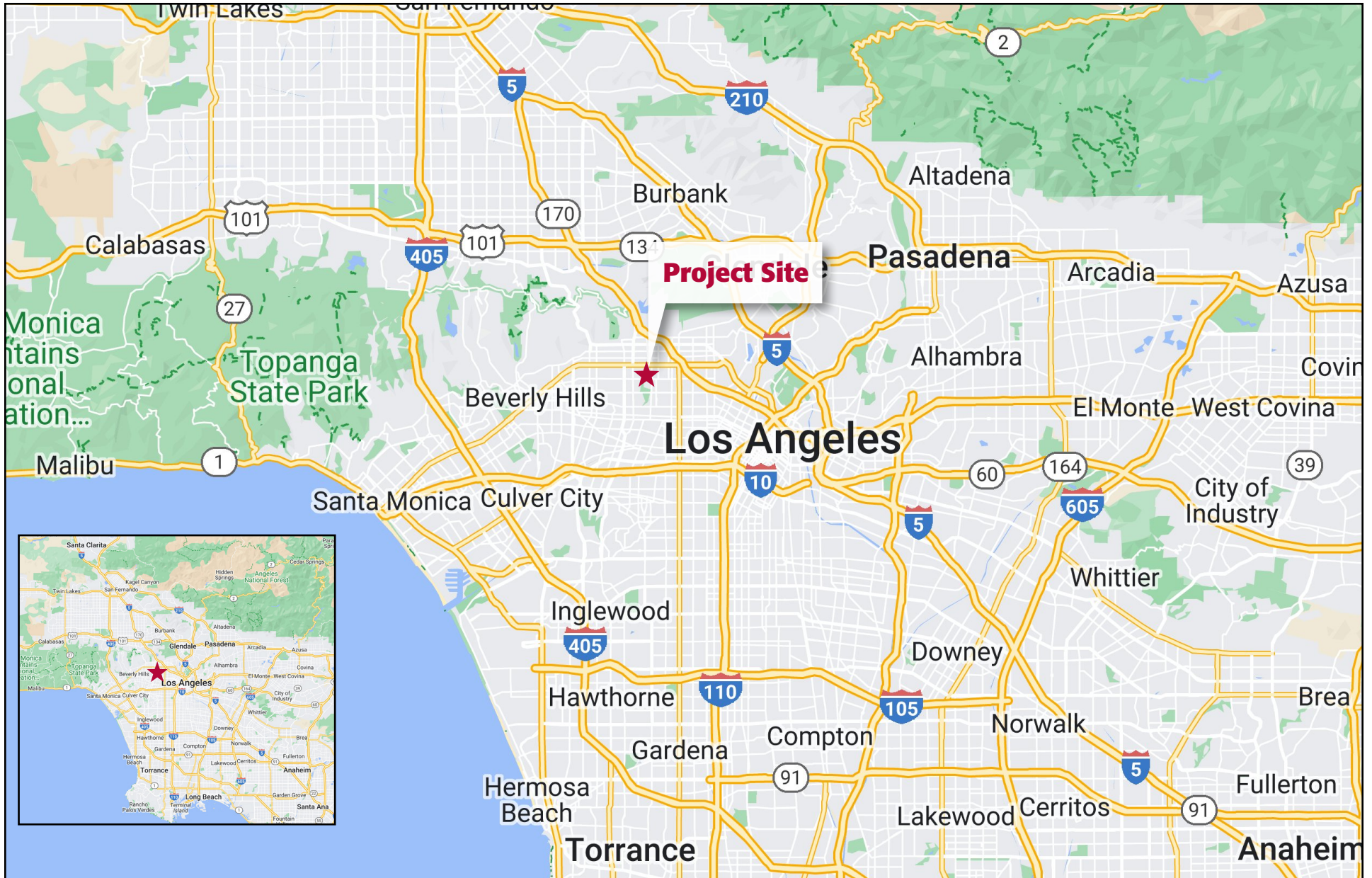
The Project is bounded by West Romaine Street to the north, North Hudson Avenue to the east, and North Seward Street to the west. The Project Site is an irregular-shaped lot that is approximately 1.29 acres or 56,254 square feet (sf). The Project Site consists of eight parcels that are currently improved with a two-story 40,000 sf film climate-controlled storage facility built in 1952 and an associated surface parking lot to the north currently used for a truck rental business surrounded by metal fencing. The Project Site is located within close proximity to several transit options. Numerous Metro transit and LADOT transit bus lines run and stop in the greater vicinity of the Project, including Metro Line 4 and Metro Line 210.

Land uses directly to the north of the Project Site across Romaine Street include a variety of one to five story buildings with commercial, restaurant, studio, and parking uses. To the west across Seward Street are various one to four story film, commercial, and office uses. Land uses adjacent to the south of the Project Site includes 3-story residential and an audio postproduction company. Land use to the east across Hudson Avenue include one to five story single and multifamily residential uses.

1.2 Project Description

The Proposed Project includes construction of a seven -story, up to 168,782 sf storage building, which would consist of 127,868 sf of self-storage uses, 39,510 sf of temperature-controlled film and media storage and up to 1,100 sf of leasing uses. The Project would also result in the demolition of an existing 40,000 sf building and its associated parking lot. Construction is expected to take 14 months. Development of the Project would require the export of approximately 5,200 cubic yards of soil. All necessary utility improvements including water, sewer, and storm drain would be constructed within the property limits.

The Project would provide 47 automobile parking spaces and 40 bicycle parking spaces on the ground-level; see [Exhibit 2: Site Plan](#). The Project would provide vehicular access along Romaine Street and Hudson Avenue. Romaine Street would contain one driveway for the entry and exit of vehicles. Hudson Avenue would contain one driveway allowing the exit of vehicles. The Project would include approximately 7,534 sf of landscaped areas throughout the Project Site including an outdoor landscaped walkway and entrance along Romaine Street and landscaping along Hudson Avenue and Seward Street.



SOURCE: Google Maps, 2023



EXHIBIT 1: Regional and Vicinity Map

956 SEWARD STREET PROJECT

2 ENVIRONMENTAL SETTING

2.1 Greenhouse Gases and Climate Change

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. While the global warming potential of CO₂ is lesser than that of methane gas (CH₄) or NO_x emissions, the volume and longevity of CO₂ in the atmosphere makes the emission so influential on the climate. Of the total annual human-caused CO₂ emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO₂ emissions remains stored in the atmosphere as of 2013. However, as the ocean and land take in more CO₂, they become less effective sinks for the molecule.¹ **Table 1: Description of Greenhouse Gases** describes the primary GHGs attributed to global climate change, including their physical properties.

¹ Intergovernmental Panel on Climate Change, *Climate Change 2021 - The Physical Science Basis*, https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM_final.pdf, accessed September 25, 2023.

Table 1: Description of Greenhouse Gases	
Greenhouse Gas	Description
Carbon Dioxide (CO ₂)	CO ₂ is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO ₂ emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO ₂ is variable because it is readily exchanged in the atmosphere. CO ₂ is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N ₂ O)	N ₂ O is largely attributable to agricultural practices and soil management. Primary human-related sources of N ₂ O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N ₂ O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N ₂ O is approximately 120 years. The Global Warming Potential of N ₂ O is 298.
Methane (CH ₄)	CH ₄ , a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH ₄ include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH ₄ is about 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF ₆)	SF ₆ is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF ₆ is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF ₃)	NF ₃ was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.
Source: Compiled from U.S. EPA, <i>Overview of Greenhouse Gases</i> , April 11, 2018 (https://www.epa.gov/ghgemissions/overview-greenhouse-gases); U.S. EPA, <i>Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016</i> , 2018; Intergovernmental Panel on Climate Change, <i>Climate Change 2007: The Physical Science Basis</i> , 2007; National Research Council, <i>Advancing the Science of Climate Change</i> , 2010; U.S. EPA, <i>Methane and Nitrous Oxide Emission from Natural Sources</i> , April 2010.	

3 REGULATORY SETTING

3.1 Federal

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency (U.S. EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO₂ in model

year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks. It should be noted that the U.S. EPA is currently proposing to freeze the vehicle fuel efficiency standards at their planned 2020 level (37 mpg), canceling any future strengthening (currently 54.5 mpg by 2026).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

On September 27, 2019, the U.S. EPA and the NHTSA published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program.” (84 Fed. Reg. 51,310 (Sept. 27, 2019).) The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two sets CO₂ emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021–2026. The current U.S. EPA administration has repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

As of April 1, 2022, the CAFE standards require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026. The new CAFE standards for model year 2024–2026 will reduce fuel use by more than 200 billion gallons through 2050, as compared to continuing under the old standards.²

Presidential Executive Orders 13990 and 14008

On January 20, 2021, President Biden issued Executive Order 13990, “Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis”. Executive Order 13990 directs Federal agencies to immediately review and take action to address the promulgation of Federal regulations and other actions that conflict with these important national objectives and to immediately commence work to confront the climate crisis. Executive Order 13990 directs the Council on Environmental Quality (CEQ) to review CEQ’s 2020 regulations implementing the procedural requirements of the National

² National Highway Traffic Safety Administration, *USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024–2026*, available at: <https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026>

Environmental Policy Act (NEPA) and identify necessary changes or actions to meet the objectives of Executive Order 13990.

On January 27, 2021, President Biden signed Executive Order 14008, "Tackling the Climate Crisis at Home and Abroad," to declare the Administration's policy to move quickly to build resilience, both at home and abroad, against the impacts of climate change that are already manifested and will continue to intensify according to current trajectories. In line with these Executive Order directives, CEQ is reviewing the 2020 NEPA regulations and plans to publish a notice of proposed rulemaking (NPRM) to identify necessary revisions in order to comply with the law; meet the environmental, climate change, and environmental justice objectives of Executive Orders 13990 and 14008; ensure full and fair public involvement in the NEPA process; provide regulatory certainty to stakeholders; and promote better decision making consistent with NEPA's statutory requirements. This phase 1 rulemaking will propose a narrow set of changes to the 2020 NEPA regulations to address these goals.

3.2 State of California

California Air Resources Board

The California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. Various Statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO₂ equivalents (CO₂e) in the world and produced 459 million gross metric tons of CO₂e in 2013. In the State, the transportation sector is the largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, *California Global Warming Solutions Act of 2006*, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major provisions of the legislation.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

AB 32 instructs the CARB to develop and enforce regulations for the reporting and verification of Statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

California Air Resource Board Scoping Plan

Adopted December 15, 2022, CARB's *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and

public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects.³ CARB specifically states that Appendix D does not address other land uses (e.g., industrial, storage).⁴ However, CARB plans to explore new approaches for other land use types in the future.⁵

As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

SB 375 (The Sustainable Communities and Climate Protection Act of 2008)

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established by AB 32. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

³ California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, Page 21, November 2022.

⁴ California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, Page 4, November 2022.

⁵ California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, Page 21, November 2022.

AB 1493 (Pavley Regulations and Fuel Efficiency Standards)

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new automobiles will emit 34 percent fewer CO₂e emissions and 75 percent fewer smog-forming emissions.

SB 1368 (Emission Performance Standards)

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO₂ per megawatt-hour.

SB 1078 and SBX1-2 (Renewable Electricity Standards)

SB 1078 requires California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 changed the due date to 2010 instead of 2017. On November 17, 2008, Governor Arnold Schwarzenegger signed Executive Order S-14-08, which established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010 by Resolution 10-23. SBX1-2, which codified the 33 percent by 2020 goal.

SB 350 (Clean Energy and Pollution Reduction Act of 2015)

Signed into law on October 7, 2015, SB 350 implements the goals of Executive Order B-30-15. The objectives of SB 350 are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 25 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

AB 398 (Market-Based Compliance Mechanisms)

Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the Statewide regulatory body responsible for ensuring that California meets its Statewide carbon pollution reduction targets, while retaining local air districts' responsibility

and authority to curb toxic air contaminants and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

SB 150 (Regional Transportation Plans)

Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with State targets (i.e., 40 percent below their 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

SB 100 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases)

Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

AB 1346 (Air Pollution: Small Off-Road Engines)

Signed into law in October 2021, AB 1346 requires CARB, to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. The bill requires CARB to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations.

AB 1279 (The California Climate Crisis Act)

AB 1279 establishes the policy of the State to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO² removal solutions and carbon capture, utilization, and storage technologies.

SB 1020 (100 Percent Clean Electric Grid)

Signed on September 16, 2022, SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

SB 905 (Carbon Sequestration Program)

Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated carbon dioxide fluid into a Class II injection well for the purpose of enhanced oil recovery.

AB 1757 (Nature-Based Solutions)

Signed on September 16, 2022, AB 1757 requires State agencies to develop a range of targets for natural carbon sequestration and nature-based climate solutions that reduce GHG emissions to meet the 2030, 2038, and 2045 goals which would be integrated into a scoping plan addressing natural and working lands.

CARB Advanced Clean Truck Regulation

CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path for an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission “last-mile” delivery trucks and vans by 2040. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- **Zero-Emission Truck Sales:** Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.
- **Company and Fleet Reporting:** Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Executive Orders Related to GHG Emissions

California’s Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the tone for the State and guide the actions of State agencies.

Executive Order S-3-05. Executive Order S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order S-01-07. Issued on January 18, 2007, Executive Order S 01-07 mandates that a Statewide goal shall be established to reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020. The executive order established a Low Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission, CARB, the University of California, and other agencies to develop and propose protocols for measuring the “life-cycle carbon intensity” of transportation fuels. CARB adopted the LCFS on April 23, 2009.

Executive Order S-13-08. Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency's development of the 2009 California Climate Adaptation Strategy. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08. Issued on November 17, 2008, Executive Order S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-21-09. Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's RPS to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Executive Order B-30-15. Issued on April 29, 2015, Executive Order B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of CO₂e (MMTCO₂e). The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. The executive order also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions by 2030 to 40 percent below 1990 levels.

Executive Order B-55-18. Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing Statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant State agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires State agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

Executive Order N-79-20. Signed in September 2020, Executive Order N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. The executive order sets a similar goal requiring that all medium and heavy-duty vehicles will be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new zero emission vehicles (ZEVs) "towards the target of 100 percent." The executive order directs the California Environmental Protection Agency, the California Geologic Energy Management Division, and the California Natural Resources Agency to transition and repurpose oil production facilities with a goal toward meeting carbon neutrality by 2045. Executive Order N-79-20 builds upon the CARB Advanced Clean Trucks regulation, which was adopted by CARB in July 2020.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations. The appliance efficiency regulations (California Code of Regulations [CCR] Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards. *California's Energy Efficiency Standards for Residential and Nonresidential Buildings* (CCR Title 24, Part 6), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2016 Building Energy Efficiency Standards were approved on January 19, 2016, and went into effect on January 1, 2017. The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018, and went into effect on January 1, 2020. Under the 2019 standards, homes will use about 53 percent less energy and nonresidential buildings will use about 30 percent less energy than buildings under the 2016 standards. The Project is subject to the 2019 Energy Code, assuming the permit applications are applied for prior to January 1, 2023. Should the Project's applications be applied for on or after January 1, 2023, the Project would be subject to the 2022 Energy Code;⁶ see the following discussion.

On August 11, 2021, the CEC adopted the 2022 Energy Code. In December 2021, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. Among other updates like strengthened ventilation standards for gas cooking appliances, the 2022 Energy Code includes updated standards such as new electric heat pump requirements for residential uses, schools, offices, banks, libraries, retail, and grocery stores; the promotion of electric-ready requirements for new homes including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure to allow for the conversion from natural gas to electricity; and the expansion of solar photovoltaic and battery storage standards to additional land uses including high-rise multi-family residences, hotels and motels, tenant spaces, offices (including medical offices and clinics), retail and grocery stores, restaurants, schools, and civic uses (including theaters auditoriums, and convention centers). Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

Title 24 California Green Building Standards Code. The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as the CALGreen Code, is a Statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and

⁶ California Energy Commission, *2022 Building Energy Efficiency Standards*, <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>, accessed September 2023.

environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code went into effect January 1, 2023 (2022 CALGreen). The 2022 CALGreen standards continue to improve upon the existing standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

3.3 Regional

South Coast Air Quality Management District Thresholds

The South Coast Air Quality Management District (SCAQMD) formed a GHG California Environmental Quality Act (CEQA) Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This Working Group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and included a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments in the South Coast Air Basin (SCAB), various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. On December 5, 2008, the SCAQMD Governing Board adopted a 10,000 metric tons of carbon dioxide equivalent (MTCO₂e) industrial threshold for projects where the SCAQMD is the lead agency. However, the SCAQMD has not announced when a GHG threshold for land use projects will be presented to the governing board where the SCAQMD is not the lead agency. The Working Group proposed a 3,000 MTCO₂e threshold for non-industrial projects, but that threshold has not been formally adopted. During Working Group Meeting #7 it was explained that this threshold was derived using a 90 percent capture rate of a large sampling of industrial facilities. During Meeting #8, the Working Group defined industrial uses as production, manufacturing, and fabrication activities or storage and distribution (e.g., warehouse, transfer facility, etc.). The Working Group indicated that the threshold applies to both emissions from construction and operational phases plus indirect emissions (electricity, water use, etc.). The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Southern California Association of Governments (SCAG)

On September 3, 2020, the Southern California Association of Governments' (SCAG's) Regional Council adopted *Connect SoCal (2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy [2020 RTP/SCS])*. The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The SCAG region strives toward sustainability through integrated land use and transportation planning. The SCAG region must achieve specific federal air quality standards and is required by law to lower regional GHG emissions.

3.4 Local

GreenLA Climate Action Plan (2007)

In 2007, the City of Los Angeles issued their Climate Action Plan (CAP) in order to give guidance promoting sustainable development citywide. The main objective of the CAP is to reduce GHGs to 35 percent below 1990 levels by 2030. GreenLA provides various focus areas in which to implement GHG reductions such as water, energy, transportation land use, waste, port, and airport in order to ensure these goals are incorporating into planning and building projects. No goals were set for individual projects in this plan.

City of Los Angeles Green Building Code

In April 2008, the City adopted the Green Building Program Ordinance to address the impacts of new development. In 2019, Chapter IX, Article 9, of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, was amended to incorporate various provisions of the CALGreen Code. The Los Angeles Green Building Code includes mandatory requirements and elective measures for three categories of buildings: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alternatives to residential and non-residential buildings.

City of Los Angeles Solid Waste Programs and Ordinances

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced as well as disposal energy averted. In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.

The City has developed and is in the process of implementing the Solid Waste Integrated Resources Plan, also referred to as the Zero Waste Plan, whose goal is to lead the City towards being a “zero waste” City by 2030. In addition, the City adopted the Recovering Energy, Natural Resources, and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan in 2006, which aims to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources not going to disposal and achieving a diversion rate of 90 percent or more by 2025.⁷ The City also approved the Waste Hauler Permit Program (Ordinance No. 181,519, LAMC Chapter VI, Article 6, Section 66.32-66.32.5), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City-certified construction and demolition waste processors. The City’s Exclusive Franchise System Ordinance (Ordinance No. 182,986), among other requirements, sets a maximum annual disposal level and diversion requirements for franchised waste haulers to promote waste diversion from landfills and support the City’s zero waste goals. These programs reduce the number of trips to haul solid waste and therefore reduce the amount of petroleum-based fuels and energy used to process solid waste.

City of Los Angeles Sustainable City pLAn (2015)

The City released the Sustainable City pLAn in 2015, which covers a variety of issues related to greenhouse gas reduction either specifically or by association. Actionable goals were set that include but are not limited to increasing green building standards for new construction, developing blue, green, and black

⁷ City of Los Angeles, RENEW LA, Five-Year Milestone Report, 2011.

waste bin infrastructure, and reducing water use by 20 percent. In 2019, the plan was updated with new goals through the Green New Deal.

Green New Deal pLAn

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal (Sustainable City pLAn 2019). Rather than an adopted plan, the Green New Deal is a mayoral initiative that consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental, and equity objectives.⁸ L.A.'s Green New Deal is the first four-year update to the City's first Sustainable City pLAn that was released in 2015. It augments, expands, and elaborates in more detail L.A.'s vision for a sustainable future and it addresses climate change with accelerated targets and new aggressive goals.

While not intended solely to reduce GHG emissions, within L.A.'s Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square foot for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 MBtu/sf in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.

⁸ City of Los Angeles, L.A.'s Green New Deal (Sustainable City pLAn 2019), 2019

- Ensure proportion of Angelenos living within 0.5 miles of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles General Plan

The City does not have a General Plan Element specific to climate change and GHG emissions, but several goals, objectives, or policies in the Air Quality Element, and Housing Element, and Mobility Plan 2035 encourage the reduction of emissions. The following five goals from the City's General Plan Air Quality Element would also lead to GHG emissions reductions:

- Less reliance on single-occupancy vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservative measures including passive measures, such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Housing Element (Housing Needs Assessment)

The Housing Element of the General Plan is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City.

The Housing Needs Assessment chapter of the Housing Element discusses the City's population and housing stock to identify housing needs for a variety of household types across the City. The current RHNA goal for affordable housing within the City is approximately forty percent of new construction. However, the City's projections show affordable housing comprising twenty percent of new construction, which falls short of the forty percent RHNA goal. In order to address this shortfall in affordable housing, the Housing Element provides measures to streamline and incentivize development of affordable housing. Such measures include revising density bonuses for affordable housing; identifying locations which are ideal for funding programs to meet low-income housing goals; and rezoning areas to encourage low-income housing. With implementation of such measures to increase affordable housing, the Housing Element predicts a significant increase in housing production at all income ranges compared to previous cycles.

The Housing Element also promotes sustainability and resilience, and environmental justice through housing, as well as the need to reduce displacement. It encourages the utilization of alternatives to current parking standards that lower the cost of housing, support GHG and VMT goals and recognize the emergence of shared and alternative mobility. The Element also identifies housing strategies for energy conservation, water conservation, alternative energy sources and sustainable development which support conservation and reduces demand.

Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City council has adopted several amendments to the mobility plan since its initial adoption, including the most recent amendment on September 7, 2016. The Mobility Plan incorporates "complete street" principles and lays the policy foundation for how the City's residents interact with their street. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emissions tracking program to establish compliance with SB 375, AB 32, and the region's Sustainable Community Strategy.

Transportation Assessment Guidelines

The City of Los Angeles Department of Transportation (LADOT) developed the City Transportation Assessment Guidelines (TAG) (July 2020) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation assessment. The TAG establishes the reduction of vehicle trips and VMT as the threshold for determining transportation impacts and thus is an implementing mechanism of the City's strategy to reduce land use transportation related GHG emissions consistent with AB 32, SB 32, and SB 375.

4 SIGNIFICANCE CRITERIA AND METHODOLOGY

4.1 Thresholds and Significance Criteria

Based upon the criteria derived from the State CEQA Appendix G, a project normally would have a significant effect on the environment if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance; or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

CEQA Guidelines Section 15064.4 provides that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. It also states that the lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) quantify GHG emissions resulting from a project; and/or (2) rely on a qualitative analysis or performance-based standards. Lead agencies should consider several factors when determining the significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; whether a project exceeds a significance threshold that the lead agency determines applies to the project; and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of GHG emissions.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)). As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.⁹ To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.¹⁰ Examples of such programs include "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."¹¹ Therefore, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of a less than significant

⁹ 14 CCR Section 15064(h)(3)

¹⁰ 14 CCR Section 15064(h)(3)

¹¹ 14 CCR Section 15064(h)(3)

impact for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The City has not adopted a numeric threshold for the analysis of GHG impacts. As noted above, CEQA Guidelines Section 15064.4(b)(2) allows the City to determine a threshold of significance that applies to the Project, and accordingly the threshold of significance applied here is whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For the Project, as a land use development, the applicable adopted regulatory plan to reduce GHG emissions is SCAG's 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by *AB 32's 2008 Climate Change Scoping Plan* and subsequent updates, and the City of Los Angeles' Green New Deal.

4.2 Methodology

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to quantify GHGs resulting from a project and/or rely on a qualitative analysis. The amendments to CEQA Guidelines Section 15064.4 do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064(h)(3)).

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions or a local climate action plan for reducing GHG emissions. Similarly, SCAQMD, OPR, CARB, CAPCOA, nor any other state or regional agency has not adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment. Based on CEQA case law, when no guidance exists, the lead agency may look to and assess general compliance with comparable regulatory schemes.¹²

¹² See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 [“[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution.”] Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal. App. 4th 74, 99

In evaluating climate change impacts, the OPR recommends consideration of the project's consistency with the State's long-term climate goals or strategies to reduce GHG emissions.¹³ The lead agency may also use modeling to estimate GHG emissions from a project.¹⁴ This allows a lead agency to quantify GHG emissions resulting from a project. Here, any quantification is for informational purposes, and is not used for a comparative analysis or as a threshold of significance.

In summary, as the lead agency, the City has determined that a project's significant impact with regard to climate change be evaluated solely on the basis of consistency with the climate change plans. This approach is aligned with the threshold of significance established by the City for the Project, which is whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions, as noted above.

Notwithstanding, for informational purposes, this analysis estimates the quantity of GHG's the Project would emit using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, this quantification is not a threshold of significance, or used for quantitative comparative purposes.

Consistency with Plans

The Project's GHG impacts were evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG reduction plans and strategies. The Project will be evaluated for consistency with AB 32's 2008 Climate Change Scoping Plan and subsequent updates, SCAG's 2020-2045 RTP/SCS, and the City's Green New Deal.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. On a statewide level, the 2008 Climate Change Scoping Plan and subsequent updates provide measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT and GHG reductions required under SB 375. The City does not have a programmatic mitigation plan to tier from, such as a Greenhouse Gas Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. The City's Green New Deal is not an adopted plan or directly applicable to private development projects. However, the City's Green New Deal, a mayoral initiative, includes short-term and long-term aspirations pertaining to climate change and this analysis addresses consistency with these strategies and goals. Thus, if the Project is designed in accordance with these policies and regulations, the Project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (e.g., AB 32, SB 32, SB 375).

¹³ OPR, Proposed Updates to the CEQA Guidelines – Final (Nov. 2017)

¹⁴ CEQA Guidelines Section 15064.4

A consistency analysis is provided below and describes the Project's compliance with, or exceedance of, performance-based standards included in the regulations outlined in the applicable portions of AB 32's 2022 *Climate Change Scoping Plan*, SCAG's 2020-2045 RTP/SC, and the City's Green New Deal.

Quantification of Emissions

In view of the above considerations, the analysis below quantifies the Project's total annual GHG emissions, taking into account the GHG emission reduction measures that would be incorporated into the Project's design. However, given the lack of a formally adopted numerical significance threshold or a formally adopted local plan for reducing GHG emissions applicable to this Project, the City has determined to assess the significance of the Project's GHG emissions consistent with the amended CEQA Guidelines which specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant. In this context, an assessment is provided herein of the Project's consistency with regulatory schemes, comparable to formally adopted local GHG emission reduction plans, that are designed to reduce GHG emissions by encouraging development located and designed to result in the efficient use of resources.

Project GHG Emissions

Global climate change is, by definition, a cumulative impact of GHG emissions. Therefore, there is no project-level analysis. The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities which almost doubled between 1970 and 2010 from approximately 27 gigatonnes (Gt) of CO₂/year to nearly 49 GtCO₂/year.¹⁵ As such, the geographic extent of climate change and GHG emissions cumulative impact discussion is worldwide.

- The Project would result in direct emissions of criteria pollutants generated by the following emissions sources:
- Construction: emissions associated with demolition of existing uses, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with consumer products, architectural coatings, and landscape equipment;
- Energy source (building operations): emissions associated with space heating and cooling, and water heating; and
- Mobile source: emissions associated with vehicles accessing the project site.

This analysis considers construction and operational impacts associated with the Project. Emissions were modeled using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.20. CalEEMod is a Statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects. GHG impacts were assessed according to methodologies recommended by CARB and the SCAQMD.

Construction Emissions

Construction equipment, trucks, worker vehicles, and ground-disturbing activities associated with Project construction would generate GHG emissions. Daily regional construction emissions are estimated by assuming construction occurs at the earliest feasible date (i.e., a conservative estimate of construction

¹⁵ Intergovernmental Panel on Climate Change, *Climate Change 2014 Mitigation of Climate Change Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014.

activities) and applying off-road, fugitive dust, and on-road emissions factors in CalEEMod. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the analysis to generate GHG emissions values for each construction activity. Please refer to CalEEMod construction output files for a complete listing of construction details modeled. CalEEMod default values were used for equipment and vehicle emission factors, equipment load factors, and vehicle trip lengths.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. As impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. Therefore, SCAQMD recommended that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.¹⁶ Thus, total construction GHG emissions were divided by 30 to determine an estimate of annual construction emissions comparable to operational emissions.

Off-Road Equipment

The emissions calculations associated with construction equipment are from off-road equipment engine use based on the equipment list and phase length. Since the majority of the off-road construction equipment used for construction projects are diesel fueled, CalEEMod assumes all of the equipment operates on diesel fuel. Construction equipment emissions vary with engine model years in which newer equipment will emit fewer pollutants. As a conservative assumption, the CalEEMod model uses an emission rate for equipment which represents an average model year for available equipment within the Air Basin. CalEEMod calculates the exhaust emissions based on CARB OFFROAD methodology using the equation presented below:

$$\text{Emissions Diesel [lbs]} = (\sum_i (\text{EF}_i \times \text{Pop}_i \times \text{AvgHP}_i \times \text{Load}_i \times \text{Activity}_i)$$

Where:	EF _i	=	Emission Factor from OFFROAD (lbs/hr)
	Pop _i	=	Population (quantity of same equipment)
	AvgHP _i	=	Maximum rated average horsepower (hp)
	Load _i	=	Load Factor (dimensionless)
	Activity _i	=	Hours of operation (hours)
	i	=	Summation index

On-Road Vehicles

Construction generates on-road vehicle exhaust, evaporative, and dust emissions from personal vehicles for worker commuting, vendor deliveries, and trucks for soil and material hauling. These emissions are based on the number of trips and VMT along with emission factors from EMFAC. The emissions from

¹⁶ SCAQMD, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, 2008.

mobile sources were calculated with the trip rates, trip lengths, and emission factors for running from EMFAC as follows:

$$\text{Emissions pollutant (lbs)} = \text{VMT} * \text{EF running, pollutant}$$

Where: VMT = vehicle miles traveled (miles)

$$\text{EF running, pollutant} = \text{emission factor for running emissions (lbs/VMT)}$$

Evaporative emissions, starting, and idling emissions in CalEEMod were calculated by multiplying the number of trips times the respective emission factor.

Architectural Coatings

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings. CalEEMod calculates the VOC evaporative emissions from application of residential and non-residential surface coatings using the following equation:

$$\text{Emissions Architectural Coatings (lbs)} = \text{EF}_{\text{AC}} \times F * A_{\text{paint}}$$

Where: EF_{AC} = Emission Factor (lb/sf)

A_{paint} = Building Surface Area (sf)

The CalEEMod model assumes the total surface for painting equals 2.7 times the floor square footage for residential and 2 times that for nonresidential square footage.

F = fraction of surface area [%]

The default values based on SCAQMD methods used in their coating rules are 75 percent for the interior surfaces and 25 percent for the exterior shell. Parking areas are based on 6-percent coverage.

The emission factor (EF) is based on the VOC content of the surface coatings and is calculated using the equation below:

$$\text{EF}_{\text{AC}} = C_{\text{VOC}} / 454(\text{g/lb}) \times 3.785 (\text{L/gal}) / 180(\text{sf})$$

Where: EF = emission factor (lb/sf)

C = VOC content (g/L or gram per liter)

The emission factors for coating categories were calculated using the equation above based on default VOC content provided by the air districts or CARB's statewide limits in CalEEMod. Architectural coating VOC emission factors are also consistent with SCAQMD Rule 1113.

Paving

CalEEMod estimates VOC off-gassing emissions associated with asphalt paving of parking lots using the following equation:

$$\text{Emissions}_{\text{AP}} (\text{lb}) = \text{EF}_{\text{AP}} \times A_{\text{parking}}$$

Where: EF = emission factor (lb/acre)

A = area of the parking lot (acre)

Operational Emissions

Similar to construction, SCAQMD-recommended CalEEMod is used to calculate potential direct and indirect GHG emissions generated by new land uses on the Project Site, including area sources, electricity, mobile sources, solid waste generation and disposal, and water usage/wastewater generation. CalEEMod default values for generation/usage rates, GHG emission factors, and GWP values were used in the evaluation of operational GHG emissions from the Project.

Mobile Emissions

Mobile-source emissions were calculated using the CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with employees and visitor vehicles visiting the Project based on the number of daily trips generated and vehicle miles traveled (VMT). The Project vehicle trip generation was obtained from the *956 Seward Transportation Assessment* (Kimley-Horn, January 2024). According to trip generation estimates, the Project would generate 314 total daily vehicle trips. The trip generation was entered into CalEEMod. Mobile source emissions were generally calculated in CalEEMod as follows:

$$\text{Mobile Emissions [lbs]} = (\sum_i (\text{Units} \times \text{ADT} \times D_{\text{TRIP}} \times \text{EF}_i))$$

Where: Units = Number of vehicles (same vehicle model year and class)

ADT = Average daily trip rate [trips/day]

D_{TRIP} = Trip distance [miles/trip]

EF = Pollutant emission factor [pounds per mile]

i = Summation index

Note: For residential land uses, emission factors are specified in units of dwelling units (DU_ instead of 1,000 sf.

The Project vehicle trip generation was obtained from the trip generation estimates (Kimley-Horn, July 2023). To calculate peak daily trip estimates, the Los Angeles Department of Transportation (LADOT) VMT Calculator was used. The VMT Calculator was developed by the City and LADOT to comply with SB 743 which requires lead agencies to adopt VMT criteria to determine transportation related impacts. The LADOT-derived VMT values account for the daily and seasonal variations in trip frequency and length associated with new employee and visitor trips to and from the Project Site and other activities that generate a vehicle trip. In addition to VMT, the number of vehicle trips generated by the Project was also accounted for in the GHG emissions calculations.

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes consumer products, architectural coatings, and landscape maintenance equipment. Pollutant emissions generated by the Project were calculated using the CalEEMod defaults, based upon the land uses that will be included in each project.

Consumer products are chemically formulated products used by household and institutional consumers, including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products; but does not include other paint products, furniture coatings, or architectural coatings. SCAQMD did an evaluation of consumer product use compared to the total square footage of buildings using data from CARB's consumer product Emission Inventory. To calculate the VOC emissions from consumer product use, the following equation was used in CalEEMod:

$$\text{Emissions Consumer Products (lbs)} = \text{EF}_{\text{CP}} \times \text{Building Area}$$

Where:

EF_{CP} = Pounds of VOC building square foot

The factor is 1.98×10^{-5} lbs/sf for SCAQMD areas.

Building Area = the total square footage of all buildings including residential square footage

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers. The operational emission methodology from architecture coating is the same as the construction methodology discussed above. All land use buildings are assumed to be repainted at a rate of 10 percent of area per year. This is based on the assumption used by SCAQMD.

The combustion of fossil fuels to operate landscape equipment such as lawnmowers and trimmers, results in pollutant emissions. The emissions occur on-site and are considered a direct source of pollutant emissions. The emissions for landscaping equipment are based on the size of the land uses and the pollutant emission factors for fuel combustion. Pollutant emissions from landscaping equipment are generally calculated in CalEEMod as follows:

$$\text{Landscaping Equipment Emissions [lbs]} = (\sum_i (\text{Units} \times \text{EF}_{\text{LE}} \times \text{ALE}))_i$$

Where: Units = Number of land use units (same land use types) [1,000 sf]

EF_{LE} = Emission factor [grams (g)/1,000 sf/day]

i = Summation index

Note: For residential land uses, emission factors are specified in units of dwelling units (DU) instead of 1,000 sf.

Energy Emissions

Combustion of fossil fuel emits GHGs directly into the atmosphere. Pollutant emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant, and this is an indirect source of emissions associated with electricity use in a building.

Energy demand emissions were calculated using the CalEEMod emissions inventory model, accounting for energy needed to provide lighting, heating, and cooling and energy consumed by sources such as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 Building Energy Efficiency Standards (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and

lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered to be the maximum feasible level of mitigation for stack emissions. In contrast, GHG emissions from power plants are not subject to stationary source permitting requirements to the same degree as criteria pollutants. As such, GHGs emitted by power plants may be indirectly attributed to individual buildings and electricity users, who have the greatest ability to decrease usage by applying mitigation measures to individual electricity “end uses”. CalEEMod therefore calculates GHG emissions (but not criteria pollutant emissions) from regional power plants associated with building energy use.

Emissions associated with electricity demand are based on the size of the proposed land use and the electrical demand factors for the land uses, the emission factors for the electricity utility provider, and the global warming potential values for the GHGs emitted. Annual electricity GHG emissions in units of MTCO₂e are calculated as follows:

$$\text{Annual Emissions [MTCO}_2\text{e]} = (\sum_i (\text{Units} \times D_E \times EF_E \times GWP)_i) / 2,204.62$$

Where:	Units	=	Number of land use units (same and use type) [1,000 sf]
	DE	=	Electrical demand factor [megawatt-hour (MWh)/1,000 sf/yr]
	EFE	=	GHG emission factor [pounds per megawatt-hour (MWh)]
	GWP	=	Global warming potential [CO ₂ = 1, CH ₄ = 21, N ₂ O = 310]
	2,204.62	=	Conversion factor [pounds/MT]
	i	=	Summation index

Note: For residential land uses, emission factors are specified in units of dwelling units (DU_ instead of 1,000 sf.

Natural Gas

The Project would be all-electric and would not require the use of natural gas. Therefore, emissions associated with natural gas combustion has not been included in the analysis.

5 POTENTIAL IMPACTS AND MITIGATION

The Project would create direct and indirect GHG emissions from Project construction and operations. Construction is considered a direct source since these emissions occur at the Project Site. Direct operational-related GHG emissions of the proposed Project would include emissions from area and mobile sources, while indirect emissions would include those related to energy consumption, water demand, and solid waste.

Construction GHG Emissions

The primary GHGs from a project such as the Proposed Project are CO₂, CH₄, and N₂O. Emissions of these GHGs are converted to metric tons of CO₂ equivalent (MTCO₂e) based on each pollutant's global warming potential.¹⁷ Construction of the Project would result in direct emissions of CO₂, N₂O, and CH₄ related to the operation of construction equipment, and the transport of materials and construction workers to and from the Project Site. The SCAQMD advises that construction GHG emissions be summed and amortized over the lifetime of a project (assumed to be 30 years), then the yearly amount be added to the operational emissions.¹⁸ Total GHG emissions generated during all phases of construction were combined and are presented in Table 3: Construction Greenhouse Gas Emissions. The CalEEMod outputs are contained within Appendix A. As shown in Table 3, Project construction would result in a total of 383 MTCO₂e (approximately 13 MTCO₂e/year when amortized over 30 years).

Table 2: Construction Greenhouse Gas Emissions	
Construction	MTCO₂e
Construction GHG Emission (2025)	356
Construction GHG Emission (2026)	27
Total Construction GHG Emission	383
30-Year Amortized Construction	13

Source: CalEEMod version 2022.1.1.20. Refer to Appendix A for model data outputs.

Operational GHG Emissions

Operational or long-term emissions would occur over the life of the proposed Project. GHG emissions would result from direct emission sources such as Project-generated vehicular traffic, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from, the Project Site, the emissions associated with solid waste generated from the Project Site, and any fugitive refrigerants from air conditioning or refrigerators. Table 3: Total Project Greenhouse Gas Emissions, summarizes the total GHG emissions (amortized construction and operations) associated with proposed

¹⁷ USEPA, *Greenhouses Gases, Understanding Global Warming Potentials*, <https://www.epa.gov/ghgemissions/understanding-global-warming-potentials>, accessed September 2023

¹⁸ The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*, August 26, 2009).

Project. As shown, the Project would generate approximately 2,209 MTCO₂e/year, not accounting for the existing emissions generated by the existing use to be demolished.

Table 3: Total Project Greenhouse Gas Emissions	
Emissions Source	MTCO₂e per Year
Construction Amortized over 30 Years	13
Area Source	4
Energy	898
Mobile	368
Waste	50
Water & Wastewater	137
Refrigerant	740
Total Project Emissions¹	2,209
1. Totals may be slightly off due to rounding.	
Source: CalEEMod version 2022.1.1.20. Refer to Appendix A for model data outputs.	

5.2 Greenhouse Gas Reduction Plan Compliance

The following section describes how the Project complies with or exceeds the performance-based standards included in the regulations outlined in the AB 32's Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the City's Green New Deal. As shown herein, the Project would not conflict with the applicable GHG reduction plans and policies.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

Under SB 375, each Metropolitan Planning Organization (MPO) is required to adopt and then update a SCS to encourage compact development that reduces passenger vehicle miles traveled and trips so that its region will meet a target, set by CARB, for reducing GHG emissions. The purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel.

Reflecting that purpose, the primary goal of SCAG's 2020–2045 RTP/SCS is to provide a framework for achieving the CARB-assigned per capita reduction targets for GHG emissions from cars and light-duty trucks through land use planning and transportation options, while accounting for anticipated future growth within the region.¹⁹ To accomplish this target, the 2020–2045 RTP/SCS identifies various strategies for reducing per capita VMT. New GHG reduction targets are assigned by CARB, and thus, SCAG's long-range planning document is updated, every four years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.²⁰ Thus, successful implementation of the

¹⁹ Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

²⁰ Ibid.

2020–2045 RTP/SCS would result in communities with a variety of transportation and housing choices, while reducing automobile use and, thus, GHG emissions from that use.

With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.²¹ These strategies and policies are addressed below. Also, the Project’s consistency with applicable growth forecasts is also assessed because the development of the RTP/SCS involved compilation of local land use and growth trends to form the basis for projections and strategies of the RTP/SCS.²² Key GHG reduction strategies in SCAG’s 2020–2045 RTP/SCS, which are based on changing the region’s land use and travel patterns, include: (1) new housing and job growth focused in High Quality Transit Areas (HQTAs); (2) limit total acreage of greenfield or otherwise rural land uses converted to urban use; and (3) reduce VMT per capita.²³

Consistency with Integrated Growth Forecast. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. These population, housing, and employment forecasts, which are adopted by SCAG’s Regional Council, are based on the local plans and policies of local jurisdictions within SCAG’s jurisdiction applicable to the specific area.²⁴ Growth forecasts prepared by SCAG that are published in the 2020–2045 RTP/SCS indicate that employment within the City will increase from 1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, which represents an increase of 287,600 jobs.²⁵ A storage facility of this size would typically employ up to two people. Representing 0.001 percent of this increase, the Project’s increase of 2 employees would be within and therefore be consistent with, and not conflict with, local and regional employment projections.

Consistency with VMT Reduction Strategies and Policies.

Trip generation and VMT were calculated using the LADOT VMT Calculator, which also accounts for the VMT reductions achieved by proximity to transit.²⁶ As shown in the Transportation Assessment, the Project would not generate greater than 250 net daily trips and further VMT analysis is not required and a no impacts related to increase in VMT is anticipated pursuant to the City’s screening criteria. The Project Site is located in a highly urbanized area that is served by public transit. The Project Site is located approximately 1.2 miles from the Hollywood and Highland metro Station which serves the B Line of the Metro Rail System. Existing transit services within 1,320 feet of the Project Site consists of one bus line, Metro Local 4, operated by Metro. Metro Local 4 provides services between Santa Monica and Downtown Los Angeles via Santa Monica Boulevard. The Project vicinity consists of a pedestrian network of sidewalks providing easy access and connectivity to transit facilities. Streetscape improvements such as additional street trees and landscaping would be provided, which would encourage walkability. Furthermore, the

²¹ Southern California Association of Governments, Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, December 2019, p. 3.8-61.

²² Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS) page 10, adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176.

²³ Southern California Association of Governments 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.

²⁴ Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176.

²⁵ Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579

²⁶ SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176.

Proposed Project would provide ample bicycle spaces and long-term bicycle lockers, promoting the use of alternative modes of transportation. The Project is consistent with and would not conflict with the GHG reduction strategies provided in the 2020–2045 RTP/SCS.²⁷

Increased Use of Alternative Fueled Vehicles Policy Initiative.

Another goal of the 2020–2045 RTP/SCS for individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions.²⁸ The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies.²⁹ Pursuant to LAMC Section 99.05.106.5.3.6, the number of electric vehicle charging stations (EVCS) shall be 10 percent of the total number of parking spaces provided for all new nonresidential buildings. The Proposed Project would provide a total of 4 electric vehicle parking spaces. As such, the Project would comply with City requirements and the Project would be consistent with, and would not conflict with, this goal.

Energy Efficiency Strategies and Policies.

Another important goal of the 2020–2045 RTP/SCS for individual development projects, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions.³⁰ That goal is to actively encourage and create incentives for energy efficiency, where possible.³¹ As discussed above, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code.^{32,33} These standards would reduce energy usage and, thereby, reduce associated GHG emissions and help minimize any impact on natural resources and infrastructure. Furthermore, the Project would not consume natural gas during operations. In addition, the Project would be subject to the 2022 Title 24 standards, which encourages efficient electric heat pumps, establishes electric-ready requirements, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards. Therefore, the Project would be consistent with, and would not conflict with, this goal.

Land Use Assumptions.

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHG emissions from car and light-duty truck travel through better land use planning.³⁴ In order to assess the Project's consistency with land use assumptions in the 2020–2045 RTP/SCS, the Project's land use characteristics have been analyzed for consistency with the underlying land use assumptions on which SCAG based its

²⁸ SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176.

²⁸ SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176.

²⁹ Ibid.

³⁰ Ibid.

³¹ Ibid.

³² City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

³³ California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

³⁴ As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020–2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled. SCAG 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176.

SCS. The following key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS are based on changing the region's land use and travel patterns:³⁵

- New housing and job growth focused in High Quality Transit Areas (HQTAs);
- Limit total acreage of greenfield or otherwise rural land uses converted to urban use; and
- Reduce VMT per capita.

Generally, projects are considered consistent with the provisions and general policies of local and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.³⁶

The Project would support, and not conflict with, the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents. The Project would demolish an existing 40,000 sf storage building and its associated parking lot and construct a seven-story storage building of up to 168,765 sf which would increase floor area and therefore job growth, on a previously developed site located in a HQTA that is in close proximity to mass transit options. These Project land use characteristics would focus its job growth in a HQTA, not in a greenfield or rural area, and would minimize the Project's vehicle miles traveled. In addition, the Project would provide bicycle parking spaces that would serve to promote walking and use of bicycles over travel by car or truck. As such, the Project's location and design would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation. The Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.³⁷ By furthering implementation of SB 375, the Project supports regional land use and transportation-related GHG reductions consistent with State regulatory requirements.

The reduction strategies stated in the 2020–2045 RTP/SCS are "consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level".³⁸ The strategies identify how the SCAG region can achieve GHG reductions and while SCAG does not have a direct role in the implementation of these strategies, SCAG works to support local jurisdictions by identifying ways to implement the RTP/SCS that fits the vision and needs of each local community.³⁹ A detailed consistency discussion placed in the context of the strategies as laid out in the RTP/SCS is included in Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency. As shown in Table 4, many RTP/SCS strategies are not directly applicable to the proposed Project. Nonetheless, the proposed Project would not conflict with implementation of any of the strategies of the RTP/SCS. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's mobile source GHG reduction targets.

³⁵ Southern California Association of Governments 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.

³⁶ See, e.g., *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-719.

³⁷ As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

³⁸ Southern California Association of Governments 2020–2045 RTP/SCS Connect SoCal, page 48. Adopted September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

³⁹ Southern California Association of Governments 2020–2045 RTP/SCS Connect SoCal, page 49. Adopted September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency	
Reduction Strategy	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options	
<ul style="list-style-type: none"> • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations. • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets. • Plan for growth near transit investments and support implementation of first/last mile strategies. • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses. • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods. • Encourage design and transportation options that reduce the reliance on a number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations). • Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking). 	<p>No Conflict. These strategies are intended to direct local jurisdictions’ actions. Nonetheless, the Project fulfills the intent of these land use policies. The Project Site is located in a HQTAs and increases floor area in a previously developed located close to jobs, residential, government, and service uses. The Project Site is located in an urban area within walking and biking distance to existing commercial and neighborhood-serving retail uses and transit. The Project Site is also located within close proximity to several transit options. Numerous bus lines also serve the Project Site, it is approximately 1,320 feet from the Metro bus route 4 and 1,709 feet from the Metro bus route 224. The Project would also provide more than the required number of bicycle parking spaces and related amenities and EV parking spaces.</p>
Promote Diverse Housing Choices	
<ul style="list-style-type: none"> • Preserve and rehabilitate affordable housing and prevent displacement. • Identify funding opportunities for new workforce and affordable housing development. • Create incentives and reduce regulatory barriers for building accessory dwelling units to increase housing supply. • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions. 	<p>No Conflict. The proposed Project does not include a residential component and this strategy would not be applicable.</p>
Leverage Technology Innovations	
<ul style="list-style-type: none"> • Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe 	<p>No Conflict. These strategies are intended to direct local jurisdictions’ actions. Nonetheless, the Project fulfills the intent of these policies. The Project would be required to comply with all applicable Title 24 and CALGreen building codes at the time of construction. These building codes would include EV charging</p>

Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency	
Reduction Strategy	Project Consistency Analysis
<p>infrastructure such as dedicated lanes, charging and parking/drop-off space.</p> <ul style="list-style-type: none"> • Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-model payments. • Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation. 	<p>stations, designated EV parking, as well as bike parking and storage. The Project would provide more than the required number of bicycle parking spaces and related amenities and four EV parking spaces. Therefore, the Project would utilize technology innovations to reduce reliance on fossil fuels to help the City, County, and State meet its GHG reduction goals. The Project would be consistent with this reduction strategy.</p>
Support Implementation of Sustainability Policies	
<ul style="list-style-type: none"> • Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions. • Support Statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations. • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space. • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies. • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region. • Continue to support long range planning efforts by local jurisdictions. • Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy. 	<p>No Conflict. These strategies are intended to direct local jurisdictions’ actions. Nonetheless, the Project fulfills the intent of these policies. As previously discussed, the Project would comply with sustainable practices included in the Title 24 standards, CALGreen Code, and City ordinances such as installation of EV charging stations, bike parking and storage, and low-flow fixtures. In addition, the Project would not install natural gas fire appliances, supporting the phasing out of fossil fuels. Thus, the Project would be consistent with this reduction strategy.</p>
Promote a Green Region	
<ul style="list-style-type: none"> • Support development of local climate adaptation and hazard mitigation plans, 	<p>No Conflict. These strategies are intended to direct local jurisdictions’ actions. Nonetheless, the Project fulfills the intent of</p>

Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency	
Reduction Strategy	Project Consistency Analysis
<p>as well as project implementation that improves community resiliency to climate change and natural hazards.</p> <ul style="list-style-type: none"> • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration. • Integrate local food production into the regional landscape. • Promote more resource efficient development focused on conservation, recycling, and reclamation. • Preserve, enhance, and restore regional wildlife connectivity. • Reduce consumption of resource areas, including agricultural land. • Identify ways to improve access to public park space. 	<p>these policies. The proposed Project consists of the demolition of a film storage building and its associated parking lot and the construction of a seven-story storage building in an urbanized area. Development of the Project would therefore not interfere with regional wildlife connectivity or consumption of agricultural or greenfield land.</p> <p>The Project would be required to comply with Title 24 standards and CALGreen Code, which would help reduce energy consumption and reduce GHG emissions. In addition, the Project would be an all-electric development that would not install natural gas appliances, and would thereby support the goal of phasing out fossil fuels. The Project would provide more than the required number of bicycle parking spaces and related amenities and EV parking spaces. The Project would include multiple pedestrian-friendly features both within the Project Site and along its perimeter, including wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. Given the Project Site's location in proximity to a variety of transportation options, its EV parking spaces, and its bicycle parking spaces and related amenities and pedestrian-friendly features, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by encouraging and providing various opportunities for the use of alternative modes of transportation, including public transit, walking and biking. Thus, the Project would support efficient development that reduces energy consumption and GHG emissions. The Project would be consistent with this reduction strategy.</p>
Source: Southern California Association of Governments, <i>Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)</i> , 2020.	

California Air Resource Board Scoping Plan Consistency

Appendix D, *Local Actions*, of the 2022 Scoping Plan Update includes “recommendations intended to build momentum for local government actions that align with the State’s climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA).” (Page 4 of Appendix D.)

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50 percent of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitoring and updated as State targets change, and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned

with the State’s climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: (transportation electrification, VMT reduction, and building decarbonization). “By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction.” (Page 9 of Appendix D.)

The State also recognizes in *Appendix D, Local Actions*, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing⁴⁰ while demonstrating that a Project is in alignment with the State’s Climate Goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State’s climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State’s goals. The State also recognizes the lead agencies’ discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State’s climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the CARB 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas).⁴¹ A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification. The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

- Convert local government fleets to zero-emission vehicles (ZEV)

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California’s EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

⁴⁰ The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, Appendix D, 2022 Scoping Plan Update, November 2022.

⁴¹ Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.

The City of LA Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement followed a “zero emission first” policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035 and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City’s goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals by installing EV chargers. Installation of additional EV chargers would encourage adoption of EVs.

- Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)

The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City’s goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to Es. The Project would provide four EV Spaces, which complies with City of Los Angeles Ordinance 184692 requirements, which requires that the number of EVSC provided shall be 10 percent of the total number of parking spaces provided for all new nonresidential buildings. Therefore, the Project would provide EV charging infrastructure that would support the 2022 Scoping Plan’s focus on zero-emission transportation.

VMT Reduction. The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- Reduce or eliminate minimum parking standards in new developments
- Implement parking pricing or transportation demand management pricing strategies

The City of Los Angeles Mobility Plan 2035 which is the Transportation Element of the City’s General Plan contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking

requirements for certain types of developments near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips.

Pursuant to SB 375, CARB has set regional targets to work towards achieving GHG emissions reductions from changed land use patterns and improved transportation. The 2035 target for the SCAG region is a 19 percent reduction in per capita vehicle GHG emissions relative to 2005 levels.

The Project would generate 241 net daily vehicle trips and 1,773 net daily VMT. Therefore, the Project is not required to perform a VMT analysis pursuant to the City's screening criteria. A storage facility of this size would employ approximately two employees. Due to the nature of the proposed use, the Project would not generate high traffic volumes on a daily, or consistent basis.

The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with California's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides measures to increase public access to electric shuttles, car sharing and walking. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation. The proposed Project would provide 40 bicycle parking and four electric vehicle spaces. Therefore, the Project would not conflict with implementation of Complete Streets policies.

- Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.
- Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.
- Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)
- Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

On a local level, the City has developed the Complete Streets Design Guide which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The Project Site is within walking and biking distance to existing commercial and neighborhood-serving retail uses and transit. The Project would increase floor area on a site located close to jobs and to residential, and service uses. The Project Site is also located within close proximity of several transit options. The Project would also provide more than the required number of bicycle parking spaces and related amenities and EV parking spaces in accordance with City of Los Angeles Ordinance 184692. The Project also includes multiple pedestrian-friendly features both within the Project Site and along its perimeter, including wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. The Project's focus on locating its growth near destinations and mobility options demonstrates that the Project would contribute to reducing GHG emissions from the transportation sector. The Project would comply with sustainable practices included in the Title 24 standards, CALGreen Code, and City ordinances such as installation of EV charging stations, bike parking and storage, and low-flow fixtures. In addition, the Project would be an all-electric development that would not directly consume natural gas, and would thereby support the goal of phasing out fossil fuels.

Building Decarbonization.

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- Adopt all-electric new construction reach codes for residential and commercial uses

California's transition away from fossil fuel-based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project would be required to comply with the City's LAMC and the new building would not include natural gas uses. Therefore, the Project would be consistent and not conflict with the LAMC.

- Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and LADWP has established rebate programs to promote use of energy-efficient products and home upgrades. Under the LADWP's Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project includes the construction of a storage facility and would not involve the demolition, retrofit, or construction of residential uses. Therefore, the rebate programs established by the City and Los Angeles Department of Water and Power would not apply to the Project.

Consistency with the City Los Angeles Green LA

The Project would comply with performance-based standards included in the Green Building Code (e.g., current building energy efficiency standards).

For all of the reasons stated above, the Project would be consistent with, and would not conflict with, applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation measure are required.

5.3 Cumulative Setting, Impacts, and Mitigation Measures

Cumulative Setting

Climate change is a global phenomenon. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have much longer atmospheric lifetimes of 1 year to several thousand years that allow them to be dispersed around the globe.

Cumulative Impacts

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As discussed above, Project would be consistent with the applicable GHG reduction plans and policies. Therefore, the Project would result in a less than significant cumulative GHG impact.

Mitigation Measures: No mitigation is required.

Level of Significance: Less Than Significant Impact.

6 REFERENCES

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Appendix A

Greenhouse Gas Emissions Data

956 Seward Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	956 Seward
Construction Start Date	1/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	16.8
Location	956 Seward St, Los Angeles, CA 90038, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4333
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.21

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Refrigerated Warehouse-No Rail	168	1000sqft	0.89	167,662	8,111	—	—	—
Parking Lot	42.0	Space	0.38	16,800	0.00	—	—	—
General Office Building	1.10	1000sqft	0.03	1,100	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-10-A	Water Exposed Surfaces
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-13	Use Low-VOC Paints for Construction
Energy	E-15	Require All-Electric Development

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.60	1.32	9.48	14.8	0.02	0.32	1.28	1.60	0.29	0.31	0.60	—	3,691	3,691	0.15	0.19	6.58	3,757
Mit.	1.60	1.32	9.48	14.8	0.02	0.32	1.28	1.60	0.29	0.31	0.60	—	3,691	3,691	0.15	0.19	6.58	3,757
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.59	50.9	9.56	14.0	0.02	0.32	1.57	1.69	0.29	0.31	0.60	—	3,635	3,635	0.15	0.23	0.17	3,695

Mit.	1.59	25.7	9.56	14.0	0.02	0.32	1.57	1.69	0.29	0.31	0.60	—	3,635	3,635	0.15	0.23	0.17	3,695
% Reduced	—	50%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.84	4.36	5.34	7.81	0.01	0.18	0.76	0.93	0.16	0.18	0.34	—	2,108	2,108	0.09	0.13	1.58	2,150
Mit.	0.84	2.21	5.34	7.81	0.01	0.18	0.76	0.93	0.16	0.18	0.34	—	2,108	2,108	0.09	0.13	1.58	2,150
% Reduced	—	49%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.15	0.80	0.97	1.42	< 0.005	0.03	0.14	0.17	0.03	0.03	0.06	—	349	349	0.02	0.02	0.26	356
Mit.	0.15	0.40	0.97	1.42	< 0.005	0.03	0.14	0.17	0.03	0.03	0.06	—	349	349	0.02	0.02	0.26	356
% Reduced	—	49%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.60	1.32	9.48	14.8	0.02	0.32	1.28	1.60	0.29	0.31	0.60	—	3,691	3,691	0.15	0.19	6.58	3,757
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.59	1.32	9.56	14.0	0.02	0.32	1.57	1.69	0.29	0.31	0.60	—	3,635	3,635	0.15	0.23	0.17	3,695
2026	1.50	50.9	9.14	13.6	0.02	0.29	1.28	1.57	0.26	0.31	0.57	—	3,598	3,598	0.15	0.19	0.16	3,657
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2025	0.84	0.68	5.34	7.81	0.01	0.18	0.76	0.93	0.16	0.18	0.34	—	2,108	2,108	0.09	0.13	1.58	2,150
2026	0.07	4.36	0.49	0.72	< 0.005	0.01	0.05	0.07	0.01	0.01	0.02	—	163	163	0.01	0.01	0.10	165
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.15	0.12	0.97	1.42	< 0.005	0.03	0.14	0.17	0.03	0.03	0.06	—	349	349	0.02	0.02	0.26	356
2026	0.01	0.80	0.09	0.13	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.0	27.0	< 0.005	< 0.005	0.02	27.3

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.60	1.32	9.48	14.8	0.02	0.32	1.28	1.60	0.29	0.31	0.60	—	3,691	3,691	0.15	0.19	6.58	3,757
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.59	1.32	9.56	14.0	0.02	0.32	1.57	1.69	0.29	0.31	0.60	—	3,635	3,635	0.15	0.23	0.17	3,695
2026	1.50	25.7	9.14	13.6	0.02	0.29	1.28	1.57	0.26	0.31	0.57	—	3,598	3,598	0.15	0.19	0.16	3,657
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.84	0.68	5.34	7.81	0.01	0.18	0.76	0.93	0.16	0.18	0.34	—	2,108	2,108	0.09	0.13	1.58	2,150
2026	0.07	2.21	0.49	0.72	< 0.005	0.01	0.05	0.07	0.01	0.01	0.02	—	163	163	0.01	0.01	0.10	165
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.15	0.12	0.97	1.42	< 0.005	0.03	0.14	0.17	0.03	0.03	0.06	—	349	349	0.02	0.02	0.26	356
2026	0.01	0.40	0.09	0.13	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.0	27.0	< 0.005	< 0.005	0.02	27.3

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
---------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.58	6.41	0.87	17.3	0.02	0.03	2.03	2.06	0.02	0.52	0.54	160	8,192	8,352	16.7	0.33	4,476	13,344
Mit.	2.58	6.41	0.87	17.3	0.02	0.03	2.03	2.06	0.02	0.52	0.54	160	8,192	8,352	16.7	0.33	4,476	13,344
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.14	5.07	0.87	8.49	0.02	0.01	2.03	2.05	0.01	0.52	0.53	160	8,064	8,225	16.7	0.33	4,468	13,211
Mit.	1.14	5.07	0.87	8.49	0.02	0.01	2.03	2.05	0.01	0.52	0.53	160	8,064	8,225	16.7	0.33	4,468	13,211
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.11	5.97	0.93	14.2	0.02	0.02	2.01	2.04	0.02	0.51	0.53	160	8,113	8,273	16.7	0.33	4,472	13,262
Mit.	2.11	5.97	0.93	14.2	0.02	0.02	2.01	2.04	0.02	0.51	0.53	160	8,113	8,273	16.7	0.33	4,472	13,262
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.39	1.09	0.17	2.60	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	26.5	1,343	1,370	2.77	0.06	740	2,196
Mit.	0.39	1.09	0.17	2.60	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	26.5	1,343	1,370	2.77	0.06	740	2,196
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
--------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.15	1.04	0.80	9.24	0.02	0.01	2.03	2.05	0.01	0.52	0.53	—	2,256	2,256	0.11	0.09	7.62	2,292
Area	1.44	5.37	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33.2	33.2	< 0.005	< 0.005	—	33.3
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,400	5,400	0.38	0.05	—	5,426
Water	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Waste	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Total	2.58	6.41	0.87	17.3	0.02	0.03	2.03	2.06	0.02	0.52	0.54	160	8,192	8,352	16.7	0.33	4,476	13,344
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.14	1.03	0.87	8.49	0.02	0.01	2.03	2.05	0.01	0.52	0.53	—	2,161	2,161	0.11	0.09	0.20	2,192
Area	—	4.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,400	5,400	0.38	0.05	—	5,426
Water	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Waste	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Total	1.14	5.07	0.87	8.49	0.02	0.01	2.03	2.05	0.01	0.52	0.53	160	8,064	8,225	16.7	0.33	4,468	13,211
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.13	1.02	0.88	8.72	0.02	0.01	2.01	2.03	0.01	0.51	0.52	—	2,187	2,187	0.11	0.09	3.29	2,220
Area	0.98	4.95	0.05	5.53	< 0.005	0.01	—	0.01	0.01	—	0.01	—	22.7	22.7	< 0.005	< 0.005	—	22.8
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,400	5,400	0.38	0.05	—	5,426
Water	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Waste	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Total	2.11	5.97	0.93	14.2	0.02	0.02	2.01	2.04	0.02	0.51	0.53	160	8,113	8,273	16.7	0.33	4,472	13,262

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.21	0.19	0.16	1.59	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	—	362	362	0.02	0.02	0.54	368
Area	0.18	0.90	0.01	1.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.76	3.76	< 0.005	< 0.005	—	3.78
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	894	894	0.06	0.01	—	898
Water	—	—	—	—	—	—	—	—	—	—	—	12.4	83.3	95.6	1.27	0.03	—	137
Waste	—	—	—	—	—	—	—	—	—	—	—	14.2	0.00	14.2	1.41	0.00	—	49.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	740	740
Total	0.39	1.09	0.17	2.60	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	26.5	1,343	1,370	2.77	0.06	740	2,196

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.15	1.04	0.80	9.24	0.02	0.01	2.03	2.05	0.01	0.52	0.53	—	2,256	2,256	0.11	0.09	7.62	2,292
Area	1.44	5.37	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33.2	33.2	< 0.005	< 0.005	—	33.3
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,400	5,400	0.38	0.05	—	5,426
Water	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Waste	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Total	2.58	6.41	0.87	17.3	0.02	0.03	2.03	2.06	0.02	0.52	0.54	160	8,192	8,352	16.7	0.33	4,476	13,344
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.14	1.03	0.87	8.49	0.02	0.01	2.03	2.05	0.01	0.52	0.53	—	2,161	2,161	0.11	0.09	0.20	2,192
Area	—	4.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,400	5,400	0.38	0.05	—	5,426
Water	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826

Waste	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Total	1.14	5.07	0.87	8.49	0.02	0.01	2.03	2.05	0.01	0.52	0.53	160	8,064	8,225	16.7	0.33	4,468	13,211
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.13	1.02	0.88	8.72	0.02	0.01	2.01	2.03	0.01	0.51	0.52	—	2,187	2,187	0.11	0.09	3.29	2,220
Area	0.98	4.95	0.05	5.53	< 0.005	0.01	—	0.01	0.01	—	0.01	—	22.7	22.7	< 0.005	< 0.005	—	22.8
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,400	5,400	0.38	0.05	—	5,426
Water	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Waste	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Total	2.11	5.97	0.93	14.2	0.02	0.02	2.01	2.04	0.02	0.51	0.53	160	8,113	8,273	16.7	0.33	4,472	13,262
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.21	0.19	0.16	1.59	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	—	362	362	0.02	0.02	0.54	368
Area	0.18	0.90	0.01	1.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.76	3.76	< 0.005	< 0.005	—	3.78
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	894	894	0.06	0.01	—	898
Water	—	—	—	—	—	—	—	—	—	—	—	12.4	83.3	95.6	1.27	0.03	—	137
Waste	—	—	—	—	—	—	—	—	—	—	—	14.2	0.00	14.2	1.41	0.00	—	49.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	740	740
Total	0.39	1.09	0.17	2.60	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	26.5	1,343	1,370	2.77	0.06	740	2,196

3. Construction Emissions Details

3.1. Demolition (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.37	0.31	3.03	4.83	0.01	0.11	—	0.11	0.10	—	0.10	—	723	723	0.03	0.01	—	725
Demolition	—	—	—	—	—	—	1.08	1.08	—	0.16	0.16	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.27	0.44	< 0.005	0.01	—	0.01	0.01	—	0.01	—	65.3	65.3	< 0.005	< 0.005	—	65.6
Demolition	—	—	—	—	—	—	0.10	0.10	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.8	10.8	< 0.005	< 0.005	—	10.9
Demolition	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.04	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.3	98.3	< 0.005	< 0.005	0.01	99.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.11	0.02	1.83	0.69	0.01	0.02	0.38	0.40	0.02	0.11	0.12	—	1,434	1,434	0.08	0.22	0.09	1,503
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.02	9.02	< 0.005	< 0.005	0.01	9.14
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.17	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	130	130	0.01	0.02	0.13	136
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.49	1.49	< 0.005	< 0.005	< 0.005	1.51
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.5	21.5	< 0.005	< 0.005	0.02	22.5

3.2. Demolition (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.37	0.31	3.03	4.83	0.01	0.11	—	0.11	0.10	—	0.10	—	723	723	0.03	0.01	—	725
Demolition	—	—	—	—	—	—	1.08	1.08	—	0.16	0.16	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.27	0.44	< 0.005	0.01	—	0.01	0.01	—	0.01	—	65.3	65.3	< 0.005	< 0.005	—	65.6
Demolition	—	—	—	—	—	—	0.10	0.10	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.8	10.8	< 0.005	< 0.005	—	10.9
Demolition	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.3	98.3	< 0.005	< 0.005	0.01	99.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.11	0.02	1.83	0.69	0.01	0.02	0.38	0.40	0.02	0.11	0.12	—	1,434	1,434	0.08	0.22	0.09	1,503
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.02	9.02	< 0.005	< 0.005	0.01	9.14
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.17	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	130	130	0.01	0.02	0.13	136
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.49	1.49	< 0.005	< 0.005	< 0.005	1.51

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.5	21.5	< 0.005	< 0.005	0.02	22.5

3.3. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.31	0.26	2.21	4.96	0.01	0.10	—	0.10	0.09	—	0.09	—	819	819	0.03	0.01	—	822
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.31	0.26	2.21	4.96	0.01	0.10	—	0.10	0.09	—	0.09	—	819	819	0.03	0.01	—	822
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.25	0.56	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.0	92.0	< 0.005	< 0.005	—	92.3

Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.2	15.2	< 0.005	< 0.005	—	15.3
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	69.1	69.1	< 0.005	< 0.005	0.25	70.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.09	0.02	1.35	0.52	0.01	0.01	0.29	0.31	0.01	0.08	0.09	—	1,098	1,098	0.06	0.17	2.55	1,154
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.29	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	65.5	65.5	< 0.005	< 0.005	0.01	66.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.08	0.02	1.40	0.53	0.01	0.01	0.29	0.31	0.01	0.08	0.09	—	1,099	1,099	0.06	0.17	0.07	1,152
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.47	7.47	< 0.005	< 0.005	0.01	7.57
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.16	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	123	123	0.01	0.02	0.12	129

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.4	20.4	< 0.005	< 0.005	0.02	21.4

3.4. Grading (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.31	0.26	2.21	4.96	0.01	0.10	—	0.10	0.09	—	0.09	—	819	819	0.03	0.01	—	822
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.31	0.26	2.21	4.96	0.01	0.10	—	0.10	0.09	—	0.09	—	819	819	0.03	0.01	—	822
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.04	0.03	0.25	0.56	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.0	92.0	< 0.005	< 0.005	—	92.3
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.2	15.2	< 0.005	< 0.005	—	15.3
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	69.1	69.1	< 0.005	< 0.005	0.25	70.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.09	0.02	1.35	0.52	0.01	0.01	0.29	0.31	0.01	0.08	0.09	—	1,098	1,098	0.06	0.17	2.55	1,154
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.29	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	65.5	65.5	< 0.005	< 0.005	0.01	66.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.08	0.02	1.40	0.53	0.01	0.01	0.29	0.31	0.01	0.08	0.09	—	1,099	1,099	0.06	0.17	0.07	1,152
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.47	7.47	< 0.005	< 0.005	0.01	7.57

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.16	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	123	123	0.01	0.02	0.12	129
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.4	20.4	< 0.005	< 0.005	0.02	21.4

3.5. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.16	0.96	8.04	8.85	0.02	0.31	—	0.31	0.28	—	0.28	—	1,650	1,650	0.07	0.01	—	1,656
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.16	0.96	8.04	8.85	0.02	0.31	—	0.31	0.28	—	0.28	—	1,650	1,650	0.07	0.01	—	1,656
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.52	0.43	3.64	4.00	0.01	0.14	—	0.14	0.13	—	0.13	—	746	746	0.03	0.01	—	748
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.66	0.73	< 0.005	0.03	—	0.03	0.02	—	0.02	—	123	123	0.01	< 0.005	—	124
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.37	0.33	0.34	5.41	0.00	0.00	1.02	1.02	0.00	0.24	0.24	—	1,076	1,076	0.05	0.04	3.94	1,092
Vendor	0.07	0.03	1.10	0.54	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	965	965	0.04	0.14	2.64	1,009
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.37	0.33	0.37	4.59	0.00	0.00	1.02	1.02	0.00	0.24	0.24	—	1,020	1,020	0.05	0.04	0.10	1,033
Vendor	0.07	0.03	1.14	0.54	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	965	965	0.04	0.14	0.07	1,007
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.15	0.18	2.18	0.00	0.00	0.45	0.45	0.00	0.11	0.11	—	468	468	0.02	0.02	0.77	474
Vendor	0.03	0.01	0.52	0.24	< 0.005	0.01	0.12	0.12	< 0.005	0.03	0.04	—	436	436	0.02	0.06	0.52	455
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.40	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	77.5	77.5	< 0.005	< 0.005	0.13	78.5
Vendor	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	72.2	72.2	< 0.005	0.01	0.09	75.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.16	0.96	8.04	8.85	0.02	0.31	—	0.31	0.28	—	0.28	—	1,650	1,650	0.07	0.01	—	1,656
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.16	0.96	8.04	8.85	0.02	0.31	—	0.31	0.28	—	0.28	—	1,650	1,650	0.07	0.01	—	1,656
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.52	0.43	3.64	4.00	0.01	0.14	—	0.14	0.13	—	0.13	—	746	746	0.03	0.01	—	748
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.66	0.73	< 0.005	0.03	—	0.03	0.02	—	0.02	—	123	123	0.01	< 0.005	—	124
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.37	0.33	0.34	5.41	0.00	0.00	1.02	1.02	0.00	0.24	0.24	—	1,076	1,076	0.05	0.04	3.94	1,092
Vendor	0.07	0.03	1.10	0.54	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	965	965	0.04	0.14	2.64	1,009

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.37	0.33	0.37	4.59	0.00	0.00	1.02	1.02	0.00	0.24	0.24	—	1,020	1,020	0.05	0.04	0.10	1,033
Vendor	0.07	0.03	1.14	0.54	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	965	965	0.04	0.14	0.07	1,007
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.15	0.18	2.18	0.00	0.00	0.45	0.45	0.00	0.11	0.11	—	468	468	0.02	0.02	0.77	474
Vendor	0.03	0.01	0.52	0.24	< 0.005	0.01	0.12	0.12	< 0.005	0.03	0.04	—	436	436	0.02	0.06	0.52	455
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.40	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	77.5	77.5	< 0.005	< 0.005	0.13	78.5
Vendor	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	72.2	72.2	< 0.005	0.01	0.09	75.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.11	0.92	7.70	8.78	0.02	0.28	—	0.28	0.25	—	0.25	—	1,650	1,650	0.07	0.01	—	1,655

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.23	0.26	< 0.005	0.01	—	0.01	0.01	—	0.01	—	48.4	48.4	< 0.005	< 0.005	—	48.6
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.02	8.02	< 0.005	< 0.005	—	8.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.32	0.28	0.34	4.29	0.00	0.00	1.02	1.02	0.00	0.24	0.24	—	1,000	1,000	0.05	0.04	0.09	1,012
Vendor	0.07	0.03	1.09	0.52	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	949	949	0.04	0.14	0.07	990
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.8	29.8	< 0.005	< 0.005	0.05	30.2
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.8	27.8	< 0.005	< 0.005	0.03	29.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.93	4.93	< 0.005	< 0.005	0.01	5.00
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.61	4.61	< 0.005	< 0.005	0.01	4.82
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.11	0.92	7.70	8.78	0.02	0.28	—	0.28	0.25	—	0.25	—	1,650	1,650	0.07	0.01	—	1,655
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.23	0.26	< 0.005	0.01	—	0.01	0.01	—	0.01	—	48.4	48.4	< 0.005	< 0.005	—	48.6
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.02	8.02	< 0.005	< 0.005	—	8.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.32	0.28	0.34	4.29	0.00	0.00	1.02	1.02	0.00	0.24	0.24	—	1,000	1,000	0.05	0.04	0.09	1,012
Vendor	0.07	0.03	1.09	0.52	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	949	949	0.04	0.14	0.07	990
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.8	29.8	< 0.005	< 0.005	0.05	30.2
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.8	27.8	< 0.005	< 0.005	0.03	29.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.93	4.93	< 0.005	< 0.005	0.01	5.00
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.61	4.61	< 0.005	< 0.005	0.01	4.82
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	0.29	2.38	2.74	< 0.005	0.11	—	0.11	0.10	—	0.10	—	417	417	0.02	< 0.005	—	419
Paving	—	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.02	0.14	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	25.1	25.1	< 0.005	< 0.005	—	25.2
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.16	4.16	< 0.005	< 0.005	—	4.18
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.03	0.52	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	104	104	< 0.005	< 0.005	0.38	105
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.01	6.01	< 0.005	< 0.005	0.01	6.09
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.00	1.00	< 0.005	< 0.005	< 0.005	1.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Paving (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	0.29	2.38	2.74	< 0.005	0.11	—	0.11	0.10	—	0.10	—	417	417	0.02	< 0.005	—	419
Paving	—	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.14	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	25.1	25.1	< 0.005	< 0.005	—	25.2
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.16	4.16	< 0.005	< 0.005	—	4.18
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.04	0.03	0.03	0.52	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	104	104	< 0.005	< 0.005	0.38	105
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.01	6.01	< 0.005	< 0.005	0.01	6.09
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.00	1.00	< 0.005	< 0.005	< 0.005	1.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.25	0.21	2.48	2.87	< 0.005	0.03	—	0.03	0.03	—	0.03	—	466	466	0.02	< 0.005	—	467
Architect ural Coatings	—	50.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.21	0.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	39.5	39.5	< 0.005	< 0.005	—	39.7
Architect ural Coatings	—	4.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.55	6.55	< 0.005	< 0.005	—	6.57
Architect ural Coatings	—	0.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.07	0.86	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	200	200	0.01	0.01	0.02	202
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17.2	17.2	< 0.005	< 0.005	0.03	17.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.85	2.85	< 0.005	< 0.005	< 0.005	2.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Architectural Coating (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.25	0.21	2.48	2.87	< 0.005	0.03	—	0.03	0.03	—	0.03	—	466	466	0.02	< 0.005	—	467
Architect ural Coatings	—	25.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.21	0.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	39.5	39.5	< 0.005	< 0.005	—	39.7
Architect ural Coatings	—	2.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.55	6.55	< 0.005	< 0.005	—	6.57
Architect ural Coatings	—	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.07	0.86	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	200	200	0.01	0.01	0.02	202
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17.2	17.2	< 0.005	< 0.005	0.03	17.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.85	2.85	< 0.005	< 0.005	< 0.005	2.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	1.12	1.01	0.78	9.01	0.02	0.01	1.98	2.00	0.01	0.50	0.52	—	2,198	2,198	0.10	0.09	7.42	2,234
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Office Building	0.03	0.03	0.02	0.24	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	57.5	57.5	< 0.005	< 0.005	0.19	58.4
Total	1.15	1.04	0.80	9.24	0.02	0.01	2.03	2.05	0.01	0.52	0.53	—	2,256	2,256	0.11	0.09	7.62	2,292
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	1.11	1.00	0.85	8.27	0.02	0.01	1.98	2.00	0.01	0.50	0.52	—	2,106	2,106	0.11	0.09	0.19	2,136
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Office Building	0.03	0.03	0.02	0.22	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	55.1	55.1	< 0.005	< 0.005	0.01	55.8
Total	1.14	1.03	0.87	8.49	0.02	0.01	2.03	2.05	0.01	0.52	0.53	—	2,161	2,161	0.11	0.09	0.20	2,192

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.20	0.18	0.16	1.55	< 0.005	< 0.005	0.36	0.36	< 0.005	0.09	0.09	—	353	353	0.02	0.01	0.53	358
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Office Building	0.01	< 0.005	< 0.005	0.04	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	9.22	9.22	< 0.005	< 0.005	0.01	9.37
Total	0.21	0.19	0.16	1.59	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	—	362	362	0.02	0.02	0.54	368

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	1.12	1.01	0.78	9.01	0.02	0.01	1.98	2.00	0.01	0.50	0.52	—	2,198	2,198	0.10	0.09	7.42	2,234
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Office Building	0.03	0.03	0.02	0.24	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	57.5	57.5	< 0.005	< 0.005	0.19	58.4
Total	1.15	1.04	0.80	9.24	0.02	0.01	2.03	2.05	0.01	0.52	0.53	—	2,256	2,256	0.11	0.09	7.62	2,292
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No Rail	1.11	1.00	0.85	8.27	0.02	0.01	1.98	2.00	0.01	0.50	0.52	—	2,106	2,106	0.11	0.09	0.19	2,136
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Office Building	0.03	0.03	0.02	0.22	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	55.1	55.1	< 0.005	< 0.005	0.01	55.8
Total	1.14	1.03	0.87	8.49	0.02	0.01	2.03	2.05	0.01	0.52	0.53	—	2,161	2,161	0.11	0.09	0.20	2,192
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.20	0.18	0.16	1.55	< 0.005	< 0.005	0.36	0.36	< 0.005	0.09	0.09	—	353	353	0.02	0.01	0.53	358
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Office Building	0.01	< 0.005	< 0.005	0.04	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	9.22	9.22	< 0.005	< 0.005	0.01	9.37
Total	0.21	0.19	0.16	1.59	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	—	362	362	0.02	0.02	0.54	368

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No	—	—	—	—	—	—	—	—	—	—	—	—	5,339	5,339	0.38	0.05	—	5,364
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	27.3	27.3	< 0.005	< 0.005	—	27.4
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	33.7	33.7	< 0.005	< 0.005	—	33.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,400	5,400	0.38	0.05	—	5,426
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	5,339	5,339	0.38	0.05	—	5,364
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	27.3	27.3	< 0.005	< 0.005	—	27.4
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	33.7	33.7	< 0.005	< 0.005	—	33.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,400	5,400	0.38	0.05	—	5,426
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	884	884	0.06	0.01	—	888
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.52	4.52	< 0.005	< 0.005	—	4.54
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	5.58	5.58	< 0.005	< 0.005	—	5.61
Total	—	—	—	—	—	—	—	—	—	—	—	—	894	894	0.06	0.01	—	898

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	5,339	5,339	0.38	0.05	—	5,364
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	27.3	27.3	< 0.005	< 0.005	—	27.4
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	33.7	33.7	< 0.005	< 0.005	—	33.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,400	5,400	0.38	0.05	—	5,426
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	5,339	5,339	0.38	0.05	—	5,364
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	27.3	27.3	< 0.005	< 0.005	—	27.4
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	33.7	33.7	< 0.005	< 0.005	—	33.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,400	5,400	0.38	0.05	—	5,426
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated	—	—	—	—	—	—	—	—	—	—	—	—	884	884	0.06	0.01	—	888
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.52	4.52	< 0.005	< 0.005	—	4.54
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	5.58	5.58	< 0.005	< 0.005	—	5.61
Total	—	—	—	—	—	—	—	—	—	—	—	—	894	894	0.06	0.01	—	898

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	3.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.44	1.32	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33.2	33.2	< 0.005	< 0.005	—	33.3
Total	1.44	5.37	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33.2	33.2	< 0.005	< 0.005	—	33.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	3.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	4.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.66	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape Equipment	0.18	0.17	0.01	1.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.76	3.76	< 0.005	< 0.005	—	3.78
Total	0.18	0.90	0.01	1.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.76	3.76	< 0.005	< 0.005	—	3.78

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	3.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.44	1.32	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33.2	33.2	< 0.005	< 0.005	—	33.3
Total	1.44	5.37	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33.2	33.2	< 0.005	< 0.005	—	33.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	3.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	4.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer	—	0.66	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.18	0.17	0.01	1.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.76	3.76	< 0.005	< 0.005	—	3.78
Total	0.18	0.90	0.01	1.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.76	3.76	< 0.005	< 0.005	—	3.78

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	74.3	500	575	7.65	0.19	—	821
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.37	2.52	2.89	0.04	< 0.005	—	4.14
Total	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	74.3	500	575	7.65	0.19	—	821
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.37	2.52	2.89	0.04	< 0.005	—	4.14
Total	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.3	82.8	95.1	1.27	0.03	—	136
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.06	0.42	0.48	0.01	< 0.005	—	0.68
Total	—	—	—	—	—	—	—	—	—	—	—	12.4	83.3	95.6	1.27	0.03	—	137

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	74.3	500	575	7.65	0.19	—	821

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.37	2.52	2.89	0.04	< 0.005	—	4.14
Total	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	74.3	500	575	7.65	0.19	—	821
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.37	2.52	2.89	0.04	< 0.005	—	4.14
Total	—	—	—	—	—	—	—	—	—	—	—	74.7	503	578	7.69	0.19	—	826
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	12.3	82.8	95.1	1.27	0.03	—	136
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.06	0.42	0.48	0.01	< 0.005	—	0.68
Total	—	—	—	—	—	—	—	—	—	—	—	12.4	83.3	95.6	1.27	0.03	—	137

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	84.9	0.00	84.9	8.49	0.00	—	297
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.55	0.00	0.55	0.06	0.00	—	1.93
Total	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	84.9	0.00	84.9	8.49	0.00	—	297
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.55	0.00	0.55	0.06	0.00	—	1.93
Total	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated	—	—	—	—	—	—	—	—	—	—	—	14.1	0.00	14.1	1.41	0.00	—	49.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.09	0.00	0.09	0.01	0.00	—	0.32
Total	—	—	—	—	—	—	—	—	—	—	—	14.2	0.00	14.2	1.41	0.00	—	49.5

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	84.9	0.00	84.9	8.49	0.00	—	297
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.55	0.00	0.55	0.06	0.00	—	1.93
Total	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	84.9	0.00	84.9	8.49	0.00	—	297

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.55	0.00	0.55	0.06	0.00	—	1.93
Total	—	—	—	—	—	—	—	—	—	—	—	85.5	0.00	85.5	8.54	0.00	—	299
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	14.1	0.00	14.1	1.41	0.00	—	49.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.09	0.00	0.09	0.01	0.00	—	0.32
Total	—	—	—	—	—	—	—	—	—	—	—	14.2	0.00	14.2	1.41	0.00	—	49.5

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468

General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	740	740
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	740	740

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,468	4,468
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	740	740
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	740	740

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipme Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipme nt Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2025	2/14/2025	5.00	33.0	—
Grading	Grading	2/15/2025	4/14/2025	5.00	41.0	—
Building Construction	Building Construction	5/15/2025	1/15/2026	5.00	176	—
Paving	Paving	4/15/2025	5/14/2025	5.00	22.0	—

Architectural Coating	Architectural Coating	1/16/2026	2/28/2026	5.00	31.0	—
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5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Demolition	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Excavators	Diesel	Average	1.00	8.00	148	0.41
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Pumps	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Air Compressors	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	0.00	8.00	84.0	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Architectural Coating	Aerial Lifts	Diesel	Average	3.00	6.00	46.0	0.31

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Demolition	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Excavators	Diesel	Average	1.00	8.00	148	0.41
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Pumps	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Air Compressors	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	0.00	8.00	84.0	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Architectural Coating	Aerial Lifts	Diesel	Average	3.00	6.00	46.0	0.31

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	7.50	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	20.7	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	5.00	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	15.9	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	77.8	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	30.4	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	7.50	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	12.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	15.6	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	7.50	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	20.7	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	5.00	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	15.9	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	77.8	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	30.4	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	7.50	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	12.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	15.6	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	253,143	84,381	988

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	2,730	—
Grading	—	5,200	0.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.38

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Refrigerated Warehouse-No Rail	0.00	0%

Parking Lot	0.38	100%
General Office Building	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	690	0.05	0.01
2026	0.00	690	0.05	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Refrigerated Warehouse-No Rail	306	306	306	111,690	2,795	2,795	2,795	1,020,192
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
General Office Building	8.00	8.00	8.00	2,920	73.1	73.1	73.1	26,672

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Refrigerated Warehouse-No Rail	306	306	306	111,690	2,795	2,795	2,795	1,020,192
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
General Office Building	8.00	8.00	8.00	2,920	73.1	73.1	73.1	26,672

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	253,143	84,381	988

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Refrigerated Warehouse-No Rail	2,822,690	690	0.0489	0.0069	0.00
Parking Lot	14,424	690	0.0489	0.0069	0.00

General Office Building	17,831	690	0.0489	0.0069	0.00
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5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Refrigerated Warehouse-No Rail	2,822,690	690	0.0489	0.0069	0.00
Parking Lot	14,424	690	0.0489	0.0069	0.00
General Office Building	17,831	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Refrigerated Warehouse-No Rail	38,771,838	113,753
Parking Lot	0.00	0.00
General Office Building	195,507	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Refrigerated Warehouse-No Rail	38,771,838	113,753
Parking Lot	0.00	0.00
General Office Building	195,507	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
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Refrigerated Warehouse-No Rail	158	—
Parking Lot	0.00	—
General Office Building	1.02	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Refrigerated Warehouse-No Rail	158	—
Parking Lot	0.00	—
General Office Building	1.02	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Refrigerated Warehouse-No Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	7.38	annual days of extreme heat

Extreme Precipitation	6.85	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events.

Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	59.7
AQ-PM	73.1
AQ-DPM	82.4
Drinking Water	92.5
Lead Risk Housing	85.6
Pesticides	0.00

Toxic Releases	72.9
Traffic	52.0
Effect Indicators	—
CleanUp Sites	82.4
Groundwater	80.9
Haz Waste Facilities/Generators	64.8
Impaired Water Bodies	0.00
Solid Waste	63.7
Sensitive Population	—
Asthma	67.7
Cardio-vascular	69.8
Low Birth Weights	51.8
Socioeconomic Factor Indicators	—
Education	83.1
Housing	96.1
Linguistic	92.1
Poverty	94.2
Unemployment	66.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	10.99704863
Employed	55.84498909
Median HI	11.11253689
Education	—

Bachelor's or higher	45.32272552
High school enrollment	100
Preschool enrollment	49.7754395
Transportation	—
Auto Access	12.8576928
Active commuting	93.26318491
Social	—
2-parent households	75.34967278
Voting	31.54112665
Neighborhood	—
Alcohol availability	4.516874118
Park access	38.94520724
Retail density	95.08533299
Supermarket access	94.25125112
Tree canopy	17.10509432
Housing	—
Homeownership	2.835878352
Housing habitability	1.93763634
Low-inc homeowner severe housing cost burden	1.783651995
Low-inc renter severe housing cost burden	14.19222379
Uncrowded housing	5.800076992
Health Outcomes	—
Insured adults	2.65622995
Arthritis	82.7
Asthma ER Admissions	37.7
High Blood Pressure	83.5
Cancer (excluding skin)	93.3

Asthma	19.7
Coronary Heart Disease	63.8
Chronic Obstructive Pulmonary Disease	29.1
Diagnosed Diabetes	30.7
Life Expectancy at Birth	16.6
Cognitively Disabled	72.6
Physically Disabled	81.6
Heart Attack ER Admissions	37.8
Mental Health Not Good	10.1
Chronic Kidney Disease	55.3
Obesity	13.4
Pedestrian Injuries	81.6
Physical Health Not Good	13.4
Stroke	45.2
Health Risk Behaviors	—
Binge Drinking	48.9
Current Smoker	9.6
No Leisure Time for Physical Activity	20.3
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	31.0
Elderly	97.9
English Speaking	5.9
Foreign-born	86.4
Outdoor Workers	16.1
Climate Change Adaptive Capacity	—

Impervious Surface Cover	2.6
Traffic Density	83.8
Traffic Access	87.4
Other Indices	—
Hardship	89.2
Other Decision Support	—
2016 Voting	20.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	95.0
Healthy Places Index Score for Project Location (b)	25.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
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Land Use	The completed project would have a maximum of 167,662 sf temperature controlled film storage and 1,100 sf of leasing uses and would provide 42 automobile parking spaces. Lot acreage based on 2-D cross-sectional area on Site for industrial land use.
Construction: Construction Phases	Based on provided project data and construction schedule.
Construction: Off-Road Equipment	<p>Based on provided equipment list for construction.</p> <p>Demolition would require 1- Backhoe, 1 loader, 1 excavator</p> <p>Grading will follow using 1 excavators, 1 Backhoe or loader.</p> <p>Paving would be performed by 1 paver, 1 Roller, and 1 concrete truck</p> <p>Building construction would require a Crane, Air Compressors, concrete truck, Backhoes, lift, welder, forklift</p> <p>Architectural Coatings would require air compressor and lifts</p>
Construction: Trips and VMT	Based on demolition of building debris (California Waste Services: 18 Miles from site) and pavement materials (25th St Recycling: 12 Miles from site).
Operations: Vehicle Data	Based on provided Transportation Study Assessment to city of Los Angeles
Operations: Energy Use	All-Electric Development. Conversion uses values from the California Commercial End Use Survey.