

# Appendix A

## **Air Quality Assessment**

Air Quality Assessment  
956 Seward Project  
City of Los Angeles, California

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**APPENDICES**

Appendix A: Air Quality Modeling Data

**LIST OF ABBREVIATED TERMS**

AQMP	air quality management plan
AB	Assembly Bill
ADT	average daily traffic
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAAQS	California Ambient Air Quality Standards
CCAA	California Clean Air Act
CalEEMod	California Emissions Estimator Model
CEQA	California Environmental Quality Act
CO	carbon monoxide
cy	cubic yards
DPM	diesel particulate matter
DSP	Delivery Service Person
EPA	Environmental Protection Agency
FCAA	Federal Clean Air Act
H <sub>2</sub> S	hydrogen sulfide
Pb	lead
LST	local significance threshold
µg/m <sup>3</sup>	micrograms per cubic meter
mg/m <sup>3</sup>	milligrams per cubic meter
NAAQS	National Ambient Air Quality Standards
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxide
O <sub>3</sub>	ozone
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
ppm	parts per million
ROG	reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SRA	source receptor area
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
sf	square foot
SO <sub>4-2</sub>	sulfates
SO <sub>2</sub>	sulfur dioxide
TAC	toxic air contaminant
C <sub>2</sub> H <sub>3</sub> Cl	vinyl chloride
VOC	volatile organic compound



# 1 INTRODUCTION

This report documents the results of an Air Quality Assessment completed for the 956 Seward Project (“Project” or “proposed Project”). The purpose of this Air Quality Assessment is to evaluate the potential construction and operational emissions associated with the Project and determine the level of air quality impact the Project may have 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](#).

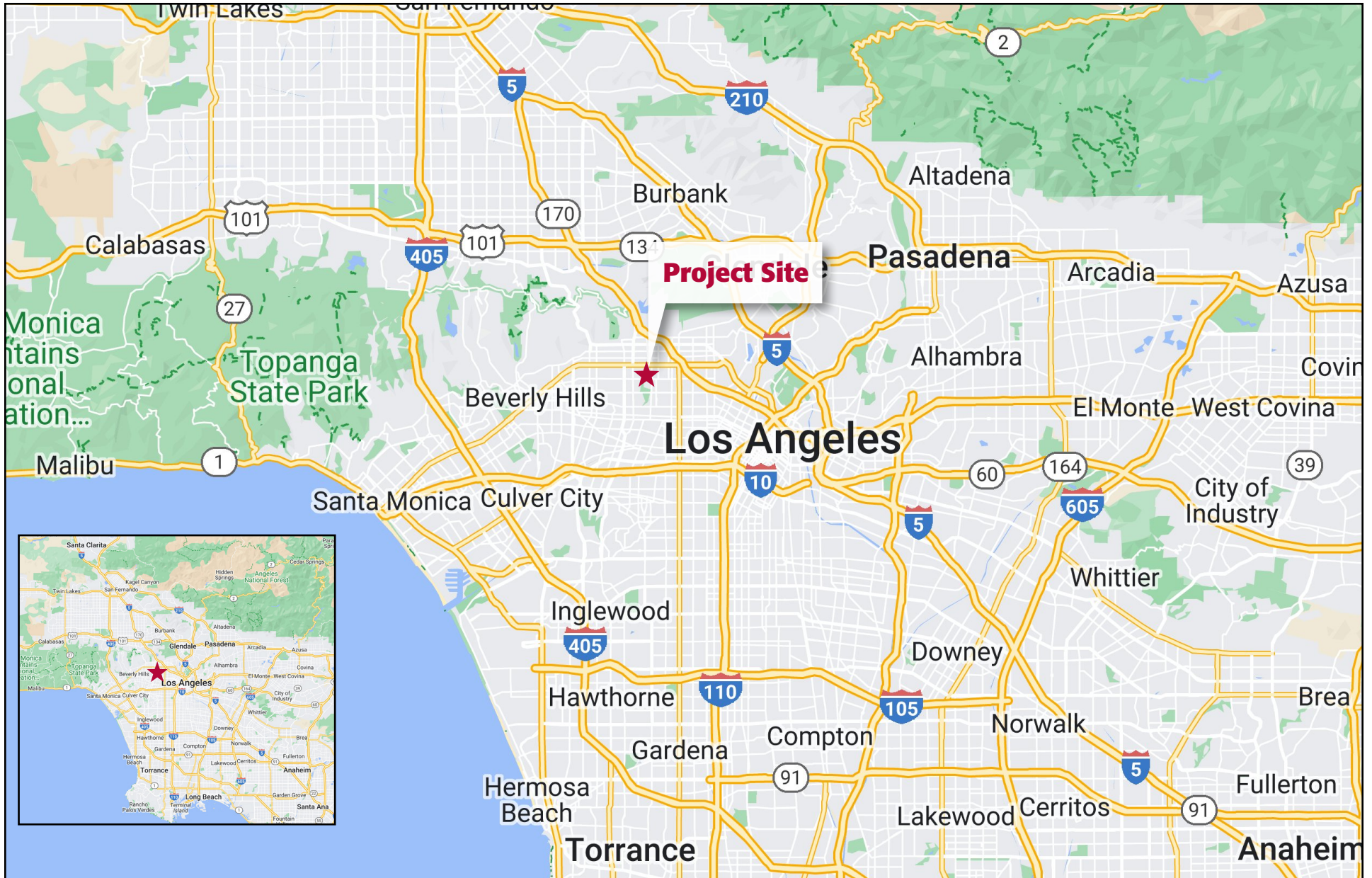
The Project is bounded by West Romaine Street to the north, North Hudson Avenue to the east, and North Seward Street to the west. The Project Site is an irregular-shaped lot that is approximately 1.29 acres or 56,254 square feet (sf). The Project Site consists of eight parcels that are currently improved 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 up to 167,682 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 landscaped areas throughout the Project Site including an outdoor landscaped walkway and entrance along Romaine Street and landscaping along Hudson Avenue and Seward Street.

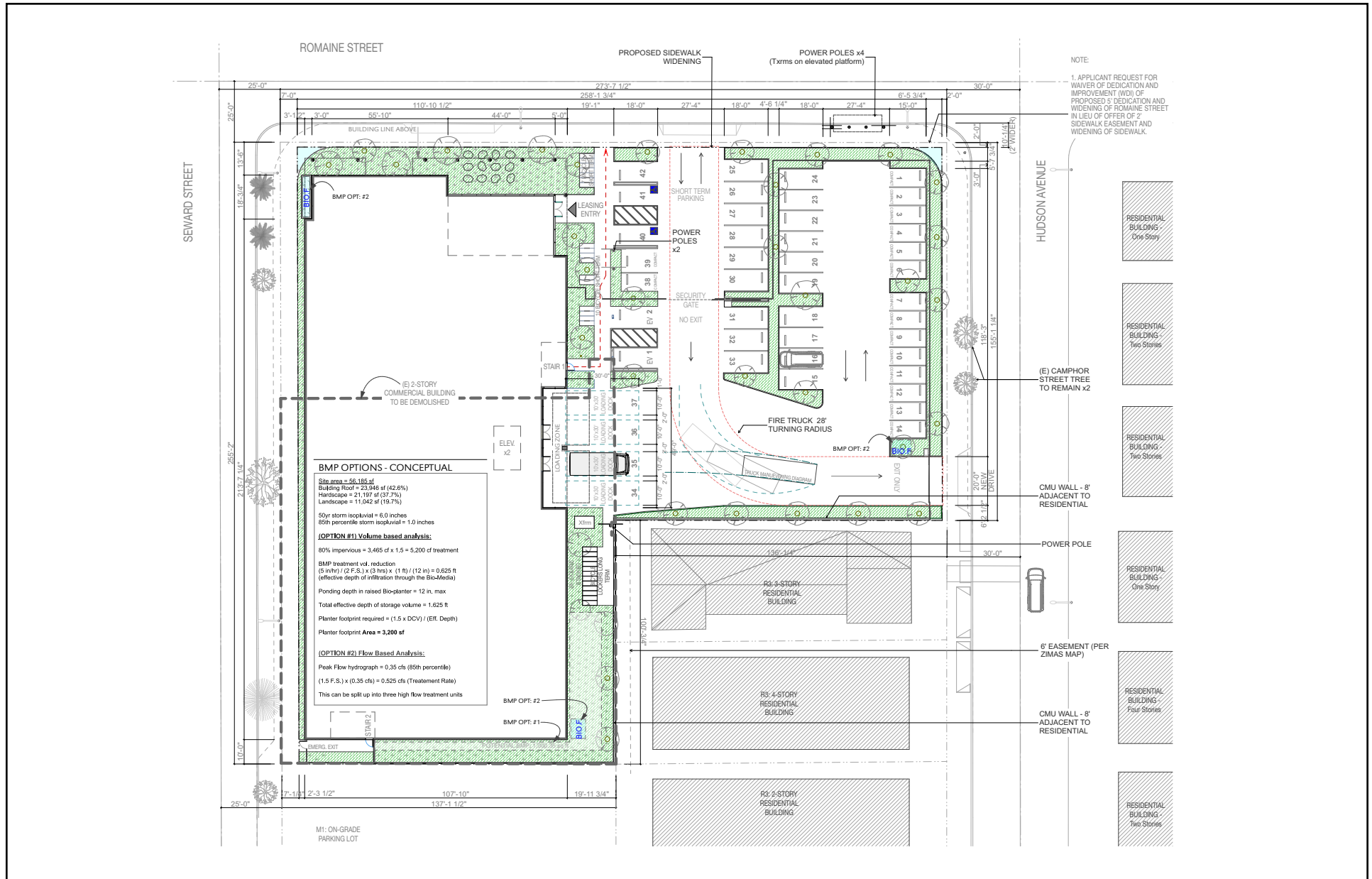


SOURCE: Google Maps, 2023



**EXHIBIT 1: Regional and Vicinity Map**

956 SEWARD STREET PROJECT



SOURCE: Michael W. Folanis Architects, 2023



# EXHIBIT 2: Site Plan

956 SEWARD STREET PROJECT



## 2 ENVIRONMENTAL SETTING

### 2.1 Climate and Meteorology

The California Air Resources Board (CARB) divides the State into 15 air basins that share similar meteorological and topographical features. The Project is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, as well as all of Orange County. The SCAB is on a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean on the southwest and high mountains forming the remainder of the perimeter<sup>1</sup>. Air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions. These factors along with applicable regulations are discussed below.

The SCAB is part of a semi-permanent high-pressure zone in the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. This usually mild weather pattern is occasionally interrupted by periods of extreme heat, winter storms, and Santa Ana winds. The annual average temperature throughout the 6,645-square-mile SCAB ranges from low 60 to high 80 degrees Fahrenheit with little variance. With more oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas.

Contrasting the steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all annual rainfall occurs between the months of November and April. Summer rainfall is reduced to widely scattered thundershowers near the coast, with slightly heavier activity in the east and over the mountains.

Although the SCAB has a semiarid climate, the air closer to the Earth's surface is typically moist because of the presence of a shallow marine layer. Except for occasional periods when dry, continental air is brought into the SCAB by offshore winds, the "ocean effect" is dominant. Periods of heavy fog are frequent and low clouds known as high fog are characteristic climatic features, especially along the coast. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB.

Wind patterns across the SCAB are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is typically higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, result in very strong, downslope Santa Ana winds. These winds normally continue for a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

In addition to the characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which air pollutants are mixed. These inversions are the marine inversion and the radiation inversion. The height of

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<sup>1</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

the base of the inversion at any given time is called the “mixing height.” The combination of winds and inversions is a critical determinant leading to highly degraded air quality for the SCAB in the summer and generally good air quality in the winter.

## 2.2 Air Pollutants of Concern

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by state and federal laws. These regulated air pollutants are known as “criteria air pollutants” and are categorized into primary and secondary pollutants.

Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), coarse particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), and lead are primary air pollutants. Of these, CO, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are criteria pollutants. ROG and NO<sub>x</sub> are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. For example, the criteria pollutant ozone (O<sub>3</sub>) is formed by a chemical reaction between ROG and NO<sub>x</sub> in the presence of sunlight. O<sub>3</sub> and nitrogen dioxide (NO<sub>2</sub>) are the principal secondary pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in [Table 1: Air Contaminants and Associated Public Health and Environmental Concerns](#).

<b>Pollutant</b>	<b>Major Man-Made Sources</b>	<b>Effects</b>
Particulate Matter (PM <sub>10</sub> and PM <sub>2.5</sub> )	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Ozone (O <sub>3</sub> )	Formed by a chemical reaction between reactive organic gases/volatile organic compounds (ROG or VOC) <sup>1</sup> and nitrogen oxides (NO <sub>x</sub> ) in the presence of sunlight. Motor vehicle exhaust industrial emissions, gasoline storage and transport, solvents, paints and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Sulfur Dioxide (SO <sub>2</sub> )	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO <sub>2</sub> )	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to O <sub>3</sub> . Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.

Table 1: Air Contaminants and Associated Public Health and Environmental Concerns		
Pollutant	Major Man-Made Sources	Effects
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been motor vehicles (such as cars and trucks) and industrial sources. Due to the phase out of leaded gasoline, metals processing is the major source of lead emissions to the air today. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers.	Exposure to lead occurs mainly through inhalation of air and ingestion of lead in food, water, soil, or dust. It accumulates in the blood, bones, and soft tissues and can adversely affect the kidneys, liver, nervous system, and other organs. Excessive exposure to lead may cause neurological impairments such as seizures, mental retardation, and behavioral disorders. Even at low doses, lead exposure is associated with damage to the nervous systems of fetuses and young children, resulting in learning deficits and lowered IQ.
<b>Notes:</b> 1. Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROG and VOCs. Both ROG and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).		
Source: U.S. Environmental Protection Agency, <i>Criteria Air Pollutants</i> , <a href="https://www.epa.gov/criteria-air-pollutants">https://www.epa.gov/criteria-air-pollutants</a> , accessed August 2023.		

### Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e. chronic, carcinogenic or cancer causing) adverse human health effects (i.e. injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

CARB identified diesel particulate matter (DPM) as a toxic air contaminant. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

### Ambient Air Quality

CARB monitors ambient air quality at approximately 250 air monitoring stations across the State. These stations usually measure pollutant concentrations ten feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. Existing levels of ambient air quality, historical trends, and projections near the Project Site are documented by measurements made by the South Coast Air Quality Management District (SCAQMD), the air pollution regulatory agency in the SCAB that maintains air quality monitoring stations which process ambient air quality measurements.

Pollutants of concern in the SCAB include O<sub>3</sub>, PM<sub>10</sub>. The closest air monitoring station to the Project that monitor ambient concentrations of O<sub>3</sub>, CO, NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> is the Los Angeles- North Main Street (located approximately 7.7 miles to the southeast of the Project Site). Local air quality data from 2020 to 2022 (the latest currently available) are provided in Table 2: Ambient Air Quality Data which lists the monitored maximum concentrations and number of exceedances of state or federal air quality standards for each year.

<b>Table 2: Ambient Air Quality Data</b>			
<b>Criteria Pollutant</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Ozone (O<sub>3</sub>)</b>			
1-hour Maximum Concentration (ppm)	0.185	0.099	0.138
8-hour Maximum Concentration (ppm)	0.118	0.086	0.091
<i>Number of Days Standard Exceeded</i>			
CAAQS 1-hour (>0.09 ppm)	14	1	6
NAAQS 8-hour (>0.070 ppm)	22	0	6
<b>Carbon Monoxide (CO)<sup>2</sup></b>			
1-hour Maximum Concentration (ppm)	2.092	1.962	1.672
<i>Number of Days Standard Exceeded</i>			
NAAQS 1-hour (>35 ppm)	0	0	0
CAAQS 1-hour (>20 ppm)	0	0	0
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>			
1-hour Maximum Concentration (ppm)	0.062	0.078	0.075
<i>Number of Days Standard Exceeded</i>			
NAAQS 1-hour (>100 ppm)	0	0	0
CAAQS 1-hour (>0.18 ppm)	0	0	0
<b>Particulate Matter Less Than 10 Microns (PM<sub>10</sub>)</b>			
National 24-hour Maximum Concentration	83.7	64.0	61.0
State 24-hour Maximum Concentration	185.2	138.5	43.7
State Annual Average Concentration (CAAQS=20 µg/m <sup>3</sup> )	33.9		24.1
<i>Number of Days Standard Exceeded</i>			
NAAQS 24-hour (>150 µg/m <sup>3</sup> )	*	0	0
CAAQS 24-hour (>50 µg/m <sup>3</sup> )	35.6	17.2	0
<b>Particulate Matter Less Than 2.5 Microns (PM<sub>2.5</sub>)</b>			
National 24-hour Maximum Concentration	175.0	61.1	33.7
State 24-hour Maximum Concentration	175.0	61.1	38.0
<i>Number of Days Standard Exceeded</i>			
NAAQS 24-hour (>35 µg/m <sup>3</sup> )	12	13	0
NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million; µg/m <sup>3</sup> = micrograms per cubic meter; – = not measured			
Measurements taken at the Los Angeles-North Main Street Monitoring Station at 1630 North Main Street, Los Angeles, California 90012 (CARB #70087).			
Source: All pollutant measurements are from the CARB Aerometric Data Analysis and Management system database ( <a href="https://www.arb.ca.gov/adam">https://www.arb.ca.gov/adam</a> ) except for CO, which were retrieved from the CARB Air Quality and Meteorological Information System ( <a href="https://www.arb.ca.gov/aqmis2/aqdselect.php">https://www.arb.ca.gov/aqmis2/aqdselect.php</a> ).			

## 2.3 Sensitive Receptors

Sensitive populations are more susceptible to the effects of air pollution than is the general population. Sensitive receptors that are in proximity to localized sources of toxics are of particular concern. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive land uses nearest to the Project are shown in Table 3: Sensitive Receptors and Exhibit 3: Sensitive Receptors.

<b>Table 3: Sensitive Receptors</b>	
<b>Receptor Description and Address</b>	<b>Distance and Direction from the Project</b>
Multifamily Residential, 945 N Hudson Avenue	Adjacent to the south
Single Family and Multifamily Residential, 936, 940, 942, 946, 952, and 956 Hudson Avenue and 6518 Romaine Street	55 feet to the east
Multifamily Residential, 1004 N Hudson Avenue	95 feet to the northeast
Single Family Residential, 6506 Barton Avenue and 913 Seward Street	205 feet to the southwest
Multifamily Residential, 6511 Romaine Street	205 feet northeast
Single Family Residential, 1006 N. Hudson Avenue	210 feet north
Source: Google Earth, 2023.	





SOURCE: Nearmap, 2023



## EXHIBIT 3: Sensitive Receptors

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### 3 REGULATORY SETTING

#### 3.1 Federal

##### Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA) and its amendments. Under the FCAA, the United States Environmental Protection Agency (EPA) developed the primary and secondary National Ambient Air Quality Standards (NAAQS) for the criteria air pollutants including O<sub>3</sub>, NO<sub>2</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each state to prepare a State Implementation Plan to demonstrate how it will attain the NAAQS within the federally imposed deadlines.

The EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a state fails to correct these planning deficiencies within two years of Federal notification, the EPA is required to develop a Federal implementation plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations Parts 51 and 93 apply in all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. The EPA has designated enforcement of air pollution control regulations to the individual states. Applicable federal standards are summarized in Table 4: State and Federal Ambient Air Quality Standards.

#### 3.2 State of California

##### California Air Resources Board

CARB administers the air quality policy in California. The California Ambient Air Quality Standards (CAAQS) were established in 1969 pursuant to the Mulford-Carrell Act. These standards, included with the NAAQS in Table 4, are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates.

The California Clean Air Act (CCAA) requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the State Implementation Plan for meeting federal clean air standards for the State of California. Like the EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc. are not considered violations of a state standard, and are not used as a basis for designating areas as nonattainment. The applicable State standards are summarized in Table 4.



**Table 4: State and Federal Ambient Air Quality Standards**

Pollutant	Averaging Time	State Standards <sup>1</sup>	Federal Standards <sup>2</sup>
Ozone (O <sub>3</sub> ) <sup>2, 5, 7</sup>	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	NA
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )	9 ppm (10 mg/m <sup>3</sup> )
	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	35 ppm (40 mg/m <sup>3</sup> )
Nitrogen Dioxide (NO <sub>2</sub> )	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	0.10 ppm <sup>11</sup>
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	0.053 ppm (100 µg/m <sup>3</sup> )
Sulfur Dioxide (SO <sub>2</sub> ) <sup>8</sup>	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )	0.14 ppm (365 µg/m <sup>3</sup> )
	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	0.075 ppm (196 µg/m <sup>3</sup> )
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m <sup>3</sup> )
Particulate Matter (PM <sub>10</sub> ) <sup>1, 3, 6</sup>	24-Hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	NA
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>3, 4, 6, 9</sup>	24-Hour	NA	35 µg/m <sup>3</sup>
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	12 µg/m <sup>3</sup>
Sulfates (SO <sub>4-2</sub> )	24 Hour	25 µg/m <sup>3</sup>	NA
Lead (Pb) <sup>10, 11</sup>	30-Day Average	1.5 µg/m <sup>3</sup>	NA
	Calendar Quarter	NA	1.5 µg/m <sup>3</sup>
	Rolling 3-Month Average	NA	0.15 µg/m <sup>3</sup>
Hydrogen Sulfide (H <sub>2</sub> S)	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	NA
Vinyl Chloride (C <sub>2</sub> H <sub>3</sub> Cl) <sup>10</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	NA

ppm = parts per million; µg/m<sup>3</sup> = micrograms per cubic meter; mg/m<sup>3</sup> = milligrams per cubic meter; – = no information available.

Notes:

- California standards for O<sub>3</sub>, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter - PM<sub>10</sub>, and visibility reducing particles are values that are not to be exceeded. The standards for sulfates, Lake Tahoe carbon monoxide, lead, hydrogen sulfide, and vinyl chloride are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e. all standards except for lead and the PM<sub>10</sub> annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average. The Lake Tahoe carbon monoxide standard is 6.0 ppm, a level one-half the national standard and two-thirds the State standard.
- National standards shown are the "primary standards" designed to protect public health. National standards other than for O<sub>3</sub>, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O<sub>3</sub> standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O<sub>3</sub> standard is attained when the 3-year average of the 4<sup>th</sup> highest daily concentrations is 0.070 ppm or less. The 24-hour PM<sub>10</sub> standard is attained when the 3-year average of the 99<sup>th</sup> percentile of monitored concentrations is less than 150 µg/m<sup>3</sup>. The 24-hour PM<sub>2.5</sub> standard is attained when the 3-year average of 98<sup>th</sup> percentiles is less than 35 µg/m<sup>3</sup>.
- Except for the national particulate standards, annual standards are met if the annual average falls below the standard at every site. The national annual particulate standard for PM<sub>10</sub> is met if the 3-year average falls below the standard at every site. The annual PM<sub>2.5</sub> standard is met if the 3-year average of annual averages spatially-averaged across officially designed clusters of sites falls below the standard. NAAQS are set by the EPA at levels determined to be protective of public health with an adequate margin of safety.
- On October 1, 2015, the national 8-hour O<sub>3</sub> primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O<sub>3</sub> concentration per year, averaged over three years, is equal to or less than 0.070 ppm. EPA will make recommendations on attainment designations by October 1, 2016, and issue final designations October 1, 2017. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O<sub>3</sub> level in the area.
- The national 1-hour O<sub>3</sub> standard was revoked by the EPA on June 15, 2005.
- In June 2002, CARB established new annual standards for PM<sub>2.5</sub> and PM<sub>10</sub>.
- The 8-hour California O<sub>3</sub> standard was approved by the CARB on April 28, 2005 and became effective on May 17, 2006.
- On June 2, 2010, the EPA established a new 1-hour SO<sub>2</sub> standard, effective August 23, 2010, which is based on the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO<sub>2</sub> NAAQS however must continue to be used until one year following EPA initial designations of the new 1-hour SO<sub>2</sub> NAAQS.
- In December 2012, EPA strengthened the annual PM<sub>2.5</sub> NAAQS from 15.0 to 12.0 µg/m<sup>3</sup>. In December 2014, the EPA issued final area designations for the 2012 primary annual PM<sub>2.5</sub> NAAQS. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.
- CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure below which there are no adverse health effects determined.
- National lead standard, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.

Source: South Coast Air Quality Management District, *Air Quality Management Plan*, 2016; California Air Resources Board, *Ambient Air Quality Standards*, May 6, 2016.

### 3.3 Regional

#### South Coast Air Quality Management District

The SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that state and federal ambient air quality standards are attained and maintained in the SCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing the AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The purpose of the AQMP is to set forth a comprehensive and integrated program that would lead the SCAB into compliance with the federal 24-hour PM<sub>2.5</sub> air quality standard, and to provide an update to the SCAQMD's commitments towards meeting the federal 8-hour O<sub>3</sub> standards. The AQMP incorporates the latest scientific and technological information and planning assumptions, including the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) and updated emission inventory methodologies for various source categories.

On October 1, 2015, the EPA strengthened the NAAQS for ground-level O<sub>3</sub>. The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the requirements for meeting the 2015 8-hour O<sub>3</sub> standard. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO<sub>x</sub> technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour ozone standard. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) and updated emission inventory methodologies for various source categories.

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Local Significance Thresholds [LST] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by California Environmental Quality Act (CEQA) and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality

in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments.

The state and federal attainment status designations for the SCAB are summarized in [Table 5: South Coast Air Basin Attainment Status](#). The SCAB is currently designated as a nonattainment area with respect to the State O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> standards, as well as the national 8-hour O<sub>3</sub> and PM<sub>2.5</sub> standards. The SCAB is designated as attainment or unclassified for the remaining state and federal standards.

<b>Pollutant</b>	<b>State</b>	<b>Federal</b>
Ozone (O <sub>3</sub> ) (1 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Ozone (O <sub>3</sub> ) (8 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Particulate Matter (PM <sub>2.5</sub> ) (24 Hour Standard)	–	Non-Attainment (Serious)
Particulate Matter (PM <sub>2.5</sub> ) (Annual Standard)	Non-Attainment	Non-Attainment (Moderate)
Particulate Matter (PM <sub>10</sub> ) (24 Hour Standard)	Non-Attainment	Attainment (Maintenance)
Particulate Matter (PM <sub>10</sub> ) (Annual Standard)	Non-Attainment	–
Carbon Monoxide (CO) (1 Hour Standard)	Attainment	Attainment (Maintenance)
Carbon Monoxide (CO) (8 Hour Standard)	Attainment	Attainment (Maintenance)
Nitrogen Dioxide (NO <sub>2</sub> ) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO <sub>2</sub> ) (Annual Standard)	Attainment	Attainment (Maintenance)
Sulfur Dioxide (SO <sub>2</sub> ) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO <sub>2</sub> ) (24 Hour Standard)	Attainment	–
Lead (Pb) (30 Day Standard)	–	Unclassifiable/Attainment
Lead (Pb) (3 Month Standard)	Attainment	Nonattainment (Partial) <sup>1</sup>
Sulfates (SO <sub>4-2</sub> ) (24 Hour Standard)	Attainment	–
Hydrogen Sulfide (H <sub>2</sub> S) (1 Hour Standard)	Unclassified	–

Source: South Coast Air Quality Management District, *Air Quality Management Plan*, 2016; United States Environmental Protection Agency, *Nonattainment Areas for Criteria Pollutants (Green Book)*, 2020.

The following is a list of SCAQMD rules that are required of construction activities associated with the Project:

- **Rule 401 (Visible Emissions)** – A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.
- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM<sub>10</sub> emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM<sub>10</sub> suppression techniques are summarized below.
  - a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
  - b) All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.
  - c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
  - d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
  - e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the work day to remove soil from pavement.
- **Rule 431.2 (Sulfur Content of Liquid Fuels)** – This rule limits the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines.
- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.
- **Rule 1403 (Asbestos Emissions from Demolition)** – This rule specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities. The requirements include asbestos surveying, notification, asbestos-containing materials (ACM) removal

procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfiling requirements.

- **Rule 1470 (Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines)** - This rule implements the Airborne Toxics Control Measures (ATCM) for Stationary Compression Ignition Engines over 50 horsepower that was approved by CARB in February 2004. The three main compliance avenues include diesel particulate matter filters, clean fuels, and limits on hours for testing and maintenance.

### 3.4 - Local

#### City of Los Angeles General Plan

##### *Air Quality Element*

The City of Los Angeles' General Plan and the City of Los Angeles' Green New Deal (Sustainable pLAn 2019) contain policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and City.

The City's General Plan Air Quality Element was adopted on November 24, 1992, and sets forth goals, objectives, and policies which guide the City in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to land use development, and relate to traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant 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 conservation 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.

In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by

conditioning discretionary permits, and monitors and enforces implementation of such mitigation measures.

*Plan for a Healthy Los Angeles*

The Plan for a Healthy Los Angeles, adopted by the City Council on March 31, 2015, lays the foundation to create healthier communities for all residents in the City. As an element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment (i.e., improved ambient and indoor air quality), the opportunity to thrive, and access to health services, affordable housing, and healthy and sustainably produced food.



## 4 SIGNIFICANCE CRITERIA AND METHODOLOGY

### 4.1 Air Quality Thresholds

#### State CEQA Guidelines Appendix G

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

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable state or federal ambient air quality standard.
- Expose sensitive receptors to substantial pollutant concentrations.
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

#### 2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide identifies the following factors that may be relevant to preparing the air quality impact analysis:

##### *Construction*

- Combustion Emissions from Construction Equipment
  - Type, number of pieces and usage for each type of fuel (diesel, natural gas) for each type of equipment; and
  - Emission factors for each type of equipment.
- Fugitive Dust – Grading, Excavation and Hauling
  - Amount of soil to be disturbed on-site or moved off-site;
  - Emission factors for disturbed soil;
  - Duration of grading, excavation and hauling activities;
  - Type and number of pieces of equipment to be used; and
  - Projected haul route.
- Fugitive Dust – Heavy-Duty Equipment Travel on Unpaved Road
  - Length and type of road;
  - Type, number of pieces, weight and usage of equipment; and
  - Type of soil.
- Other Mobile Source Emissions
  - Number and average length of construction worker trips to Project Site, per day; and

- Duration of construction activities.

#### Operation

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the daily thresholds presented below (as reprinted from the CEQA Air Quality Handbook):

Pollutant	Significance Threshold (lbs/day)
ROG	55
NO <sub>x</sub>	55
CO	550
PM <sub>10</sub>	150
SO <sub>x</sub>	150

- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The proposed project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm).
  - The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

#### Toxic Air Contaminants

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The regulatory framework for the toxic material(s) and process(es) involved;
- The proximity of the TACs to sensitive receptors;
- The quantity, volume, and toxicity of the contaminants expected to be emitted;
- The likelihood and potential level of exposure; and
- The degree to which project design will reduce the risk of exposure.

#### South Coast Air Quality Management District

The City utilizes the thresholds of significance in SCAQMD's CEQA Air Quality Handbook, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>, to assess the significance of the Project's estimated air quality impacts.

**Mass Emissions Thresholds.** The significance criteria established by SCAQMD may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if the Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during construction and operational activities of land use development projects, as shown in Table 6: South Coast Air Quality Management District Emissions Thresholds.

<b>Table 6: South Coast Air Quality Management District Emissions Thresholds</b>		
Criteria Air Pollutants and Precursors	Daily Emissions (pounds/day)	
	Construction-Related	Operational-Related
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO <sub>x</sub> )	100	55
Sulfur Oxides (SO <sub>x</sub> )	150	150
Coarse Particulates (PM <sub>10</sub> )	150	150
Fine Particulates (PM <sub>2.5</sub> )	55	55

Source: South Coast Air Quality Management District, *CEQA Air Quality Significance Thresholds*, April 2019.

**Localized Carbon Monoxide.** In addition to the daily thresholds listed above, development associated with the Project would also be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels near the Project are above state and federal CO standards (the more stringent California standards are 20 ppm for 1-hour and 9 ppm for 8-hour). The SCAB has been designated as attainment under the 1-hour and 8-hour standards.

**Localized Significance Thresholds.** In addition to the CO hotspot analysis, the SCAQMD developed LSTs for emissions of NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project without expecting to cause or substantially contribute to an exceedance of the most stringent state or federal ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects that disturb 5 acres or less on a single day. The Project site is located within SCAQMD SRA 1 (Central Los Angeles). Table 7: Local Significance Thresholds for Construction/Operations, shows the LSTs for 1-acre, 2-acre, and 5-acre projects in SRA 1 with sensitive receptors located within 25 meters of the Project Site which represents the closest distance for LSTs.

<b>Table 7: Local Significance Thresholds for Construction/Operations</b>				
Project Size	Nitrogen Oxide (NO <sub>x</sub> ) – lbs/day	Carbon Monoxide (CO) – lbs/day	Coarse Particulates (PM <sub>10</sub> ) – lbs/day	Fine Particulates (PM <sub>2.5</sub> ) – lbs/day
1 Acre	74/74	680/680	5/2	3/1
2 Acres	108/108	1,048/1,048	8/2	5/2
5 Acres	161/161	1,861/1,861	16/4	8/2

Source: South Coast Air Quality Management District, *Localized Significance Threshold Methodology*, July 2008.

LSTs associated with all acreage categories are provided in Table 7 for informational purposes. Table 7 shows that the LSTs increase as acreages increase. It should be noted that LSTs are screening thresholds and are therefore conservative. The construction LST acreage is determined based daily acreage disturbed. The operational LST acreage is based on the total area of the Project site.

**Toxic Air Contaminants.** Based on the criteria set forth in the SCAQMD's CEQA Air Quality Handbook, the Project would have a significant TAC impact, if the Project results in:

- Offsite incremental increase in cancer risk of 10 in one million or greater, or

- Acute or chronic hazard index of 1.0 or greater, or
- Cancer burden of more than 0.5 excess cancer cases (in areas  $\geq 1$  in 1 million risk)

**Consistency with Applicable Air Quality Plans.** CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the Project's consistency with the SCAQMD and SCAG regional plans and policies, including the AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations;
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?

In addition, the Project's consistency with the General Plan's Air Quality Element is discussed.

**Cumulative Impacts.** Based on SCAQMD guidance, individual construction projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed in SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution:

*As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR ... Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.<sup>2</sup>*

The cumulative analysis of air quality impacts herein follows SCAQMD's guidance such that construction or operational Project emissions will be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold.

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<sup>2</sup> White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.

## 4.2 Methodology

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 air quality impact analysis considers construction and operational impacts associated with the Project. Where criteria air pollutant quantification was required, 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 criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Air quality impacts were assessed according to methodologies recommended by CARB and the SCAQMD. As discussed above, the SCAQMD provides significance thresholds for emissions associated with proposed project construction and operations. The proposed Project's construction and operational emissions are compared to the daily criteria pollutant emissions significance thresholds in order to determine the significance of the Project's impact on regional air quality.

### Construction Emissions

Construction equipment, trucks, worker vehicles, and ground-disturbing activities associated with Project construction would generate emissions of criteria air pollutants and precursors. Daily regional construction emissions are estimated by assuming construction occurs at the earliest feasible date (i.e., a conservative estimate of construction 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 criteria pollutant analysis to generate criteria pollutant 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. It should be noted that the maximum daily emissions were predicted values for the worst-case day and do not represent the emissions that would occur for every day of Project construction. The maximum daily emissions were compared to the SCAQMD daily regional numeric indicators.

#### *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:

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

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

Fugitive dust emissions from use of off-road equipment were also calculated using CalEEMod based on the types of equipment used during grading activities and based on the amount of import/export from loading or unloading dirt into haul trucks. These methods have been adapted from USEPA's AP-42 method for Western Coal Mining. As recommended by SCAQMD, the fugitive dust emissions from the grading phase are calculated using the methodology described in ESEPA AP-42.  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$  emissions from fugitive dust will be controlled by watering the construction site three times a day consistent with SCAQMD Rule 403 and were estimated to be reduced by 61 percent.

#### *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 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)

EF running, pollutant = 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 for each pollutant.

#### *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:

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

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

$A_{\text{paint}}$  = 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:

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

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:

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

Where: EF = emission factor (lb/acre)

A = area of the parking lot (acre)

### *Localized Emissions*

The localized effects from the Project's on-site emissions were evaluated in accordance with the SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. These ambient standards were established at levels that provide public health protection and allow adequate margin of safety, including protecting the health of sensitive populations.

### **Operational Emissions**

Analysis of the Project's impact on regional air quality during long-term Project operations takes into consideration three types of sources: (1) mobile; (2) area; and (3) energy. Similar to construction,

CalEEMod was used to estimate Project emissions during operation. To determine if a significant air quality impact would occur, the increase in regional operational emissions generated by the Project was compared against SCAQMD's significance thresholds.

#### *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]
	$D_{\text{TRIP}}$	=	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.

#### *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:



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

Where:

$EF_{CP}$  = Pounds of VOC building square foot

The factor is  $1.98 \times 10^{-5}$  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:

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

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 pollutant emissions 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 such sources 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.

#### *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.

#### *Localized Emissions*

The localized effects from the Project’s on-site emissions were evaluated in accordance with the SCAQMD’s LST methodology, discussed above.

#### *Carbon Monoxide Hotspots*

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD’s 2003 *Air Quality Management Plan* and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).<sup>3,4</sup> As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region’s unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans. The Basin was re-designated as attainment in 2007 and CO is no longer addressed in the SCAQMD’s Air Quality Management Plan (AQMP).

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day.

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<sup>3</sup> South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003.

<sup>4</sup> South Coast Air Quality Management District, *Federal Attainment Plan for Carbon Monoxide*, 1992.

The 2003 *Air Quality Management Plan* is the most recent AQMP that addressed CO concentrations, because the SCAB was designated as maintenance of the CO NAAQS in 2007. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).<sup>5</sup> The Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard. A project would potentially result in a CO hotspot if a project intersection would exceed 100,000 vehicles per day.

### 4.3 Project Design Features

The following project design feature is proposed with regard to air quality:

**PDF AQ-1 Off-Road Diesel-Powered Construction Equipment.** All off-road diesel-powered construction equipment greater than 90 horsepower would meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.

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<sup>5</sup> South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003.

## 5 POTENTIAL IMPACTS AND MITIGATION

### 5.1 Air Quality Analysis

#### Threshold 5.1 Would the Project conflict with or obstruct implementation of the applicable air quality plan?

As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Ambient Air Quality Standards (CAAQS) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP and 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2022 AQMP builds upon measures already in place from previous AQMPs.<sup>6</sup> The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS). Air quality management planning is a regional and multi-agency effort including the SCAQMD, the CARB, the Southern California Association of Governments (SCAG), and the EPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's growth projections and the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1:** The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans,

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<sup>6</sup> South Coast Air Quality Management District, *2022 Air Quality Management Plan*, page ES-2, December 2022. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

and thus if it would interfere with the region's ability to comply with CAAQS and National Ambient Air Quality Standards (NAAQS).<sup>7</sup>

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown below (see [Table 8](#), [Table 9](#), [Table 11](#), and [Table 12](#)), the Project would not exceed the construction or operational standards. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Thus, the Project would be consistent with the AQMP under the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts (SCAG's 2020-2045 RTP/SCS). SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The 2020-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.<sup>8</sup> Growth forecasts prepared by SCAG contained 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, an increase of 287,600 jobs.<sup>9</sup> A storage facility of this size would typically employ up to two people. Representing 0.001 percent of this increase, the Project's employee increase would be within local and regional employment projections. The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed and are not typically brought from other regions to work on developments such as the Project. Thus, the Project would also be consistent with the AQMP under the second criterion.

As an infill development, the Project advances goals of the AQMP and RTP/SCS to reduce VMT and related vehicle emissions. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the Plan with those prepared by SCAG.

In addition, the Project would not conflict with or obstruct implementation of the City's General Plan Air Quality Element.<sup>10</sup> The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

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<sup>7</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

<sup>8</sup> 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](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176).

<sup>9</sup> 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](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579)

<sup>10</sup> Department of City Planning Los Angeles, General Plan Air Quality Element, November 1992, [https://planning.lacity.org/odocument/Off9a9b0-0adf-49b4-8e07-0c16f6ea70bc/Air\\_Quality\\_Element.pdf](https://planning.lacity.org/odocument/Off9a9b0-0adf-49b4-8e07-0c16f6ea70bc/Air_Quality_Element.pdf).

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
  - **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
  - **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
  - **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
- **Goal 2:** Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- **Goal 4:** Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
  - **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

The Project's location within an existing developed urban area would reduce VMT and related vehicle emissions in comparison to a project located in a non-urban environment. High population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT with the co-benefit of decreasing pollutant emissions from mobile sources. In addition, the Project includes short- and long-term bicycle parking spaces as required by the LAMC and is well-served by transit including local bus lines. The Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit, opportunities for walking and biking, thereby facilitating a reduction in VMT. The Project is consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options.

The analysis above is based on the Project's consistency with the AQMP as well as the City of Los Angeles' Air Quality Element goals, objectives, and policies that are relevant to the Project. The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project is consistent with the growth projections that form the basis of the 2016 AQMP, the Project would be consistent with the emission forecasts in the AQMP. Furthermore, with adherence to the regulatory requirements identified above, no significant air quality impacts would occur and as such, no mitigation measures are necessary for the Project to meet this AQMP consistency criterion. As the Project would support the City's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures.

Project implementation would not exceed the SCAQMD localized significance thresholds which were developed to ensure no exceedances of the California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>), the Project also would not delay timely attainment of air quality standards or interim emission

reductions specified in the AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP or the City's General Plan Air Quality Element. Therefore, impacts would be less than significant, and no mitigation measures are required.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less than significant impact.

**Threshold 5.2 Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable state or federal ambient air quality standard?**

**Construction Emissions**

Construction associated with the proposed Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the South Coast Air Basin include ozone-precursor pollutants (i.e., ROG and NO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. Construction-generated emissions of these criteria pollutants are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated were to exceed the SCAQMD's thresholds of significance.

Construction would result in the temporary generation of criteria pollutant emissions from activities such as demolition, site grading, building construction, architectural coating, motor vehicle exhaust associated with construction equipment, materials deliveries and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Fugitive dust emissions would result from demolition and construction activities. Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance; the volume of airborne particulate matter is largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water. Mobile source emissions, primarily NO<sub>x</sub>, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Construction activities for the Project were assumed to begin in January 2025. Construction-generated emissions associated with the proposed Project were calculated using the California Air Resources Board (CARB)-approved California Emissions Estimator Model (CalEEMod), version 2022.1.1.20, which is designed to model emissions for land use development projects, based on typical construction requirements. It is assumed that all construction equipment operated during each individual phase would be operated simultaneously to provide a conservative analysis. See [Appendix A: Air Quality Data](#) for more information regarding the construction assumptions used in this analysis.

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in [Table 8: Project Construction Criteria Pollutant Emissions](#). As noted in [Table 8](#), the



Project's emissions were calculated assuming mandatory compliance with SCAQMD Rule 403, fugitive dust control measures.

<b>Table 8: Project Construction Criteria Pollutant Emissions</b>						
Construction Year	Emissions (pounds per day) <sup>1</sup>					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 1 (2025)	1.32	9.56	14.80	0.02	1.69	0.60
Year 2 (2026)	25.65	9.14	13.59	0.02	1.57	0.57
SCAQMD Threshold	75	100	550	150	150	55
<b>SCAQMD Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
1. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust assumed. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to <a href="#">Appendix A</a> for Model Data Outputs.						
Source: CalEEMod version 2022.1.1.20. Refer to <a href="#">Appendix A</a> for model outputs.						

The results summarized on [Table 8](#) show that the Project's regional criteria pollutant emissions during construction would remain below applicable thresholds.

Project construction would also comply with SCAQMD Rules 402 (Nuisance)<sup>11</sup> and 1113 (Architectural Coatings)<sup>12</sup> and CARB's anti-idling regulations which prohibit idling for more than five minutes; however, to be conservative, compliance with these rules also was not assumed when estimating the Project's construction emissions for [Table 8](#), above. In addition, the Project proposes Project Design Feature AQ-PDF-1, which would reduce the Project's diesel exhaust construction emissions by requiring that all off-road diesel-powered construction equipment greater than 90 horsepower meet CARB Tier 4 Final off-road emissions standards. Therefore, the Project's maximum-day construction emissions of criteria pollutants would be even lower than reported in [Table 8](#) if the Project's compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations were taken into account.

As shown above, the Project's estimated criteria pollutant emissions during construction would be below their respective thresholds. Therefore, impacts would be less than significant, and no mitigation measures are required.

### Operational Emissions

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, etc.), energy sources, mobile sources (i.e., motor vehicle use), and off-road equipment. Primary sources of operational criteria pollutants are from motor vehicle use and area sources. Long-term operational emissions attributable to the Project are summarized in [Table 9: Operational Criteria Pollutant Emissions](#). The operational emissions sources are described below.

- **Area Source Emissions.** Area source emissions would be generated due to on-site equipment, architectural coating, and landscape maintenance equipment.

<sup>11</sup> SCAQMD Rule 402 prohibits the discharge of quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or have a natural tendency to cause injury or damage to business or property.

<sup>12</sup> SCAQMD Rule 1113 sets limits on the VOC content of architectural coatings.



- **Energy Source Emissions.** Energy source emissions would be generated due to electricity usage associated with the Project. The Project would be all-electric and would not require the use of natural gas. Primary uses of electricity by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.
- **Mobile Source Emissions.** Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are all pollutants of regional concern. NO<sub>x</sub> and ROG react with sunlight to form O<sub>3</sub>, known as photochemical smog. Additionally, wind currents readily transport PM<sub>10</sub> and PM<sub>2.5</sub>. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions are based on the trip generation estimates and have been incorporated into CalEEMod, as recommended by the SCAQMD. The Project would generate 314 total daily vehicle trips. It should be noted that this analysis conservatively does not account for emissions reductions associated with trips generated by the existing uses.

<b>Table 9: Operational Criteria Pollutant Emissions</b>						
<b>Source</b>	<b>Emissions (pounds per day)<sup>1, 2</sup></b>					
	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Area	5.37	0.07	8.07	<0.01	0.01	0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	1.04	0.87	9.24	0.02	2.05	0.53
<b>Proposed Project Total</b>	<b>6.41</b>	<b>0.94</b>	<b>17.31</b>	<b>0.02</b>	<b>2.06</b>	<b>0.54</b>
SCAQMD Threshold	55	55	550	150	150	55
<b>SCAQMD Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
1. Worst-case seasonal maximum daily emissions are reported.						
Source: CalEEMod version 2022.1.1.20. Refer to <a href="#">Appendix A</a> for model outputs.						

As shown in [Table 9](#), and discussed above, operational (i.e., area, energy, mobile, off-road, and emergency generators) emissions would not exceed SCAQMD thresholds for all criteria pollutants and the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Therefore, impacts would be less than significant, and no mitigation measures are required.

### Cumulative Construction Emissions

SCAB is designated nonattainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> for State standards and nonattainment for O<sub>3</sub> and PM<sub>2.5</sub> for federal standards. As discussed above, the Project's construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. As shown in [Table 8](#) above, Project construction-related emissions would not exceed the SCAQMD significance thresholds for criteria

pollutants. Therefore, the proposed Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be used during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB, which would include related cumulative projects. Table 8 shows that the Project's construction-related emissions would not exceed the SCAQMD thresholds. As a result, construction emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Compliance with SCAQMD rules and regulations would further minimize the proposed Project's construction-related emissions. Project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. Therefore, impacts would be less than significant, and no mitigation measures are required.

### **Cumulative Operational Impacts**

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact and, inversely, emission volumes below the SCAQMD operational thresholds are not cumulatively considerable.

Table 9 shows that the Project operational emissions would not exceed the SCAQMD thresholds. As a result, operational emissions associated with the Project would not represent a cumulatively considerable contribution to significant cumulative air quality impacts. Therefore, impacts would be less than significant, and no mitigation measures are required.

### **Laws, Ordinances, and Regulations:**

Laws, Ordinances, and Regulations (LOR) are existing requirements that are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review. Typical LORs include compliance with the provisions of the Building Code, SCAQMD Rules, etc. The City may impose additional conditions during the approval process, as appropriate. Because LORs are neither Project specific nor a result of development of the Project, they are not considered to be either Project Design Features or Mitigation Measures.

**LOR AQ-1** Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to comply with South Coast Air Quality Management District's (SCAQMD's) Rules 402 and 403 to minimize construction emissions of dust and particulates. The measures include, but are not limited to, the following:

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

**LOR AQ-2** Pursuant to SCAQMD Rule 1113, the Project Applicant shall require by contract specifications that the interior and exterior architectural coatings (paint and primer including parking lot paint) products used would have a volatile organic compound rating of 50 grams per liter or less.

**LOR AQ-3** Require diesel powered construction equipment to turn off when not in use per Title 13 of the California Code of Regulations, Section 2449.

**LOR AQ-4** Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the City's Water Efficient Landscape requirements.

**LOR AQ-5** In accordance with California Title 24 Standards, buildings will be designed to have 15 percent of the roof area "solar ready" that will structurally accommodate later installation of rooftop solar panels. If future building operators pursue providing rooftop solar panels, they will submit plans for solar panels prior to occupancy.

**LOR AQ-6** The Project shall be designed in accordance with the applicable California Green Building Standards (CALGreen) Code (24 CCR, Part 11). The Building Official, or designee shall ensure compliance prior to the issuance of each building permit. These requirements include, but are not limited to:

- Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.
- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.
- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410 of the California Green Building Standards Code Part 11.

- To facilitate future installation of electric vehicle supply equipment (EVSE), nonresidential construction shall comply with Section 5.106.5.3 (nonresidential electric vehicle charging) of the California Green Building Standards Code Part 11.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less than significant impact.

### **Threshold 5.3 Would the Project expose sensitive receptors to substantial pollutant concentrations?**

#### **Localized Construction Significance Analysis**

The nearest sensitive receptors to the Project Site are the residential units located immediately adjacent to and to the south of the Project Site (see [Exhibit 3](#)). To assess the potential for Project construction to create impacts to sensitive receptors, the SCAQMD recommends utilizing its Localized Significance Thresholds (LSTs) for construction. The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and are based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the state or federal ambient air quality standard (the more stringent of the two). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance.<sup>13</sup> The LST methodology assists lead agencies in their project-specific analysis of the potential localized impacts associated with proposed projects.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, [Table 10: Equipment-Specific Grading Rates](#) was used to determine the maximum daily disturbed acreage for the LST analysis. For this Project, the appropriate source receptor area (SRA) for the LSTs is the Central LA (SRA 1) area since this area includes the Project Site. LSTs only take into consideration emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>.<sup>14</sup> The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size.<sup>15</sup> Based on the daily equipment modeled in CalEEMod, Project construction is anticipated to disturb approximately 1 acre in a single day. Thus, the LSTs applicable to this Project uses the SCAQMD-produced look up tables for a 1-acre site.

<sup>13</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, Accessed December 2022

<sup>14</sup> Ibid.

<sup>15</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Appendix C – Mass Rate LST Look-up Tables, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, Accessed December 2022

<b>Table 10: Equipment-Specific Grading Rates</b>					
<b>Construction Phase</b>	<b>Equipment Type</b>	<b>Equipment Quantity</b>	<b>Acres Graded per 8-Hour Day</b>	<b>Operating Hours per Day</b>	<b>Acres Graded per Day</b>
Grading	Backhoe	1	0.5	8	0.5
	Grader	0	0.5	8	0
	Front Loader	0	0.5	8	0
<b>Total Acres Graded per Day</b>					<b>1</b>
Source: CalEEMod version 2022.1.1.20					

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs."<sup>16</sup> Therefore, for purposes of the construction LST analysis, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. Maximum on-site daily construction emissions for NOX, CO, PM10, and PM2.5 were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 1 based on a construction site acreage of one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are residences located directly south of the Project Site boundary. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters (or approximately 82 feet) or less from the Project Site.<sup>17</sup> Therefore, the LSTs for 1 acre at 25 meters were used for the construction analysis, which is consistent with the SCAQMD LST methodology. Table 11 presents the emissions modeling results for the Project's localized emissions during each phase of construction at the nearest sensitive receptor adjacent to the south of the Project Site. All on-site construction activity has been evaluated and is shown in Table 11. To be conservative, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations were not assumed when estimating the Project's localized construction emissions for Table 11. Therefore, the Project's maximum-day localized construction emissions would actually be even lower than reported in Table 11. Table 11 shows that the emissions of these pollutants on the peak day of construction would not exceed the LSTs and therefore would not be expected to create substantial concentrations of pollutants at the sensitive receptors closest to the Project Site or cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, impacts would be less than significant, and no mitigation measures are required.

<sup>16</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, Accessed December 2022

<sup>17</sup> Ibid.

<b>Table 11: Localized Significance of Construction Emissions</b>				
<b>Source/Activity</b>	<b>Emissions (pounds per day)<sup>1,2</sup></b>			
	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Demolition (2025)	3.03	4.83	1.19	0.27
Grading (2025)	2.21	4.96	0.10	0.09
Building Construction (2025)	8.04	8.85	0.31	0.28
Building Construction (2026)	7.70	8.78	0.28	0.25
Paving (2025)	2.38	2.74	0.11	0.10
Architectural Coating (2026)	2.48	2.87	0.03	0.03
<i>Maximum Daily Emissions</i>	8.04	8.85	1.19	0.28
SCAQMD LST (for 1 acre at 25 meters)	74	680	5	3
<b>Maximum Daily Emissions Exceed SCAQMD Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
1. Worst-case seasonal maximum daily emissions are reported. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Source: CalEEMod version 2022.1.1.20. Refer to <a href="#">Appendix A</a> for model outputs.				

### Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, operational LSTs apply only to on-site sources.<sup>18</sup> LSTs for receptors located at 25 meters for SRA 1 were utilized in this analysis. The 1.0-acre LST threshold was conservatively used for the Project Site.<sup>19</sup> The on-site operational emissions were calculated using CalEEMod and are compared to the LST thresholds in [Table 12: Localized Significance of Operational Emissions](#).

<b>Table 12: Localized Significance of Operational Emissions</b>				
<b>Activity</b>	<b>Emissions (pounds per day)<sup>1, 2</sup></b>			
	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
On-Site Emissions (Area and Energy Sources)	0.07	8.07	0.01	0.01
<i>SCAQMD Localized Screening Threshold (adjusted for 1.0 acre at 25 meters)</i>	74	680	2	1
<b>Exceed SCAQMD Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
1. As recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported. 2. On-site emissions consist of area sources and energy sources. Source: CalEEMod version 2022.1.1.20. Refer to <a href="#">Appendix A</a> for model outputs.				

The operational emissions shown on [Table 12](#) include all on-site Project-related sources (i.e., area and energy). The results of the LST analysis show that the Project would not cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, impacts would be less than significant, and no mitigation measures are required.

<sup>18</sup> Ibid.

<sup>19</sup> Construction LST analysis is based on the amount of daily ground disturbance, which was calculated to be 1 acre. For operations, the size of the Project Site has been used.

### Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [2018] 6 Cal.5<sup>th</sup> 502).

The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the South Coast Air Basin) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program<sup>20</sup> was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, Projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

As previously discussed, localized effects of on-site Project emissions on nearby receptors were found to be less than significant (refer to [Table 11](#) and [Table 12](#)). The LSTs represent the maximum emissions from a Project that are not expected to cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. Information on health impacts related to exposure to ozone and particulate matter emissions published by the U.S. EPA and CARB have been summarized above and discussed in the Regulatory Setting section. As shown above (see [Table 8](#), [Table 9](#), [Table 11](#), and [Table 12](#)), Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards.

### Construction-Related Diesel Particulate Matter

Construction of the Project would result in the generation of DPM emissions from the use of required off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature

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<sup>20</sup> Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Non-attainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S)]



of construction activities. The California Office of Environmental Health Hazard Assessment (OEHHA) has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time which would limit the exposure of any proximate individual sensitive receptor to TACs.

Additionally, construction is subject to and would comply with California regulations (e.g., California Code of Regulations, Title 13, Sections 2485 and 2449), which reduce diesel PM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes. These regulations would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the Project site (i.e., construction is not likely to occur in any one location for an extended time), the dose of DPM of any one receptor is exposed to would be limited.

Considering the relatively short duration of DPM-emitting construction activity at any one location, and the highly dispersive properties of DPM, sensitive receptors would not be exposed to substantial concentrations of construction-related TAC emissions. Therefore, impacts would be less than significant, and no mitigation measures are required.

### **Operational Toxic Air Contaminants**

The proposed self-storage facility will consist of approximately 1,400 square foot storage units with an average size of approximately 80-85 square feet per unit. Per ExtraSpace's sizing guide a 5x10 unit (or 50 square feet) could store the contents of a one-bedroom apartment, and a 10x10 unit (or 100 square feet) could store the contents of a larger living space or a two-bedroom apartment. Most vehicular requirements for tenants at the proposed facility would use a personal van/pickup truck. Less frequently, a small 10 to 15 foot U-Haul truck (non-diesel) could be used by tenants. Larger trucks or diesel-powered vehicles will not be necessary or common, and larger cross-country moving trucks will not be able to access parking lot due to limited space. Additionally, approximately 40,000 square feet of the facility (approximately 25%) will be dedicated to film storage. The average size for film storage units is smaller than the facility average of 80 to 85 square feet, with the majority of units being 5x5 or 5x10 unit sizes. Storage and transportation of film are typically handled by small, specialized vans with minimal heat or particulate exposure as they often require additional care. Film stored at the proposed facility is not anticipated to move frequently once in storage. The proposed Project does not include a land use that has the potential to significantly impact nearby sensitive receptors during the proposed Project's operational phase, since the proposed Project does not generate trips by heavy-duty diesel trucks, which are an emitter of diesel particulate matter (DPM). Therefore, impacts would be less than significant, and no mitigation measures are required.

### **Carbon Monoxide Hotspots**

An analysis of CO "hot spots" is needed to determine whether the change in the level of service (LOS) of an intersection as a result of Project activities would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile

for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 *Air Quality Management Plan* and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).<sup>21,22</sup> As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans. The Basin was re-designated as attainment in 2007 and CO is no longer addressed in the SCAQMD's Air Quality Management Plan (AQMP).

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day.

The 2003 *Air Quality Management Plan* is the most recent AQMP that addressed CO concentrations. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).<sup>23</sup> The Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard.

By contrast, the proposed Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. According to daily traffic volume data, Seward Street between Romaine and Willoughby has an existing vehicle count of 1,354, Romaine Street between Seward and Hudson has an existing vehicle count of 1,456, Hudson Avenue between Romaine and Willoughby has an existing vehicle count of 969, and Willoughby Avenue between Seward and Hudson has an existing vehicle count of 5,312. As CO hotspots were not created at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodated 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any of the intersections in the vicinity of the Project Site from

<sup>21</sup> South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003.

<sup>22</sup> South Coast Air Quality Management District, *Federal Attainment Plan for Carbon Monoxide*, 1992.

<sup>23</sup> South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003.

an additional 314 daily vehicle trips attributable to the Project. Therefore, impacts would be less than significant, and no mitigation measures are required.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less than significant impact.

**Threshold 5.4 Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Construction**

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

*A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors would be temporary, would be typical of construction projects, and would disperse rapidly. Furthermore, odors that could be generated by construction activities are required to follow SCAQMD Rule 402 (Nuisance) to prevent odor nuisances on sensitive land uses. Therefore, impacts would be less than significant, and no mitigation measures are required.

**Operational**

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project proposes the construction of a storage facility which would not involve the types of uses that would emit objectionable odors affecting substantial numbers of people. The proposed Project would not include any of the land uses that have been identified by the SCAQMD as significant odor sources. Therefore, impacts would be less than significant, and no mitigation measures are required.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less than significant impact.

## 5.2 Cumulative Impacts

### Cumulative Setting

The cumulative setting for air quality includes the City of Los Angeles and the SCAB. The SCAB is designated as a nonattainment area for state standards of ozone,  $PM_{10}$ , and  $PM_{2.5}$ . For federal standards, the SCAB is designated as a partial nonattainment area for lead and nonattainment for ozone and  $PM_{2.5}$ , attainment and serious maintenance for federal  $PM_{10}$  standards, and unclassified or attainment for all other pollutants. Cumulative growth in population and vehicle use could inhibit efforts to improve regional air quality and attain the ambient air quality standards. However, as a result of plans and regulations, air quality in the SCAB has improved over time despite population growth and increased in vehicle usage.

### Cumulative Impacts

The SCAQMD's approach to assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with requirements of the FCAA and CCAA. As discussed above, the proposed Project would be consistent with the AQMP, which is intended to bring SCAB into attainment for all criteria pollutants. Since the Project's estimated construction and operational emissions would not exceed the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining both NAAQS and CAAQS, cumulative impacts would be less than significant.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less than significant impact.

## 6 REFERENCES

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12. United States Environmental Protection Agency, *Policy Assessment for the Review of the Lead National Ambient Air Quality Standards*, 2013.

## Appendix A

### Air Quality Modeling Data

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# 956 Seward Detailed Report

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### 7.6. Health & Equity Custom Measures

## 8. User Changes to Default Data



# 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
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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.