Greenhouse Gas Emissions Assessment
1605 South 7th Street Project
City of San José, California

Prepared by:

Kimley-Horn and Associates, Inc.
10 S. Almaden Boulevard, Suite 1250
San José, California 95113
Contact: Noemi Wyss, AICP

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LIST OF ABBREVIATED TERMS

AB	Assembly Bill
CARB	California Air Resource Board
CCR	California Code of Regulations
CalEEMod	California Emissions Estimator Model
CEQA	California Environmental Quality Act
CALGreen	California Green Building Standards
CPUC	California Public Utilities Commission
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CFC	Chlorofluorocarbon
CAA	Clean Air Act
CG(PD)	Commercial General Planned Development
CAFE	Corporate Average Fuel Economy
cy	cubic yard
EPA	Environmental Protection Agency
FCAA	Federal Clean Air Act
FR	Federal Register
GHG	greenhouse gas
GHGRS	Greenhouse Gas Reduction Strategy
HCFC	Hydrochlorofluorocarbon
HFC	Hydrofluorocarbon
LEED	Leadership in Energy and Environmental Design
LCFS	Low Carbon Fuel Standard
CH_4	Methane
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
$MTCO_2e$	million tons of carbon dioxide equivalent
NHTSA	National Highway Traffic Safety Administration
NF_3	nitrogen trifluoride
N_2O	nitrous oxide
PBCE	Department of Planning, Building, and Code Enforcement
PFC	Perfluorocarbon
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RPS	Renewable Portfolio Standard
SAFE	Safer Affordable Fuel Efficient
SJCE	San José Community Energy
SB	Senate Bill
Sf	square foot
SF_6	sulfur hexafluoride
TAC	toxic air contaminants
TDM	Transportation Demand Management
VMT	Vehicle Miles Travelled

1 INTRODUCTION

This report describes effects of climate change and greenhouse gas (GHG) emissions that would be caused by implementation of the 1605 South 7th Street Project. The study area for climate change and the analysis of GHG emissions is broad because climate change is influenced by world-wide emissions and their global effects. However, the study area is also limited by the CEQA Guidelines [Section 15064(d)], which directs lead agencies to consider an "indirect physical change" only if that change is a reasonably foreseeable impact that may be caused by the Project. This report limits discussion to those physical changes to the environment that are not speculative and are reasonably foreseeable.

1.1 PROJECT LOCATION

The Project site is located at 1605 South 7th Street in San José, on the southern corner of South 7th Street and East Alma Avenue. Figure 1: Regional Vicinity and Figure 2: Site Vicinity, depict the Project site in a regional and local context. The Project site is located in an urban area with a mix of surrounding uses including commercial, office, and industrial uses. The Project site is designated HI – Heavy Industrial in the City's General Plan, which allows for warehousing and distribution uses, and zoned as HI – Heavy Industrial, which allows for a warehouse/distribution facility.

The site is currently developed with a two-story, 279,030-square foot main industrial building, and ancillary office structures. The existing two-story building is located on the western half of the parcel, with additional office uses on the southern and western portions of the site. Loading docks are located along the southern part of the main industrial building. Surface parking is available on the northern half of the site and truck parking is available in the northeast corner of the Project site. The Project site has existing landscaping along the northern and eastern site boundaries; however, the majority of the site is paved/and or improved with industrial buildings supporting several existing businesses. The Project site also has existing surface lighting.

1.2 PROJECT DESCRIPTION

The proposed 1605 South 7th Street Project (proposed Project) would demolish and clear the existing on-site industrial structures and construct an approximately 106,771 square foot new one-story concrete tilt-up warehouse/industrial use building. An approximately 36,613 square foot prefabricated canopy structure would be installed over the loading zone along the east elevation. Approximately 8,694 square feet of the total 106,771 square foot building would be incidental office use. The office space of the building would be equipped with bathrooms and a changing room, including at least one (1) shower. The Project consists of a 24-hour operation of outdoor uses (loading/unloading) and is designed and proposed to support the "last mile" distribution of packages, including nine (9) loading docks. The Project would provide approximately 178 employee parking stalls, 10 accessible stalls, 413 van parking stalls, 18 electric vehicle parking stalls, 72 electric vehicle capable stalls, 18 bicycle parking stalls, and 5 motorcycle parking stalls. Proposed site work also includes exterior van loading and loading canopy, site lighting, and utility infrastructure as required to support project operations. Figure 3: Project Site Plan, shows the proposed layout of the Project site.

There would be four access driveways to the Project site. One access driveway would be located at the northwestern corner of the Project site, from East Alma Avenue. The other three driveways would be located along the eastern site boundary, from South 7th Street.

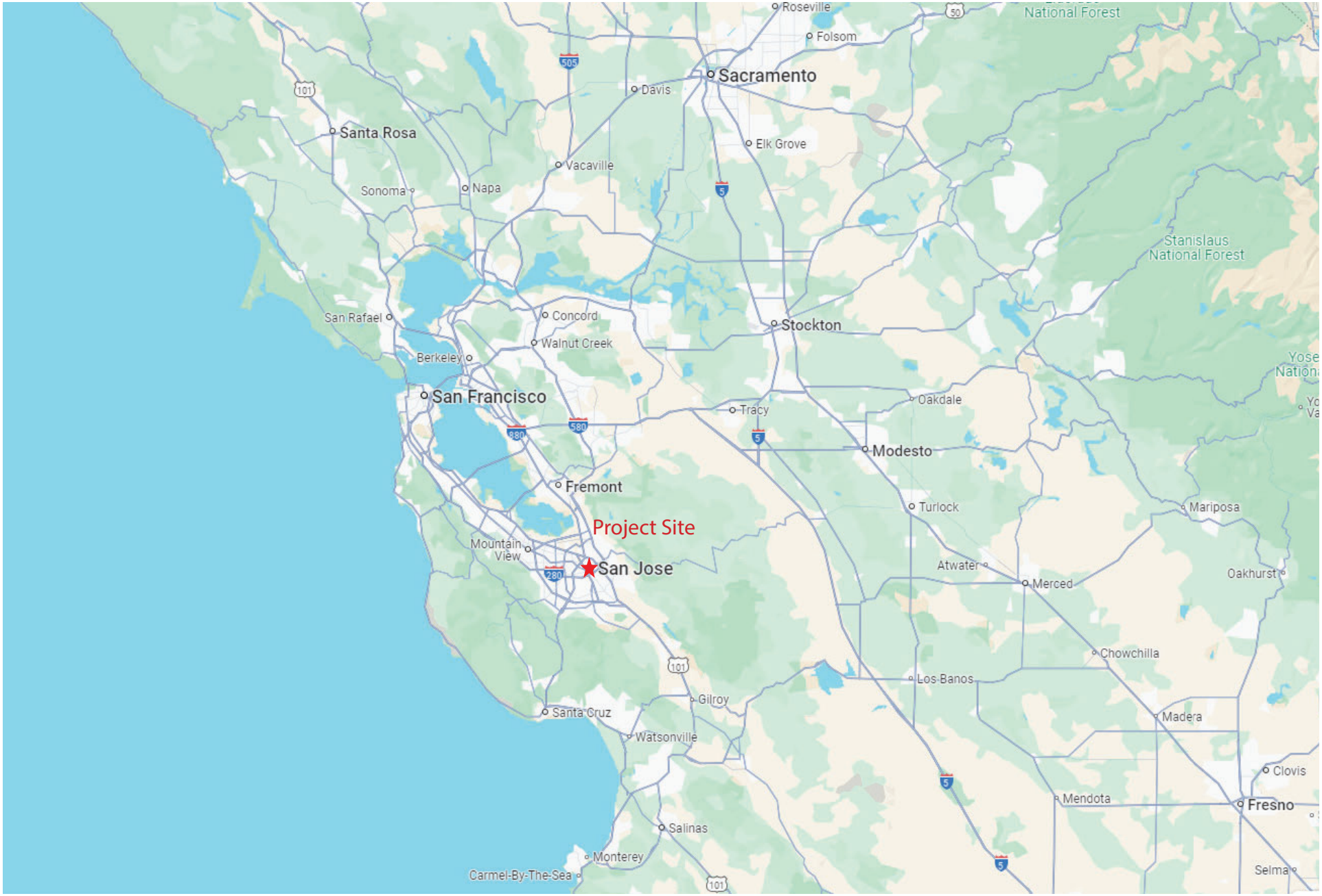
Construction of the Project is expected to commence in July 2026 and last for approximately 17 months. There would be approximately 39,219 tons of demolition and 3,000 cubic yards of export of soil.

Project Operations

The Project is designed and proposed as a "last mile" e-commerce distribution center (delivery facility). It is anticipated that the Project would be operated by a single tenant for their business operations. Delivery centers support the last mile of the tenant's order fulfillment process and help to expedite local deliveries for customers. Packages would be transported to the Project site via line haul trailer trucks from separate tenant fulfillment and sortation centers and would then be sorted, picked, and loaded into delivery vans on the Project site.

The Project is anticipated operate 24/7 to support delivery of packages to customer locations between 10:00 AM and 9:30 PM. At this facility, a total of 52 daily truck trips are expected to deliver packages to the Project site each day, between 12:00 AM and 7:00 AM. The customer packages are unloaded from haul trucks, sorted, picked to the delivery routes, placed onto movable racks and staged for dispatch. While the exact geographic range that the project would service is not rigidly defined, the tenant would operate the delivery facility in order to provide expedited delivery to the local market.

Approximately 600 workers would be hired at the delivery facility, however the total daily workers onsite would not exceed 400 workers. The majority of the Project employees would arrive and depart between 1:20 AM and 1:50 PM. Other Project employees 9:00 AM to 10:30 PM. Delivery vans are anticipated to arrive at the delivery facility between 9:30 AM and 11:30 AM. During this time, delivery vans will load and depart from the Project every 30 minutes to facilitate a regulated traffic flow into the surrounding area. The departure window is designed to avoid peak period of local traffic. Approximately 8 to 12 hours after dispatch, delivery routes are completed and the vans return to the station between 8:30 PM and 10:30 PM. The drivers park the delivery van onsite and leave using a personal vehicle or public transportation. Project operation would also involve independent contractors to deliver packages from this location. It is anticipated that traditional passenger vehicles, associated with the independent contractors, would enter the delivery facility, staggered between 4:30 PM and 5:30 PM.



Source: Google Maps, 2024

Figure 1: Regional Vicinity

1605 South 7th Street Project
Technical Assessment

Not to scale

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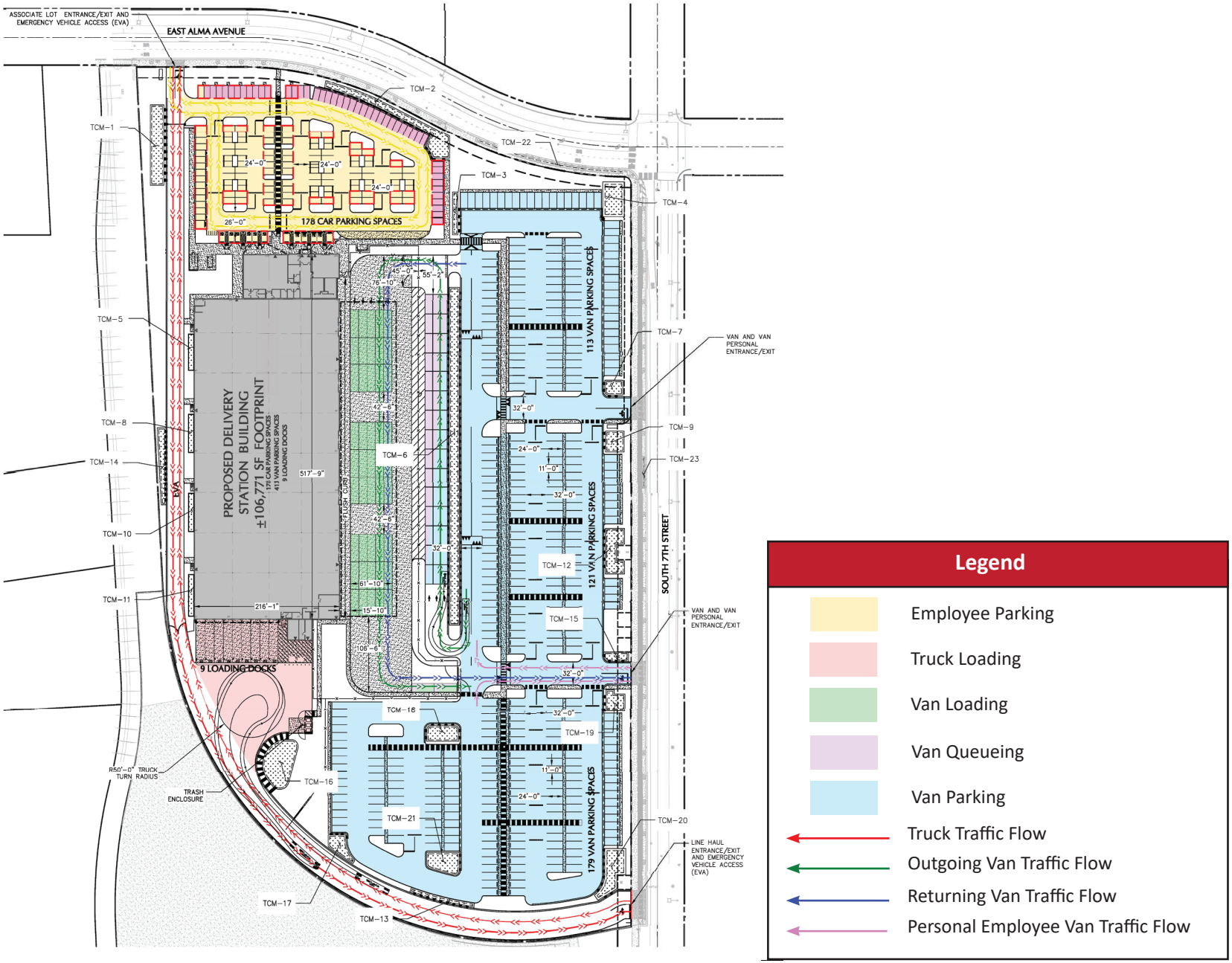
Source: Google Earth, 2024

Figure 2: Site Vicinity

1605 South 7th Street Project
Technical Assessment

Not to scale

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Source: Langan, 2025

Figure 3: Project Site Plan

1605 South 7th Street Project

Technical Assessment

Not to scale

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2 ENVIRONMENTAL SETTING

2.1 GREENHOUSE GASES AND CLIMATE CHANGE

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

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere (Intergovernmental Panel on Climate Change, 2013). Table 1: Description of Greenhouse Gases, describes the primary GHGs attributed to global climate change, including their physical properties.

Table 1: Description of Greenhouse Gases

Greenhouse Gas	Description
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The Global Warming Potential of N_2O is 298.
Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, approximately 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is approximately 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays approximately 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF_6 is 23,900.
Hydrochlorofluoro-carbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the

Greenhouse Gas	Description
	Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.

Source: Compiled from U.S. EPA, *Overview of Greenhouse Gases*, April 11, 2018 (https://www.epa.gov/ghgemissions/overview-greenhouse-gases); U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016*, 2018; Intergovernmental Panel on Climate Change, *Climate Change 2007: The Physical Science Basis*, 2007; National Research Council, Advancing the Science of Climate Change, 2010; U.S. EPA, *Methane and Nitrous Oxide Emission from Natural Sources*, April 2010.

Climate change is a complex process that has the potential to alter local climatic patterns and meteorology. Although modeling indicates that climate change will result in sea-level rise, both globally and in San Francisco Bay, as well as changes in climate and rainfall, among other effects, there remains uncertainty about characterizing precise local climate characteristics and predicting precisely how various ecological and social systems will react to changes in the existing climate at the local level. Regardless of this uncertainty, it is widely understood that substantial climate change has occurred and will continue to occur in the future, although the precise extent will take further research to define. Specifically, the effects from global climate change in California and worldwide include the following:

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates, with a corresponding increase in atmospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures.[1]

- Rising average global sea levels, due primarily to thermal expansion in the oceans and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets.[2]

- Changing weather patterns, including changes in precipitation and wind patterns, and more energetic episodes of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and intense tropical cyclones.[3]

- Declining Sierra Nevada snowpack levels, which account for approximately half of the surface water storage in California. Snow levels could decline by 70 to as much as 90 percent over the next 100 years.[4]

- Increases in the number of days that could be conducive to ground-level ozone formation (e.g., clear days with intense sunlight) by the end of the 21st century in areas with high levels

1 California Natural Resources Agency. 2018. California's Fourth Climate Change Assessment Statewide Summary Report. Available: https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4- 2018-013_Statewide_Summary_Report_ADA.pdf.

2 Intergovernmental Panel on Climate Change. 2018. Global Warming of 1.5°C. Contribution of Working Group I, II, and III (Summary for Policy Makers). Available: https://www.ipcc.ch/sr15/.

3 Ibid.

4 California Natural Resources Agency. 2018. California's Fourth Climate Change Assessment Statewide Summary Report. Available: https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf.

of ozone. The number of days could increase by 25 to 85 percent, depending on the future temperature scenario.[5]

- Increases in the potential for erosion of California's coastlines as well as seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level.[6]

- The severity of drought conditions in California could be exacerbated (e.g., durations and intensities could be amplified, ultimately increasing the risk of wildfires and consequential damage).[7]

- Under changing climate conditions, agricultural operations are forecast to experience lower crop yields due to extreme heat waves, heat stress, increased water needs of crops and livestock (particularly during dry and warm years), and new and changing pest and disease threats.[8]

The impacts of climate change, such as increases in the number of heat-related events, droughts, and wildfires, pose direct and indirect risks to public health, with people experiencing worsening episodes of illness and an earlier death. Indirect impacts on public health include increases in incidents of vector-borne diseases, stress and mental trauma due to extreme events and disasters, economic disruptions, and residential displacement.[9]

5 Ibid.
6 Ibid.
7 Ibid.
8 Ibid.
9 Ibid.

3 REGULATORY SETTING

3.1 FEDERAL

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

Clean Air Act

In April 2007, in Massachusetts v. EPA, the U.S. Supreme Court directed the Administrator of the U.S. Environmental Protection Agency (U.S. EPA) to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the U.S. EPA Administrator was directed to follow the language of Section 202(a) of the Clean Air Act (CAA). In December 2009, the Administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the CAA:

- Elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the "endangerment finding."

- The combined emissions of GHGs— CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the CAA.

Energy Independence and Security Act of 2007

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

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Additional provisions of the Energy Independence and Security Act (EISA) address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

U.S. Environmental Protection Agency Endangerment Finding

The U.S. EPA authority to regulate GHG emissions stems from the U.S. Supreme Court decision in Massachusetts v. EPA (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence, it found that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

Federal Vehicle Standards

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

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks. It should be noted that the EPA is currently proposing to freeze the vehicle fuel efficiency standards at their planned 2020 level (37 mpg), canceling any future strengthening (currently 54.5 mpg by 2026).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baseline.

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021

through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

On September 27, 2019, the U.S. EPA and the NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program." (84 Fed. Reg. 51,310 (Sept. 27, 2019.)[10] The SAFE Rule (Part One) revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two sets CO_2 emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The current U.S. EPA administration repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than three billion tons of GHG emissions through 2050.[11]

Paris Climate Agreement

The Paris Agreement was negotiated within the United Nations Framework Convention on Climate Change in 2015 to reduce GHG emissions internationally. The goal of the Paris Agreement was to keep the global temperature rise this century to below 2 degrees Celsius above pre-industrial standards, with efforts to limit temperature increase even further to 1.5 degrees Celsius. The Paris Agreement became effective on November 4, 2016. As of October 5, 2016, 155 of 197 parties had ratified the Paris Agreement. On January 20, 2021, President Biden signed an Executive Order formally rejoining the United States to the Paris Agreement.[12]

Executive Order 14008

On January 27, 2021, President Biden issued an Executive Order on Tackling the Climate Crisis at Home and Abroad (Executive Order 14008)[13]. Part I of the Order highlights putting the climate crisis at the center of United States foreign policy and national security. Addressing the climate crisis will require significant short-term global reductions in GHG emissions and net-zero global emissions by mid-century or sooner. The United States will pursue green recovery efforts and initiatives to advance the clean energy transition.

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10 U.S. EPA and NHTSA, Federal Register, Vol. 84, No. 188, *The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program*, September 27, 2019. Available at: https://www.govinfo.gov/content/pkg/FR-2019-09-27/pdf/2019-20672.pdf. Accessed: October 2024.

11 U.S. EPA, *Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026,* 2021. Available at: https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions. Accessed: October 2024.

12 White House Briefing Room. 2021. *Paris Climate Agreement.* January 20. Available at: https://www.whitehouse.gov/briefing-room/statements-releases/2021/01/20/paris-climate-agreement/. Accessed: October 2024.

13 White House Briefing Room. 2021. Executive Order on Tackling the Climate Crisis at Home and Abroad. January 27. Available at:https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/ Accessed: October 2024.

Part II of the Order relays the government-wide approach to the climate crisis, which involves reducing climate pollution in every sector of the economy, especially through innovation, commercialization, and deployment of clean energy technologies and infrastructure. A National Climate Task Force is established to focus on addressing the climate crisis through key federal actions to reduce climate change impacts. A 100 percent carbon pollution-free electricity sector is targeted by no later than 2035 and a net-zero emissions economy is to be achieved by no later than 2050. Offshore wind is aimed to be doubled by 2030. Opportunities for federal funding of clean energy technology and infrastructure shall be identified. Federal permitting decisions need to consider the effects of GHG emissions and climate change.[2]

3.2 STATE OF CALIFORNIA

3.2.1 California Air Resources Board

The California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of carbon dioxide equivalent (CO2e) in the world and produced 369 million gross metric tons (MMT) of CO2e in 2020. The transportation sector is the State's largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

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

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

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

CARB Scoping Plan.

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

generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.

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

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with recommendations to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan is not regulatory, is not exhaustive, and does not include everything local governments can implement to support the State's climate goals. It focuses primarily on climate action plans (CAPs) and local authority over new residential development. It includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. CARB specifically states that Section 3 of Appendix D, which discusses land use plans and development projects, does not address land uses other than residential and mixed-use residential such as industrial. However, CARB plans to explore new approaches for other land use types in the future.

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

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

With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan. The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping Plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other Federal actions. In 2022, CARB published the 2022 Scoping Plan, which is discussed above.

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

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

planning for transportation and housing, and creates specified incentives for the implementation of the strategies. The applicable sustainable community strategy in the Bay Area is Plan Bay Area 2040.

AB 1493 (Pavley Regulations and Fuel Efficiency Standards).

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new automobiles will emit 34 percent fewer CO_2e emissions and 75 percent fewer smog-forming emissions.

SB 1368 (Emission Performance Standards).

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The new law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the state. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO_2 per megawatt-hour.

SB 1078, SB 107, and SBX1-2 (Renewable Electricity Standards).

SB 1078 (2002) required California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 (2006) changed the due date to 2010 instead of 2017. On November 17, 2008, Executive Order S-14-08 established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the state's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010, by Resolution 10-23. SB X1-2 codified the 33 percent by 2020 goal.

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

Signed into law on October 7, 2015, SB 350 implements Executive Order B-30-15's goals. The SB 350 objectives are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 45 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

AB 398 (Market-Based Compliance Mechanisms).

The Cap-and-Trade program covers approximately 80 percent of California's GHG emissions.[14] The statewide cap for GHG emissions from the capped sectors (i.e., electricity generation, industrial sources, petroleum refining, and cement production) commenced in 2013 and would decline approximately three percent each year, achieving GHG emission reductions throughout the program's duration. Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb toxic air TACs and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

SB 150 (Regional Transportation Plans).

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

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

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

SB 100 and SB 1020 (California Renewables Portfolio Standard Program: 100 Percent Clean Electric Grid).

Signed into Law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. SB 1020 provides additional goals for the path to be the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

[14] California Air Resources Board, *Cap-and-Trade Program*, https://ww2.arb.ca.gov/our-work/programs/cap-and-trade-program/about, Accessed October 2024.

SB 905 (Carbon Sequestration Program)

Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated CO_2 fluid into a Class II injection well for the purpose of enhanced oil recovery.

AB 1757 (Nature-Based Solutions)

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

Executive Orders Related to GHG Emissions

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

Executive Order S-3-05.

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

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

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

Executive Order S-01-07

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

Executive Order S-13-08.

Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency development of the 2009 California Climate Adaptation Strategy. Objectives include

analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08.

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

Executive Order S-21-09.

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

Executive Order B-30-15.

Issued on April 29, 2015, Executive Order B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of CO_2e ($MMTCO_2e$). The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. The executive order also requires the state's climate adaptation plan to be updated every three years and for the state to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions by 2030 to 40 percent below 1990 levels.

Executive Order B-55-18.

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

Executive Order N-79-20.

Issued on September 23, 2020, Executive Order N-79-20 established a goal to end the sales of new internal combustion engine vehicles in the state as soon as possible, and no later than 2035, and continue to phaseout fossil-fueled cars and trucks. By setting a course to end sales of internal combustion passenger vehicles by 2035, the Governor's Executive Order establishes a target for the

transportation sector that helps put the state on a path to carbon neutrality by 2045. It is important to note that the Executive Order focuses on new vehicle sales for automakers, and therefore does not require Californians to give up the existing cars and trucks they already own.

California Regulations and Building Codes

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

Title 20 Appliance Efficiency Regulations

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

Title 24 Building Energy Efficiency Standards.

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The California Energy Commission (CEC) adopted the 2022 Energy Code on August 11, 2021, which was subsequently approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption across California. For example, the 2022 Title 24 standards will require efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards.

Title 24 California Green Building Standards Code.

The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as CALGreen, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and nonresidential buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The latest CALGreen Code took effect on January 1, 2023 (2022 CALGreen). The 2022 CALGreen standards has improved upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings).

California Vehicles Registration

Advanced Clean Cars I and II.

Advanced Clean Cars combines several regulations into one package including the Low-Emission Vehicle (LEV) criteria and greenhouse gas regulations and the zero-emission vehicle (ZEV) regulation. Advanced Clean Cars I was adopted in 2012, and Advanced Clean Cars II was adopted in 2022. These regulations rapidly scale down emissions of light-duty passenger cars, pickup trucks and SUVs and require an increased number of zero-emission vehicles to meet air quality and climate change emissions goals. By 2035 all new passenger cars, trucks and SUVs sold in California will be zero emissions. The Advanced Clean Cars II regulations take the state's already growing zero-emission vehicle market and robust motor vehicle emission control rules and augments them to meet more aggressive tailpipe emissions standards and ramp up to 100% zero-emission vehicles.

3.3 REGIONAL

Bay Area Air Quality Management District Thresholds

The Bay Area Air District is the primary agency responsible for addressing air quality concerns in the San Francisco Bay Area, including the City of San José. The Bay Area Air District also recommends methods for analyzing project-related GHGs in CEQA analyses as well as multiple GHG reduction measures for land use development projects. The Bay Area Air District released its *Justification Report CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans* (Bay Area Air District Justification Report) in April 2022. The Bay Area Air District Justification Report presents updates to the CEQA GHG thresholds from the 2017 CEQA Guidelines, which were not consistent with the statewide GHG target established by SB 32. The GHG thresholds of significance were updated to consider newer state reduction targets (e.g., SB 32) and plans for eventual carbon neutrality by 2045 (e.g., Executive Order B-55-18 and SB 1279), as well as evolving case law. The Bay Area Air District Justification Report (and thus the GHG thresholds) was adopted by the Board of Directors on April 20, 2022. In summary, the updated thresholds emphasize:

- Avoiding wasting electricity and developing fossil fuel infrastructure (i.e., natural gas plumbing or appliances) in new buildings that will be in place for decades and thus conflict with carbon neutrality by 2045.
- Compliance with California Green Building Standards Code (CALGreen) Tier 2 EV requirements and per capita VMT reductions consistent with SB 743.
- Consistency with a qualified GHG reduction strategy (also known as a Climate Action Plan).

Clean Air Plan

Air quality plans developed to meet federal requirements are referred to as State Implementation Plans. The federal and state Clean Air Acts require plans to be developed for areas designated as nonattainment (with the exception of areas designated as nonattainment for the state PM_{10} standard). The 2017 Clean Air Plan: Spare the Air, Cool the Climate was adopted on April 19, 2019, by the Bay Area Air District.

The 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate. To protect public health, the plan describes how the Bay Area Air District will continue progress toward attaining all state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 Clean Air Plan defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious greenhouse gas (GHG) reduction targets for 2030 and 2050 and provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets.

The 2017 Clean Air Plan includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants; to reduce emissions of methane and other "super-GHGs" that are potent climate pollutants in the near-term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

3.4 LOCAL

City of San José Municipal Code

The City's Municipal Code includes the following regulations that would reduce GHG emissions from future development:

- Green Building Regulations for Private Development (Chapter 17.84)
- Water Efficient Landscape Standards for New and Rehabilitated Landscaping (Chapter 15.10)
- Transportation Demand Programs for employers with more than 100 employees (Chapter 11.105)
- Construction and Demolition Diversion Deposit Program (Chapter 9.10)
- Wood Burning Ordinance (Chapter 9.10)

City of San José General Plan

The General Plan includes a Greenhouse Gas Reduction Strategy (GHGRS) that is designed to help the City sustain its natural resources, grow efficiently, and meet California legal requirements for GHG emissions reduction. Multiple policies and actions in the General Plan have GHG implications including those targeting land use, housing, transportation, water usage, solid waste generation and recycling, and reuse of historic buildings. The policies also include a monitoring component that allows for adaptation and adjustment of City programs and initiatives related to sustainability and associated reductions in GHG emissions. The GHGRS is intended to meet the mandates as outlined in the CEQA Guidelines and the recent standards for "qualified plans" as set forth by the Bay Area Air District.

The GHGRS was re-adopted by the San José City Council in December 2015. The environmental impacts of the GHGRS were analyzed in the General Plan Final Program Environmental Impact

Report (FPEIR) and a 2015 Supplement to the General Plan FPEIR. The City's projected emissions and the GHGRS are consistent with the measures necessary to meet state-wide 2020 goals established by AB 32 and addressed in the Climate Change Scoping Plan. Measures have not been identified that would ensure GHG emissions would be consistent with state-wide 2045 goals; however, the City adopted overriding considerations for identified future impacts associated with buildout of the City's General Plan.

The General Plan includes the following GHG reduction policies, which are applicable to the Project. These policies are also described within the City's GHGRS.

Policy MS – 1.1: Demonstrate leadership in the development and implementation of green building policies and practices. Ensure that all projects are consistent with or exceed the City's Green Building Ordinance and City Council Policies as well as State and/or regional policies which require that projects incorporate various green building principles into their design and construction.

Policy MS-1.2: Continually increase the number and proportion of buildings within San José' that make use of green building practices by incorporating those practices into both new construction and retrofit of existing structures.

Policy MS-1.3: Continually update and strengthen the City's Green Building policies and ordinances for new construction and rehabilitation of existing buildings to provide flexibility for application of new technologies and innovative techniques that may develop in the green building field.

Policy MS – 1.4: Foster awareness of San José's business and residential communities of the economic and environmental benefits of green building practices. Encourage design and construction of environmentally responsible commercial and residential buildings that are also operated and maintained to reduce waste, conserve water, and meet other environmental objectives.

Policy MS-1.5: Advocate for new or revised local, regional, state, or national policies and laws that further the use of green building techniques and to further the development of green building technology. Support the development and implementation of new and innovative technologies to achieve the construction of all types of environmentally high-performing buildings.

Policy MS-1.6: Recognize the interconnected nature of green building systems, and, in the implementation of Green Building Policies, give priority to green building options that provide environmental benefit by reducing water and/or energy use and solid waste.

Policy MS-2.1: Develop and maintain policies, zoning regulations, and guidelines that require energy conservation and use of renewable energy sources.

Policy MS-2.3: Utilize solar orientation (i.e., building placement), landscaping, design, and construction techniques for new construction to minimize energy consumption.

Policy MS-2.4: Promote energy efficient construction industry practices.

Policy MS – 2.6: Promote roofing design and surface treatments that reduce the heat island effect of new and existing development and support reduced energy use, reduced air pollution, and a healthy urban forest. Connect businesses and residents with cool roof rebate programs through City outreach efforts.

Policy MS-2.7: Encourage the installation of solar panels or other clean energy power generation sources over parking areas.

Policy MS – 2.11: Require new development to incorporate green building policies, including those required by the Green Building Ordinance. Specifically, target reduced energy use through construction techniques (e.g., design of building envelopes and systems to maximize energy performance), through architectural design (e.g., design to maximize cross ventilation and interior daylight) and through site design techniques (e.g., orienting buildings on sites to maximize effectiveness of passive solar design).

Policy MS-3.1: Require water-efficient landscaping, which conforms to the State's Model Water Efficient Landscape Ordinance, for all new commercial, institutional, industrial, and developer-installed residential development unless for recreation needs or other area functions.

Policy MS-3.2: Promote use of green building technology or techniques that can help reduce the depletion of the City's potable water supply, as building codes permit. For example, promote the use of captured rainwater, graywater, or recycled water as the preferred source for non-potable water needs such as irrigation and building cooling, consistent with Building Codes or other regulations.

Policy MS-3.3: Promote the use of drought tolerant plants and landscaping materials for nonresidential and residential uses.

Policy MS-3.4: Promote the use of green roofs (i.e., roofs with vegetated cover), landscape-based treatment measures, pervious materials for hardscape, and other stormwater management practices to reduce water pollution.

Policy MS-5.3: Evaluate recycling collection strategies to improve marketability of cleaner materials.

Policy MS-5.4: Increase program participation and reduce disposal of recyclable materials through intensive outreach, incentives, enforcement or mandates.

Policy MS-5.5: Maximize recycling and composting from all residents, businesses, and institutions in the City.

Policy MS-5.6: Enhance the construction and demolition debris recycling program to increase diversion from the building sector.

Policy MS-6.5: Reduce the amount of waste disposed in landfills through waste prevention, reuse, and recycling of materials at venues, facilities, and special events.

Policy MS – 14.4: Implement the City's Green Building Policies so that new construction and rehabilitation of existing buildings fully implements industry best practices, including the use of optimized energy systems, selection of materials and resources, water efficiency, sustainable site selection, passive solar building design, and planting of trees and other landscape materials to reduce energy consumption.

Policy CD-2.5: Integrate Green Building Goals and Policies of this Plan into site design to create healthful environments. Consider factors such as shaded parking areas, pedestrian connections, minimization of impervious surfaces, incorporation of stormwater treatment measures, appropriate building orientations, etc.

City of San José 2030 Greenhouse Gas Reduction Strategy

The City of San José adopted its 2030 GHGRS in November 2020, consistent with SB 32. SB 32 established an interim statewide GHG reduction goal for 2030 to meet the long-term target of carbon neutrality by 2045 (EO B-55-18). SB 32 expands upon AB 32, the Global Warming Solutions Act of 2006, and requires a reduction in GHG emissions of at least 40 percent below the 1990 levels by 2030.

The 2030 GHGRS allows for tiering and streamlining of GHG analyses under CEQA because it serves as a qualified Climate Action Plan for the City of San José. The 2030 GHGRS was prepared under the Bay Area Air District CEQA Guidelines, and particularly in conformance with CEQA Guidelines Section 15183.5, which specifically addresses the development of GHG Reduction Plans for tiering and streamlining GHG analysis under CEQA. The 2030 GHGRS identifies major General Plan strategies and polices to be implemented by development project such as green building practices, transportation strategies, energy use, water conservation, waste reduction and diversion, and other sectors that contribute to GHG reductions and advancements of the City's broad sustainability goals.

The 2030 GHGRS identifies GHG emissions reduction measures to be implemented by development projects in three categories: built environment and energy, land use and transportation, and recycling and waste reduction. Some measures are mandatory for all proposed development projects and others are voluntary. Voluntary measures could be incorporated as mitigation measures for proposed projects, at the City's discretion. The 2030 GHGRS includes a compliance checklist (GHGRS Checklist), the purpose of which is to:

- Implement GHG reduction strategies from the 2030 GHGRS to new development projects.
- Provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

Compliance with the GHGRS Checklist ensures that an individual project conforms with the GHGRS and would not constitute a cumulatively considerable contribution to significant cumulative global climate change impacts.

City of San José Private Sector Green Building Policy (6-32)

In October 2008, the City adopted the Private Sector Green Building Policy (6-32) that establishes baseline green building standards for private sector new construction and provides framework for the implementation of these standards. This policy requires that applicable projects achieve minimum green building performance levels using the Council adopted standards.

Climate Smart San Jose

Climate Smart San José was developed by the City to reduce air pollution, save water, and create a healthier community. The plan contains nine strategies to reduce carbon emissions consistent with the Paris Climate Agreement. These strategies include use of renewable energy, densification of neighborhoods, electrification and sharing of vehicle fleets, investments in public infrastructure, creating local jobs, and improving building energy-efficiency.

Reach Building Code

In 2019, the San José City Council approved Ordinance No. 30311 and adopted Reach Code Ordinance (Reach Code) to reduce energy-related GHG emissions consistent with the goals of Climate Smart San José. The Reach Code applies to new construction projects in San José. It requires new residential construction to be outfitted with entirely electric fixtures. Mixed-fuel buildings (i.e., use of natural gas) are required to demonstrate increased energy efficiency through a higher Energy Design Ratings and be electrification ready. In addition, the Reach Code requires EV charging infrastructure for all building types (above current CALGreen requirements), and solar readiness for non-residential buildings.

San José Clean Energy

San José Clean Energy (SJCE) is a not-for-profit electricity supplier operated by the City of San José. The utility offers a suite of electricity sourcing options. The GHRS Checklist requires participation in at least SJCE GreenSource program which includes 60 percent renewable energy and up to 95 percent carbon-free power. There is also the Total Green Level program, which provides 100 percent carbon-free electricity.

4 SIGNIFICANCE CRITERIA AND METHODOLOGY

4.1 THRESHOLDS AND SIGNIFICANCE CRITERIA

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

GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Bay Area Air District's approach to developing a threshold of significance for GHG emissions for local development projects that are not stationary sources is to identify features that, if included, would show that the project would not interfere with the state's goal to have net zero emissions by 2045. Under the Bay Area Air District thresholds a project that meets either A or B is a project that would make a less than cumulatively considerable contribution to significant cumulative climate change impacts:

A. Projects must include, at a minimum, the following Project design elements:

    1. Buildings

        a. The Project would not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).

        b. The Project would not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

    2. Transportation

        a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:

            i. Residential projects: 15 percent below the existing VMT per capita

            ii. Office projects: 15 percent below the existing VMT per employee

            iii. Retail projects: no net increase in existing VMT

        b. Achieve compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Be consistent with a local GHGRS that meets the criteria under the CEQA Guidelines section 15183.5(b)

A qualified GHGRS adopted by a local jurisdiction shall include the following elements as described in the State CEQA Guidelines Section 15183.5(b)(1):

i. Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

ii. Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;

iii. Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;

iv. Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

v. Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and

vi. Be adopted in a public process following environmental review.

It shall be noted that the Bay Area Air District does not have an adopted threshold of significance for construction-related GHG emissions. The Bay Area Air District recommends that the Lead Agency shall make a determination on the significance of these construction generated GHG emission impacts in relation to meeting AB 32 GHG reduction goals, as required by the Public Resources Code, Section 21082.2. The Lead Agency is encouraged to incorporate best management practices to reduce GHG emissions during construction, as feasible and applicable.

The City of San José has established consistency with their 2030 GHGRS would result in a less than cumulatively considerable impact. The City of San José does not have a construction-related GHG emission threshold. The 2030 GHGRS meets the requirements of CEQA Guidelines section 15183.5.

4.2 METHODOLOGY

Global climate change is, by definition, a cumulative impact of GHG emissions. Therefore, there is no project-level analysis. The baseline against which to compare potential impacts of the Project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities which almost doubled between 1970 and 2010 from approximately 27 gigatonnes (Gt) of CO_2/year to nearly 49 $GtCO_2$/year.[15] Further, average annual GHG emissions during 2010–2019 were higher than in any previous decade on record, while the rate of growth between 2010 and 2019 (1.3 percent per year) was lower than that between 2000 and 2009 (2.1 percent per year) and world-wide GHG emissions in 2019 were estimated to be 59 $GtCO_2$/year.[16] As such, the geographic extent of climate change and GHG emissions' cumulative impact discussion is worldwide.

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2022 (CalEEMod). Details of the modeling assumptions and emission factors are provided in Appendix A: Greenhouse Gas Emissions Data. For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. The Project's construction-related GHG emissions were forecasted based on the proposed construction schedule and applying the mobile-source emissions factors derived from CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles.

The Project's operations-related GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance, consumer products), electrical generation, water supply and wastewater treatment, and solid waste. The operational analysis uses compliance with the City's GHGRS Checklist as a threshold. The City's GHGRS Checklist aims to achieve its proportional share of State GHG emission reductions for the interim target year 2030 based on the mandate to reduce statewide GHG emissions by 85 percent of 1990 levels by 2045. This prescribes the interim target to be a 48 percent reduction of GHGs by 2030. It is assumed the GHGRS Checklist aims to achieve the City's proportional share of the state mandate beyond 2030 to the State 2045 mandate.

[15] Intergovernmental Panel on Climate Change, *Climate Change 2014 Mitigation of Climate Change Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014.
[16] Intergovernmental Panel on Climate Change, 2023: Summary for Policymakers. In: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, 2023

5 POTENTIAL IMPACTS AND MITIGATION

5.1 GREENHOUSE GAS EMISSIONS

Impact GHG-1 **Would the Project generate greenhouse gas emissions, either directly or indirectly, that could have a significant impact on the environment?**

Construction Greenhouse Gas Emissions

Project construction would result in minor increases in GHG emissions from on-site and construction equipment and emissions from construction workers' personal vehicle travelling to and from the Project construction site. Construction-related GHG emissions vary depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of construction workers. Neither the City nor the Bay Area Air District have an adopted threshold of significance for construction-related GHG emissions; however, the Bay Area Air District recommends quantifying emissions and disclosing that GHG emissions would occur during construction. The CalEEMod outputs prepared for the Project (refer to Appendix G) calculated emissions with Project construction to be 1,486 $MTCO_2e$ for the total construction period of two years. The first year of construction in 2026 would total 872 $MTCO_2e$ and the second year in 2027, would total 614 $MTCO_2e$. Project construction would be a temporary condition (a total of 17 months) and would not result in a permanent increase in emissions that would interfere with the implementation of the State's GHG reduction goals (established by AB 32, SB 32, AB 1279, etc.).

The 2030 GHGRS is focused on on-going operational GHG emissions and does not address short term, one time, construction emissions. The 2030 GHGRS policies (discussed in further detail in Appendix G) includes the reduction strategy, zero net carbon – residential construction (GHGRS 2), which does not apply to the Project as it is not a residential project. Section 4.1.2 Implementation Actions in the GHGRS mentions construction under green building policies. This section requires new construction or additions with more than 10,000 square feet to meet LEED silver with a goal of gold or platinum. This is also included in Municipal Code Chapter 17.84. The Project would comply with LEED silver. Policy MS-5.6 includes increasing construction and demolition debris recycling program. This is also required in Municipal Code Chapter 9.10 Solid Waste Management, Part 15-Construction and Demolition Diversion Program. The 2030 GHGRS includes other policies and implementation programs that focus around construction of buildings and projects that meet the City's Green Building Ordinances, City Council Policies, and State or regional policies (i.e. MS-1.1, MS-1.2, MS-2.3, MS-2.11, and MS-14.4). These policies require new construction projects to be built to minimize energy consumption during operations. These policies do not include requirements for actual construction activities and do not include a numeric GHG construction emissions threshold. As described above, Project construction would not conflict with the 2030 GHGRS.

As stated above, the Bay Area Air District does not have an adopted threshold of significance for construction-related GHG emissions. The Bay Area Air District encourages Lead Agencies to incorporate best management practices to reduce GHG emissions during construction, as feasible and applicable. The Project would implement the City's standard permit conditions, which includes Bay Area Air District Basic Construction Control Measures during all phases of construction as stated in Table 6-1 of the Bay Area Air District CEQA Guidelines. Details on implementation of the

BMPs can be found in the 1605 South 7th Street Air Quality Assessment (Kimley-Horn 2025). Therefore, construction GHG emissions would be less than significant.

Operational Greenhouse Gas Emissions

Operational, or long-term emissions, would occur over the Project's life. GHG emissions would result from direct emissions such as Project generated vehicular traffic and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power over the life of the Project, the energy required to convey water to, and wastewater from the Project site, the emissions associated with solid waste generated from the Project site, and any fugitive refrigerants from air conditioning or refrigerators. It should be noted that the operational emissions reflect Project energy consumption based on the 2022 Title 24 Part 6 (Building Energy Efficiency Standards). The standards require updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements that would cut residential energy use by more than 50 percent (with solar) and nonresidential energy use by 30 percent. The standards also encourage demand responsive technologies including battery storage and heat pump water heaters and improve the building's thermal envelope through high performance attics, walls and windows to improve comfort and energy savings.[17] As noted above, the 2022 Energy Code became effective on January 1, 2023 and strengthens ventilation standards, includes new electric heat pump requirements, promotes electric-ready requirements for new homes (including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure), and expands solar photovoltaic and battery storage standards. The Project would be required to comply with the 2022 Energy Code standards noted above.[18]

The Project would also comply with the appliance energy efficiency standards in Title 20 of the California Code of Regulations. The Title 20 standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances. The Project would be constructed according to the 2022 CALGreen standards, which includes water conserving plumbing fixtures and fittings, electric heat pump technology, electric-ready requirements when natural gas is installed, and strengthening ventilation standards. Additionally, consistent with San José Green Building policies, the project would be required to meet LEED Silver performance standards.

At the State and global level, improvements in technology, policy, and social behavior would influence and reduce Project operational emissions. The State is currently on a pathway to achieving the Renewable Portfolio Standards goal of 52 percent by December 31, 2027, 60 percent renewables by 2030 per SB 100, and achieve carbon neutrality by 2045 per AB 1279. Energy and mobile sources are targeted by statewide measures such as low carbon fuels, cleaner vehicles, strategies to promote sustainable communities and improved transportation choices that result in reducing VMT. With continued implementation of various statewide measures, the Project's operational energy and mobile source emissions would continue to decline in the future.

[17] California Energy Commission, *2019 Building Energy Efficiency Standards*, 2018. Available at: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

[18] California Energy Commission, *2022 Building Energy Efficiency Standards*, 2022. Available at: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency.

As discussed below, the Project would be constructed in compliance with the City's Council Policy 6-32 and the City's Green Building Ordinance which would ensure operational emissions reductions consistent with the 2030 GHGRS. As shown in Appendix B, the Project would be consistent with Table A: General Plan policies and Table B: 2030 GHGRS Checklist.

Impact GHG-2 Would the Project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing greenhouse gas emissions.

City of San José Greenhouse Gas Reduction Strategy Compliance Checklist

The City's 2030 GHGRS outlines the actions the City would undertake to achieve its proportional share of State GHG emission reductions for the interim target year 2030. Individual projects demonstrate their compliance with the GHGRS through the GHGRS Compliance Checklist. The City of 2030 GHGRS is a qualified local GHG reduction plan under CEQA, which can be used to determine the significance of GHG emissions from a Project (CEQA Guidelines Section 15183.5). The Bay Area Air District also recognizes the use of a GHGRS as a significance threshold for a project's GHG emissions. Therefore, if the Project is consistent with the 2030 GHGRS, then the Project would result in a less than significant cumulative impact to global climate change in 2030.

Prior to Project approval, the applicant is required to complete the GHGRS Compliance Checklist to demonstrate the Project's compliance with the 2030 GHGRS, refer to Appendix B. Compliance with the checklist is demonstrated by completing Section A (General Plan Policy Conformance) and Section B (Greenhouse Gas Reduction Strategies). Projects that propose alternative GHG mitigation measures must also complete Section C (Alternative Project Measures and Additional GHG Reductions). The proposed Project does not include any alternative measures.

As discussed above, the Project would be constructed in accordance with the latest California Building Code, green building regulations/CalGreen, the City's Council Policy 6-32, and the City's Green Building Ordinance. Additionally, Project construction and demolition waste would be diverted to exceed City requirements and at least 75 percent of construction and demolition waste and 100 percent of metal would be recycled. The Project would be serviced by PG&E. Currently, both PG&E and SJCE provide 100 percent carbon-free electricity. As of 2023, PG&E's electricity mix was entirely greenhouse gas-free. [19] SJCE's TotalGreen service provides 100 percent renewable energy. Therefore, PG&E currently provides a comparable alternative to SJCE's TotalGreen services in terms of delivering nearly 100 percent greenhouse gas emissions-free electricity. Additionally, the Project would be solar-ready by including building roof space for a "Future PV Array" per California Code. Thus, the Project would be consistent with the 2030 GHGRS.

The proposed Project would be consistent with the 2030 GHGRS through compliance with the State's Model Water Efficient Landscape Ordinance and the City's Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code). The proposed landscaping along street frontages and within the Project site interior would consist predominately of drought-tolerant species adapted to both local and regional climate condition. Further, the Project would install a water efficient low flow, point source system designed to provide adequate watering to support plant growth and insure deeply rooted plant material while avoiding excess water application. Project

[19] Pacific Gas and Electric, 2023 Content Power Label, https://www.pge.com/assets/pge/docs/account/billing-and-assistance/bill-inserts/1224-power-content-label.pdf.

would include new shade, accent and street trees to help mitigate urban heat island effect. The proposed shade trees are intended to comply with the new CalGreen regulations, which require trees to provide a minimum 50 percent shade coverage within the parking lot, including a minimum 20 percent shade coverage at abutting landscape and hardscape areas within 15 years. Additionally, the Project would include low-flow fixtures and appliances and would utilize recycled water for the outdoor landscaping.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a Project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the GHGRS. As described above, the Project would not conflict with the 2030 GHGRS (refer to Appendix B for further detail). Therefore, the Project would be consistent with a qualified local GHG reduction plan under CEQA Guidelines Section 15183.5. GHG emissions caused by long-term operation of the proposed Project would be less than significant.

2022 CARB Scoping Plan

As previously noted, the 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan plans to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity, carbon sequestration, and industrial sector emission reductions.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero-electric vehicle buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CO_2 removal projects and technology.

As described above, the Project would implement the City's Standard Permit Conditions included in the Air Quality Assessment (Kimley-Horn 2025) during construction. For example, the construction measures include enforcing idling time restrictions on construction vehicles, use of added exhaust muffling and filtering devices, which also reduce GHG emissions.

The 2022 Scoping Plan states that local CAPs that address the State's largest sources of emissions and prioritize transportation electrification, VMT reduction, and building decarbonization, contribute to the alignment between local climate action and the State's climate goals. The City GHGRS Checklist addresses alignment between local climate action and the State's climate goals through implementation of measures promoting green building practices, harmonious pedestrian, bicycle

and transit designs, water conservation, renewable energy development, and zero waste goals. As indicated above, the proposed Project would be consistent with the 2030 GHGRS and would also be constructed in accordance with the latest California Building Code, green building regulations/CalGreen, the City's Council Policy 6-32 and the City's Green Building Ordinance. The Project would be solar-ready by including building roof space for a "Future PV Array" per California Code. Further, Project's GHG emissions associated with energy and mobile sources would be reduced by the 2022 Scoping Plan measures described above. It shall be noted that the City has no control over vehicle emissions; however, these emissions would decline in the future due to Statewide measures discussed above, as well as cleaner technology and fleet turnover.

As shown in Table 2: Project Consistency with Applicable CARB Scoping Plan Measures the Project is consistent with most of the strategies, while others are not applicable to the Project.

Table 2: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
Transportation	California Cap-and-Trade Program Linked to Western Climate Initiative	Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanism April 1, 2019 (CCR 95800)	**Consistent.** The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers. However, the regulation indirectly affects people who use the products and services produced by these industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
	California Light-Duty Vehicle Greenhouse Gas Standards	Advanced Clean Cars II Regulations	**Consistent**. The Advanced Clean Cars II Regulations provide reductions from new vehicles sold in California between 2026 and 2035. Passenger vehicles associated with the site would comply with the Advanced Clean Cars II Standards. It is noted that CARB withdrew its FCAA waiver request to the U.S. EPA for this regulation. Regardless of the status of this regulation, vehicles accessing the Project site would be required to comply with the current regulations.
	Low Carbon Fuel Standard	2009 readopted in 2015 and updated in 2018. Regulations to Achieve Greenhouse Gas Emission Reductions Sub article 7. Low Carbon Fuel Standard CCR 95480	**Consistent.** This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict with implementation of this measure. Motor vehicles associated with construction and operation of the Project would utilize low carbon transportation fuels as required under this measure.
	Regional Transportation-Related Greenhouse Gas Targets	SB 375. Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, 21159.28	**Consistent**. The Project would provide development in the region that is consistent with the growth projections in the Regional Transportation Plan/Sustainable Communities Strategy (SCS) (Plan Bay Area 2040).
	Medium/Heavy-Duty Vehicle	The Advanced Clean Trucks Regulation, the Heavy-Duty Omnibus Regulation and the California Phase 2 Regulation	**Consistent**. This measure applies to medium and heavy-duty vehicles that operate in the state. The Project would not conflict with implementation of this measure. Medium and heavy-duty vehicles associated with construction and operation of the Project would be required to comply with the requirements of this regulation.

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
Electricity and Natural Gas	Energy Efficiency	Title 20 Appliance Efficiency Regulation	**Consistent.** The Project would not conflict with implementation of this measure. The Project would comply with the latest energy efficiency standards.
		Title 24 Part 6 Energy Efficiency Standards for Residential and Non-Residential Building	
		Title 24 Part 11 California Green Building Code Standards	
	Renewable Portfolio Standard/Renewable Electricity Standard.	SB 100 The 100 Percent Clean Energy Act of 2018 (65% 2030) and Affordability Act of 2022 and SB 100 The 100 Percent Clean Energy Act of 2018 (60% 2030)	**Consistent.** The Project would obtain electricity from the local electricity supplier, PG&E. PG&E currently provides 100 percent greenhouse gas free electricity.
		SB 350 Clean Energy and Pollution Reduction Act of 2015	
	California Solar Initiative	Tac Incentive program	**Consistent.** This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. The Project would be serviced by PG&E which provides 100% greenhouse gas free electricity.
Water	Water	Title 24 Part 11 California Green Building Code Standard	**Consistent.** The Project would comply with the indoor water use requirements listed in the 2022 California Green Building Standards Code. The Project would also comply with the actions listed in the Conserve Water Section (Chapter 4) of the Bay-Friendly Landscape Guidelines.
		SBX 7-7 – The Water Conservation Act of 2009	
		Model Water Efficient Landscape Ordinance	
Green Buildings	Green Building Strategy	Title 24 Part 11 California Green Building Code Standards	**Consistent.** The State goal is to increase the use of green building practices. The Project would implement required

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
			green building strategies through existing regulation that requires the Project to comply with various CalGreen requirements.
Industry	Industrial Emissions	CARB Mandatory Reporting of Greenhouse Gas Emissions (MRR) Regulation	**Consistent.** This measure is to ensure industrial sources must report their annual GHG emissions to CARB. The proposed Project would comply with mandatory GHG reporting annually.
Recycling and Waste Management	Recycling and Waste	Title 24 Part 11 California Green Building Code Standards	**Consistent:** The Project would not conflict with implementation of these measures. The Project is required to achieve the waste reduction and recycling mandates via compliance with the CALGreen code.
		AB 1383 Statewide 75 Percent Diversion Goal by 2025 and waste reduction requirements listed in AB 1826 and AB 241	
Forests	Sustainable Forests	Cap and Trade Offset Projects	**Not applicable.** The Project site is an existing disturbed site located in an urban area. No forested lands exist on-site.
High Global Warming Potential	High Global Warming Potential Gases	CARB Refrigerant Management Program CCR 95380	**Not applicable.** The regulations are applicable to refrigerants used by large air conditioning systems and large commercial and industrial refrigerators and cold storage systems. The Project is not expected to use large systems subject to the refrigerant management regulations adopted by CARB.
		2022 Amendment to the Airborne Toxic Control Measure for In-Use Diesel Fueled Transport Refrigeration Units (TRUs) and TRUs Generator sets and Facilities where TRUs operate	
Agriculture	Agriculture	Cap and Trade Offset Projects for Livestock and Rice Cultivation	**Not applicable.** The Project site is an infill site. No grazing, feedlot or other agricultural activities that generate manure currently exist on-site or are proposed to be implemented by the Project.
		SB 1383 Methane Reductions for Dairy and Livestock Operations	

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency

Source: California Air Resources Board (CARB), *California's 2022 Climate Change Scoping Plan*, 2022 and CARB, *Climate Change Scoping Plan*, December 2017

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would not impede or conflict with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

Plan Bay Area

The Project would not conflict with the overall goals of Plan Bay Area 2050 to provide housing, healthy and safe communities, and climate protection with an overall goal to reduce adverse health impacts. Plan Bay Area 2050 is based on the land uses in the City's General Plan. As noted above, the Project would demolish and clear the existing on-site structures and construct a new one-story concrete tilt-up warehouse/industrial use building. The Project would add employment and vehicle trips related to new employees that work directly at the Project site but such trips are anticipated by Plan Bay Area. Further, the Plan Bay Area seeks to decrease vehicle per capita emissions to 20 percent below 2005 levels by 2035. Achievement of the decrease in vehicle per capita emissions is conducted by regional planning efforts through the MTC and other agencies with regard to land use and transportation decision making; for which the Project's land use remains unchanged. The Project would not impede the region from reaching its GHG reductions required under Plan Bay Area.

Thus, implementation of the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and this impact would be less than significant.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

5.2 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

Cumulative Setting

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

Cumulative Impacts and Mitigation Measures

It is generally the case that an individual project of the Project's size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-

related GHG emissions would not result in a cumulatively considerable contribution to global climate change. As shown in Appendix B and discussed in GHG-1 and GHG-2 above, the Project would be consistent with the 2030 GHGRS, 2022 Scoping Plan, and Plan Bay Area 2050. Thus, the Project would not conflict with any applicable GHG reduction plan and would not interfere with the State's goal to achieve carbon neutrality by 2045. Therefore, the Project's cumulative contribution of GHG emissions would be less than cumulatively considerable.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than cumulatively considerable impacts.

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Appendix A

Greenhouse Gas Emissions Data

7th Street Construction v2 Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	7th Street Construction v2
Construction Start Date	7/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40
Precipitation (days)	1.60
Location	37.31688933074615, -121.86932951651731
County	Santa Clara
City	San Jose
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1804
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

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
Unrefrigerated Warehouse-No Rail	135	1000sqft	3.09	134,690	134,690	—	—	—
Parking Lot	547	1000sqft	12.6	0.00	0.00	—	—	—

General Office Building	8.69	1000sqft	0.20	8,694	0.00	—	—	—
City Park	0.02	Acre	0.02	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers

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.	15.4	14.9	36.1	43.5	0.10	1.39	15.9	16.8	1.28	2.74	3.65	—	13,825	13,825	0.95	1.68	21.9	14,373
Mit.	13.6	13.6	17.2	53.5	0.10	0.21	15.9	16.0	0.21	2.74	2.93	—	13,825	13,825	0.95	1.68	21.9	14,373
% Reduced	11%	9%	52%	-23%	—	85%	—	5%	84%	—	20%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.3	14.9	67.6	73.0	0.14	2.75	15.9	16.8	2.53	2.74	4.21	—	15,874	15,874	0.96	1.68	0.57	15,972
Mit.	13.6	13.5	17.9	82.0	0.14	0.34	15.9	16.0	0.33	2.74	2.93	—	15,874	15,874	0.96	1.68	0.57	15,972
% Reduced	11%	9%	74%	-12%	—	88%	—	5%	87%	—	30%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.37	6.08	17.6	16.8	0.04	0.65	3.69	4.34	0.60	0.79	1.39	—	5,153	5,153	0.28	0.35	2.02	5,267

Mit.	5.13	5.08	5.14	19.4	0.04	0.09	3.69	3.78	0.09	0.79	0.88	—	5,153	5,153	0.28	0.35	2.02	5,267
% Reduced	20%	16%	71%	-15%	—	86%	—	13%	85%	—	36%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.16	1.11	3.21	3.07	0.01	0.12	0.67	0.79	0.11	0.14	0.25	—	853	853	0.05	0.06	0.33	872
Mit.	0.94	0.93	0.94	3.54	0.01	0.02	0.67	0.69	0.02	0.14	0.16	—	853	853	0.05	0.06	0.33	872
% Reduced	20%	16%	71%	-15%	—	86%	—	13%	85%	—	36%	—	—	—	—	—	—	—

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.82	2.56	33.3	25.8	0.10	0.97	15.9	16.8	0.90	2.74	3.65	—	13,825	13,825	0.95	1.68	21.9	14,373
2027	15.4	14.9	36.1	43.5	0.09	1.39	4.47	5.86	1.28	1.64	2.92	—	10,458	10,458	0.43	0.22	3.93	10,539
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	9.03	7.55	67.6	73.0	0.14	2.75	15.9	16.8	2.53	2.74	4.21	—	15,874	15,874	0.96	1.68	0.57	15,972
2027	15.3	14.9	64.2	71.9	0.14	2.56	4.61	7.17	2.36	1.67	4.03	—	15,842	15,842	0.65	0.27	0.11	15,939
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.21	1.74	17.6	16.8	0.04	0.65	3.69	4.34	0.60	0.79	1.39	—	5,153	5,153	0.28	0.35	2.02	5,267
2027	6.37	6.08	12.6	16.8	0.03	0.47	1.10	1.57	0.43	0.37	0.80	—	3,679	3,679	0.15	0.09	0.87	3,711
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.40	0.32	3.21	3.06	0.01	0.12	0.67	0.79	0.11	0.14	0.25	—	853	853	0.05	0.06	0.33	872
2027	1.16	1.11	2.30	3.07	0.01	0.09	0.20	0.29	0.08	0.07	0.15	—	609	609	0.02	0.02	0.14	614

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.46	0.63	17.2	25.0	0.10	0.19	15.9	16.0	0.19	2.74	2.93	—	13,825	13,825	0.95	1.68	21.9	14,373
2027	13.6	13.6	8.39	53.5	0.09	0.21	4.47	4.67	0.21	1.64	1.85	—	10,458	10,458	0.43	0.22	3.93	10,539
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.96	1.83	17.9	82.0	0.14	0.34	15.9	16.0	0.33	2.74	2.93	—	15,874	15,874	0.96	1.68	0.57	15,972
2027	13.6	13.5	11.9	81.8	0.14	0.33	4.61	4.94	0.33	1.67	2.00	—	15,842	15,842	0.65	0.27	0.11	15,939
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.58	0.41	5.14	18.1	0.04	0.09	3.69	3.78	0.09	0.79	0.88	—	5,153	5,153	0.28	0.35	2.02	5,267
2027	5.13	5.08	3.68	19.4	0.03	0.08	1.10	1.18	0.08	0.37	0.44	—	3,679	3,679	0.15	0.09	0.87	3,711
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.11	0.07	0.94	3.31	0.01	0.02	0.67	0.69	0.02	0.14	0.16	—	853	853	0.05	0.06	0.33	872
2027	0.94	0.93	0.67	3.54	0.01	0.01	0.20	0.22	0.01	0.07	0.08	—	609	609	0.02	0.02	0.14	614

3. Construction Emissions Details

3.1. Demolition (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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demoliti on	—	—	—	—	—	—	13.0	13.0	—	1.97	1.97	—	—	—	—	—	—	—
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-Roa d Equipm ent	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demoliti on	—	—	—	—	—	—	13.0	13.0	—	1.97	1.97	—	—	—	—	—	—	—
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-Roa d Equipm ent	0.50	0.42	3.79	3.49	0.01	0.15	—	0.15	0.14	—	0.14	—	629	629	0.03	0.01	—	631
Demoliti on	—	—	—	—	—	—	2.39	2.39	—	0.36	0.36	—	—	—	—	—	—	—
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-Roa d Equipm ent	0.09	0.08	0.69	0.64	< 0.005	0.03	—	0.03	0.03	—	0.03	—	104	104	< 0.005	< 0.005	—	104
Demoliti on	—	—	—	—	—	—	0.44	0.44	—	0.07	0.07	—	—	—	—	—	—	—
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	0.05	0.05	0.03	0.57	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	126	126	< 0.005	< 0.005	0.46	128
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	1.05	0.22	12.6	6.22	0.07	0.13	2.71	2.84	0.13	0.74	0.87	—	10,272	10,272	0.81	1.65	21.4	10,806
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.49	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	117	117	< 0.005	0.01	0.01	118
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	1.03	0.21	13.3	6.27	0.07	0.13	2.71	2.84	0.13	0.74	0.87	—	10,276	10,276	0.81	1.65	0.56	10,790
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.7	21.7	< 0.005	< 0.005	0.04	22.0
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	0.19	0.04	2.40	1.15	0.01	0.02	0.50	0.52	0.02	0.14	0.16	—	1,886	1,886	0.15	0.30	1.69	1,982
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.59	3.59	< 0.005	< 0.005	0.01	3.64
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	0.03	0.01	0.44	0.21	< 0.005	< 0.005	0.09	0.10	< 0.005	0.02	0.03	—	312	312	0.02	0.05	0.28	328

3.2. Demolition (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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.36	0.36	4.51	18.2	0.03	0.06	—	0.06	0.06	—	0.06	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	13.0	13.0	—	1.97	1.97	—	—	—	—	—	—	—
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	0.36	0.36	4.51	18.2	0.03	0.06	—	0.06	0.06	—	0.06	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	13.0	13.0	—	1.97	1.97	—	—	—	—	—	—	—
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	0.07	0.07	0.83	3.34	0.01	0.01	—	0.01	0.01	—	0.01	—	629	629	0.03	0.01	—	631
Demolition	—	—	—	—	—	—	2.39	2.39	—	0.36	0.36	—	—	—	—	—	—	—
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	0.15	0.61	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	104	104	< 0.005	< 0.005	—	104
Demolition	—	—	—	—	—	—	0.44	0.44	—	0.07	0.07	—	—	—	—	—	—	—
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	0.05	0.05	0.03	0.57	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	126	126	< 0.005	< 0.005	0.46	128
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	1.05	0.22	12.6	6.22	0.07	0.13	2.71	2.84	0.13	0.74	0.87	—	10,272	10,272	0.81	1.65	21.4	10,806
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.49	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	117	117	< 0.005	0.01	0.01	118
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	1.03	0.21	13.3	6.27	0.07	0.13	2.71	2.84	0.13	0.74	0.87	—	10,276	10,276	0.81	1.65	0.56	10,790
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.7	21.7	< 0.005	< 0.005	0.04	22.0
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	0.19	0.04	2.40	1.15	0.01	0.02	0.50	0.52	0.02	0.14	0.16	—	1,886	1,886	0.15	0.30	1.69	1,982
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.59	3.59	< 0.005	< 0.005	0.01	3.64
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	0.03	0.01	0.44	0.21	< 0.005	< 0.005	0.09	0.10	< 0.005	0.02	0.03	—	312	312	0.02	0.05	0.28	328

3.3. Site Preparation (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	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
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	0.67	0.56	5.19	5.13	0.01	0.22	—	0.22	0.20	—	0.20	—	943	943	0.04	0.01	—	947
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	0.12	0.10	0.95	0.94	< 0.005	0.04	—	0.04	0.04	—	0.04	—	156	156	0.01	< 0.005	—	157
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	0.05	0.05	0.05	0.57	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	136	136	< 0.005	0.01	0.01	138
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	0.01	0.01	0.10	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	24.5	24.5	< 0.005	< 0.005	0.04	24.9
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	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.06	4.06	< 0.005	< 0.005	0.01	4.12
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

3.4. Site Preparation (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	0.59	0.57	3.48	28.2	0.05	0.13	—	0.13	0.13	—	0.13	—	5,298	5,298	0.21	0.04	—	5,316
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	0.11	0.10	0.62	5.02	0.01	0.02	—	0.02	0.02	—	0.02	—	943	943	0.04	0.01	—	947
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-Roa Equipment	0.02	0.02	0.11	0.92	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	156	156	0.01	< 0.005	—	157
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	0.05	0.05	0.05	0.57	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	136	136	< 0.005	0.01	0.01	138
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	0.01	0.01	0.10	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	24.5	24.5	< 0.005	< 0.005	0.04	24.9
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	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.06	4.06	< 0.005	< 0.005	0.01	4.12
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

3.5. Site Preparation (2027) - 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	3.63	3.05	28.0	28.3	0.05	1.17	—	1.17	1.08	—	1.08	—	5,298	5,298	0.21	0.04	—	5,316
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	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.4	10.4	< 0.005	< 0.005	—	10.4
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.72	1.72	< 0.005	< 0.005	—	1.72
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	0.05	0.05	0.04	0.53	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	134	134	< 0.005	0.01	0.01	136
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	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.26	0.26	< 0.005	< 0.005	< 0.005	0.27
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	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04
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

3.6. Site Preparation (2027) - 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	0.59	0.57	3.44	28.2	0.05	0.12	—	0.12	0.12	—	0.12	—	5,298	5,298	0.21	0.04	—	5,316
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	< 0.005	< 0.005	0.01	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.4	10.4	< 0.005	< 0.005	—	10.4
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.72	1.72	< 0.005	< 0.005	—	1.72
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	0.05	0.05	0.04	0.53	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	134	134	< 0.005	0.01	0.01	136
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	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.26	0.26	< 0.005	< 0.005	< 0.005	0.27
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	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04
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

3.7. Grading (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	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
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	0.65	0.54	4.85	4.91	0.01	0.20	—	0.20	0.18	—	0.18	—	1,175	1,175	0.05	0.01	—	1,179
Dust From Material Movement	—	—	—	—	—	—	0.64	0.64	—	0.25	0.25	—	—	—	—	—	—	—
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	0.12	0.10	0.88	0.90	< 0.005	0.04	—	0.04	0.03	—	0.03	—	195	195	0.01	< 0.005	—	195
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.05	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.06	0.65	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	156	156	< 0.005	0.01	0.02	158
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	0.02	< 0.005	0.26	0.12	< 0.005	< 0.005	0.05	0.06	< 0.005	0.01	0.02	—	203	203	0.02	0.03	0.01	213
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.0	28.0	< 0.005	< 0.005	0.05	28.5
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	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36.1	36.1	< 0.005	0.01	0.03	37.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.64	4.64	< 0.005	< 0.005	0.01	4.71
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	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.97	5.97	< 0.005	< 0.005	0.01	6.27

3.8. Grading (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	0.64	0.64	4.43	35.3	0.06	0.12	—	0.12	0.12	—	0.12	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
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	0.11	0.11	0.79	6.29	0.01	0.02	—	0.02	0.02	—	0.02	—	1,175	1,175	0.05	0.01	—	1,179
Dust From Material Movement	—	—	—	—	—	—	0.64	0.64	—	0.25	0.25	—	—	—	—	—	—	—
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	0.02	0.02	0.14	1.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	195	195	0.01	< 0.005	—	195
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.05	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.06	0.65	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	156	156	< 0.005	0.01	0.02	158
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	0.02	< 0.005	0.26	0.12	< 0.005	< 0.005	0.05	0.06	< 0.005	0.01	0.02	—	203	203	0.02	0.03	0.01	213
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.0	28.0	< 0.005	< 0.005	0.05	28.5
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	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36.1	36.1	< 0.005	0.01	0.03	37.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.64	4.64	< 0.005	< 0.005	0.01	4.71
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	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.97	5.97	< 0.005	< 0.005	0.01	6.27

3.9. Grading (2027) - 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	3.51	2.95	25.6	27.3	0.06	1.04	—	1.04	0.96	—	0.96	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—

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	3.51	2.95	25.6	27.3	0.06	1.04	—	1.04	0.96	—	0.96	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
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	0.62	0.52	4.56	4.86	0.01	0.19	—	0.19	0.17	—	0.17	—	1,175	1,175	0.05	0.01	—	1,179
Dust From Material Movement	—	—	—	—	—	—	0.64	0.64	—	0.25	0.25	—	—	—	—	—	—	—
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	0.11	0.10	0.83	0.89	< 0.005	0.03	—	0.03	0.03	—	0.03	—	195	195	0.01	< 0.005	—	195
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.05	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

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.71	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	165	165	< 0.005	0.01	0.55	168
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	0.02	< 0.005	0.24	0.12	< 0.005	< 0.005	0.05	0.06	< 0.005	0.01	0.02	—	198	198	0.02	0.03	0.39	208
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.61	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	153	153	< 0.005	0.01	0.01	155
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	0.02	< 0.005	0.25	0.12	< 0.005	< 0.005	0.05	0.06	< 0.005	0.01	0.02	—	198	198	0.02	0.03	0.01	208
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	27.5	27.5	< 0.005	< 0.005	0.04	27.9
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	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.2	35.2	< 0.005	0.01	0.03	37.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.56	4.56	< 0.005	< 0.005	0.01	4.63
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	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.83	5.83	< 0.005	< 0.005	< 0.005	6.13

3.10. Grading (2027) - 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	0.64	0.64	4.43	35.3	0.06	0.12	—	0.12	0.12	—	0.12	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
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	0.64	0.64	4.43	35.3	0.06	0.12	—	0.12	0.12	—	0.12	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
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	0.11	0.11	0.79	6.29	0.01	0.02	—	0.02	0.02	—	0.02	—	1,175	1,175	0.05	0.01	—	1,179
Dust From Material Movement	—	—	—	—	—	—	0.64	0.64	—	0.25	0.25	—	—	—	—	—	—	—
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	0.02	0.02	0.14	1.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	195	195	0.01	< 0.005	—	195

Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.05	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.71	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	165	165	< 0.005	0.01	0.55	168
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	0.02	< 0.005	0.24	0.12	< 0.005	< 0.005	0.05	0.06	< 0.005	0.01	0.02	—	198	198	0.02	0.03	0.39	208
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.61	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	153	153	< 0.005	0.01	0.01	155
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	0.02	< 0.005	0.25	0.12	< 0.005	< 0.005	0.05	0.06	< 0.005	0.01	0.02	—	198	198	0.02	0.03	0.01	208
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	27.5	27.5	< 0.005	< 0.005	0.04	27.9
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	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.2	35.2	< 0.005	0.01	0.03	37.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.56	4.56	< 0.005	< 0.005	0.01	4.63
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	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.83	5.83	< 0.005	< 0.005	< 0.005	6.13

3.11. 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	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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	0.15	0.13	1.16	1.52	< 0.005	0.04	—	0.04	0.04	—	0.04	—	281	281	0.01	< 0.005	—	282
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	0.03	0.02	0.21	0.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	46.6	46.6	< 0.005	< 0.005	—	46.8
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	0.19	0.17	0.16	1.93	0.00	0.00	0.49	0.49	0.00	0.12	0.12	—	462	462	0.01	0.02	0.05	469
Vendor	0.06	0.02	0.82	0.38	< 0.005	0.01	0.17	0.17	0.01	0.05	0.05	—	623	623	0.03	0.09	0.04	652
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	0.02	0.02	0.02	0.22	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	54.9	54.9	< 0.005	< 0.005	0.09	55.7
Vendor	0.01	< 0.005	0.09	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	73.2	73.2	< 0.005	0.01	0.08	76.5
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	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.09	9.09	< 0.005	< 0.005	0.02	9.22
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12.1	12.1	< 0.005	< 0.005	0.01	12.7
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. 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	0.35	0.33	2.82	14.8	0.02	0.07	—	0.07	0.07	—	0.07	—	2,397	2,397	0.10	0.02	—	2,405
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	0.04	0.04	0.33	1.74	< 0.005	0.01	—	0.01	0.01	—	0.01	—	281	281	0.01	< 0.005	—	282
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	0.06	0.32	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	46.6	46.6	< 0.005	< 0.005	—	46.8
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	0.19	0.17	0.16	1.93	0.00	0.00	0.49	0.49	0.00	0.12	0.12	—	462	462	0.01	0.02	0.05	469
Vendor	0.06	0.02	0.82	0.38	< 0.005	0.01	0.17	0.17	0.01	0.05	0.05	—	623	623	0.03	0.09	0.04	652
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	0.02	0.02	0.02	0.22	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	54.9	54.9	< 0.005	< 0.005	0.09	55.7
Vendor	0.01	< 0.005	0.09	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	73.2	73.2	< 0.005	0.01	0.08	76.5
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	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.09	9.09	< 0.005	< 0.005	0.02	9.22
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12.1	12.1	< 0.005	< 0.005	0.01	12.7
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

3.13. Building Construction (2027) - 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	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
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	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
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	0.66	0.55	5.04	6.94	0.01	0.18	—	0.18	0.17	—	0.17	—	1,285	1,285	0.05	0.01	—	1,290
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	0.12	0.10	0.92	1.27	< 0.005	0.03	—	0.03	0.03	—	0.03	—	213	213	0.01	< 0.005	—	214
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	0.18	0.16	0.12	2.12	0.00	0.00	0.49	0.49	0.00	0.12	0.12	—	490	490	0.01	0.02	1.64	497
Vendor	0.05	0.02	0.74	0.36	< 0.005	0.01	0.17	0.17	0.01	0.05	0.05	—	610	610	0.03	0.09	1.34	640
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	0.18	0.16	0.15	1.80	0.00	0.00	0.49	0.49	0.00	0.12	0.12	—	454	454	0.01	0.02	0.04	460
Vendor	0.05	0.02	0.78	0.37	< 0.005	0.01	0.17	0.17	0.01	0.05	0.05	—	611	611	0.03	0.09	0.03	639
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	0.09	0.08	0.08	0.96	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	246	246	< 0.005	0.01	0.38	250
Vendor	0.03	0.01	0.41	0.20	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	327	327	0.02	0.05	0.31	343
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	0.02	0.02	0.01	0.17	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	40.7	40.7	< 0.005	< 0.005	0.06	41.3
Vendor	0.01	< 0.005	0.07	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	54.2	54.2	< 0.005	0.01	0.05	56.7
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

3.14. Building Construction (2027) - 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	0.35	0.33	2.82	14.8	0.02	0.07	—	0.07	0.07	—	0.07	—	2,397	2,397	0.10	0.02	—	2,405
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	0.35	0.33	2.82	14.8	0.02	0.07	—	0.07	0.07	—	0.07	—	2,397	2,397	0.10	0.02	—	2,405
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	0.19	0.18	1.51	7.95	0.01	0.04	—	0.04	0.04	—	0.04	—	1,285	1,285	0.05	0.01	—	1,290
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	0.03	0.03	0.28	1.45	< 0.005	0.01	—	0.01	0.01	—	0.01	—	213	213	0.01	< 0.005	—	214
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	0.18	0.16	0.12	2.12	0.00	0.00	0.49	0.49	0.00	0.12	0.12	—	490	490	0.01	0.02	1.64	497
Vendor	0.05	0.02	0.74	0.36	< 0.005	0.01	0.17	0.17	0.01	0.05	0.05	—	610	610	0.03	0.09	1.34	640
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	0.18	0.16	0.15	1.80	0.00	0.00	0.49	0.49	0.00	0.12	0.12	—	454	454	0.01	0.02	0.04	460
Vendor	0.05	0.02	0.78	0.37	< 0.005	0.01	0.17	0.17	0.01	0.05	0.05	—	611	611	0.03	0.09	0.03	639
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	0.09	0.08	0.08	0.96	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	246	246	< 0.005	0.01	0.38	250
Vendor	0.03	0.01	0.41	0.20	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	327	327	0.02	0.05	0.31	343
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	0.02	0.02	0.01	0.17	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	40.7	40.7	< 0.005	< 0.005	0.06	41.3
Vendor	0.01	< 0.005	0.07	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	54.2	54.2	< 0.005	0.01	0.05	56.7
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

3.15. Paving (2027) - 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	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.26	0.22	2.09	3.00	< 0.005	0.09	—	0.09	0.08	—	0.08	—	455	455	0.02	< 0.005	—	457
Paving	0.09	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.05	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	75.4	75.4	< 0.005	< 0.005	—	75.7
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.05	0.04	0.03	0.53	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	124	124	< 0.005	< 0.005	0.42	126
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.46	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	115	115	< 0.005	< 0.005	0.01	116
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	0.01	0.01	0.14	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	34.9	34.9	< 0.005	< 0.005	0.05	35.5
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	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.79	5.79	< 0.005	< 0.005	0.01	5.87
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

3.16. Paving (2027) - 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	0.16	0.16	1.93	10.6	0.01	0.03	—	0.03	0.03	—	0.03	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.16	1.93	10.6	0.01	0.03	—	0.03	0.03	—	0.03	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	0.58	3.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	455	455	0.02	< 0.005	—	457
Paving	0.09	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.11	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	75.4	75.4	< 0.005	< 0.005	—	75.7
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.05	0.04	0.03	0.53	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	124	124	< 0.005	< 0.005	0.42	126
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.46	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	115	115	< 0.005	< 0.005	0.01	116
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	0.01	0.01	0.14	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	34.9	34.9	< 0.005	< 0.005	0.05	35.5
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	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.79	5.79	< 0.005	< 0.005	0.01	5.87
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

3.17. Architectural Coating (2027) - 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	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	12.5	12.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	12.5	12.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.05	0.04	0.30	0.41	< 0.005	0.01	—	0.01	0.01	—	0.01	—	48.3	48.3	< 0.005	< 0.005	—	48.4
Architectural Coatings	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.99	7.99	< 0.005	< 0.005	—	8.02
Architectural Coatings	0.82	0.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.02	0.42	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.0	98.0	< 0.005	< 0.005	0.33	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	0.00	0.00	0.00	0.00	0.00	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	0.04	0.03	0.03	0.36	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	90.8	90.8	< 0.005	< 0.005	0.01	92.0
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	0.01	0.01	0.13	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	33.2	33.2	< 0.005	< 0.005	0.05	33.7
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	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.49	5.49	< 0.005	< 0.005	0.01	5.57
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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.18. Architectural Coating (2027) - 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	0.02	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	12.5	12.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.02	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	12.5	12.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	0.01	0.23	0.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	48.3	48.3	< 0.005	< 0.005	—	48.4
Architectural Coatings	4.51	4.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.99	7.99	< 0.005	< 0.005	—	8.02

Architect Coatings	0.82	0.82	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.02	0.42	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.0	98.0	< 0.005	< 0.005	0.33	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	0.00	0.00	0.00	0.00	0.00	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	0.04	0.03	0.03	0.36	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	90.8	90.8	< 0.005	< 0.005	0.01	92.0
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	0.01	0.01	0.13	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	33.2	33.2	< 0.005	< 0.005	0.05	33.7
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	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.49	5.49	< 0.005	< 0.005	0.01	5.57
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	0.00	0.00	0.00	0.00	0.00	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

4.10. 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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	7/1/2026	10/1/2026	5.00	67.0	—
Site Preparation	Site Preparation	10/2/2026	1/1/2027	5.00	66.0	—
Grading	Grading	10/2/2026	4/1/2027	5.00	130	—
Building Construction	Building Construction	11/2/2026	10/1/2027	5.00	240	—
Paving	Paving	7/1/2027	12/1/2027	5.00	110	—
Architectural Coating	Architectural Coating	6/1/2027	12/1/2027	5.00	132	—

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	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40

Site Preparation	Tractors/Loaders/Back	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	2.00	8.00	367	0.40
Demolition	Excavators	Diesel	Tier 4 Final	3.00	8.00	36.0	0.38
Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	33.0	0.73
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Final	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41

Grading	Excavators	Diesel	Tier 4 Final	2.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	8.00	84.0	0.37
Grading	Scrapers	Diesel	Tier 4 Final	2.00	8.00	423	0.48
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Tier 4 Final	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Tier 4 Final	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Tier 4 Final	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 4 Final	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 4 Final	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48

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	15.0	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	146	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT

Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	2.88	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	59.4	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	23.5	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	11.9	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	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	15.0	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	146	20.0	HHDT

Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	2.88	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	59.4	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	23.5	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	11.9	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	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

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

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	215,076	71,692	32,819

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	39,219	—
Grading	0.00	3,000	390	0.00	—
Paving	0.00	0.00	0.00	0.00	12.6

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	12.6	100%

General Office Building	0.00	0%
City Park	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
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005

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

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

5.18.2.2. Mitigated

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

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	12.6	annual days of extreme heat
Extreme Precipitation	2.35	annual days with precipitation above 20 mm
Sea Level Rise	—	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 ¾ 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	1	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	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	0	0	0	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	1	1	1	2
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
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	1	1	1	2

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	22.2
AQ-PM	33.2
AQ-DPM	80.3
Drinking Water	22.7
Lead Risk Housing	29.1
Pesticides	0.00
Toxic Releases	30.3
Traffic	53.5
Effect Indicators	—
CleanUp Sites	80.4
Groundwater	94.9
Haz Waste Facilities/Generators	87.7
Impaired Water Bodies	33.2
Solid Waste	98.8
Sensitive Population	—
Asthma	44.1
Cardio-vascular	16.7
Low Birth Weights	65.4
Socioeconomic Factor Indicators	—

Education	81.7
Housing	91.5
Linguistic	95.3
Poverty	87.5
Unemployment	15.8

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	15.74489927
Employed	13.05017323
Median HI	1.398691133
Education	—
Bachelor's or higher	24.56050302
High school enrollment	100
Preschool enrollment	70.15270114
Transportation	—
Auto Access	6.967791608
Active commuting	39.71512896
Social	—
2-parent households	37.88014885
Voting	44.15501091
Neighborhood	—
Alcohol availability	31.57962274
Park access	25.52290517
Retail density	84.3320929
Supermarket access	48.45374054

Tree canopy	57.65430515
Housing	—
Homeownership	22.34056204
Housing habitability	6.082381625
Low-inc homeowner severe housing cost burden	5.504940331
Low-inc renter severe housing cost burden	12.66521237
Uncrowded housing	14.25638393
Health Outcomes	—
Insured adults	22.21224176
Arthritis	40.2
Asthma ER Admissions	72.1
High Blood Pressure	27.5
Cancer (excluding skin)	74.5
Asthma	37.3
Coronary Heart Disease	37.1
Chronic Obstructive Pulmonary Disease	22.0
Diagnosed Diabetes	14.5
Life Expectancy at Birth	74.1
Cognitively Disabled	9.6
Physically Disabled	5.2
Heart Attack ER Admissions	85.9
Mental Health Not Good	29.3
Chronic Kidney Disease	35.4
Obesity	49.0
Pedestrian Injuries	94.3
Physical Health Not Good	24.5
Stroke	26.0
Health Risk Behaviors	—

Binge Drinking	97.0
Current Smoker	24.1
No Leisure Time for Physical Activity	14.6
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	65.5
Elderly	61.3
English Speaking	2.6
Foreign-born	87.0
Outdoor Workers	79.8
Climate Change Adaptive Capacity	—
Impervious Surface Cover	13.1
Traffic Density	43.1
Traffic Access	87.4
Other Indices	—
Hardship	84.4
Other Decision Support	—
2016 Voting	41.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	69.0
Healthy Places Index Score for Project Location (b)	13.0
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
Construction: Construction Phases	based on assumptions spreadsheet.
Construction: Dust From Material Movement	based on assumptions spreadsheet
Land Use	—

Appendix B

2030 Greenhouse Gas Reduction Strategy Checklist

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

DEPARTMENT OF PLANNING, BUILDING AND CODE ENFORCEMENT

Purpose of the Compliance Checklist

In 2020, the City adopted a Greenhouse Gas Reduction Strategy (GHGRS) that outlines the actions the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions for the interim target year 2030. The purpose of the Greenhouse Gas Reduction Strategy Compliance Checklist (Checklist) is to:

- Implement GHG reduction strategies from the 2030 GHGRS to new development projects.
- Provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to the California Environmental Quality Act (CEQA).

The 2030 GHGRS presents the City's comprehensive path to reduce GHG emissions to achieve the 2030 reduction target, based on SB 32, Bay Area Air District, and OPR. Additionally, the 2030 GHGRS leverages other important City plans and policies; including the General Plan, Climate Smart San José, and the City Municipal Code in identifying reductions strategies that achieve the City's target. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gases. Accordingly, the City of San José's 2030 GHGRS represents San José's qualified climate action plan in compliance with CEQA.

As described in the 2030 GHGRS, these GHG reductions will occur through a combination of City initiatives in various plans and policies and will provide reductions from both existing and new developments. This Compliance Checklist specifically applies to proposed discretionary projects that require environmental review pursuant to CEQA. Therefore, the Checklist is a critical implementation tool in the City's overall strategy to reduce GHG emissions. Implementation of applicable reduction actions in new development projects will help the City achieve incremental reductions toward its target. Per the 2030 GHGRS, the City will monitor strategy implementation and make updates, as necessary, to maintain an appropriate trajectory to the 2030 GHG target.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the GHGRS.

Instructions for Compliance Checklist

Applicants shall complete the following sections to demonstrate conformance with the City of San José 2030 Greenhouse Gas Reduction Strategy for the proposed project. All projects must complete Section A. General Plan Policy Conformance and Section B. Greenhouse Gas Reduction Strategies. Projects that propose alternative GHG mitigation measures must also complete Section C. Alternative Project Measures and Additional GHG Reductions.

A. General Plan Policy Compliance

Projects need to demonstrate consistency with the Envision San José 2040 General Plan's relevant policies for Land Use & Design, Transportation, Green Building, and Water Conservation, enumerated in Table A. All applicants shall complete the following steps.

1. Complete Table A, Item #1 to demonstrate the project's consistency with the General Plan Land Use and Circulation Diagram.

2. Complete Table A, Items #2 through #4 to demonstrate the project's consistency with General Plan policies[1] related to green building; pedestrian, bicycle & transit site design; and water conservation and urban forestry, as applicable. For each policy listed, mark the relevant yes/no check boxes to indicate project consistency, and provide a qualitative description of how the policy is implemented in the proposed project or why the policy is not applicable to the proposed project. Qualitative descriptions can be included in Table A or provided as separate attachments. This explanation will provide the basis for analysis in the CEQA document.

B. Greenhouse Gas Reduction Strategies

Table B identifies the GHGRS strategies and recommended consistency options. Projects need to demonstrate consistency with the GHGRS reduction strategies listed in Table B or document why the strategies are not applicable or are infeasible. The corresponding GHGRS strategies are indicated in the table to provide additional context, with the full text of the strategies preceding Table B.

Residential projects must complete Table B, Part 1 and 2; Non-residential projects must complete Table B, Part 2 only. All applicants shall complete the following steps for Table B.

1. Review the project consistency options described in the column titled 'GHGRS Strategy and Consistency Options'.
2. Use the check boxes in the column titled "Project Conformance" to indicate if the strategy is 'Proposed', 'Not Applicable', 'Not Feasible', or if there is an 'Alternative Measure Proposed'.
3. Provide a qualitative analysis of the proposed project's compliance with the GHGRS strategies in the column titled "Description of Project Measure". This will be the basis for CEQA analysis to demonstrate compliance with the 2030 GHGRS and by extension, with SB
   32. The qualitative analysis should provide:

   a. A description of which consistency options are included as part of the proposed project, or

   b. A description of why the strategy is not applicable to the proposed project, or

   c. A description of why the consistency options are infeasible. If applicants select 'Not Feasible'

[1]The lists in items # 2-4 do not represent all General Plan policies but allow projects to demonstrate consistency and achievement of policies that are related to quantified reduction estimates in the 2030 GHGRS.

or 'Alternative Measure Proposed', they must complete Table C to document what alternative project measures will be implemented to achieve a similar level of greenhouse gas reduction and how those reduction estimates were calculated.

C. Alternative Project Measures and Additional GHG Reductions

Projects that propose alternative GHG mitigation measures to those identified in Table B or propose to include additional GHG mitigation measures beyond those described in Tables A and B, shall provide a summary explanation of the proposed measures and demonstrate efficiency or greenhouse gas reductions achievable though the proposed measures. Documentation for these alternative or additional project measures shall be documented in Table C. Any applicants who select 'Not Feasible' or 'Alternative Measure Proposed' in Table B must complete the following steps for Table C.

1. In the column titled "Description of Proposed Measure" provide a qualitative description of what measure will be implemented, why it is proposed, and how it will reduce GHG emissions.
2. In the column titled "Description of GHG Reduction Estimate" demonstrate how the alternative project measure would achieve the same or greater level of greenhouse gas reductions as the GHGRS strategy it replaces. Documentation or calculation files can be attached separately.
3. In the column titled "Proposed Measure Implementation" identify how the measure will be implemented: incorporated as part of the project design or as an additional measure that is not part of the project (e.g., purchase of carbon offsets).

Compliance Checklist

Evaluation of Project Conformance with the 2030 Greenhouse Gas Reduction Strategy

Table A: General Plan Consistency

Development Type: ☐ Commercial ☐ Residential ☐ Office ☒ Other: [Industrial]

1) Consistency with the Land Use/Transportation Diagram (Land Use and Density)	Yes	No
Is the proposed Project consistent with the Land Use/Transportation Diagram?	☒	☐
If not, and the proposed project includes a General Plan Amendment, does the proposed amendment decrease GHG emissions (in absolute terms or per capita, per employee, per service population) below the level assumed in the GHGRS based on the existing planned land use? (The project could have a higher density, mix of uses, or other features that would reduce GHG emissions compared to the planned land use).[2]	☐	☐
If not, would the proposed project and the General Plan Amendment increase GHG emissions (in absolute terms or per capita, per employee, per service population)? Project is not consistent with GHGRS and further modeling will be required to determine if additional mitigation measures are necessary.	☐	☐

Response documentation:

The Project site has a General Plan land use designation of HI – Heavy Industrial. The HI- Heavy Industrial designation allows for warehousing and distribution uses. The Project would be consistent with the development assumptions for the land use and is therefore consistent with the General Plan land use designation. Therefore, the proposed project is consistent with the Land Use/Transportation Diagram.

[2] For example, a General Plan Amendment to change use from single-family residential to multi-family residential or a General Plan Amendment to change the use from regional-serving commercial to mixed-use urban in a transit-served area might reduce travel demand, and therefore GHG emissions from mobile sources.

2) Implementation of Green Building Measures	Yes	No
***MS-2.2**: Encourage maximized use of on-site generation of renewable energy for all new and existing buildings.*	☒	☐
Not applicable	☐	☐
Consistent. All building equipment is powered by electricity; there is no proposed natural gas on site. The east side of the building is designed for future installation of PV panels. Any energy generated from the future PV panels will feed back into the building's electrical panels.		
***MS-2.3**: Encourage consideration of solar orientation, including building placement, landscaping, design and construction techniques for new construction to minimize energy consumption.*	☒	☐
Not applicable	☐	☐
Consistent. The proposed Project would include landscaping and shading of the parking areas and walkways. The Project would also include 156 new shade, accent and street trees. Consistent with San José Green Building policies, the project would be required to meet LEED Silver performance standards which are aimed to minimize energy consumption. Additionally, the Project would be designed to achieve net zero carbon through low embodied carbon building materials, natural/low global warming potential refrigerants, smart building technology, and no on-site combustion. As noted above, the building is designed for future installation of PV panels. In the future, solar orientation will be a consideration if PV panels are installed.		
***MS-2.7**: Encourage the installation of solar panels or other clean energy power generation sources over parking areas.*	☐	☒
Not applicable	☐	☐
Not Consistent. The building is designed for future installation of PV panels. There are no plans for the installation of PV panels over the parking areas since this would significantly reduce the amount of van parking stalls available for project operations.		
***MS-2.11**: Require new development to incorporate green building practices, including those required by the Green Building Ordinance. Specifically, target reduced energy use through construction techniques (e.g., design of building envelopes and systems to maximize energy performance), through architectural design (e.g., design to maximize cross ventilation and interior daylight) and through site design techniques (e.g., orienting buildings on sites to maximize the effectiveness of passive solar design).*	☒	☐
Not applicable	☐	☐
Consistent. The Project would comply with various CalGreen requirements to reduce energy use including water conserving plumbing fixtures and fittings, electric heat pump technology, electric-ready requirements when natural gas is installed, and strengthening ventilation standards. The project would also adhere to the 2022 Energy Code (or later, if applicable) requirements, which include standards related to decreasing the energy requirements of a building through building envelope assemblies, HVAC, water heating, indoor lighting, outdoor lighting, electrical power distribution, ventilation, and signs. Additionally, the Project would be designed to achieve net zero carbon through low embodied carbon building materials, natural/low global warming potential refrigerants, smart building technology, and no on-site combustion. Further, the Project would include building design measures to meet LEED Silver performance standards.		
***MS-16.2**: Promote neighborhood-based distributed clean/renewable energy generation to improve local energy security and to reduce the amount of energy wasted in transmitting electricity over long distances.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. **Not Applicable**. The Project does not include any on-site renewable energy generation. However, the building is designed for future installation of PV panels per the California Building Code (Title 24).		

3) Pedestrian, Bicycle & Transit Site Design Measures	**Yes**	**No**
***CD-2.1**: Promote the Circulation Goals and Policies in the Envision San José 2040 General Plan. Create streets that promote pedestrian and bicycle transportation by following applicable goals and policies in the Circulation section of the Envision San José 2040 General Plan.*	☒	☐
a) Design the street network for its safe shared use by pedestrians, bicyclists, and vehicles. Include elements that increase driver awareness.	☒	☐
b) Create a comfortable and safe pedestrian environment by implementing wider sidewalks, shade structures, attractive street furniture, street trees, reduced traffic speeds, pedestrian-oriented lighting, mid-block pedestrian crossings, pedestrian-activated crossing lights, bulb-outs and curb extensions at intersections, and on-street parking that buffers pedestrians from vehicles.	☒	☐
c) Consider support for reduced parking requirements, alternative parking arrangements, and Transportation Demand Management strategies to reduce area dedicated to parking and increase area dedicated to employment, housing, parks, public art, or other amenities. Encourage de-coupled parking to ensure that the value and cost of parking are considered in real estate and business transactions.	☒	☐
Not applicable	☐	☐
Consistent. Along South 7th Street, there are 5 to 7 feet wide Class II bike lanes in both directions with additional solid green striping. Along Phelan Ave, there are both Class II and Class III bike lanes in both the NB and SB directions. Pedestrian crosswalks are present at every intersection with ADA compliant ramps. Construction of the project will maintain the existing Class II and Class III bike lanes and pedestrian facilities along Phelan Avenue. Along East Alma Avenue, the Project would replace the existing sidewalk with a 10-foot sidewalk along the entirety of the northern Project site frontage. New landscaping, including street trees, would be installed along the reconstructed sidewalk. On South 7th Street, the Project would replace the existing sidewalk with a 10-foot sidewalk. The Project would also replace the existing Class II bike lane along the South 7th Street Project site frontage with a Class IV protected bike lane. The bike lane would be separated from the roadway by raised concrete, new planted trees, and landscaped planters. Bicycle marking striping would be installed along the entirety of the improved bicycle lane and bicycle crossings would be striped where the bicycle lane intersects with the Project driveways on South 7th Street. The Project would also install new streetlights along the Project site frontage on East Alma Avenue and South 7th Street. The Project would include 18 bicycle parking spaces as well as bicycle and pedestrian access on the driveway.		
***CD-2.5**: Integrate Green Building Goals and Policies of the Envision San José 2040 General Plan into site design to create healthful environments. Consider factors such as shaded parking areas, pedestrian connections, minimization of impervious surfaces, incorporation of stormwater treatment measures, appropriate building orientations, etc.*	☒	☐
Not applicable	☐	☐
Consistent. The proposed Project would include landscaping and shading of the parking areas and walkways. The Project would include 156 new shade, accent and street trees. The proposed shade trees are intended to comply with the new CalGreen regulations, which require trees to provide a minimum 50 percent shade coverage within the parking lot, including a minimum 20 percent shade coverage at abutting landscape and hardscape areas within 15 years. Additionally, the Project would replace the existing sidewalk with a 10-foot sidewalk along the entirety of the northern Project site frontage. On South 7th Street, the Project would reconstruct the existing public sidewalks along the entirety of the Project site frontage, therefore increasing pedestrian connection to the Project site. Further, new landscaping, including street trees, would be installed along the reconstructed sidewalk.		
***CD-2.11**: Within the Downtown and Urban Village Overlay areas, consistent with the minimum density requirements of the pertaining Land Use/Transportation Diagram designation, avoid the construction of surface parking lots except as an interim use, so that long-term development of the site will result in a cohesive urban form. In these areas, whenever possible, use structured parking, rather than surface parking, to fulfill parking*	☐	☐

requirements. Encourage the incorporation of alternative uses, such as parks, above parking structures.		
Not Applicable	☒	☐
Not Applicable. The proposed Project is not located within the Downtown or Urban Village Overlay areas. However, the Project is consistent with applicable density requirements.		
***CD-3.2**: Prioritize pedestrian and bicycle connections to transit, community facilities (including schools), commercial areas, and other areas serving daily needs. Ensure that the design of new facilities can accommodate significant anticipated future increases in bicycle and pedestrian activity.*	☒	☐
Not applicable	☐	☐
Consistent. As discussed above, the Project would replace the existing sidewalk with a 10-foot sidewalk along the entirety of the northern Project site frontage. On South 7th Street, the Project would replace the existing sidewalk with a 10-foot sidewalk. The Project would also replace the existing Class II bike lane along the South 7th Street with a Class IV protected bike lane. The proposed Project would include 14 bicycle parking spaces as well as bicycle and pedestrian access on the driveways.		
***CD-3.4**: Encourage pedestrian cross-access connections between adjacent properties and require pedestrian and bicycle connections to streets and other public spaces, with particular attention and priority given to providing convenient access to transit facilities. Provide pedestrian and vehicular connections with cross-access easements within and between new and existing developments to encourage walking and minimize interruptions by parking areas and curb cuts.*	☒	☐
Not applicable	☐	☐
Consistent. As discussed above, the Project would include several off-site improvements to the pedestrian and bicycle networks along the Project boundaries encouraging pedestrian and bicycle and providing access to transit facilities. Additionally, the proposed Project would include adequate bicycle parking spaces and promote bicyclist and pedestrian safety onsite. This would promote safety and encourage employees to use alternative sources of transportation. The Project would not include pedestrian barriers to transit.		
***LU-3.5**: Balance the need for parking to support a thriving Downtown with the need to minimize the impacts of parking upon a vibrant pedestrian and transit oriented urban environment. Provide for the needs of bicyclists and pedestrians, including adequate bicycle parking areas and design measures to promote bicyclist and pedestrian safety.*	☒	☐
Not applicable	☐	☐
Consistent. As discussed above, the Project would include several off-site improvements to the pedestrian and bicycle networks along the Project boundaries. Additionally, the proposed Project would include adequate bicycle parking spaces and promote bicyclist and pedestrian safety onsite. The Project is not located within the Downtown area.		
***TR-2.8:** Require new development to provide on-site facilities such as bicycle storage and showers, provide connections to existing and planned facilities, dedicate land to expand existing facilities or provide new facilities such as sidewalks and/or bicycle lanes/paths, or share in the cost of improvements.*	☒	☐
Not applicable	☐	☐
Consistent. The Project would be equipped with bathrooms and a changing room, including one (1) shower and a bicycle shelter with long term bicycle parking. The Project would make a 2-foot street dedication to the City of San José along East Alma Avenue and South 7th Street for off-site pedestrian and bicycle network improvements. As noted above, the Project would replace the existing sidewalk with a 10-foot sidewalk along the entirety of the northern Project site frontage. On South 7th Street, the Project would replace the existing sidewalk with a 10-foot sidewalk. The Project would also replace the existing Class II bike lane along the South 7th Street with a Class IV protected bike lane, therefore increasing pedestrian and bicycle connections to the Project site.		

TR-7.1: *Require large employers to develop TDM programs to reduce the vehicle trips and vehicle miles generated by their employees through the use of shuttles, provision for car-sharing, bicycle sharing, carpool, parking strategies, transit incentives and other measures.*	☒	☐
Not applicable	☐	☐
Consistent. Proposed site design includes on-site bicycle parking, and a carpool/vanpool drop off lane to reduce vehicle trips and vehicle miles. The Project would also incorporate the following TDM measures: 1. Provide Bike Network Improvements – Fund the design and/or construction of bike and micro-mobility network improvements outside of the Project's property frontage and within 1 mile of the Project site. 2. Transit Network Improvements – Fund the design and/or construction of transit network improvements outside of the Project's property frontage and within 1 mile of the Project site. 3. Provide Pedestrian Network Improvements –Fund the design and/or construction of pedestrian street improvements outside of the Project's property frontage and within 1 mile of the Project site.		
TR-8.5: *Promote participation in car share programs to minimize the need for parking spaces in new and existing development.*	☒	☐
Not applicable	☐	☐
Consistent. The Project would also incorporate the TDM measures listed above aimed to reduce vehicle trips and need for parking spaces. Further, the proposed Project site is located within 2,000 feet of transit stops at Montague Expressway / Trimble Road intersection and Brokaw Road / Junction Avenue intersection and would include several bicycle and pedestrian network improvements which would provide alternative transportation for those who can take advantage.		

4) Water Conservation and Urban Forestry Measures	**Yes**	**No**
MS-3.1*: Require water-efficient landscaping, which conforms to the State's Model Water Efficient Landscape Ordinance, for all new commercial, institutional, industrial and developer-installed residential development unless for recreation needs or other area functions.*	☒	☐
Not applicable	☐	☐
Consistent. The proposed Project would comply with the State's Model Water Efficient Landscape Ordinance and the City's Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code). Landscaping along street frontages and within the Project site interior will consist predominately of drought-tolerant species adapted to both local and regional climate condition. Further, the Project would install a water efficient low flow, point source system designed to provide adequate watering to support plant growth and ensure deeply rooted plant material while avoiding excess water application.		
MS-3.2*: Promote the use of green building technology or techniques that can help reduce the depletion of the City's potable water supply, as building codes permit. For example, promote the use of captured rainwater, graywater, or recycled water as the preferred source for non-potable water needs such as irrigation and building cooling, consistent with Building Codes or other regulations.*	☒	☐
Not applicable	☐	☐
Consistent. The Project would comply with measures to increase water efficiency and green building techniques per building codes. Consistent with San José Green Building policies, the project would be required to meet LEED Silver performance standards. The Project would include low-flow fixtures and appliances, which are required by City Code 15.11. Sustainable features within the Project includes installation of water-efficient fixtures and appliances, where possible. Further, the Project would install a water efficient low flow, point source system designed to provide adequate watering to support plant growth and insure deeply rooted plant material while avoiding excess water application.		
MS-19.4*: Require the use of recycled water wherever feasible and cost-effective to serve existing and new development.*	☐	☒
Not applicable	☐	☐

Not Feasible. Per the South Bay Water Recycling (SBWR) system map, the City does not provide recycled water in the vicinity of the project site. However, the proposed Project would comply with the CalGreen Code, which requires that recycled water be used for landscaping, where feasible. Further, the Project would install a water efficient low flow, point source system designed to provide adequate watering to support plant growth and insure deeply rooted plant material while avoiding excess water application.		
***MS-21.3**: Ensure that San José's Community Forest is comprised of species that have low water requirements and are well adapted to its Mediterranean climate. Select and plant diverse species to prevent monocultures that are vulnerable to pest invasions. Furthermore, consider the appropriate placement of tree species and their lifespan to ensure the perpetuation of the Community Forest.*	☒	☐
Not applicable	☐	☐
Consistent. The Project would comply with City landscaping requirements through plan check and design review processes. Landscaping along street frontages and within the Project site interior will consist predominately of drought-tolerant species adapted to both local and regional climate condition. The Project would also include 156 new shade, accent and street trees.		
***MS-26.1**: As a condition of new development, require the planting and maintenance of both street trees and trees on private property to achieve a level of tree coverage in compliance with and that implements City laws, policies or guidelines.*	☒	☐
Not applicable	☐	☐
Consistent. The Project would comply with City policy and landscaping requirements. As discussed above, the Project would include 156 new shade, accent and street trees. The proposed shade trees are intended to comply with the new CalGreen regulations, which require trees to provide a minimum 50 percent shade coverage within the parking lot, including a minimum 20 percent shade coverage at abutting landscape and hardscape areas within 15 years.		
***ER-8.7**: Encourage stormwater reuse for beneficial uses in existing infrastructure and future development through the installation of rain barrels, cisterns, or other water storage and reuse facilities.*	☒	☐
Not applicable	☐	☐
Consistent. The proposed Project would comply with the CalGreen Code, which requires that recycled water be used for landscaping, where feasible. The Project would also install 17 LID compliant lined bioretention basins with underdrains onsite and 4 offsite bioretention basins. Additionally, 5 flow-through concrete-lined planters with underdrains would be installed onsite. The on-site treatment facilities would treat the roof and parking lot runoff entering the storm drainage system, consistent with the NPDES requirements.		

GHGRS Strategies

GHGRS #1: The City will implement the San José Clean Energy program to provide residents and businesses access to cleaner energy at competitive rates.

GHGRS #2: The City will implement its building reach code ordinance (adopted September 2019) and its prohibition of natural gas infrastructure ordinance (adopted October 2019) to guide the city's new construction toward zero net carbon (ZNC) buildings.

GHGRS #3: The City will expand development of rooftop solar energy through the provision of technical assistance and supportive financial incentives to make progress toward the Climate Smart San José goal of becoming a one-gigawatt solar city.

GHGRS #4: The City will support a transition to building decarbonization through increased efficiency improvements in the existing building stock and reduced use of natural gas appliances and equipment.

GHGRS #5: As an expansion to Climate Smart San José, the City will update its Zero Waste Strategic Plan and reassess zero waste strategies. Throughout the development of the update, the City will continue to divert 90 percent of waste away from landfills through source reduction, recycling, food recovery and composting, and other strategies.

GHGRS #6: The City will continue to be a partner in the Caltrain Modernization Project to enhance local transit opportunities while simultaneously improving the city's air quality.

GHGRS #7: The City will expand its water conservation efforts to achieve and sustain long-term per capita reductions that ensure a reliable water supply with a changing climate, through regional partnerships, sustainable landscape designs, green infrastructure, and water-efficient technology and systems.

Table B: 2030 Greenhouse Gas Reduction Strategy Compliance

GHGRS Strategy and Consistency Options	Description of Project Measure	Project Conformance
PART 1: RESIDENTIAL PROJECTS ONLY		
Zero Net Carbon Residential Construction 1. Achieve/exceed the City's Reach Code, and 2. Exclude natural gas infrastructure in new construction, or 3. Install on-site renewable energy systems or participate in a community solar program to offset 100% of the project's estimated energy demand, or 4. Participate in San José Clean Energy at the Total Green level (i.e., 100% carbon-free electricity) for electricity accounts associated with the project until which time SJCE achieves 100% carbon-free electricity for all accounts. **Supports Strategies:** GHGRS #1, GHGRS #2, GHGRS #3	**Not Applicable.**	☐Proposed ☒Not Applicable ☐Not Feasible* ☐Alternative Measure Proposed **The 2030 GHGRS assumed this strategy would be feasible for 50% of residential units constructed between 2020 and 2030.*
PART 2: RESIDENTIAL AND NON-RESIDENTIAL PROJECTS		
Renewable Energy Development 1. Install solar panels, solar hot water, or other clean energy power generation sources on development sites, or 2. Participate in community solar programs to support development of renewable energy in the community, or 3. Participate in San José Clean Energy at the Total Green level (i.e., 100% carbon-free electricity) for electricity accounts associated with the project. **Supports Strategies**: GHGRS #1, GHGRS #3	**Consistent.** The building is designed for future PV panel installation. The Project would be serviced by PG&E. Currently, both PG&E and SJCE provide 100% carbon-free electricity. As of 2023, PG&E's electricity mix was entirely greenhouse gas-free. [3] SJCE's TotalGreen service provides 100% renewable energy. Therefore, PG&E currently provides a comparable alternative to SJCE's TotalGreen services in terms of delivering nearly 100% greenhouse gas emissions-free electricity.	☐See Part 1 (Residential projects only) ☒Proposed ☐Not Applicable ☐Not Feasible ☐Alternative Measure Proposed

[3] Pacific Gas and Electric, 2023 Content Power Label, https://www.pge.com/assets/pge/docs/account/billing-and-assistance/bill-inserts/1224-power-content-label.pdf.

Building Retrofits – Natural Gas[4] This strategy only applies to projects that include a retrofit of an existing building. If the proposed project does not include a retrofit, select "Not Applicable" in the Project Conformance column. 1. Replace an existing natural gas appliance with an electric alternative (e.g., space heater, water heater, clothes dryer), or 2. Replace an existing natural gas appliance with a high-efficiency model **Supports Strategies:** GHGRS #4	**Not Applicable**. The proposed Project is not a retrofit.	☐Proposed ☒Not Applicable ☐Not Feasible ☐Alternative Measure Proposed
Zero Waste Goal 1. Provide space for organic waste (e.g., food scraps, yard waste) collection containers, and/or 2. Exceed the City's construction & demolition waste diversion requirement. **Supports Strategies:** GHGRS #5	**Consistent.** The proposed development includes an exterior trash enclosure with space for recycling and organic waste collection.	☒Proposed ☐Not Applicable ☐Not Feasible ☐Alternative Measure Proposed
Caltrain Modernization 1. For projects located within ½ mile of a Caltrain station, establish a program through which to provide project tenants and/or residents with free or reduced Caltrain passes or 2. Develop a program that provides project tenants and/or residents with options to reduce their vehicle miles traveled (e.g., a TDM program), which could include transit passes, bike lockers and showers, or other strategies to reduce project related VMT. **Supports Strategies:** GHGRS #6	**Not Applicable.** The proposed Project is not located within ½ mile of a Caltrain station. Therefore, this strategy is not applicable to the Project.	☐Proposed ☒Not Applicable ☐Not Feasible ☐Alterative Measure Proposed

[4] GHGRS Strategy #4 applies to existing building retrofits and not to new construction; Strategy #2 applies to new construction to reduce natural gas related GHG emissions.

Water Conservation 1. Install high-efficiency appliances/fixtures to reduce water use, and/or include water-sensitive landscape design, and/or 2. Provide access to reclaimed water for outdoor water use on the project site. **Supports Strategies:** GHGRS #7	**Consistent.** The proposed Project would comply with water conservation measures per the California Green Building Standards Code, which requires a 20 percent reduction in indoor water use. The Project would also comply with the City's Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code).	☒Proposed ☐Not Applicable ☐Not Feasible ☐Alternative Measure Proposed