

MEMORANDUM

DATE: May 31, 2023

To: Shab Vakili, KSP Studio

FROM: Amy Fischer, President
Cara Cunningham, Associate

SUBJECT: Air Quality and Greenhouse Gas Technical Memorandum for the Proposed Anaheim Extra Space Storage Project in the City of Anaheim, California

INTRODUCTION

LSA has prepared this Air Quality and Greenhouse Gas Technical Memorandum to evaluate the impacts associated with construction and operation of the proposed Anaheim Extra Space Storage Project (project) in Anaheim, California. This analysis was prepared using methods and assumptions recommended in the air quality impact assessment guidelines of the South Coast Air Quality Management District (SCAQMD) in its *CEQA Air Quality Handbook* (1993) and associated updates. This analysis includes an assessment of criteria pollutant emissions, an assessment of carbon monoxide (CO) hot-spot impacts, and an assessment of the project's greenhouse gas (GHG) emissions.

PROJECT LOCATION AND DESCRIPTION

The 1.93-acre project site is located at 1761 W. Katella Avenue in the City of Anaheim (City) in Orange County, California. The project site is currently developed with an approximately 58,956 square feet (sq ft) of storage building and approximately 3,279 sq ft of commercial buildings. Both on-site buildings are currently operational. The project site is bounded by residential uses to the east and north and commercial uses to the west and south. Access to the project site is provided by Humor Drive.

The proposed project would demolish the existing 3,279 sq ft commercial building and add a 2-story extra space storage building next to the existing 58,956 sq ft storage building. The proposed extra space storage building would be a total 52,661 sq ft and would consist of approximately 588 units. In addition, the proposed project would provide 21 parking spaces on site. The proposed project would generate approximately 77 average daily trips (ADT), including 5 AM trips and 8 PM trips.¹ The proposed project would be all-electric and would not include natural gas.

¹ LSA. 2023. *Transportation Analysis for 1761 West Katella Avenue, Anaheim, California*. February 23.

Construction would include demolition, site preparation, excavation, grading, building construction, and the installation of landscaping and irrigation, lighting, storm drain facilities, and underground utilities. Construction of the proposed project is anticipated to commence in September 2024 and occur for approximately 12 months. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment. Based on the preliminary grading plans, the proposed project would require the import of approximately 330 cubic yards of soil.

EXISTING LAND USES IN THE PROJECT AREA

For the purposes of this analysis, sensitive receptors are areas of the population that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include residences, schools, daycare centers, hospitals, parks, and similar uses that are sensitive to air quality. Impacts on sensitive receptors are of particular concern because those receptors are the population most vulnerable to the effects of air pollution. The project site is surrounded primarily by residential and commercial uses. The areas adjacent to the project site include the following uses: residential uses to the east and north, and commercial uses to the west and south. The closest sensitive receptors to the project site include the single-family homes located immediately adjacent to the project site to the north and east.

ENVIRONMENTAL SETTING

Air Quality Background

Air quality is primarily a function of local climate, local sources of air pollution, and regional pollution transport. The amount of a given pollutant in the atmosphere is determined by the amount of the pollutant released and the atmosphere's ability to transport and dilute the pollutant. The major determinants of transport and dilution are wind, atmospheric stability, terrain and, for photochemical pollutants, sunshine.

A region's topographic features have a direct correlation with air pollution flow and therefore are used to determine the boundary of air basins. The proposed project is in Orange County, and is within the jurisdiction of SCAQMD, which regulates air quality in the South Coast Air Basin (Basin).

The Basin comprises approximately 10,000 square miles and covers all of Orange County and the urban parts of Los Angeles, Riverside, and San Bernardino Counties. The Basin is on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east, forming the inland perimeter.

Both State and federal governments have established health-based Ambient Air Quality Standards for six criteria air pollutants: CO, ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O₃ and NO₂, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO₂, and Pb are considered local pollutants that tend to accumulate in the air locally.

Air quality monitoring stations are located throughout the nation and are maintained by the local air districts and State air quality regulating agencies. Data collected at permanent monitoring stations are used by the United State Environmental Protection Agency (USEPA) to identify regions as “attainment” or “nonattainment” depending on whether the regions meet the requirements stated in the applicable National Ambient Air Quality Standards (NAAQS). Nonattainment areas are imposed with additional restrictions as required by the USEPA. In addition, different classifications of attainment (e.g., marginal, moderate, serious, severe, and extreme) are used to classify each air basin in the State on a pollutant-by-pollutant basis. The classifications are used as a foundation to create air quality management strategies to improve air quality and to comply with the NAAQS. As shown in Table A, the Basin is designated as nonattainment by federal standards for O₃ and particulate matter less than 2.5 microns in diameter (PM_{2.5}) and nonattainment by State standards for O₃, particulate matter less than 10 microns in diameter (PM₁₀), and PM_{2.5}.

Table A: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
O ₃ 1-hour	Nonattainment	N/A
O ₃ 8-hour	Nonattainment	Extreme Nonattainment
PM ₁₀	Nonattainment	Attainment/Maintenance
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO ₂	Attainment	Unclassified/Attainment (1-hour) Attainment/Maintenance (Annual)
SO ₂	Attainment	Unclassified/Attainment
Lead	Attainment ¹	Unclassified/Attainment ¹
All Others	Attainment/Unclassified	Attainment/Unclassified

Source 1: NAAQS and CAAQS Attainment Status for South Coast Air Basin (SCAQMD 2016). Website: www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf (accessed April 2023).

Source 2: Nonattainment Areas for Criteria Pollutants (Green Book) (USEPA 2019). Website: <https://www.epa.gov/green-book> (accessed April 2023).

¹ Only the Los Angeles County portion of the South Coast Air Basin is in nonattainment for lead.

CAAQS = California ambient air quality standards

CO = carbon monoxide

N/A = not applicable

NAAQS = national ambient air quality standards

NO₂ = nitrogen dioxide

O₃ = ozone

PM₁₀ = particulate matter less than 10 microns in diameter

PM_{2.5} = particulate matter less than 2.5 microns in diameter

SCAQMD = South Coast Air Quality Management District

SO₂ = sulfur dioxide

USEPA = United States Environmental Protection Agency

O₃ levels, as measured by peak concentrations and the number of days over the State 1-hour standard, have declined substantially as a result of aggressive programs by SCAQMD and other regional, State, and federal agencies. The reduction of peak concentrations represents progress in improving public health; however, the Basin still exceeds the State standard for 1-hour and 8-hour O₃ levels. The USEPA lowered the 1997 0.80 parts per million (ppm) national 8-hour ozone standard to 0.75 ppm in 2008 and then to 0.70 ppm on October 1, 2015. The Basin is classified as nonattainment for the 1-hour and 8-hour ozone standards at the State and federal level. During the 2020–2022 period, the Anaheim Air Monitoring Station located at 1630 W. Pampas Lane (the closest

monitoring station to the project site) recorded the following exceedances of the State and federal 1-hour and 8-hour O₃ standards²:

- The federal 8-hour ozone standard had 15 exceedances in 2020, no exceedances in 2021, and 1 exceedance in 2022.
- The State 8-hour ozone standard had 16 exceedances in 2020, no exceedances in 2021, and an unknown number of exceedances in 2022.
- The federal 1-hour ozone standard had 2 exceedances in 2020, and no exceedances in 2021 and 2022.
- The State 1-hour ozone standard had 6 exceedances in 2020, no exceedances in 2021, and an unknown number of exceedances in 2022.

National and State standards have also been established for PM_{2.5} over 24-hour and yearly averaging periods. PM_{2.5}, because of the small size of individual particles, can be especially harmful to human health. PM_{2.5} is emitted by common combustion sources such as cars, trucks, buses, and power plants, in addition to ground-disturbing activities. On December 17, 2006, the USEPA strengthened the 24-hour PM_{2.5} NAAQS from 65 micrograms per cubic meter (µg/m³) to 35 µg/m³, and the Basin was subsequently designated “moderate” nonattainment for 2006 24-hour PM_{2.5} NAAQS on December 14, 2009. The Basin is also considered a nonattainment area for the PM_{2.5} standard at the State level. During the 2020–2022 time period, the Anaheim Monitoring Station recorded the following exceedances of the federal 24-hour PM_{2.5} standards. The State 24-hour PM_{2.5} standards had no exceedances in the 3-year period:

- The federal 24-hour PM_{2.5} standard had 12 exceedances in 2020, 10 exceedances in 2021, and an unknown number of exceedances in 2022.

The Basin is classified as a PM₁₀ nonattainment area at the State level and was redesignated from serious nonattainment to attainment of the federal PM₁₀ standard on July 26, 2013. Because the Basin was redesignated from nonattainment to attainment, a PM₁₀ maintenance plan was adopted in 2013 and is required to be updated every 10 years. From 2020 to 2022, the Anaheim Air Monitoring Station recorded the following exceedances of the State 24-hour PM₁₀ standard. The federal 24-hour PM₁₀ standard had no exceedances in the 3-year period:

- The State 24-hour PM₁₀ standard had 5 exceedances in 2020, 1 exceedance in 2021, and no exceedances in 2022.

All areas of the Basin have continued to remain below the federal CO standards (35 ppm 1-hour and 9 ppm 8-hour) since 2003. The USEPA redesignated the Basin to attainment of the federal CO standards, effective June 11, 2017. The Basin is also well below the State CO standards (20 ppm 1-hour CO and 9 ppm 8-hour CO).

² California Air Resources Board (CARB). 2020. iADAM Air Quality Data Statistics. Website: <https://www.arb.ca.gov/adam/topfour/topfour1.php> (accessed April 2023).

Greenhouse Gas Background

GHGs are present in the atmosphere naturally, are released by natural sources, or form from secondary reactions taking place in the atmosphere. Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. Although manmade GHGs include naturally occurring GHGs such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), some gases like hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), nitrogen trifluoride (NF₃), and sulfur hexafluoride (SF₆) are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of each gas is measured relative to CO₂, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO₂ over a specified time period. GHG emissions are typically measured in terms of pounds or tons of “CO₂ equivalents” (CO₂e).

REGULATORY SETTING

This section provides regulatory background information for air quality and GHGs.

Air Quality

Applicable federal, State, regional, and local air quality regulations are discussed below.

Federal Regulations

The 1970 Federal Clean Air Act (CAA) authorized the establishment of national health-based air quality standards and set deadlines for their attainment. The CAA Amendments of 1990 changed deadlines for attaining national standards as well as the remedial actions required for areas of the nation that exceed the standards. Under the CAA, State and local agencies in areas that exceed the national standards are required to develop State Implementation Plans to demonstrate how they will achieve the national standards by specified dates.

State Regulations

In 1988, the California Clean Air Act (CCAA) required that all air districts in the State endeavor to achieve and maintain California Ambient Air Quality Standards (CAAQS) for CO, O₃, SO₂, and NO₂ by the earliest practical date. The CCAA provides districts with the authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from

transportation and area-wide emission sources. Each nonattainment district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

The California Air Resources Board (CARB) is the State's "clean air agency." CARB's goals are to attain and maintain healthy air quality, protect the public from exposure to toxic air contaminants, and oversee compliance with air pollution rules and regulations.

Regional Regulations

The proposed project would be required to comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures, so the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. SCAQMD Rule 1113 limits the volatile organic compound (VOC) content of architectural coatings. Applicable dust suppression techniques from SCAQMD Rule 403 and low VOC content in paints under SCAQMD Rule 1113 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM₁₀ component). Compliance with these rules would reduce impacts on nearby sensitive receptors.

South Coast Air Quality Management District Rule 403 Measures.

- Water active sites at least twice times daily (locations where grading is to occur will be thoroughly watered prior to earthmoving).
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).
- Traffic speeds on all unpaved roads shall be reduced to 15 miles per hour or less.

South Coast Air Quality Management District Rule 1113 Measures. SCAQMD Rule 1113 governs the sale, use, and manufacture of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction and operation of the proposed project. Therefore, all paints and solvents used during construction and operation of the proposed project must comply with SCAQMD Rule 1113.

Local Regulations

City of Anaheim General Plan. The City of Anaheim addresses air quality in the Green Element of the City's General Plan.³ The Green Element includes goals and policies that work to improve air

³ City of Anaheim. 2004. *General Plan, Green Element*. May. Website: Anaheim General Plan - Green Element (accessed April 2023).

quality in Anaheim through local actions and interagency cooperation. The following policies are applicable to the proposed project:

- Regulate construction practices, including grading, dust suppression, chemical management, and encourage pre-determined construction routes that minimize dust and particulate matter pollution.
- Encourage alternative work schedules for public and private sector workers.
- Encourage development of new commercial and industrial projects that provide on-site amenities that help lesson vehicle trips such as on-site day care facilities, cafeterias, automated teller machines and bicycle storage facilities.
- Encourage use of vanpools and carpools by providing priority parking through the project design process.
- Encourage the development of commercial, office, and residential uses in appropriate mixed-use and multiple settings.

Greenhouse Gas Emissions

This section describes regulations related to global climate change at the federal, State, and local levels.

Federal Regulations

The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the USEPA has the authority to regulate CO₂ emissions under the CAA.

Although there currently are no adopted federal regulations for the control or reduction of GHG emissions, the USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change, including the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an endangerment finding action in 2009 under the CAA, finding that seven GHGs (CO₂, CH₄, N₂O, HFCs, NF₃, PFCs, and SF₆) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

State Regulations

CARB is the lead agency for implementing climate change regulations in the State. Since its formation, CARB has worked with the public, the business sector, and local governments to find solutions to California's air pollution problems. Key efforts by the State are described below.

Assembly Bill 32 (2006), California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is Assembly Bill (AB) 32, passed by the State legislature on August 31, 2006. This effort set a GHG emission reduction target to reduce GHG emissions to 1990 levels by 2020. CARB has established the level of GHG emissions in 1990 at 427 million metric tons (MMT) of CO₂e.

The emissions target of 427 MMT requires the reduction of 169 MMT from the State's projected business-as-usual 2020 emissions of 596 MMT. AB 32 requires CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. CARB approved the Scoping Plan on December 11, 2008. It contains the main strategies California will implement to achieve the reduction of approximately 169 MMT of CO₂e, or approximately 30 percent, from the State's projected 2020 emission level of 596 MMT of CO₂e under a business-as-usual scenario (this is a reduction of 42 MMT of CO₂e, or almost 10 percent from 2002–2004 average emissions). The Scoping Plan also includes CARB recommended GHG reductions for each emissions sector of the State's GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards:

- Improved emissions standards for light-duty vehicles (estimated reduction of 31.7 MMT CO₂e);
- The Low-Carbon Fuel Standard (15.0 MMT CO₂e);
- Energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO₂e); and
- A renewable portfolio standard for electricity production (21.3 MMT CO₂e).

The Scoping Plan identifies 18 emission reduction measures that address cap-and-trade programs, vehicle gas standards, energy efficiency, low carbon fuel standards, renewable energy, regional transportation-related GHG targets, vehicle efficiency measures, goods movement, solar roof programs, industrial emissions, high-speed rail, green building strategies, recycling, sustainable forests, water, and air. The measures would result in a total reduction of 174 MMT of CO₂e by 2020.

On August 24, 2011, CARB unanimously approved both the new supplemental assessment and reapproved its Scoping Plan, which provides the overall roadmap and rule measures to carry out AB 32. CARB also approved a more robust California Environmental Quality Act (CEQA) equivalent document supporting the supplemental analysis of the cap-and-trade program. The cap-and-trade took effect on January 1, 2012, with an enforceable compliance obligation that began January 1, 2013.

CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defines CARB's climate change priorities until 2020 and sets the groundwork to reach long-term goals set forth in Executive Orders (EOs) S-3-05 and B-16-2012. The Update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the initial Scoping Plan. It also evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,⁴ to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32.

⁴ CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November.

Senate Bill 375 (2008). Signed into law on October 1, 2008, SB 375 supplements GHG reductions from new vehicle technology and fuel standards with reductions from more efficient land use patterns and improved transportation. Under the law, CARB approved GHG reduction targets in February 2011 for California's 18 federally designated regional planning bodies, known as Metropolitan Planning Organizations (MPOs). CARB may update the targets every 4 years and must update them every 8 years. MPOs, in turn, must demonstrate how their plans, policies and transportation investments meet the targets set by CARB through Sustainable Community Strategies (SCS). The SCSs are included with the Regional Transportation Plan, a report required by State law. However, if an MPO finds that its SCS will not meet the GHG reduction targets, it may prepare an Alternative Planning Strategy. The Alternative Planning Strategy identifies the impediments to achieving the targets.

Executive Order B-30-15 (2015). Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the immediate target of:

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target, and, therefore, is moving forward with the update process. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350 (2015) Clean Energy and Pollution Reduction Act. SB 350, signed by Governor Jerry Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's renewable portfolio standard from 33 percent to 50 percent; and
- Increase energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission (CPUC) for the private utilities and by the California Energy Commission (CEC) for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other nonrenewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32, California Global Warming Solutions Act of 2016, and Assembly Bill 197. In summer 2016 the Legislature passed, and the Governor signed, SB 32 and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 EO B-30-15. SB 32 builds on AB 32 and keeps us on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change (IPCC) analysis of the emissions trajectory that would

stabilize atmospheric GHG concentrations at 450 ppm CO₂e and reduce the likelihood of catastrophic impacts from climate change.

The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 meant to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

Senate Bill 100. On September 10, 2018, Governor Brown signed SB 100, which raises California's renewable portfolio standard requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the Western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18. EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO₂e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Title 24, Building Efficiencies Standards and the California Green Building Standards Code. In November 2008, the California Building Standards Commission established the California Green Building Standards Code (CALGreen Code) (California Code of Regulations, Title 24, Part 11), which sets performance standards for residential and nonresidential development to reduce environmental impacts and to encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2022 to include new mandatory measures for residential and nonresidential uses. These measures took effect on January 1, 2023.

Regional Regulations

Southern California Association of Governments. The Southern California Association of Governments (SCAG) is a regional council consisting of the following six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. In total, the SCAG region encompasses 191 cities and over 38,000 square miles within Southern California. SCAG is the MPO serving the region under federal law and serves as the Joint Powers Authority, the Regional Transportation Planning Agency, and the Council of Governments under State law. As the Regional Transportation Planning Agency, SCAG prepares long-range transportation plans for the Southern California region, including the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2008 Regional Comprehensive Plan (RCP).

On September 3, 2020, SCAG adopted Connect SoCal—The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS).⁵ In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled (VMT) from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, CARB has set GHG reduction targets at 8 percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. The RTP/SCS lays out a strategy for the region to meet these targets. Overall, the SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. Land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable corridors, and creating neighborhood mobility areas to integrate land use and transportation and plan for more active lifestyles.⁶ However, the SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the SCS; instead, it provides incentives to governments and developers for consistency.

South Coast Air Quality Management District. In 2008, the South Coast Air Quality Management District (SCAQMD) formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin. The Working Group developed several different options that are contained in the SCAQMD 2008 draft guidance document titled *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* (2008) that could be applied by lead agencies. On September 28, 2010, SCAQMD Working Group Meeting No.15 provided further guidance, including a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. SCAQMD has not presented a finalized version of these thresholds to the governing board.

SCAQMD identifies the emissions level for which a project would not be expected to substantially conflict with any State legislation adopted to reduce statewide GHG emissions. As such, the utilization of a service population represents the rates of emissions needed to achieve a fair share of the State's mandated emissions reductions. Overall, SCAQMD identifies a GHG efficiency level that, when applied statewide or to a defined geographic area, would meet the 2020 and post-2020 emission targets as required by AB 32 and SB 32. If projects are able to achieve targeted rates of emissions per the service population, the State would be able to accommodate expected population growth and achieve economic development objectives while also abiding by AB 32's emissions target and future post-2020 targets. The SCAQMD has established a flow chart for evaluating GHG significance and indicates that when a project is exempt from CEQA, no further analysis is required.

Local Regulations

City of Anaheim General Plan The City of Anaheim addresses GHGs in the Green Element of its General Plan.⁷ The Green Element includes goals and policies that work to reduce GHG emissions

⁵ Southern California Association of Governments (SCAG). 2020. Connect SoCal: The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176 (accessed April 2023).

⁶ Ibid.

⁷ City of Anaheim. 2004. op cit.

from Anaheim to levels consistent with State goals. The following policies are applicable to the proposed project:

- Encourage designs that incorporate solar and wind exposure features such as daylight design, natural ventilation, space planning, and thermal massing.

METHODOLOGY

Construction Emissions

Construction activities can generate a substantial amount of air pollution. Construction activities are considered temporary; however, short-term impacts can contribute to exceedances of air quality standards. Construction activities include demolition, site preparation, earthmoving, and general construction. The emissions generated from these common construction activities include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty, diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips.

The California Emissions Estimator Model version 2022.1.12 (CalEEMod) computer program was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site. Construction of the proposed project would begin in September 2024 and would occur for approximately 12 months. This analysis assumes the use of Tier 2 construction equipment and that the proposed project would comply with SCAQMD Rule 403 measures. Grading and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment. Based on the preliminary grading plans, the proposed project would require the import of approximately 330 cubic yards of soil. All other construction details are not yet known; therefore, default assumptions (e.g., construction worker and truck trips and fleet activities) from CalEEMod were used.

Operational Emissions

This air quality analysis includes estimating emissions associated with long-term operation of the project. Indirect emissions of criteria pollutants with regional impacts would be emitted by project-generated vehicle trips. In addition, localized air quality impacts (i.e., higher CO concentrations or “hot-spots”) near intersections or roadway segments in the project vicinity would also potentially occur due to project-generated vehicle trips.

Consistent with SCAQMD guidance for estimating emissions associated with land use development projects, the CalEEMod computer program was used to calculate the long-term operational emissions associated with the project. As previously discussed in the Project Location and Description section, the proposed project would add a 52,661 sq ft extra space storage building.⁸ This analysis assumes that the proposed project would dedicate approximately 15 percent of the project site area to landscaping per the City’s Municipal Code Chapter 18.46. Therefore, the proposed project analysis was conducted using land use codes *Unrefrigerated Warehouse No Rail*

⁸ The CalEEMod analysis evaluated a 52,871 sq ft building and 32 parking spaces. The proposed project has since been modified to include a 52,661 sq ft building and 21 parking spaces. Given this minimal decrease to the project size and parking lot, this modification would not result in any more severe air quality or GHG emissions than what is described within.

and *Parking Lot*. Trip generation rates used in CalEEMod for the project were based on the project's trip generation analysis, which identifies that the proposed project would generate approximately 77 ADT. In addition, consistent with the project design plans, this CalEEMod analysis incorporates selections to reflect no natural gas. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions.

Greenhouse Gas Emissions

GHG emissions associated with the project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term GHG emissions associated with project-related vehicular trips. Recognizing that the field of global climate change analysis is rapidly evolving, the approaches advocated most recently indicate that, for determining a project's contribution to GHG emissions, lead agencies should calculate, or estimate, emissions from vehicular traffic, energy consumption, water conveyance and treatment, waste generation, construction activities, and any other significant source of emissions within the project area. The CalEEMod results were used to quantify GHG emissions generated by the project.

THRESHOLDS OF SIGNIFICANCE

This section describes the thresholds of significance for Air Quality and GHG impacts.

Air Quality

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse air quality impact if project-generated pollutant emissions would do any of the following:

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

Certain air districts (e.g., SCAQMD) have created guidelines and requirements to conduct air quality analysis. The SCAQMD's current guidelines, the *CEQA Air Quality Handbook*⁹ with associated updates, were followed in this assessment of air quality impacts for the proposed project.

Regional Emissions Thresholds

SCAQMD has established daily emission thresholds for construction and operation of proposed projects in the Basin. The emission thresholds were established based on the attainment status of the Basin with regard to air quality standards for specific criteria pollutants. Because the

⁹ South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Website: [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)) (accessed April 2023).

concentration standards were set at a level that protects public health with an adequate margin of safety, these emission thresholds are regarded as conservative and would overstate an individual project's contribution to health risks. Table B lists the CEQA significance thresholds for construction and operational emissions established for the Basin.

Table B: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO _x	CO	PM ₁₀	PM _{2.5}	SO _x
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: SCAQMD Air Quality Significance Thresholds, April 2019. Website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2> (accessed April 2023).

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOCs = volatile organic compound

Projects in the Basin with construction- or operation-related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which the SCAQMD developed and that apply throughout the Basin, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and cumulative impact.

Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the Basin, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 ppm; and
- California State 8-hour CO standard of 9 ppm.

Localized Impacts Analysis

SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.¹⁰ This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance to the project. Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality.

LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For the proposed project, the

¹⁰ SCAQMD. 2008. *Final Localized Significance Threshold Methodology*. July.

appropriate SRA for the LST is the Central Orange County area (SRA 17). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. As identified above, the closest sensitive receptors to the project site include the single-family homes located immediately adjacent to the project site to the north and east. An LST analysis was completed to show the construction and operational impacts at a distance of 25 meters (30 feet) to the nearest sensitive receptors. Based on the anticipated construction equipment, it is assumed that the maximum daily disturbed acreage for the proposed project would be 3.5 acres or less. Table C lists the emissions thresholds that apply during project construction and operation.

Table C: SCAQMD Localized Significance Thresholds

Emissions Source	Pollutant Emissions Threshold (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Construction (3.5-acres, 25-meter distance)	149.0	948.0	9.5	5.5
Operations (3.5-acres, 25-meter distance)	149.0	984.0	2.5	1.5

Source: Final Localized Significance Threshold Methodology (SCAQMD, July 2008).

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns in size

PM_{2.5} = particulate matter less than 2.5 microns in size

SCAQMD = South Coast Air Quality Management District

Greenhouse Gas Emissions

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse GHG emissions impact if the project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reduction the emissions of greenhouse gases.

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD has convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting held in September 2010 (Meeting No. 15), SCAQMD proposed to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1. Exemptions:** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.
- **Tier 2. Consistency with a Locally Adopted GHG Reduction Plan:** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.
- **Tier 3. Numerical Screening Threshold:** If GHG emissions are less than the numerical screening-level threshold, project-level and cumulative GHG emissions are less than significant.

- **Tier 4. Performance Standards:** If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. The SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per-capita efficiency targets. The SCAQMD is not recommending use of a percentage emissions reduction target. Instead, the SCAQMD proposes a 2020 efficiency target of 4.8 MT CO₂e per year per service population for project-level analyses and 6.6 MT CO₂e per year per service population for plan-level projects (e.g., program-level projects such as General Plans).

For the purpose of this analysis, the proposed project will be compared to the screening-level Tier 3 Numerical Screening Threshold of 3,000 MT CO₂e per year. The project is also evaluated for compliance with the 2022 Scoping Plan and the 2020–2045 RTP/SCS.

IMPACT ANALYSIS

This section identifies potential air quality and GHG impacts associated with implementation of the proposed project.

Air Quality Impacts

Air pollutant emissions associated with the project would occur over the short term from construction activities and over the long term from project-related vehicular trips and due to energy consumption (e.g., electricity and natural gas usage) by the proposed land uses.

Consistency with Applicable Air Quality Plans

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategy being based on projections from local General Plans.

The proposed project would consist of a total 111,827 sq ft extra space storage building, including the existing 58,956 sq ft that would remain and the additional 52,661 sq ft self-storage building that would be constructed on site. The proposed project is not considered a project of statewide, regional, or area-wide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential development of more than 500 dwelling units, shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 sq ft of floor space) as defined in the California Code of Regulations (Title 14, Division 6, Chapter 3, Article 13, §15206(b)). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet the SCAG Intergovernmental Review criteria.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD Air Quality Management Plan (AQMP). Pursuant to the methodology provided in the SCAQMD's *CEQA Air Quality Handbook*, consistency with the Basin 2022 AQMP is affirmed when a project (1) would not increase the frequency or severity of an air quality standards violation or cause

a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated below; therefore, the project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.
2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as significant. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning, and would be consistent with the City's General Plan and Zoning Ordinance.

Based on the consistency analysis presented above, the proposed project would be consistent with the regional AQMP.

Criteria Pollutant Analysis

The South Coast Air Basin is currently designated as nonattainment for the federal and State standards for O₃ and PM_{2.5}. In addition, the Basin is in nonattainment for the PM₁₀ standard. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of an ambient air quality standard. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, SCAQMD considered the emissions levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by demolition, grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include CO, nitrogen oxides (NO_x), VOCs, directly emitted PM_{2.5} or PM₁₀, and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include demolition, grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM₁₀ emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM₁₀ emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emissions reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

In addition to dust-related PM₁₀ emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_x), NO_x, VOCs, and some soot particulate (PM_{2.5} and PM₁₀) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod and summarized in Table D. Attachment A provides CalEEMod output sheets.

Table D: Short-Term Regional Construction Emissions

Construction Phase	Maximum Daily Regional Pollutant Emissions (lbs/day)							
	VOCs	NO _x	CO	SO _x	Exhaust PM ₁₀	Fugitive PM ₁₀	Exhaust PM _{2.5}	Fugitive PM _{2.5}
Demolition	2.3	35.6	32.2	<0.1	1.3	0.7	1.2	0.1
Site Preparation	1.9	29.4	25.7	<0.1	1.1	5.1	1.0	2.4
Grading	2.3	35.2	30.9	<0.1	1.3	5.9	1.2	2.8
Building Construction	1.7	23.2	21.9	<0.1	0.9	0.4	0.9	0.1
Paving	1.1	13.1	14.4	<0.1	0.1	0.3	0.5	0.1
Architectural Coating	4.5	2.0	2.4	<0.1	0.6	0.1	0.1	<0.1
Peak Daily Emissions	6.2	35.6	32.2	0.1	7.2		4.0	
SCAQMD Threshold	75.0	100.0	550.0	150.0	150.0		55.0	
Significant?	No	No	No	No	No		No	

Source: Compiled by LSA (May 2023).

Note = Some values may not appear to add correctly due to rounding. Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases.

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOCs = volatile organic compounds

As shown in Table D, construction emissions associated with the project would not exceed the daily SCAQMD thresholds for VOCs, NO_x, CO, sulfur oxides (SO_x), PM_{2.5}, or PM₁₀ emissions. Therefore, construction of the proposed project would not result in emissions that would result in a cumulatively considerable net increase of any criteria pollutant for which the project is in nonattainment under an applicable federal or State ambient air quality standards.

Operational Air Quality Impacts. Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result from activities in buildings that use natural gas. Mobile-source emissions are from vehicle trips associated with operation of the project. Area-source emissions consist of direct sources of air emissions at the project site, including architectural coatings, consumer products, and use of landscape maintenance equipment.

PM₁₀ emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM₁₀ occurs when vehicle tires pulverize small rocks and pavement, and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other particulate matter emissions processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Energy-source emissions result from activities in buildings that use natural gas. As identified above, the proposed project would not include natural gas; therefore, the proposed project would not result in energy source emissions.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. Table E provides the estimated existing emission estimates and the proposed project's estimated operational emissions. Attachment A provides CalEEMod output sheets.

Table E: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile Sources	0.3	0.2	2.0	<0.1	0.2	<0.1
Area Sources	1.3	<0.1	0.0	<0.1	0.0	0.0
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	1.5	0.2	2.0	<0.1	0.2	<0.1
SCAQMD Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	No	No	No	No	No	No

Source: Compiled by LSA (May 2023).

Notes: Some values may not appear to add correctly due to rounding. Actual net new mobile source emissions would be less than estimated because the project would have 45 net new vehicle trips when compared to the existing uses.

CO = carbon monoxide

PM₁₀ = particulate matter less than 10 microns in size

lbs/day = pounds per day

SCAQMD = South Coast Air Quality Management District

NO_x = nitrogen oxides

SO_x = sulfur oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

VOCs = volatile organic compounds

The results shown in Table E indicate the proposed project would not exceed the significance criteria for daily VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the proposed project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions.

CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Anaheim Air Monitoring Station located at 1630 W. Pampas Lane (the closest station to the project site), showed a highest recorded 1-hour concentration of 2.4 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 1.7 ppm (the State standard is 9 ppm) from 2020 to 2022. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.

The proposed project is expected to generate 77 ADT, with 5 trips occurring in the AM peak hour and 8 trips occurring in the PM peak hour. As the proposed project would not generate 100 or more AM or PM peak hour trips, the proposed project did not meet the criteria for an evaluation of study area intersection or roadway segment level of service. Therefore, given the extremely low level of CO concentrations in the project area and the lack of traffic impacts at any intersections, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot spots would occur, and the project would not result in any project-related impacts on CO concentrations.

Health Risk on Nearby Sensitive Receptors

Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units. As discussed above, the closest sensitive receptors to the project site include the single-family homes located immediately adjacent to the project site to the north and east. LST analysis was completed to show the construction and operational impacts at 25 meters (82 feet) to the nearest sensitive receptors to the project site in SRA 17, based on a 5-acre daily disturbance area and a 3.5-acre project site. Tables F and G show the results of the LST analysis during project construction and operation, respectively.

Table F: Project Localized Construction Emissions

Source	Pollutant Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site Emissions	35.2	30.6	6.8	3.9
Localized Significance Threshold	149.0	984.0	9.5	5.5
Significant?	No	No	No	No

Source: Compiled by LSA (May 2023).

Note: Source Receptor Area 17, based on a 3.5-acre construction disturbance daily area, at a distance of 82 feet from the project boundary.

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

Table G: Project Localized Operational Emissions

Source	Pollutant Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site Emissions	<0.1	0.1	<0.1	<0.1
Localized Significance Thresholds	149.0	984.0	2.5	1.5
Significant?	No	No	No	No

Source: Compiled by LSA (May 2023).

Note: Source Receptor Area 17, based on a 3.5-acre operational daily area, at a distance of 82 feet from the project boundary.

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario

assessment, the emissions detailed in Table G assume all area and energy source emissions would occur on site and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is conservative. Table G indicates the localized operational emissions would not exceed the LSTs at nearby residences. Therefore, the proposed operational activity would not result in a locally significant air quality impact.

As detailed in Tables F and G, the emission levels indicate that the project would not exceed SCAQMD LSTs during project construction or operation. The project's peak operational on-site NO_x emissions are less than 0.1 pounds per day (lbs/day). Due to the small size of the proposed project in relation to the overall Basin, the level of emissions is not sufficiently high to use a regional modeling program to correlate health effects on a Basin-wide level. On a regional scale, the quantity of emissions from the project is incrementally minor. Because the SCAQMD has not identified any other methods to quantify health impacts from small projects and due to the size of the project, it is speculative to assign any specific health effects to small project-related emissions. However, based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the project would not expose sensitive receptors to substantial levels of pollutant concentrations.

Odors

Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease after individual construction is completed. No other sources of objectionable odors have been identified for the proposed project.

SCAQMD Rule 402 regarding nuisances states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The proposed uses are not anticipated to emit any objectionable odors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Greenhouse Gas Emission Impacts

The following sections describe the proposed project's construction- and operation-related GHG impacts and consistency with applicable GHG reduction plans.

Generation of Greenhouse Gas Emissions

This section describes the proposed project's construction- and operational-related GHG emissions and contribution to global climate change. SCAQMD has not addressed emissions thresholds for construction in its *CEQA Air Quality Handbook*; however, SCAQMD requires quantification and disclosure. Thus, this section discusses construction emissions.

Construction Greenhouse Gas Emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. Construction would emit GHGs through the operation of construction equipment and from worker and builder supply vendor

vehicles for the duration of the approximately 12-month construction period. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, the fueling of heavy equipment emits CH₄. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

As indicated above, SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD then requires the construction GHG emissions to be amortized over the life of the project, defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier.

Based on CalEEMod, it is estimated that the project would generate 542.0 MT CO₂e during construction of the project. When amortized over the 30-year life of the project, annual emissions would be 18.1 MT CO₂e.

Operational Greenhouse Gas Emissions. Long-term operation of the proposed project would generate GHG emissions from area, mobile, waste, and water sources as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips associated with trips to the proposed project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site and other sources. Waste source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

GHG emissions were estimated using CalEEMod. Table H shows the estimated operational GHG emissions for the proposed project.

Table H: Greenhouse Gas Emissions

Emission Type	Operational Emissions (metric tons per year)				
	CO ₂	CH ₄	N ₂ O	CO ₂ e	Percentage of Total
Mobile Sources	83.0	<0.1	<0.1	84.3	29
Area Source	<0.1	<0.1	<0.1	<0.1	<1
Energy Source	130.0	<0.1	<0.1	131.0	46
Water Source	42.9	0.4	<0.1	55.7	20
Waste Source	4.4	0.4	0.0	15.3	5
Total Operational Emissions				286.3	100.0
Amortized Construction Emissions				18.1	—
Total Annual Emissions				304.4	—
SCAQMD Tier 3 GHG Numerical Screening Threshold				3,000.0	
Exceedance?				No	

Source: LSA (May 2023).

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

GHG = greenhouse gas

N₂O = nitrous oxide

SCAQMD = South Coast Air Quality Management District

As shown in Table H, energy emissions are the largest source of GHG emissions for the project at approximately 46 percent of the project total. Mobile sources are the next largest category at

approximately 29 percent. Water and waste sources are about 20 percent and 5 percent of the total emissions, respectively.

As discussed above, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than the scaled SCAQMD threshold of 3,000 MT CO₂e per year. Based on the analysis results, the proposed project would result in approximately 304.4 CO₂e per year over the existing conditions. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment.

Consistency with Greenhouse Gas Reduction Plans

An evaluation of the proposed project's consistency with the 2022 Scoping Plan and the 2020–2045 RTP/SCS is provided below.

2022 Scoping Plan. The following discussion evaluates the proposed project according to the goals of the 2022 Scoping Plan, EO B-30-15, SB 32, and AB 197.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,¹¹ to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps us on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have

¹¹ CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November.

transitioned to zero-emission as fully as possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As discussed above, the proposed project would comply with the CALGreen Code, regarding energy conservation and green building standards. In addition, the proposed project would be all-electric, and no natural gas demand is anticipated during construction or operation of the proposed project. The elimination of natural gas in new development would help projects implement their "fair share" of achieving long-term 2045 carbon neutrality consistent with State goals. As such, if a project does not utilize natural gas, a lead agency can conclude that it would be consistent with achieving the 2045 neutrality goal and would not have a cumulatively considerable impact on climate change.¹² Therefore, the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would comply with the CALGreen Code, which includes a variety of different measures, including the reduction of wastewater and water use. In addition, the proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle emissions for all vehicles by 2020. Vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy. SCAG's 2020–2045 RTP/SCS was adopted on September 3, 2020. SCAG's RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high-quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2020–2045 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway

¹² Bay Area Air Quality Management District (BAAQMD). 2022. *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*. April. Website: <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-thresholds-2022/justification-report-pdf.pdf?la=en> (accessed May 2023).

users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a forecasted development pattern that is generally consistent with regional-level General Plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 8 percent per capita by 2020 and 19 percent by 2035 (compared to 2005 levels). The 2020–2045 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2020–2045 RTP/SCS but provides incentives for consistency for governments and developers.

Implementing SCAG’s RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emission reduction targets. The proposed project would not conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG’s ability to achieve the region’s GHG reduction targets at 8 percent below 2005 per capita emissions levels by 2020 and 19 percent below 2005 per capita emissions levels by 2035, and it can be assumed that regional mobile emissions will decrease in line with the goals of the RTP/SCS. Furthermore, the proposed project is not regionally significant per *State CEQA Guidelines* Section 15206, and, as such, it would not conflict with the SCAG RTP/SCS targets as those targets were established and are applicable on a regional level.

The proposed project would consist of a total 111,827 sq ft extra space storage building, including the existing 58,956 sq ft that would remain and the additional 52,661 sq ft self-storage building that would be constructed on site. Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG’s ability to implement the regional strategies outlined in the RTP/SCS. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

CONCLUSION

Based on the analysis presented above, construction and operation of the proposed project would not result in the generation of criteria air pollutants that would exceed SCAQMD thresholds of significance. Compliance with SCAQMD Rule 403: Fugitive Dust would further reduce construction dust impacts. The proposed project is not expected to produce significant emissions that would affect nearby sensitive receptors. The project would also be consistent with the 2022 AQMP. The project would also not result in objectionable odors affecting a substantial number of people. GHG emissions released during construction and operation of the project are estimated to be minimal and would not be cumulatively considerable. The proposed project would generally be consistent with both the CARB Scoping Plan and the SCAG RTP/SCS.

Attachment A: CalEEMod Output Files

ATTACHMENT A

CALEEMOD OUTPUT FILES

Extra Space Anaheim Storage Project Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Extra Space Anaheim Storage Project
Construction Start Date	9/2/2024
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	1.80
Precipitation (days)	18.2
Location	1761 W Katella Ave, Anaheim, CA 92804, USA
County	Orange
City	Anaheim
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5898
EDFZ	7
Electric Utility	City of Anaheim Public Utilities Department
Gas Utility	Southern California Gas
App Version	2022.1.1.12

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Unrefrigerated Warehouse-No Rail	52.0	1000sqft	1.19	52,871	0.00	12,611	—	—
Parking Lot	32.0	Space	0.74	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.16	35.6	32.2	0.05	1.34	5.08	6.17	1.23	2.39	3.39	5,596	0.23	0.10	5,632
Mit.	6.16	35.6	32.2	0.05	1.34	5.08	6.17	1.23	2.39	3.39	5,596	0.23	0.10	5,632
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.29	35.2	30.9	0.05	1.30	5.86	7.16	1.20	2.75	3.95	5,463	0.23	0.10	5,498
Mit.	2.29	35.2	30.9	0.05	1.30	5.86	7.16	1.20	2.75	3.95	5,463	0.23	0.10	5,498
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.25	12.0	11.7	0.02	0.47	0.44	0.69	0.44	0.19	0.49	2,184	0.09	0.04	2,198
Mit.	2.25	12.0	11.7	0.02	0.47	0.44	0.69	0.44	0.19	0.49	2,184	0.09	0.04	2,198

% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.41	2.19	2.13	< 0.005	0.09	0.08	0.13	0.08	0.03	0.09	362	0.01	0.01	364
Mit.	0.41	2.19	2.13	< 0.005	0.09	0.08	0.13	0.08	0.03	0.09	362	0.01	0.01	364
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.31	35.6	32.2	0.05	1.34	5.08	6.17	1.23	2.39	3.39	5,596	0.23	0.10	5,632
2025	6.16	24.7	24.2	0.04	0.98	0.42	1.40	0.90	0.10	1.00	4,499	0.18	0.08	4,531
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.29	35.2	30.9	0.05	1.30	5.86	7.16	1.20	2.75	3.95	5,463	0.23	0.10	5,498
2025	1.63	22.7	21.7	0.04	0.88	0.36	1.25	0.81	0.09	0.90	4,159	0.17	0.08	4,187
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.44	6.42	5.87	0.01	0.25	0.44	0.69	0.23	0.19	0.42	1,068	0.04	0.02	1,075
2025	2.25	12.0	11.7	0.02	0.47	0.20	0.67	0.44	0.05	0.49	2,184	0.09	0.04	2,198
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.08	1.17	1.07	< 0.005	0.05	0.08	0.13	0.04	0.03	0.08	177	0.01	< 0.005	178
2025	0.41	2.19	2.13	< 0.005	0.09	0.04	0.12	0.08	0.01	0.09	362	0.01	0.01	364

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.31	35.6	32.2	0.05	1.34	5.08	6.17	1.23	2.39	3.39	5,596	0.23	0.10	5,632
2025	6.16	24.7	24.2	0.04	0.98	0.42	1.40	0.90	0.10	1.00	4,499	0.18	0.08	4,531
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.29	35.2	30.9	0.05	1.30	5.86	7.16	1.20	2.75	3.95	5,463	0.23	0.10	5,498
2025	1.63	22.7	21.7	0.04	0.88	0.36	1.25	0.81	0.09	0.90	4,159	0.17	0.08	4,187
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.44	6.42	5.87	0.01	0.25	0.44	0.69	0.23	0.19	0.42	1,068	0.04	0.02	1,075
2025	2.25	12.0	11.7	0.02	0.47	0.20	0.67	0.44	0.05	0.49	2,184	0.09	0.04	2,198
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.08	1.17	1.07	< 0.005	0.05	0.08	0.13	0.04	0.03	0.08	177	0.01	< 0.005	178
2025	0.41	2.19	2.13	< 0.005	0.09	0.04	0.12	0.08	0.01	0.09	362	0.01	0.01	364

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.52	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,585	5.11	0.09	1,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.52	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,565	5.11	0.09	1,720

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.52	0.20	1.94	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,571	5.11	0.09	1,726
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.28	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	260	0.85	0.01	286

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.25	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	516	0.02	0.02	524
Area	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	784	0.07	0.01	788
Water	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Waste	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Total	1.52	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,585	5.11	0.09	1,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.25	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	496	0.02	0.02	503
Area	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	784	0.07	0.01	788
Water	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Waste	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Total	1.52	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,565	5.11	0.09	1,720
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	0.24	0.20	1.94	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	501	0.02	0.02	509
Area	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	784	0.07	0.01	788
Water	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Waste	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Total	1.52	0.20	1.94	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,571	5.11	0.09	1,726
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.04	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	83.0	< 0.005	< 0.005	84.3
Area	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	130	0.01	< 0.005	131
Water	—	—	—	—	—	—	—	—	—	—	42.9	0.39	0.01	55.7
Waste	—	—	—	—	—	—	—	—	—	—	4.36	0.44	0.00	15.3
Total	0.28	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	260	0.85	0.01	286

2.6. Operations Emissions by Sector, Mitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.25	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	516	0.02	0.02	524
Area	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	784	0.07	0.01	788
Water	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Waste	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Total	1.52	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,585	5.11	0.09	1,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	0.25	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	496	0.02	0.02	503
Area	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	784	0.07	0.01	788
Water	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Waste	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Total	1.52	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,565	5.11	0.09	1,720
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.24	0.20	1.94	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	501	0.02	0.02	509
Area	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	784	0.07	0.01	788
Water	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Waste	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Total	1.52	0.20	1.94	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	1,571	5.11	0.09	1,726
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.04	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	83.0	< 0.005	< 0.005	84.3
Area	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	130	0.01	< 0.005	131
Water	—	—	—	—	—	—	—	—	—	—	42.9	0.39	0.01	55.7
Waste	—	—	—	—	—	—	—	—	—	—	4.36	0.44	0.00	15.3
Total	0.28	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	260	0.85	0.01	286

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
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Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.22	35.2	30.6	0.05	1.34	—	1.34	1.23	—	1.23	4,987	0.20	0.04	5,004
Demolition	—	—	—	—	—	0.32	0.32	—	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.96	0.84	< 0.005	0.04	—	0.04	0.03	—	0.03	137	0.01	< 0.005	137
Demolition	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.18	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	22.6	< 0.005	< 0.005	22.7
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.10	1.50	0.00	0.00	0.33	0.33	0.00	0.08	0.08	339	< 0.005	0.01	344
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
Hauling	0.01	0.33	0.15	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	270	0.02	0.04	284
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	8.95	< 0.005	< 0.005	9.07
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
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	7.39	< 0.005	< 0.005	7.76
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.48	< 0.005	< 0.005	1.50
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
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.22	< 0.005	< 0.005	1.28

3.2. Demolition (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.22	35.2	30.6	0.05	1.34	—	1.34	1.23	—	1.23	4,987	0.20	0.04	5,004
Demolition	—	—	—	—	—	0.32	0.32	—	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.96	0.84	< 0.005	0.04	—	0.04	0.03	—	0.03	137	0.01	< 0.005	137
Demolition	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.18	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	22.6	< 0.005	< 0.005	22.7
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.10	1.50	0.00	0.00	0.33	0.33	0.00	0.08	0.08	339	< 0.005	0.01	344
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
Hauling	0.01	0.33	0.15	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	270	0.02	0.04	284
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	8.95	< 0.005	< 0.005	9.07
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
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	7.39	< 0.005	< 0.005	7.76
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.48	< 0.005	< 0.005	1.50
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
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.22	< 0.005	< 0.005	1.28

3.3. Site Preparation (2024) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.89	29.3	24.8	0.04	1.09	—	1.09	1.00	—	1.00	4,127	0.17	0.03	4,141
Dust From Material Movement	—	—	—	—	—	4.89	4.89	—	2.34	2.34	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.89	29.3	24.8	0.04	1.09	—	1.09	1.00	—	1.00	4,127	0.17	0.03	4,141
Dust From Material Movement	—	—	—	—	—	4.89	4.89	—	2.34	2.34	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	1.20	1.02	< 0.005	0.04	—	0.04	0.04	—	0.04	170	0.01	< 0.005	170
Dust From Material Movement	—	—	—	—	—	0.20	0.20	—	0.10	0.10	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.22	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	28.1	< 0.005	< 0.005	28.2
Dust From Material Movement	—	—	—	—	—	0.04	0.04	—	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.90	0.00	0.00	0.20	0.20	0.00	0.05	0.05	203	< 0.005	0.01	206
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.78	0.00	0.00	0.20	0.20	0.00	0.05	0.05	193	< 0.005	0.01	196
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	8.06	< 0.005	< 0.005	8.17
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.33	< 0.005	< 0.005	1.35
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
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

3.4. Site Preparation (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.89	29.3	24.8	0.04	1.09	—	1.09	1.00	—	1.00	4,127	0.17	0.03	4,141
Dust From Material Movement	—	—	—	—	—	4.89	4.89	—	2.34	2.34	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.89	29.3	24.8	0.04	1.09	—	1.09	1.00	—	1.00	4,127	0.17	0.03	4,141
Dust From Material Movement	—	—	—	—	—	4.89	4.89	—	2.34	2.34	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	1.20	1.02	< 0.005	0.04	—	0.04	0.04	—	0.04	170	0.01	< 0.005	170
Dust From Material Movement	—	—	—	—	—	0.20	0.20	—	0.10	0.10	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.22	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	28.1	< 0.005	< 0.005	28.2
Dust From Material Movement	—	—	—	—	—	0.04	0.04	—	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.06	0.06	0.90	0.00	0.00	0.20	0.20	0.00	0.05	0.05	203	< 0.005	0.01	206
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.78	0.00	0.00	0.20	0.20	0.00	0.05	0.05	193	< 0.005	0.01	196
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	8.06	< 0.005	< 0.005	8.17
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.33	< 0.005	< 0.005	1.35
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
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

3.5. Grading (2024) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	2.21	34.7	29.7	0.05	1.30	—	1.30	1.19	—	1.19	4,907	0.20	0.04	4,924
Dust From Material Movement	—	—	—	—	—	5.52	5.52	—	2.67	2.67	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.95	0.81	< 0.005	0.04	—	0.04	0.03	—	0.03	134	0.01	< 0.005	135
Dust From Material Movement	—	—	—	—	—	0.15	0.15	—	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.17	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	22.3	< 0.005	< 0.005	22.3
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	1.04	0.00	0.00	0.26	0.26	0.00	0.06	0.06	258	< 0.005	0.01	261
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
Hauling	0.01	0.38	0.16	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	298	0.02	0.05	313
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	7.16	< 0.005	< 0.005	7.26
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
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	8.17	< 0.005	< 0.005	8.58
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.19	< 0.005	< 0.005	1.20
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
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.35	< 0.005	< 0.005	1.42

3.6. Grading (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.21	34.7	29.7	0.05	1.30	—	1.30	1.19	—	1.19	4,907	0.20	0.04	4,924
Dust From Material Movement	—	—	—	—	—	5.52	5.52	—	2.67	2.67	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.95	0.81	< 0.005	0.04	—	0.04	0.03	—	0.03	134	0.01	< 0.005	135
Dust From Material Movement	—	—	—	—	—	0.15	0.15	—	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.17	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	22.3	< 0.005	< 0.005	22.3
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	1.04	0.00	0.00	0.26	0.26	0.00	0.06	0.06	258	< 0.005	0.01	261
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
Hauling	0.01	0.38	0.16	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	298	0.02	0.05	313
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	7.16	< 0.005	< 0.005	7.26
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
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	8.17	< 0.005	< 0.005	8.58
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.19	< 0.005	< 0.005	1.20
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
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.35	< 0.005	< 0.005	1.42

3.7. Building Construction (2024) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.61	22.8	20.6	0.04	0.92	—	0.92	0.85	—	0.85	3,602	0.15	0.03	3,615
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	3.22	2.90	0.01	0.13	—	0.13	0.12	—	0.12	508	0.02	< 0.005	509
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.59	0.53	< 0.005	0.02	—	0.02	0.02	—	0.02	84.0	< 0.005	< 0.005	84.3
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.10	1.15	0.00	0.00	0.29	0.29	0.00	0.07	0.07	286	< 0.005	0.01	290
Vendor	0.01	0.31	0.15	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	281	0.02	0.04	293
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.17	0.00	0.00	0.04	0.04	0.00	0.01	0.01	40.9	< 0.005	< 0.005	41.5
Vendor	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	39.6	< 0.005	0.01	41.3
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	6.77	< 0.005	< 0.005	6.86
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	6.55	< 0.005	< 0.005	6.83
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

3.8. Building Construction (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.61	22.8	20.6	0.04	0.92	—	0.92	0.85	—	0.85	3,602	0.15	0.03	3,615
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	3.22	2.90	0.01	0.13	—	0.13	0.12	—	0.12	508	0.02	< 0.005	509
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.59	0.53	< 0.005	0.02	—	0.02	0.02	—	0.02	84.0	< 0.005	< 0.005	84.3
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

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.10	1.15	0.00	0.00	0.29	0.29	0.00	0.07	0.07	286	< 0.005	0.01	290
Vendor	0.01	0.31	0.15	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	281	0.02	0.04	293
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.17	0.00	0.00	0.04	0.04	0.00	0.01	0.01	40.9	< 0.005	< 0.005	41.5
Vendor	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	39.6	< 0.005	0.01	41.3
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	6.77	< 0.005	< 0.005	6.86
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	6.55	< 0.005	< 0.005	6.83
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

3.9. Building Construction (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.54	22.3	20.5	0.04	0.88	—	0.88	0.81	—	0.81	3,602	0.15	0.03	3,615
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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.54	22.3	20.5	0.04	0.88	—	0.88	0.81	—	0.81	3,602	0.15	0.03	3,615
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.75	10.8	9.95	0.02	0.43	—	0.43	0.39	—	0.39	1,748	0.07	0.01	1,754
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	1.98	1.82	< 0.005	0.08	—	0.08	0.07	—	0.07	289	0.01	< 0.005	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	1.24	0.00	0.00	0.29	0.29	0.00	0.07	0.07	295	< 0.005	0.01	299
Vendor	0.01	0.29	0.14	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	276	0.02	0.04	289
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.09	1.08	0.00	0.00	0.29	0.29	0.00	0.07	0.07	281	< 0.005	0.01	284
Vendor	0.01	0.30	0.15	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	276	0.02	0.04	288
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.55	0.00	0.00	0.14	0.14	0.00	0.03	0.03	138	< 0.005	0.01	140
Vendor	< 0.005	0.15	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	134	0.01	0.02	140

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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.03	0.03	0.00	0.01	0.01	22.8	< 0.005	< 0.005	23.1
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	22.2	< 0.005	< 0.005	23.2
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

3.10. Building Construction (2025) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.54	22.3	20.5	0.04	0.88	—	0.88	0.81	—	0.81	3,602	0.15	0.03	3,615
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.54	22.3	20.5	0.04	0.88	—	0.88	0.81	—	0.81	3,602	0.15	0.03	3,615
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.75	10.8	9.95	0.02	0.43	—	0.43	0.39	—	0.39	1,748	0.07	0.01	1,754
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	1.98	1.82	< 0.005	0.08	—	0.08	0.07	—	0.07	289	0.01	< 0.005	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	1.24	0.00	0.00	0.29	0.29	0.00	0.07	0.07	295	< 0.005	0.01	299
Vendor	0.01	0.29	0.14	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	276	0.02	0.04	289
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.09	1.08	0.00	0.00	0.29	0.29	0.00	0.07	0.07	281	< 0.005	0.01	284
Vendor	0.01	0.30	0.15	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	276	0.02	0.04	288
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.55	0.00	0.00	0.14	0.14	0.00	0.03	0.03	138	< 0.005	0.01	140
Vendor	< 0.005	0.15	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	134	0.01	0.02	140
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.03	0.03	0.00	0.01	0.01	22.8	< 0.005	< 0.005	23.1
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	22.2	< 0.005	< 0.005	23.2
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

3.11. Paving (2025) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81	13.0	13.1	0.02	0.56	—	0.56	0.52	—	0.52	1,941	0.08	0.02	1,948
Paving	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.36	0.36	< 0.005	0.02	—	0.02	0.01	—	0.01	53.2	< 0.005	< 0.005	53.4
Paving	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	8.81	< 0.005	< 0.005	8.84
Paving	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	1.26	0.00	0.00	0.29	0.29	0.00	0.07	0.07	299	< 0.005	0.01	303
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	7.89	< 0.005	< 0.005	8.00
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.31	< 0.005	< 0.005	1.32
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
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

3.12. Paving (2025) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81	13.0	13.1	0.02	0.56	—	0.56	0.52	—	0.52	1,941	0.08	0.02	1,948
Paving	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.36	0.36	< 0.005	0.02	—	0.02	0.01	—	0.01	53.2	< 0.005	< 0.005	53.4
Paving	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	8.81	< 0.005	< 0.005	8.84
Paving	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	1.26	0.00	0.00	0.29	0.29	0.00	0.07	0.07	299	< 0.005	0.01	303
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	7.89	< 0.005	< 0.005	8.00
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.31	< 0.005	< 0.005	1.32
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
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

3.13. Architectural Coating (2025) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.97	2.10	< 0.005	0.09	—	0.09	0.09	—	0.09	267	0.01	< 0.005	268
Architectural Coatings	4.34	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.62	0.66	< 0.005	0.03	—	0.03	0.03	—	0.03	84.1	< 0.005	< 0.005	84.4
Architectural Coatings	1.37	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.11	0.12	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	13.9	< 0.005	< 0.005	14.0
Architectural Coatings	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.25	0.00	0.00	0.06	0.06	0.00	0.01	0.01	59.0	< 0.005	< 0.005	59.8
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

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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	17.9	< 0.005	< 0.005	18.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.97	< 0.005	< 0.005	3.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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

3.14. Architectural Coating (2025) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.97	2.10	< 0.005	0.09	—	0.09	0.09	—	0.09	267	0.01	< 0.005	268
Architectural Coatings	4.34	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.62	0.66	< 0.005	0.03	—	0.03	0.03	—	0.03	84.1	< 0.005	< 0.005	84.4
Architectural Coatings	1.37	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.11	0.12	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	13.9	< 0.005	< 0.005	14.0
Architectural Coatings	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.25	0.00	0.00	0.06	0.06	0.00	0.01	0.01	59.0	< 0.005	< 0.005	59.8
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	17.9	< 0.005	< 0.005	18.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.97	< 0.005	< 0.005	3.01

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.25	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	516	0.02	0.02	524
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.25	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	516	0.02	0.02	524
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.25	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	496	0.02	0.02	503
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.25	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	496	0.02	0.02	503
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated	0.04	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	83.0	< 0.005	< 0.005	84.3
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.04	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	83.0	< 0.005	< 0.005	84.3

4.1.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.25	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	516	0.02	0.02	524
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.25	0.18	2.03	0.01	< 0.005	0.18	0.19	< 0.005	0.03	0.04	516	0.02	0.02	524
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.25	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	496	0.02	0.02	503
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.25	0.20	1.90	< 0.005	< 0.005	0.18	0.19	< 0.005	0.03	0.04	496	0.02	0.02	503
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.04	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	83.0	< 0.005	< 0.005	84.3

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.04	0.04	0.35	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	83.0	< 0.005	< 0.005	84.3

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	703	0.06	0.01	708
Parking Lot	—	—	—	—	—	—	—	—	—	—	80.5	0.01	< 0.005	80.9
Total	—	—	—	—	—	—	—	—	—	—	784	0.07	0.01	788
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	703	0.06	0.01	708
Parking Lot	—	—	—	—	—	—	—	—	—	—	80.5	0.01	< 0.005	80.9
Total	—	—	—	—	—	—	—	—	—	—	784	0.07	0.01	788
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	116	0.01	< 0.005	117
Parking Lot	—	—	—	—	—	—	—	—	—	—	13.3	< 0.005	< 0.005	13.4
Total	—	—	—	—	—	—	—	—	—	—	130	0.01	< 0.005	131

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	703	0.06	0.01	708
Parking Lot	—	—	—	—	—	—	—	—	—	—	80.5	0.01	< 0.005	80.9
Total	—	—	—	—	—	—	—	—	—	—	784	0.07	0.01	788
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	703	0.06	0.01	708
Parking Lot	—	—	—	—	—	—	—	—	—	—	80.5	0.01	< 0.005	80.9
Total	—	—	—	—	—	—	—	—	—	—	784	0.07	0.01	788
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	116	0.01	< 0.005	117
Parking Lot	—	—	—	—	—	—	—	—	—	—	13.3	< 0.005	< 0.005	13.4
Total	—	—	—	—	—	—	—	—	—	—	130	0.01	< 0.005	131

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

4.3. Area Emissions by Source

4.3.2. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectura Coatings	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—

4.3.1. Mitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectura I Coatings	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectura I Coatings	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.27	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectura I Coatings	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	42.9	0.39	0.01	55.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	42.9	0.39	0.01	55.7

4.4.1. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	259	2.38	0.06	337
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	42.9	0.39	0.01	55.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	42.9	0.39	0.01	55.7

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	4.36	0.44	0.00	15.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	4.36	0.44	0.00	15.3

4.5.1. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	26.3	2.63	0.00	92.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	4.36	0.44	0.00	15.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	4.36	0.44	0.00	15.3

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

4.6.2. Mitigated

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

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

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.7.2. Mitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.8.2. Mitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.9.2. Mitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	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	9/2/2024	9/13/2024	5.00	10.0	—
Site Preparation	Site Preparation	9/16/2024	10/4/2024	5.00	15.0	—
Grading	Grading	10/7/2024	10/18/2024	5.00	10.0	—
Building Construction	Building Construction	10/21/2024	9/5/2025	5.00	230	—
Paving	Paving	9/8/2025	9/19/2025	5.00	10.0	—
Architectural Coating	Architectural Coating	4/21/2025	9/26/2025	5.00	115	—

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	Concrete/Industrial Saws	Diesel	Tier 2	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Tier 2	1.00	8.00	367	0.40

Demolition	Tractors/Loaders/Backhoes	Diesel	Tier 2	3.00	8.00	84.0	0.37
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Site Preparation	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Site Preparation	Rubber Tired Dozers	Diesel	Tier 2	1.00	7.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 2	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 2	2.00	7.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Cranes	Diesel	Tier 2	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 2	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Tier 2	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Tier 2	3.00	8.00	46.0	0.45
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20

Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Tier 2	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 2	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 2	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	8.00	84.0	0.37
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 2	1.00	6.00	37.0	0.48
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	Concrete/Industrial Saws	Diesel	Tier 2	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Tier 2	1.00	8.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Tier 2	3.00	8.00	84.0	0.37
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40

Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Site Preparation	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Site Preparation	Rubber Tired Dozers	Diesel	Tier 2	1.00	7.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 2	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 2	2.00	7.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Cranes	Diesel	Tier 2	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 2	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Tier 2	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Tier 2	3.00	8.00	46.0	0.45
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45

Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Tier 2	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 2	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 2	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	8.00	84.0	0.37
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 2	1.00	6.00	37.0	0.48
Architectural Coating	Air Compressors	Diesel	Average	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	25.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	3.80	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	15.0	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT

Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	4.20	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	22.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	8.67	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	22.5	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	4.44	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	25.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT

Demolition	Hauling	3.80	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	15.0	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	4.20	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	22.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	8.67	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	22.5	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	4.44	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	79,307	26,436	1,934

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 (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	3,279	—
Site Preparation	0.00	0.00	14.1	0.00	—
Grading	330	0.00	10.0	0.00	—
Paving	0.00	0.00	0.00	0.00	0.74

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	0.74	100%
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5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	1,040	0.09	0.01
2025	0.00	1,040	0.09	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Unrefrigerated Warehouse-No Rail	77.0	77.0	77.0	28,090	663	663	663	241,949
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Unrefrigerated Warehouse-No Rail	77.0	77.0	77.0	28,090	663	663	663	241,949
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	79,307	26,436	1,934

5.10.3. Landscape Equipment

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

5.10.4. Landscape Equipment - Mitigated

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	246,814	1,040	0.0945	0.0135	0.00
Parking Lot	28,237	1,040	0.0945	0.0135	0.00

5.11.2. Mitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	246,814	1,040	0.0945	0.0135	0.00
Parking Lot	28,237	1,040	0.0945	0.0135	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	12,025,000	199,764
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	12,025,000	199,764
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	48.9	—
Parking Lot	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
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Unrefrigerated Warehouse-No Rail	48.9	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

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

5.16.1. Emergency Generators and Fire Pumps

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

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

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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8. User Changes to Default Data

Screen	Justification
Land Use	Project would add a 52,871 sf storage building to a 1.93 acre site. Approximately 15% of project site will consist of landscaping.
Construction: Construction Phases	Construction will start in September 2024 and last approximately 12 months. Overlap between building construction and architectural coating phases.
Construction: Off-Road Equipment	Default construction equipment with tier 2 engine
Operations: Vehicle Data	Based on 77 ADT
Operations: Energy Use	Project would not include natural gas
Construction: Dust From Material Movement	based on the grading plans, the proposed project would import approximately 330 CY of soil