Del Amo Technology Center

GREENHOUSE GAS ANALYSIS

CITY OF TORRANCE

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DECEMBER 17, 2024

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LIST OF ABBREVIATED TERMS

%	Percent
°C	Degrees Celsius
°F	Degrees Fahrenheit
(1)	Reference
2017 Scoping Plan	Final 2017 Scoping Plan Update
AB	Assembly Bill
AB 32	Global Warming Solutions Act of 2006
AB 1493	Pavley Fuel Efficiency Standards
AB 1881	California Water Conservation Landscaping Act of 2006
Annex I	Industrialized Nations
APA	Administrative Procedure Act
AQIA	*Del Amo Technology Center Air Quality Impact Analysis*
BAU	Business as Usual
C_2F_6	Hexafluoroethane
C_2H_6	Ethane
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CEQA Guidelines	*CEQA Statute and Guidelines*
CDFA	California Department of Food and Agriculture
CF_4	Tetrafluoromethane
CFC	Chlorofluorocarbons
CFC-113	Trichlorotrifluoroethane
CH_4	Methane
City	City of Torrance
CNRA	California Natural Resources Agency
CNRA 2009	*2009 California Climate Adaptation Strategy*
CO_2	Carbon Dioxide

CO_2e	Carbon Dioxide Equivalent
Convention	United Nation's Framework Convention on Climate Change
COP	Conference of the Parties
CPUC	California Public Utilities Commission
DWR	Department of Water Resources
EPA	Environmental Protection Agency
EV	Electric Vehicle
GCC	Global Climate Change
Gg	Gigagram
GHGA	Greenhouse Gas Analysis
gpd	Gallons Per Day
GWP	Global Warming Potential
H_2O	Water
HFC	Hydrofluorocarbons
HDT	Heavy-Duty Trucks
HFC-23	Fluoroform
HFC-134a	1,1,1,2-tetrafluoroethane
HFC-152a	1,1-difluoroethane
HHDT	Heavy-Heavy-Duty Trucks
hp	Horsepower
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator
kWh	Kilowatt Hours
lbs	Pounds
LBNL	Lawrence Berkeley National Laboratory
LCA	Life-Cycle Analysis
LCD	Liquid Crystal Display
LCFS	Low Carbon Fuel Standard or Executive Order S-01-07
LDA	Light-Duty Auto
LDT1/LDT2	Light-Duty Trucks
LEV III	Low-Emission Vehicle
LHDT1/LHDT2	Light-Heavy-Duty Trucks
LULUCF	Land-Use, Land-Use Change and Forestry
MCY	Motorcycles
MD	Medium Duty
MDT	Medium-Duty Trucks
MDV	Medium-Duty Vehicles
MHDT	Medium-Heavy-Duty Tucks

$MMTCO_2e$	Million Metric Ton of Carbon Dioxide Equivalent
mpg	Miles Per Gallon
MPOs	Metropolitan Planning Organizations
$MMTCO_2e/yr$	Million Metric Ton of Carbon Dioxide Equivalent Per Year
MT/yr	Metric Tons Per Year
$MTCO_2e$	Metric Ton of Carbon Dioxide Equivalent
$MTCO_2e/yr$	Metric Ton of Carbon Dioxide Equivalent Per Year
MW	Megawatts
MWh	Megawatts Per Hour
MWELO	California Department of Water Resources' Model Water Efficient
N_2O	Nitrous Oxide
NDC	Nationally Determined Contributions
NF_3	Nitrogen Trifluoride
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO_X	Nitrogen Oxides
Non-Annex I	Developing Nations
OAL	Office of Administrative Law
OPR	Office of Planning and Research
PFC	Perfluorocarbons
ppb	Parts Per Billion
ppm	Parts Per Million
ppt	Parts Per Trillion
Project	Del Amo Technology Center
RTP	Regional Transportation Plan
SAFE	Safer Affordable Fuel-Efficient Vehicles Rule
SB	Senate Bill
SB 32	California Global Warming Solutions Act of 2006
SB 375	Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies
SB 1078	Renewable Portfolio Standards
SB 1368	Statewide Retail Provider Emissions Performance Standards
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
Scoping Plan	California Air Resources Board Climate Change Scoping Plan
SCS	Sustainable Communities Strategy

sf	Square Feet
SF_6	Sulfur Hexaflouride
SLPS	Short-Lived Climate Pollutant Strategy
TA	*Del Amo Technology Center Traffic Analysis*
TDM	Transportation Demand Measures
Title 20	Appliance Energy Efficiency Standards
Title 24	California Building Code
TRUs	Transportation Refrigeration Units
U.N.	United Nations
U.S.	United States
UNFCCC	United Nations' Framework Convention on Climate Change
VMT	Vehicle Miles Traveled
WCI	Western Climate Initiative
WRI	World Resources Institute
ZE/NZE	Zero and Near-Zero Emissions
ZEV	Zero-Emissions Vehicles

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EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

The results of this *Del Amo Technology Center Greenhouse Gas Analysis* (GHGA) is summarized below based on the significance criteria in Section 3 of this report consistent with Appendix G of the *California Environmental Quality Act (CEQA) Guidelines* (*CEQA Guidelines* (1). Table ES-1 shows the findings of significance for potential greenhouse gas (GHG) impacts under CEQA.

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
GHG Impact #1: Would the Project generate GHG emissions either directly or indirectly, that may have a significant impact on the environment?	3.7	*Potentially Significant*	*Significant and Unavoidable*
GHG Impact #2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	3.7	*Potentially Significant*	*Significant and Unavoidable*

ES.2 PROJECT REQUIREMENTS

The Project would be required to comply with regulations imposed by the State of California and the South Coast Air Quality Management District (SCAQMD) aimed at the reduction of air pollutant emissions. Those that are directly and indirectly applicable to the Project and that would assist in the reduction of GHG emissions include:

- Global Warming Solutions Act of 2006 (Assembly Bill (AB) 32) (2).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (Senate Bill (SB) 375) (3).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles (4).
- California Building Code (Title 24 California Code of Regulations (CCR)) and CALGreen standards. Establishes energy efficiency requirements for new construction (5).
- Appliance Energy Efficiency Standards (Title 20 CCR). Establishes energy efficiency requirements for appliances (6).
- Low Carbon Fuel Standard (LCFS). Requires carbon content of fuel sold in California to be 10 percent (%) less by 2020 (7).
- California Water Conservation in Landscaping Act of 2006 (AB 1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or

equivalent by January 1, 2010, to ensure efficient landscapes in new development and reduced water waste in existing landscapes (8).

- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions (9).
- Renewable Portfolio Standards (SB 1078 – also referred to as RPS). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20% by 2010 and 33% by 2020 (10).
- California Global Warming Solutions Act of 2006 (SB 32). Requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (11).

Promulgated regulations that will affect the Project's emissions are accounted for in the Project's GHG calculations provided in this report. In particular, AB 1493, LCFS, and RPS, and therefore are accounted for in the Project's emission calculations.

ES.3 MITIGATION MEASURES

Although the following MMs are aimed primarily at reducing the Project's air quality emissions impacts, these measures would also generally reduce indirect GHG emissions. With implementation of MM GHG-5, the analysis assumed that all operational off-road equipment would be zero-emission powered engines (electric powered or equivalent). However, for the remaining mitigation measures it should be noted that there is no way to quantify these reductions in the California Emissions Estimator Model (CalEEMod), and therefore, to provide a conservative disclosure of Project emissions, no reductions in emissions are assumed to occur even with implementation of these measures. Notwithstanding the foregoing, it is likely that all of the below measures will decrease Project emissions.

MM GHG-1

Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to the issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.

MM GHG-2

Prior to tenant occupancy, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that occupants/tenants of the Project site have been provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.

MM GHG-3

Final Project designs shall provide for installation of conduit in tractor trailer parking areas for the purpose of accommodating potential installation of EV truck charging stations.

MM GHG-4

All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric transport refrigeration units (TRUs).

MM GHG-5

All on-site outdoor cargo-handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) and all on-site indoor forklifts will be zero-emission powered engines (electric powered or equivalent).

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1 INTRODUCTION

This report presents the results of the GHGA prepared by Urban Crossroads, Inc., for the proposed Del Amo Technology Center (Project). The purpose of this GHGA is to evaluate Project-related construction and operational emissions and determine the level of GHG impacts as a result of constructing and operating the Project.

1.1 SITE LOCATION

The proposed project is located on the northeast corner of Prairie Avenue and Del Amo Boulevard in the City of Torrance as shown on Exhibit 1-A. The Torrance Municipal Airport is located approximately 2.5 miles south of the Project site. Existing land uses near the site include commercial and industrial uses to the south, with residential use to the west and southwest of the Project site.

1.2 PROJECT DESCRIPTION

The Project is anticipated to be developed within a single phase with an anticipated opening year of 2027. The proposed Project consists of the development totaling 403,033 square feet with the 362,730 square feet of High-Cube Fulfillment Center (Sort) (90% of the total square footage) and 40,303 square feet of High-Cube Cold Storage Warehouse (10% of the total square footage). A preliminary site plan for the proposed Project is shown in Exhibit 1-B.

It should be noted that High-Cube Fulfillment Center (Sort) land use is highly conservative as it generates more trips and therefore more emissions than the High-Cube Fulfillment Center (Non-Sort) land use. As described in the *Del Amo Technology Center Traffic Analysis*, the ITE Trip Generation Manual has two subcategories for the High-Cube Fulfillment Center use: sort and non-sort. ITE describes a sort facility as a fulfillment center that ships out smaller items, requiring extensive sorting, typically by manual means. In comparison, a non-sort facility is a fulfillment center that ships large box items that are processed primarily with automation rather than through manual means. Some limited assembly and repackaging may occur within the facility. Given this description, a sort facility has been assumed for the purposes of calculating trip generation for the Project in an effort to conduct a conservative analysis (12).

Additionally, since it is currently unknown whether the Project will be a single tenant or multi-tenant, the analysis will evaluate two options, which affect the truck trip distribution only, as summarized in the Project's traffic study:

Option 1: Single Tenant Building

Option 2: Two-Tenant Building

The only difference between the two scenarios is the truck trip distribution which affects the operational HRA component and has been studied in the *Del Amo Technology Center Construction and Operational Health Risk Assessment* (HRA) (13). For Option 1, the trucks will have access to the building via Prairie Avenue and Del Almo Boulevard, however, the majority of the truck access is proposed to occur at the signalized driveway on Del Amo Boulevard. For

Option 2, approximately 25% of the trucks would access the site via the driveway on Prairie Avenue while the remaining 75% of the trucks would access the site via Del Amo Boulevard. It is anticipated that both the building and the truck court area would be partitioned to separate the two tenants (i.e., no reciprocal access within the truck court or within the building). Access into the truck court will also be secured via a security gate on either side of the building (applicable to both Option 1 and Option 2).

EXHIBIT 1-A: LOCATION MAP

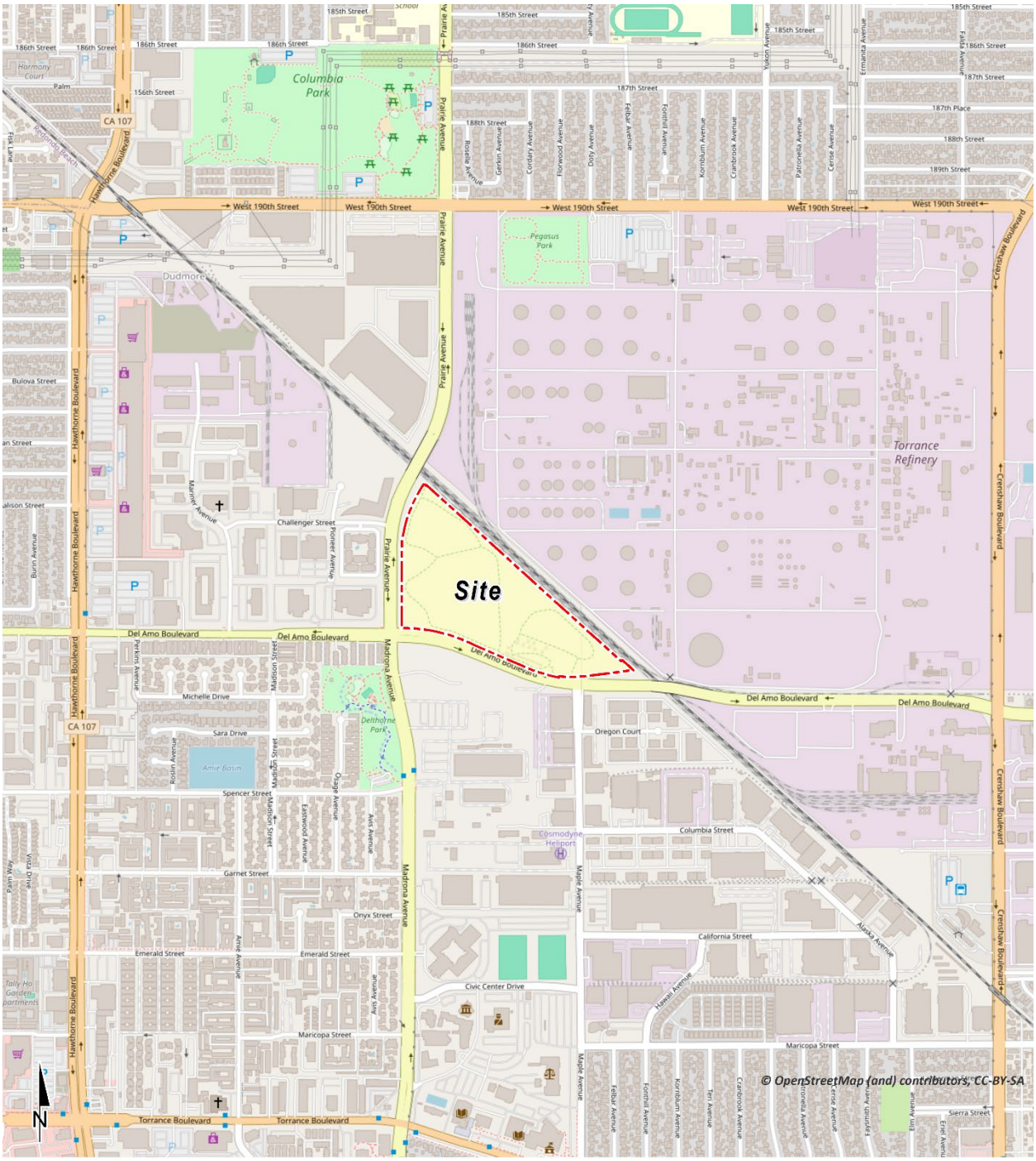

EXHIBIT 1-B: SITE PLAN

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2 CLIMATE CHANGE SETTING

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE (GCC)

GCC is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

An individual project like the proposed Project evaluated in this GHGA cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, Section 3.0 will evaluate the potential for the proposed Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

2.2 GLOBAL CLIMATE CHANGE DEFINED

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

2.3 GHGS

2.3.1 GHGS AND HEALTH EFFECTS

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and as discussed in Table 2-1. For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other

substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

TABLE 2-1: GHGS

GHGs	Description	Sources	Health Effects
Water	Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. Climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop would continue is	The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.	There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor.

GHGs	Description	Sources	Health Effects
	unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it would eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (14).		
CO_2	CO_2 is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (15).	CO_2 is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (16).	Outdoor levels of CO_2 are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO_2 can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO_2 in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period (17).

GHGs	Description	Sources	Health Effects
CH_4	CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH_4. Other anthropocentric sources include fossil-fuel combustion and biomass burning (18).	CH_4 is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to elevated levels of CH_4 can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.
N_2O	N_2O, also known as laughing gas, is a colorless GHG. Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream	N_2O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage) (19).

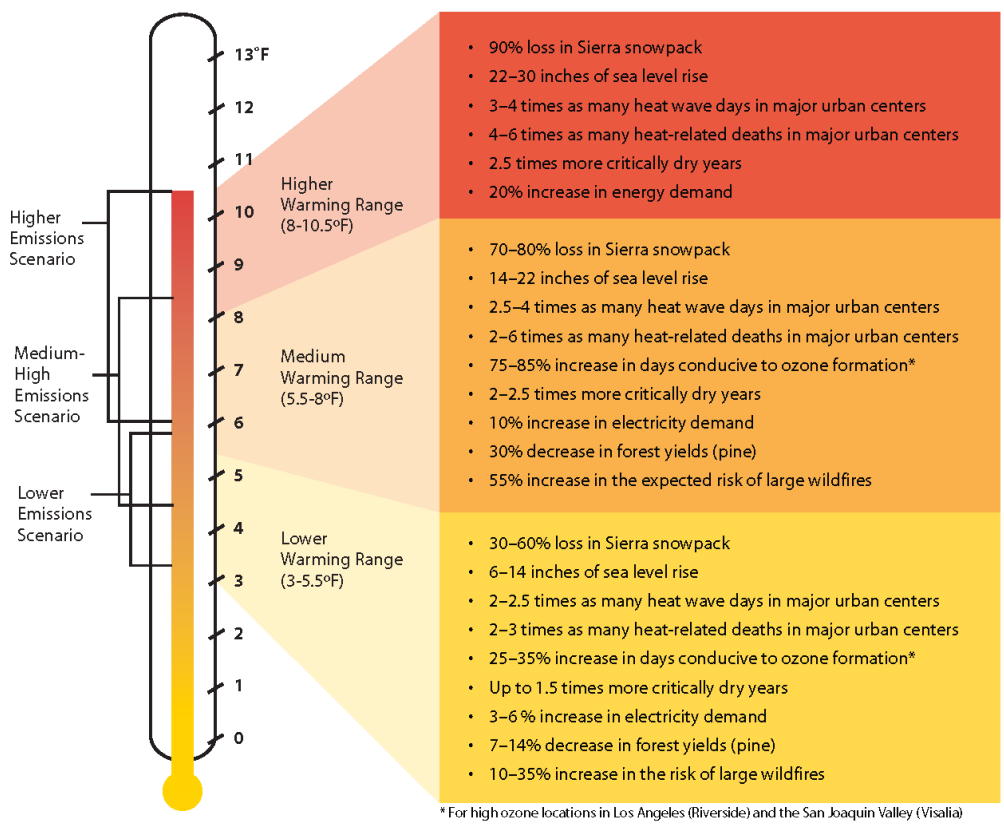
GHGs	Description	Sources	Health Effects
		bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (19).	
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs would remain in the atmosphere for over 100 years (20).	In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

GHGs	Description	Sources	Health Effects
HFCs	HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), Fluoroform (HFC-23), 1,1,1,2-tetrafluoroethane (HFC-134a), and 1,1-difluoroethane (HFC-152a). Prior to 1990, the only significant emissions were of HFC-23. HCF-134a emissions are increasing due to its use as a refrigerant.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.	No health effects are known to result from exposure to HFCs.
PFCs	PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have exceptionally long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The EPA estimates that concentrations of CF_4 in the atmosphere are over 70 parts per trillion (ppt).	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.
SF_6	SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (21). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

GHGs	Description	Sources	Health Effects
Nitrogen Trifluoride (NF_3)	NF_3 is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF_3 has a 100-year GWP of 17,200 (22).	NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers.	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis (23).

The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Climate change would likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (24). Exhibit 2-A presents the potential impacts of global warming (25).

EXHIBIT 2-A: SUMMARY OF PROJECTED GLOBAL WARMING IMPACT, 2070-2099 (AS COMPARED WITH 1961-1990)



Source: Barbara H. Allen-Diaz. "Climate change affects us all." *University of California, Agriculture and Natural Resources*, 2009.

2.4 GLOBAL WARMING POTENTIAL

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas cause over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a GWP of 1. CO_2 equivalent (CO_2e) is a term used for describing the different GHGs in a common unit. CO_2e signifies the amount of CO_2 which would have the equivalent GWP.

The Intergovernmental Panel on Climate Change (IPCC) is the international body for assessing the science related to climate change. IPCC Assessment Reports cover the full scientific, technical and socio-economic assessment of climate change. The atmospheric lifetime and GWP of selected GHGs are summarized at Table 2-2. As shown in the table below, GWP for the 2nd Assessment Report range from 1 for CO_2 to 23,900 for SF_6 and GWP for the 6th Assessment Report range from 1 for CO_2 to 25,200 for SF_6 (26).

TABLE 2-2: GWP AND ATMOSPHERIC LIFETIME OF SELECT GHGS

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2nd Assessment Report	6th Assessment Report
CO_2	Multiple	1	1
CH_4	11.8	21	28
N_2O	109	310	273
HFC-23	228	11,700	14,600
HFC-134a	14	1,300	1,526
HFC-152a	1.6	140	164
SF_6	3,200	23,900	25,200

Source: IPCC Second Assessment Report, 1995 and IPCC Sixth Assessment Report, 2023

2.5 GHG EMISSIONS INVENTORIES

2.5.1 GLOBAL

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2021. Based on the latest available data, the sum of these emissions totaled approximately 28,272,940 gigagram (Gg) CO_2e[1] (27) (28) as summarized on Table 2-3.

[1] The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2021 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used U.N. Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014 and 2016, respectively.

2.5.2 UNITED STATES

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2021.

TABLE 2-3: TOP GHG PRODUCING COUNTRIES AND THE EUROPEAN UNION

Emitting Countries	GHG Emissions (Gg CO_2e)
China	12,300,200
United States	6,340,228
European Union (27-member countries)	3,468,394
India	2,839,425
Russian Federation	2,156,599
Japan	1,168,094
Total	**28,272,940**

2.5.3 STATE OF CALIFORNIA

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total (19). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2024 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2022 GHG emissions period, California emitted an average 371.1 million metric tons of CO_2e per year ($MMTCO_2e$/yr) or 371,100 Gg CO_2e (5.85% of the total United States GHG emissions) (29). Based on data published by the U.S. Energy Information Administration, California's per capita (9.12 metric tons) GHG emissions are much less than the nationwide per capita (15.8 metric ton) average (30).

2.6 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

2.6.1 PUBLIC HEALTH

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. Based on *Our Changing Climate Assessing the Risks to California by the California Climate Change Center*, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced (31).

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a

significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

2.6.2 WATER RESOURCES

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the State from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply.

2.6.3 AGRICULTURE

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts.

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

2.6.4 Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation.

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC.

2.6.5 Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches.

2.7 Regulatory Setting

2.7.1 International

Climate change is a global issue involving GHG emissions from all around the world; therefore, countries such as the ones discussed below have made an effort to reduce GHGs.

IPCC

In 1988, the United Nations (U.N.) and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.

UNITED NATION'S FRAMEWORK CONVENTION ON CLIMATE CHANGE (UNFCCC)

On March 21, 1994, the U.S. joined a number of countries around the world in signing the Convention. Under the UNFCCC, governments gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

INTERNATIONAL CLIMATE CHANGE TREATIES

The Kyoto Protocol is an international agreement linked to the UNFCCC. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions at an average of 5% against 1990 levels over the five-year period 2008–2012. The Convention (as discussed above) encouraged industrialized countries to stabilize emissions; however, the Protocol commits them to do so. Developed countries have contributed more emissions over the last 150 years; therefore, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

In 2001, President George W. Bush indicated that he would not submit the treaty to the U.S. Senate for ratification, which effectively ended American involvement in the Kyoto Protocol. In December 2009, international leaders met in Copenhagen to address the future of international climate change commitments post-Kyoto. No binding agreement was reached in Copenhagen; however, the UN Climate Change Committee identified the long-term goal of limiting the maximum global average temperature increase to no more than 2 degrees Celsius (°C) above pre-industrial levels, subject to a review in 2015. The Committee held additional meetings in Durban, South Africa in November 2011; Doha, Qatar in November 2012; and Warsaw, Poland in November 2013. The meetings gradually gained consensus among participants on individual climate change issues.

On September 23, 2014, more than 100 Heads of State and Government and leaders from the private sector and civil society met at the Climate Summit in New York hosted by the U.N. At the Summit, heads of government, business and civil society announced actions in areas that would have the greatest impact on reducing emissions, including climate finance, energy, transport, industry, agriculture, cities, forests, and building resilience.

Parties to the UNFCCC reached a landmark agreement on December 12, 2015, in Paris, charting a fundamentally new course in the two-decade-old global climate effort. Culminating a four-year negotiating round, the new treaty ends the strict differentiation between developed and developing countries that characterized earlier efforts, replacing it with a common framework that commits all countries to put forward their best efforts and to strengthen them in the years ahead. This includes, for the first time, requirements that all parties report regularly on their emissions and implementation efforts and undergo international review.

The agreement and a companion decision by parties were the key outcomes of the conference, known as the 21st session of the UNFCCC Conference of the Parties (COP) 21. Together, the Paris Agreement and the accompanying COP decision:

- Reaffirm the goal of limiting global temperature increase well below 2°C, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make "nationally determined contributions" (NDCs), and to pursue domestic measures aimed at achieving them;
- Commit all countries to report regularly on their emissions and "progress made in implementing and achieving" their NDCs, and to undergo international review;
- Commit all countries to submit new NDCs every five years, with the clear expectation that they would "represent a progression" beyond previous ones;
- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing $100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address "loss and damage" resulting from climate change, which explicitly would not "involve or provide a basis for any liability or compensation;"
- Require parties engaging in international emissions trading to avoid "double counting;" and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another country's NDC (C2ES 2015a) (32).

Following President Biden's day one executive order, the United States officially rejoined the landmark Paris Agreement on February 19, 2021, positioning the country to once again be part of the global climate solution. Meanwhile, city, state, business, and civic leaders across the country and around the world have been ramping up efforts to drive the clean energy advances needed to meet the goals of the agreement and put the brakes on dangerous climate change.

2.7.2 NATIONAL

Prior to the last decade, there have been no concrete federal regulations of GHGs or major planning for climate change adaptation. The following are actions regarding the federal government, GHGs, and fuel efficiency.

GHG ENDANGERMENT

In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four GHGs, including CO_2, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Supreme Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned

decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section "Clean Vehicles" below. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator's findings (33).

CLEAN VEHICLES

Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the U.S. On April 1, 2010, the EPA, and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the U.S.

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO_2 per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this CO_2 level solely through fuel economy improvements. Together, these standards would cut CO_2 emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The EPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012. The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of CO_2 in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20% reduction in CO_2 emissions and fuel consumption by the 2018 model year. For HDT and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10% reduction for gasoline vehicles and a 15% reduction for diesel vehicles by the 2018 model year (12 and 17% respectively if

accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10% reduction in fuel consumption and CO_2 emissions from the 2014 to 2018 model years.

On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which declared that the MY 2022-2025 GHG standards are not appropriate and should be revised (34). This Final Determination serves to initiate a notice to further consider appropriate standards for MY 2022-2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing Corporate Average Fuel Economy (CAFE) and tailpipe CO_2 standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO_2 emissions standards by 1.5% each year through model year 2026 (35). On December 21, 2021, after reviewing all the public comments submitted on NHTSA's April 2021 Notice of Proposed Rulemaking, NHTSA finalizes the CAFE Preemption rulemaking to withdraw its portions of the so-called SAFE I Rule. The final rule concludes that the SAFE I Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests. The final rule ensures that the SAFE I Rule will no longer form an improper barrier to states exploring creative solutions to address their local communities' environmental and public health challenges (36).

On March 31, 2022, NHTSA finalized CAFE standards for MY 2024-2026. The standards for passenger cars and light trucks for MYs 2024-2025 were increased at a rate of 8% per year and then increased at a rate of 10% per year for MY 2026 vehicles. NHTSA currently projects that the revised standards would require an industry fleet-wide average of roughly 49 mpg in MY 2026 and would reduce average fuel outlays over the lifetimes of affected vehicles that provide consumers hundreds of dollars in net savings. These standards are directly responsive to the agency's statutory mandate to improve energy conservation and reduce the nation's energy dependence on foreign sources (37).

MANDATORY REPORTING OF GHGS

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons per year (MT/yr) or more of GHG emissions are required to submit annual reports to the EPA.

NEW SOURCE REVIEW

The EPA issued a final rule on May 13, 2010, that establishes thresholds for GHGs that define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule "tailors" the requirements of these CAA permitting programs to limit which facilities would be required to obtain Prevention of Significant Deterioration and Title V permits. In the preamble to the revisions to the Federal Code of Regulations, the EPA states:

> *"This rulemaking is necessary because without it the Prevention of Significant Deterioration and Title V requirements would apply, as of January 2, 2011, at the 100 or 250 tons per year levels provided under the CAA, greatly increasing the number of required permits, imposing undue costs on small sources, overwhelming the resources of permitting authorities, and severely impairing the functioning of the programs. EPA is relieving these resource burdens by phasing in the applicability of these programs to GHG sources, starting with the largest GHG emitters. This rule establishes two initial steps of the phase-in. The rule also commits the agency to take certain actions on future steps addressing smaller sources but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for GHG emissions until at least April 30, 2016."*

The EPA estimates that facilities responsible for nearly 70% of the national GHG emissions from stationary sources would be subject to permitting requirements under this rule. This includes the nation's largest GHG emitters—power plants, refineries, and cement production facilities.

STANDARDS OF PERFORMANCE FOR GHG EMISSIONS FOR NEW STATIONARY SOURCES: ELECTRIC UTILITY GENERATING UNITS

As required by a settlement agreement, the EPA proposed new performance standards for emissions of CO_2 for new, affected, fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatts (MW) would be required to meet an output-based standard of 1,000 pounds (lbs) of CO_2 per MW-hour (MWh), based on the performance of widely used natural gas combined cycle technology. It should be noted that on February 9, 2016, the Supreme Court issued a stay of this regulation pending litigation. Additionally, the current EPA Administrator has also signed a measure to repeal the Clean Power Plan, including the CO_2 standards. The Clean Power Plan was officially repealed on June 19, 2019, when the EPA issued the final Affordable Clean Energy rule (ACE). Under ACE, new state emission guidelines were established that provided existing coal-fired electric utility generating units with achievable standards.

On January 19, 2021, the D.C. Circuit Court of Appeals ruled that the EPA's ACE Rule for GHG emissions from power plants rested on an erroneous interpretation of the CAA that barred EPA from considering measures beyond those that apply at and to an individual source. The court therefore vacated and remanded the ACE Rule and adopted a replacement rule which regulates

CO_2 emissions from existing power plants, potentially again considering generation shifting and other measures to more aggressively target power sector emissions.

CAP-AND-TRADE

Cap-and-trade refers to a policy tool where emissions are limited to a certain amount and can be traded or provides flexibility on how the emitter can comply. Successful examples in the U.S. include the Acid Rain Program and the N_2O Budget Trading Program and Clean Air Interstate Rule in the northeast. There is no federal GHG cap-and-trade program currently; however, some states have joined to create initiatives to provide a mechanism for cap-and-trade.

The Regional GHG Initiative is an effort to reduce GHGs among the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Each state caps CO_2 emissions from power plants, auctions CO_2 emission allowances, and invests the proceeds in strategic energy programs that further reduce emissions, save consumers money, create jobs, and build a clean energy economy. The Initiative began in 2008 and in 2020 has retained all participating states.

The Western Climate Initiative (WCI) partner jurisdictions have developed a comprehensive initiative to reduce regional GHG emissions to 15% below 2005 levels by 2020. The partners were originally California, British Columbia, Manitoba, Ontario, and Quebec. However, Manitoba and Ontario are not currently participating. California linked with Quebec's cap-and-trade system January 1, 2014, and joint offset auctions took place in 2015. While the WCI has yet to publish whether it has successfully reached the 2020 emissions goal initiative set in 2007, SB 32 requires that California, a major partner in the WCI, adopt the goal of reducing statewide GHG emissions to 40% below the 1990 level by 2030.

SMARTWAY PROGRAM

The SmartWay Program is a public-private initiative between the EPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. SmartWay is comprised of four components (38):

1. SmartWay Transport Partnership: A partnership in which freight carriers and shippers commit to benchmark operations, track fuel consumption, and improve performance annually.
2. SmartWay Technology Program: A testing, verification, and designation program to help freight companies identify equipment, technologies, and strategies that save fuel and lower emissions.
3. SmartWay Vehicles: A program that ranks light-duty cars and small trucks and identifies superior environmental performers with the SmartWay logo.
4. SmartWay International Interests: Guidance and resources for countries seeking to develop freight sustainability programs modeled after SmartWay.

SmartWay effectively refers to requirements geared towards reducing fuel consumption. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. Moreover, over time, all HDTs would have to comply with the CARB GHG Regulation that is

designed with the SmartWay Program in mind, to reduce GHG emissions by making them more fuel-efficient. For instance, in 2015, 53 foot or longer dry vans or refrigerated trailers equipped with a combination of SmartWay-verified low-rolling resistance tires and SmartWay-verified aerodynamic devices would obtain a total of 10% or more fuel savings over traditional trailers.

Through the SmartWay Technology Program, the EPA has evaluated the fuel saving benefits of various devices through grants, cooperative agreements, emissions, and fuel economy testing, demonstration projects and technical literature review. As a result, the EPA has determined the following types of technologies provide fuel saving and/or emission reducing benefits when used properly in their designed applications, and has verified certain products:

- Idle reduction technologies – less idling of the engine when it is not needed would reduce fuel consumption.
- Aerodynamic technologies minimize drag and improve airflow over the entire tractor-trailer vehicle. Aerodynamic technologies include gap fairings that reduce turbulence between the tractor and trailer, side skirts that minimize wind under the trailer, and rear fairings that reduce turbulence and pressure drop at the rear of the trailer.
- Low rolling resistance tires can roll longer without slowing down, thereby reducing the amount of fuel used. Rolling resistance (or rolling friction or rolling drag) is the force resisting the motion when a tire rolls on a surface. The wheel would eventually slow down because of this resistance.
- Retrofit technologies include things such as diesel particulate filters, emissions upgrades (to a higher tier), etc., which would reduce emissions.
- Federal excise tax exemptions.

EXECUTIVE ORDER 13990

On January 20, 2021, Federal agencies were directed to immediately review, and take action to address, Federal regulations promulgated and other actions taken during the last 4 years that conflict with national objectives to improve public health and the environment; ensure access to clean air and water; limit exposure to dangerous chemicals and pesticides; hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; reduce greenhouse gas emissions; bolster resilience to the impacts of climate change; restore and expand our national treasures and monuments; and prioritize both environmental justice and employment.

2.7.3 CALIFORNIA

2.7.3.1 LEGISLATIVE ACTIONS TO REDUCE GHGS

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

AB 1881

The Water Conservation in Landscaping Act of 2006 requires local agencies to adopt the updated DWR model ordinance or equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

SB 1368

California SB 1368 adds Sections 8340 and 8341 to the Public Utilities Code (effective January 1, 2007) with the intent "to prevent long-term investments in power plants with GHG emissions in excess of those produced by a combined-cycle natural gas power plant" with the aim of "reducing emissions of GHGs from the state's electricity consumption, not just the state's electricity production." SB 1368 provides a mechanism for reducing the GHG emissions of electricity providers, both in-state and out-of-state, thereby assisting CARB in meeting its mandate under AB 32, the Global Warming Solutions Act of 2006.

AB 32

The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met[2]). GHGs as defined under AB 32 include CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. Since AB 32 was enacted, a seventh chemical, NF_3, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

> *"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."*

SB 375

On September 30, 2008, SB 375 was signed by Governor Schwarzenegger. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California. SB 375 states, "Without improved land use and transportation policy, California would not be able to achieve the goals of AB 32." SB 375 does the following: it (1) requires metropolitan planning organizations (MPOs) to include sustainable community strategies in their

[2] Based upon the 2024 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2022 GHG emissions period, California emitted an average 371.1 $MMTCO_2e$ (62). This is less than the 2020 emissions target of 431 $MMTCO_2e$.

regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

SB 375 requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

1. Is in an area with an approved sustainable communities strategy or an alternative planning strategy that CARB accepts as achieving the GHG emission reduction targets.
2. Is consistent with that strategy (in designation, density, building intensity, and applicable policies).
3. Incorporates the MMs required by an applicable prior environmental document.

AB 1493 - Pavley Fuel Efficiency Standards

Enacted on July 22, 2002, California AB 1493, also known as the Pavley Fuel Efficiency Standards, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011.

The standards phase in during the 2009 through 2016 MY. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars (ACC) program. The ACC program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for MY 2017 through 2025. The regulation would reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules would clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicles (EV) and hydrogen fuel cell cars. The package would also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

CLEAN ENERGY AND POLLUTION REDUCTION ACT OF 2015 (SB 350)

In October 2015, the legislature approved, and Governor Jerry Brown signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50% reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 45% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target would be achieved through the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western United States.

SB 32

On September 8, 2016, Governor Brown signed SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (11).

2017 CARB SCOPING PLAN

In November 2017, CARB released the *Final 2017 Scoping Plan Update* (*2017 Scoping Plan*), which identifies the State's post-2020 reduction strategy. The *2017 Scoping Plan* reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH_4 emissions from agricultural and other wastes.

The *2017 Scoping Plan* establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030 (39).

California's climate strategy would require contributions from all sectors of the economy, including the land base, and would include enhanced focus on zero and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH_4, black carbon, and fluorinated gases); and an increased focus on integrated land

use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries would further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the *2017 Scoping Plan* framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero-emission vehicles (ZEV) buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH_4 and HCF emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Note, however, that the *2017 Scoping Plan* acknowledges that:

> *"[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."*

In addition to the statewide strategies listed above, the *2017 Scoping Plan* also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO_2e ($MTCO_2e$) or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidence-based bright-line numeric thresholds—consistent with the *2017 Scoping Plan* and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and MMs that avoid or minimize project emissions to the degree feasible; or a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, could

achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 $MTCO_2e$ per year ($MTCO_2e$/yr), indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State's 80% reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050 (40) (41).

2022 CARB SCOPING PLAN

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) (42). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation - the regulations that will impact this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan's executive summary:

> "The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution."
>
> "[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies."

Under the 2022 Scoping Plan, the State will lead efforts to meet the 2045 carbon neutrality goal through implementation of the following objectives:

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.

- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.
- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.
- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development to determine consistency with the 2022 Scoping Plan. CARB's primary recommendation for determining consistency with the 2022 Scoping Plan and determining a less than significant impact is for Project's to rely on a CEQA-qualified Climate Action Plan (CAP).

In Appendix D of the 2022 Scoping Plan, CARB states: "When jurisdictions have a CEQA-qualified CAP, an individual project that complies with the strategies and actions within a CEQA-qualified

CAP can tier and streamline its project-specific CEQA GHG analysis to make a determination "that a project's incremental contribution to a cumulative [GHG] effect is not cumulatively considerable" (CEQA Guidelines Sections 15064.4 (b)(3) and 15183.5). CARB states that CEQA-qualified CAPs serve to assist the state with its long-term carbon neutrality goals. As such, it follows that a Project that is consistent with a CEQA-qualified CAP would also be consistent with meeting the States 2022 Scoping Plan goals." For analytical purposes, the City of Torrance's adopted CAP is relied upon in this analysis to determine if the Project would have a significant impact with respect to GHG emissions.

CAP-AND-TRADE PROGRAM

The *2017 Scoping Plan* identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program would help put California on the path to meet its goal of achieving a 40% reduction in GHG emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap would be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from regulated entities by more than 16% between 2013 and 2020, and by an additional 40% by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and would decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25,000 $MTCO_2e$/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 $MTCO_2e$/yr "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or "MRR").

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender "compliance instruments" for each $MTCO_2e$ of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year's compliance obligation by November of each year (43).

The Cap-and-Trade Program provides a firm cap, which provides the highest certainty of achieving the 2030 target. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the *First Update to the Climate Change Scoping Plan*:

> *"The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance*

> *instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced. In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative."* (44)

The Cap-and-Trade Program covers approximately 80% of California's GHG emissions (39). The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.

2.7.3.2 EXECUTIVE ORDERS RELATED TO GHG EMISSIONS

California's Executive Branch has taken several actions to reduce GHGs through the use of Executive Orders. Although not regulatory, they set the tone for the state and guide the actions of state agencies.

EXECUTIVE ORDER S-3-05

California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following reduction targets for GHG emissions:

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

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

EXECUTIVE ORDER S-01-07 (LCFS)

Governor Schwarzenegger signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020. CARB adopted the LCFS on April 23, 2009.

The LCFS was challenged in the U.S. District Court in Fresno in 2011. The court's ruling issued on December 29, 2011, included a preliminary injunction against CARB's implementation of the rule. The Ninth Circuit Court of Appeals stayed the injunction on April 23, 2012, pending final ruling on appeal, allowing CARB to continue to implement and enforce the regulation. The Ninth Circuit

Court's decision, filed September 18, 2013, vacated the preliminary injunction. In essence, the court held that LCFS adopted by CARB were not in conflict with federal law. On August 8, 2013, the Fifth District Court of Appeal (California) ruled CARB failed to comply with CEQA and the Administrative Procedure Act (APA) when adopting regulations for LCFS. In a partially published opinion, the Court of Appeal reversed the trial court's judgment and directed issuance of a writ of mandate setting aside Resolution 09-31 and two executive orders of CARB approving LCFS regulations promulgated to reduce GHG emissions. However, the court tailored its remedy to protect the public interest by allowing the LCFS regulations to remain operative while CARB complies with the procedural requirements it failed to satisfy.

To address the Court ruling, CARB was required to bring a new LCFS regulation to the Board for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the 2010 LCFS as well as new provisions designed to foster investments in the production of the low-carbon intensity fuels, offer additional flexibility to regulated parties, update critical technical information, simplify, and streamline program operations, and enhance enforcement. On November 16, 2015, the Office of Administrative Law (OAL) approved the Final Rulemaking Package. The new LCFS regulation became effective on January 1, 2016.

In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector (45).

EXECUTIVE ORDER S-13-08

Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the Order, the *2009 California Climate Adaptation Strategy* (*CNRA 2009*) was adopted, which is the "…first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

EXECUTIVE ORDER B-30-15

On April 29, 2015, Governor Brown issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor's executive order aligned California's GHG reduction targets with those of leading international governments ahead of the U.N. Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the *2017 Scoping Plan* to express the 2030 target in terms of $MMTCO_2e$. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions.

As with Executive Order S-3-05, this Order is not legally enforceable as to local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

EXECUTIVE ORDER B-55-18 AND SB 100

SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25% of retail sales of electricity are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California EPA (CalEPA), the California Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

2.7.3.3 CALIFORNIA REGULATIONS AND BUILDING CODES

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

TITLE 20 CCR SECTIONS 1601 ET SEQ. – APPLIANCE EFFICIENCY REGULATIONS

The Appliance Efficiency Regulations regulate the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles (RV) or other mobile equipment (CEC 2012).

TITLE 24 CCR PART 6 – CALIFORNIA ENERGY CODE

PART 6 NONRESIDENTIAL MANDATORY MEASURES

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. These include the use of electric heat pump technology for space and water heating, expansion of solar photovoltaic system and battery storage technologies, and improving ventilation requirements to improve indoor air quality (46).

- Building Envelope. Improved requirements for insulation in walls, roofs, and floors to prevent heat loss or gain, as well as the use of cool roofs and improved glazing on windows to limit solar heat gain (3.120.1 through 3.120.10).
- Lighting Systems. Limits on wattage per square foot to minimize energy use, requirements for the use of occupancy sensors, daylight controls, and dimming systems to reduce energy use in unoccupied spaces or when daylight is sufficient (2.110.9).
- Heating, Ventilation, and Air Conditioning Systems. Establishes minimum efficiency requirements for heating, ventilation, and air conditioning systems and requirements for ventilation adjustments based on building occupancy levels (3.120.0).
- Electrical Power Distribution. Requires the use of sub-metering and energy management systems for real-time tracking and monitoring of energy use in larger buildings as well as demand response controls for load reduction during peak times in response to grid demands (2.110.11, 2.110.12).
- Renewable Energy. Encourages and in some cases requires the use of on-site renewable energy sources such as solar panels (2.110.2).

TITLE 24 CCR PART 11 – CALIFORNIA GREEN BUILDING STANDARDS CODE

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023[3]. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons (47). The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. These require, among other items (48) (49):

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).

[3] The 2022 California Green Building Standard Code became effective on January 1, 2023, however; it has since been amended on July 1, 2024 with the Intervening Code Cycle Update which is reflected in this report.

- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.1 (5.106.5.3). Alternatively, the power allocation method may be used as an alternative to the requirements mentioned in Section 5.106.5.1, and associated Table 5.106.5.3. Use of Table 5.106.5.3.6 to can be used to determine the total power in kVA required based on the total number of actual parking spaces. Additionally, Table 5.106.5.5.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1).
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor- mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
    - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combined flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
    - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is projected to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

CARB REFRIGERANT MANAGEMENT PROGRAM

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

TRACTOR-TRAILER GHG REGULATION

The tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the HD tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors MY 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices.

PHASE I AND 2 HEAVY-DUTY VEHICLE GHG STANDARDS

In September 2011, CARB has adopted a regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the EPA rule for new trucks and engines nationally. Existing HD vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG

requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer GHG Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. The EPA rule has compliance requirements for new compression and spark ignition engines, as well as trucks from Class 2b through Class 8. Compliance requirements began with MY 2014 with stringency levels increasing through MY 2018. The rule organizes truck compliance into three groupings, which include a) HD pickups and vans; b) vocational vehicles; and c) combination tractors. The EPA rule does not regulate trailers.

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later MY HDT vehicles, including trailers. The EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

SB 97 AND THE CEQA GUIDELINES UPDATE

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a)."

In 2012, Public Resources Code Section 21083.05 was amended to state:

> *"The Office of Planning and Research and the Natural Resources Agency shall periodically update the guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption, to incorporate new information or criteria established by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code."*

On December 28, 2018, the Natural Resources Agency announced the OAL approved the amendments to the *CEQA Guidelines* for implementing CEQA. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing *CEQA Guidelines* to reference climate change.

Section 15064.4 was added the *CEQA Guidelines* and states that in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively insignificant compared to statewide, national, or global emissions. The agency's

analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use (50).

2.7.4 REGIONAL

The project is within the SCAB, which is under the jurisdiction of the SCAQMD.

SCAQMD

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, which could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - Residential and commercial land use: 3,000 $MTCO_2e/yr$
    - Industrial land use: 10,000 $MTCO_2e/yr$

  - Based on land use type: residential: 3,500 $MTCO_2e$/yr; commercial: 1,400 $MTCO_2e$/yr; or mixed use: 3,000 $MTCO_2e$/yr
- Tier 4 has the following options:
  - Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
  - Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$ per SP per year for projects and 6.6 $MTCO_2e$ per SP per year for plans;
  - Option 3, 2035 target: 3.0 $MTCO_2e$ per SP per year for projects and 4.1 $MTCO_2e$ per SP per year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate.

SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the project would include stationary sources of emissions subject to SCAQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD would fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

SCAQMD RULE 2305

The SCAQMD adopted Rule 2305, the Warehouse Indirect Source Rule, on May 7, 2021. Owners and operators associated with warehouses 100,000 square feet (sf) or larger are required to directly reduce NO_X and PM emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. While NOX and PM emissions are the

target of this regulation, GHG emission reductions would also be realized through the implementation of zero-emission and/or near-zero emissions trucks, solar panels, and electric vehicle chargers.

2.7.5 LOCAL

CITY OF TORRANCE CLIMATE ACTION PLAN

The City of Torrance Climate Action Plan (CAP) identifies GHG emissions sources, presents current and future GHG emissions estimates, identifies a GHG reduction target for future years, and provides strategic policies and actions to reduce GHG emissions from energy, transportation, land use, water use, and waste sectors. The CAP is consistent with and implements GHG emissions legislation, GHG emissions reduction strategies, and GHG emissions reduction policies of the State of California. The CAP is also consistent with and implements GHG emissions legislation, GHG emissions reduction strategies, and GHG emissions reduction policies implemented by the South Bay Cities Council of Governments (SBCCOG) (51).

The CAP's existing and projected GHG inventories are based on land use designations and buildout of the City reflected in the City of Torrance General Plan. The Project is consistent with the land use designation and projected buildout conditions presented in the General Plan. Since the Project is consistent with the buildout conditions reflected under the General Plan, the Project by extension would not result in GHG emissions beyond those considered and addressed in the CAP.

All development in the City, including the Project, are required to conform to all City-adopted policies including those presented in the CAP. The City, through established design and development review processes, would ensure that applicable CAP GHG-reducing strategies would be incorporated in the Project.

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3 PROJECT GHG IMPACT

3.1 INTRODUCTION

The Project has been evaluated to determine if it will result in a significant GHG impact. The significance of these potential impacts is described in the following sections.

3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related GHG impacts are taken from the Initial Study Checklist in Appendix G of the State *CEQA Guidelines* (14 California Code of Regulations §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would (52):

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the *CEQA Guidelines* Section 15064.7(c) state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- **Consideration #1:** The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those

goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

3.2.1 THRESHOLDS OF SIGNIFICANCE

The SCAQMD's adopted numerical threshold of 10,000 $MTCO_2e$/yr for industrial stationary source emissions is typically selected as the significance criterion. However, the City has determined that the SCAQMD's draft threshold of 3,000 $MTCO_2e$/yr is more conservative and appropriate for industrial and warehouse land use development projects. The screening threshold of 3,000 $MTCO_2e$/yr to determine if additional analysis is required is an acceptable approach for small projects such as the proposed Project. This approach is a widely accepted screening threshold used by the City of Torrance and numerous cities in the South Coast Air Basin (SCAB) and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required (53). As noted by the SCAQMD:

> *"…the…screening level for stationary sources is based on an emission capture rate of 90% for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90% of all new or modified stationary source projects. A GHG significance threshold based on a 90% emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90% emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than 1% of future 2050 statewide GHG emissions target (85 [MMTCO2e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."* (54)

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 $MTCO_2e$/yr, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 $MTCO_2e$/yr, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. As previously discussed, the proposed Project would include industrial uses and

therefore as a conservative measure, the screening threshold of 3,000 $MTCO_2e$/yr is used to determine if the Project would be considered a substantial source of GHG emissions.

3.3 MODELS EMPLOYED TO ANALYZE GHGS

3.3.1 CALIFORNIA EMISSIONS ESTIMATOR MODEL (CALEEMOD)

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (55). Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity for the proposed Project is provided in Appendices 3.1. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, refrigerants, stationary, on-site cargo equipment, and TRUs.

3.4 LIFE-CYCLE ANALYSIS NOT REQUIRED

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time (56). Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared.

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood, or documented, and would be challenging to mitigate (57). Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, SCAQMD has not recommended, and is not requiring, life-cycle emissions analysis.

3.5 CONSTRUCTION EMISSIONS

Project construction activities would generate CO_2 and CH_4 emissions. The report *Del Amo Technology Center Air Quality Impact Analysis* (AQIA) contains detailed information regarding Project construction activities (58). As discussed in the AQIA, Construction related emissions are expected from the following construction activities:

- Clearing
- Earthwork
- Export/Remediation

- Import
- Rough Grading
- Vertical Construction
- Site Work Fine Grading
- Building Construction
- Paving
- Architectural Coating

3.5.1 CONSTRUCTION DURATION

For purposes of analysis, construction of Project is expected to commence in in October 2025 and will last through October 2027 (58). The construction schedule utilized in the analysis, shown in Table 3-1, represents a "conservative" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent[4]. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines* (50).

TABLE 3-1: CONSTRUCTION DURATION

Construction Activity	Start Date	End Date	Days
Clearing	10/22/2025	10/28/2025	5
Earthwork	10/29/2025	11/20/2025	17
Export/Remediation	11/21/2025	5/5/2026	118
Import	5/6/2026	9/24/2026	102
Rough Grading	9/25/2026	11/2/2026	27
Vertical Construction	11/3/2026	3/24/2027	102
Site Work Fine Grading	3/25/2027	4/9/2027	12
Building Construction	4/10/2027	8/18/2027	93
Paving	8/19/2027	9/2/2027	11
Architectural Coating	8/19/2027	10/6/2027	35

3.5.2 CONSTRUCTION EQUIPMENT

A summary of construction equipment by phase is provided at Table 3-2. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-2 will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the City code.

[4] As shown in the CalEEMod User's Guide Version 2022.1, Section 4.3 "OFFROAD Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Activity	Equipment	Amount	Hours Per Day	Tier
Clearing	Dumpers/Tenders	4	8	Tier 4
	Crawler Tractors	2	8	Tier 4
Earthwork	Rubber Tired Dozers	1	8	Tier 4
	Rubber Tired Dozers	1	8	Tier 4
	Scrapers	4	8	Tier 3
Export/Remediation	Excavators	1	8	Tier 3
	Other Construction	1	8	Tier 3
	Crawler Tractors	1	8	Tier 3
Import	Dumpers/Tenders	61	8	Tier 4
	Rubber Tired Dozers	1	8	Tier 4
	Sweepers/Scrubbers	1	8	Tier 4
Rough Grading	Graders	1	8	Tier 4
	Rubber Tired Dozers	1	8	Tier 4
	Scrapers	1	8	Tier 3
	Scrapers	6	8	Tier 3
Vertical Construction	Graders	1	8	Tier 4
	Rollers	1	8	Tier 4
	Scrapers	2	8	Tier 3
	Tractors/Loaders/Backhoes	1	8	Tier 4
Site Work Fine Grading	Graders	1	8	Tier 4
	Rollers	1	8	Tier 4
	Scrapers	1	8	Tier 3
	Skid Steer Loaders	2	8	Tier 4
	Crawler Tractors	1	8	Tier 4
Building Construction	Cranes	2	8	Tier 3
	Forklifts	5	8	Tier 3
	Generator Sets	2	8	Tier 3
	Tractors/Loaders/Backhoes	5	8	Tier 3
	Welders	2	8	Tier 3
Paving	Pavers	2	8	Tier 3
	Paving Equipment	2	8	Tier 3
	Rollers	2	8	Tier 3

Construction Activity	Equipment	Amount	Hours Per Day	Tier
Architectural Coating	Air Compressors	1	8	Tier 3

3.5.3 CONSTRUCTION EMISSIONS SUMMARY

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions (59). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 3-3.

TABLE 3-3: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e[5]
2025	148.13	0.01	0.00	0.03	149.45
2026	2,071.46	0.10	0.21	1.46	2,138.40
2027	568.30	0.02	0.02	0.30	574.10
Total GHG Emissions	2,787.89	0.13	0.23	1.78	2,861.96
Amortized Construction Emissions	**92.93**	**4.23E-03**	**7.73E-03**	**5.94E-02**	**95.40**

Source: CalEEMod annual construction-source emissions are presented in Appendix 3.1.
[A] CalEEMod reports the most common GHGs emitted which include CO_2, CH_4, N_2O and Refrigerants. These GHGs are then converted into CO_2e by multiplying the individual GHG by the GWP.

3.6 OPERATIONAL EMISSIONS

Operational activities associated with the Project will result in emissions of CO_2, CH_4, N_2O and Refrigerants from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions
- Stationary Source Emissions
- On-site Cargo Equipment
- Transportation Refrigeration Units (TRUs)
- Water Supply, Treatment, and Distribution
- Solid Waste
- Refrigerants

[5] CalEEMod reports the most common GHGs emitted which include CO_2, CH_4, N_2O and Refrigerants. These GHGs are then converted into the CO_2e by multiplying the individual GHG by the GWP.

3.6.1 AREA SOURCE EMISSIONS

LANDSCAPE MAINTENANCE EQUIPMENT

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now effective. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

3.6.2 ENERGY SOURCE EMISSIONS

COMBUSTION EMISSIONS ASSOCIATED WITH NATURAL GAS AND ELECTRICITY

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting[6]. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Electricity usage associated with the Project was calculated by CalEEMod using default parameters. The Project will also include a 37-kw solar system on the building, consistent with Title 24 requirements, which is anticipated to generate up to 65,792 kWh/annually[7]. Based on information provided by the Project Applicant, the Project would not use natural gas for the building envelope. As such, natural gas consumption has not been analyzed in this study.

3.6.3 MOBILE SOURCE EMISSIONS

The Project related operational air quality emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the *Del Amo Technology Center Traffic Analysis* were utilized in this analysis (12). Per the *Del Amo Technology Center Traffic Analysis* the proposed Project expected to generate approximately 2,424 total trips per day which include 2,324 passenger car trips per day and 100 truck trips per day.

APPROACH FOR ANALYSIS OF THE PROJECT

To determine emissions from passenger car vehicles, the CalEEMod defaults were utilized for trip length and trip purpose for the proposed industrial land uses.

[6] The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

[7] It should be noted that the kWh generation associated with the solar was modeled as mitigation in CalEEMod, as such the operational emissions reflect this reduction.

This analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1[8] & LDT2[9]), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. To account for emissions generated by passenger cars, the following fleet mix was utilized in this analysis:

TABLE 3-4: PASSENGER CAR FLEET MIX

Land Use	% Vehicle Type				
	LDA	LDT1	LDT2	MDV	MCY
High-Cube Fulfillment Center Warehouse	52.41%	4.50%	25.52%	15.24%	2.34%
High-Cube Cold Storage Warehouse					

Note: The Project-specific passenger car fleet mix used in this analysis is based on a proportional split utilizing the default CalEEMod percentages assigned to LDA, LDT1, LDT2, and MDV vehicle types.

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 15.3 miles for 2-axle (LHDT1, LHDT2) trucks, 14.2 miles 3-axle (MHDT) trucks and 40 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages taken from the *Del Amo Technology Center Traffic Analysis*. The trip length function for the proposed industrial building uses has been calculated to 30.54 miles for the High-Cube Fulfillment Center Warehouse use and 28.27 for the High-Cube Cold Storage Warehouse use, with an assumption of 100% primary trips. This trip length assumption is higher than the CalEEMod defaults for trucks.

In order to be consistent with the *Del Amo Technology Center Traffic Analysis* and to accurately reflect anticipated project characteristics, trucks are broken down by truck type. The truck fleet mix is estimated by apportioning the trip rates for each truck type based on information provided in the *Del Amo Technology Center Traffic Analysis*. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1[10] & LHDT2 [11])/2-axle, Medium-Heavy-Duty Trucks (MHD)/3-axle, and Heavy-Heavy-Duty Trucks (HHD)/4+-axle. To account for emissions generated by trucks, the following fleet mix was utilized in this analysis:

TABLE 3-5: TRUCK FLEET MIX

Land Use	% Vehicle Type			
	LHDT1	LHDT2	MHDT	HHDT
High-Cube Fulfillment Center Warehouse	13.64%	3.50%	20.00%	62.86%
High-Cube Cold Storage Warehouse	26.52%	6.81%	13.33%	53.33%

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips.

[8] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

[9] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

[10] Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.

[11] Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.

3.6.3 STATIONARY SOURCE EMISSIONS

The proposed Project was conservatively assumed to include installation of one 300-horsepower diesel-powered fire pump and one 700-horsepower diesel-powered emergency generator at the industrial building. The fire pump and emergency generator were estimated to operate for up to 1 hour per day, 1 day per week for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered emergency fire pump and emergency generator were calculated using CalEEMod.

3.6.4 ON-SITE CARGO HANDLING EQUIPMENT EMISSIONS

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For this Project, on-site modeled operational equipment includes up to two (2) 175 horsepower (hp), natural gas-powered cargo handling equipment – port tractors operating at 4 hours a day[12] for 365 days of the year.

3.6.5 TRU EMISSIONS

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. For modeling purposes, 30 truck trips are anticipated to include TRUs (e.g., all truck trips that would be associated with up to 40,303-sf of high-cube cold storage use, as summarized in the *Del Amo Technology Center Traffic Analysis* (12). TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on EMissions FACtor Model version 2021 (EMFAC2021), developed by the CARB. EMFAC2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day while all activity, fuel consumption and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not always consistent with assumptions used in the modeling of project level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each pollutant by equipment type and the average daily hours of operations.

3.6.6 WATER SUPPLY, TREATMENT AND DISTRIBUTION

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used.

[12] Based on Table II-3, Port and Rail Cargo Handling Equipment Demographics by Type, from CARB's Technology Assessment: Mobile Cargo Handling Equipment document, a single piece of equipment could operate up to 2 hours per day (Total Average Annual Activity divided by Total Number Pieces of Equipment). As such, the analysis conservatively assumes that the tractor/loader/backhoe would operate up to 4 hours per day.

3.6.7 SOLID WASTE

Industrial land uses will result in the generation and disposal of solid waste. A percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters.

3.6.8 REFRIGERANTS

Air conditioning (A/C) and refrigeration equipment associated with the Project are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA (2016b). CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, beginning January 1, 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters.

3.7 GHG EMISSIONS FINDINGS AND RECOMMENDATIONS

GHG Impact #1: The Project would have the potential to generate direct or indirect GHG emissions that would result in a significant impact on the environment.

EMISSIONS SUMMARY-WITHOUT MITIGATION

The annual GHG emissions associated with the Project without mitigation are summarized in Table 3-6. As shown in Table 3-6, construction and operation of the Project would generate approximately 4,705.37 $MTCO_2e$/yr.

TABLE 3-6: PROJECT GHG EMISSIONS – WITHOUT MITIGATION

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	92.93	0.00	0.01	0.06	95.40
Mobile Source	3,493.86	0.15	0.25	4.42	3,575.30
Area Source	8.17	0.00	0.00	0.00	8.20
Energy Source	412.63	0.04	0.00	0.00	415.03
Water Usage	132.88	3.04	0.07	0.00	230.75

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Waste	33.80	3.38	0.00	0.00	118.27
Refrigerants	0.00	0.00	0.00	6.80	6.80
Stationary Source	19.04	0.00	0.00	0.00	19.10
TRU Source	0.00	0.00	0.00	0.00	141.78
On-Site Equipment	0.00	0.00	0.00	0.00	94.73
Total CO_2e (All Sources)	**4,705.37**				

Source: CalEEMod output, See Appendix 3.1 for detailed proposed Project model outputs.

A numerical threshold for determining the significance of GHG emissions in the SCAB has not been established by the SCAQMD for Projects where it is not the lead agency. As an interim threshold based on guidance provided in the CAPCOA *CEQA and Climate Change* handbook, the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90% of emissions from future development. The latest threshold developed by SCAQMD using this method is 3,000 $MTCO_2e$/yr for all projects (60).

As shown construction and operation of the Project would generate a total of approximately 4,705.37 $MTCO_2e$/yr, which would exceed the significance threshold of 3,000 $MTCO_2e$/yr; therefore, Project-related GHG emissions are considered potentially significant. The majority of the GHG emissions (81%) are associated with non-construction related mobile sources, as shown previously on Table 3-6. Emissions of motor vehicles are controlled by State and Federal standards, and the Project has no control over these emissions.

LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Potentially Significant.

MITIGATION MEASURES

The following summarizes pertinent GHG mitigation measures that have the potential to reduce GHG emissions. The predominance of the Project's operational-source GHG emissions would be generated by passenger cars and trucks accessing the Project site. The City of Torrance nor the Project Applicant have regulatory authority to control mobile source (tailpipe) emissions, and no feasible MMs beyond what is identified below exist that would reduce GHG emissions to levels that are less-than-significant, thus as shown on Table 3-7, even after implementation of applicable mitigation measures, these emissions are considered significant and unavoidable.

MM GHG-1

Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more

than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to the issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.

MM GHG-2

Prior to tenant occupancy, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that occupants/tenants of the Project site have been provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.

MM GHG-3

Final Project designs shall provide for installation of conduit in tractor trailer parking areas for the purpose of accommodating potential installation of EV truck charging stations.

MM GHG-4

All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric transport refrigeration units (TRUs).

MM GHG-5

All on-site outdoor cargo-handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) and all on-site indoor forklifts will be zero-emission powered engines (electric powered or equivalent).

EMISSIONS SUMMARY-WITH MITIGATION

As mentioned previously, with implementation of MM GHG-5, the analysis assumes that all operational off-road equipment would be zero-emission powered engines (electric powered or equivalent). However, for the remaining mitigation measures it should be noted that there is no way to quantify these reductions in the California Emissions Estimator Model (CalEEMod), and therefore, to provide a conservative disclosure of Project emissions, no reductions in emissions are assumed to occur even with implementation of these measures. Notwithstanding the foregoing, it is likely that all of the below measures will decrease Project emissions.

As shown on Table 3-7, after implementation of mitigation measure GHG-5, emissions resulting from the Project would result in 4,610.63 MTCO2e/yr. Detailed operation model outputs for the Project are presented in Appendix 3.1.

TABLE 3-7: PROJECT GHG EMISSIONS – WITH MITIGATION

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	92.93	0.00	0.01	0.06	95.40

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Mobile Source	3,493.86	0.15	0.25	4.42	3,575.30
Area Source	8.17	0.00	0.00	0.00	8.20
Energy Source	412.63	0.04	0.00	0.00	415.03
Water Usage	132.88	3.04	0.07	0.00	230.75
Waste	33.80	3.38	0.00	0.00	118.27
Refrigerants	0.00	0.00	0.00	6.80	6.80
Stationary Source	19.04	0.00	0.00	0.00	19.10
TRU Source	0.00	0.00	0.00	0.00	141.78
Total CO_2e (All Sources)	**4,610.63**				

Source: CalEEMod output, See Appendix 3.1 for detailed proposed Project model outputs.

With implementation of mitigation, the Project would result in approximately 4,610.63 $MTCO_2e$/yr. As such, the Project would exceed the SCAQMD's numeric threshold of 3,000 $MTCO_2e$ if it were applied even after mitigation. As such, Project operational-source GHG emissions are considered significant and unavoidable.

GHG Impact #2: The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

As previously stated, pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (61). As such, the Project's consistency with the 2022 Scoping Plan, is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary, since both of these plans have been superseded by the 2022 Scoping Plan. As previously noted, the 2022 Scoping Plan advocates for compliance with a local CAP to determine consistency.

2022 SCOPING PLAN CONSISTENCY

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, In-Use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. Notwithstanding, since the Project would result in an exceedance of the aforementioned numeric GHG significance thresholds, the Project has been conservatively determined to have the potential to conflict with an applicable GHG reduction plan.

CITY OF TORRANCE CAP CONSISTENCY

The Climate Action Plan identifies GHG emissions sources, presents current and future GHG emissions estimates, identifies a GHG reduction target for future years, and provides strategic policies and actions to reduce GHG emissions from energy, transportation, land use, water use, and waste sectors. The Climate Action Plan is consistent with and implements GHG emissions legislation, GHG emissions reduction strategies, and GHG emissions reduction policies of the State of California. The Climate Action Plan is also consistent with and implements GHG emissions legislation, GHG emissions reduction strategies, and GHG emissions reduction policies implemented by the South Bay Cities Council of Governments (SBCCOG).

The Climate Action Plan's existing and projected GHG inventories are based on land use designations and buildout of the City reflected in the City of Torrance General Plan. The Project is consistent with the land use designation and projected buildout conditions presented in the General Plan. Since the Project is consistent with the buildout conditions reflected under the General Plan, the Project by extension would not result in GHG emissions beyond those considered and addressed in the Climate Action Plan.

All development in the City, including the Project, are required to conform to all City-adopted policies including those presented in the CAP. The City, through established design and development review processes, would ensure that applicable CAP GHG-reducing strategies would be incorporated in the Project. The Project would be consistent with the City's CAP goal of increasing energy efficiency in new commercial buildings by complying with the most current Title 24 Green Building Standards.

The Project would have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

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5 CERTIFICATIONS

The contents of this GHG study report represent an accurate depiction of the GHG impacts associated with the proposed Del Amo Technology Center Project. The information contained in this GHG report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at hqureshi@urbanxroads.com.

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Master of Science in Environmental Studies
California State University, Fullerton • May 2010

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AEP – Association of Environmental Professionals
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PROFESSIONAL CERTIFICATIONS

Planned Communities and Urban Infill – Urban Land Institute • June 2011
Indoor Air Quality and Industrial Hygiene – EMSL Analytical • April 2008
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APPENDIX 3.1:

CALEEMOD PROJECT EMISSIONS MODEL OUTPUTS

11796-Del Amo Technology Center (Construction and Operations) Detailed Report

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1.1. Basic Project Information

Data Field	Value
Project Name	11796-Del Amo Technology Center (Construction and Operations)
Construction Start Date	12/27/2024
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.50
Precipitation (days)	17.4
Location	2899 Del Amo Blvd, Torrance, CA 90503, USA
County	Los Angeles-South Coast
City	Torrance
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4668
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Unrefrigerated Warehouse-No Rail	363	1000sqft	8.33	362,730	283,720	—	—	High-Cube Fulfillment Center Warehouse
Refrigerated Warehouse-No Rail	40.3	1000sqft	0.93	40,303	31,524	—	—	High-Cube Cold Storage Warehouse
Parking Lot	718	Space	5.67	0.00	0.00	—	—	—
Other Asphalt Surfaces	16.4	Acre	16.4	0.00	0.00	—	—	—
User Defined Industrial	403	User Defined Unit	0.00	0.00	0.00	—	—	PC Trips

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Energy	E-10-B	Establish Onsite Renewable Energy Systems: Solar Power

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	67.1	67.1	78.7	100.0	0.24	3.04	10.9	11.2	2.71	3.30	3.89	—	33,486	33,486	1.73	4.23	65.5	34,856
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	61.4	61.3	78.7	99.8	0.19	3.04	4.74	7.17	2.71	1.93	3.89	—	20,479	20,479	0.83	0.24	0.26	20,561
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.75	6.70	19.7	23.1	0.09	0.48	3.74	4.22	0.43	1.10	1.54	—	12,512	12,512	0.62	1.28	8.81	12,916

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.23	1.22	3.59	4.21	0.02	0.09	0.68	0.77	0.08	0.20	0.28	—	2,071	2,071	0.10	0.21	1.46	2,138

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.33	3.31	78.7	100.0	0.24	3.04	10.9	11.2	2.71	3.30	3.89	—	33,486	33,486	1.73	4.23	65.5	34,856
2027	67.1	67.1	29.2	45.3	0.05	1.18	2.42	3.60	1.08	0.58	1.65	—	7,148	7,148	0.30	0.22	8.92	7,229
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.13	2.11	48.5	65.2	0.12	1.87	4.74	6.61	1.67	1.93	3.60	—	13,372	13,372	0.54	0.21	0.10	13,424
2026	3.33	3.31	78.7	99.8	0.19	3.04	4.13	7.17	2.71	1.18	3.89	—	20,479	20,479	0.83	0.24	0.26	20,561
2027	61.4	61.3	15.6	34.7	0.05	0.55	2.44	2.98	0.49	0.58	1.07	—	8,020	8,020	0.27	0.23	0.24	8,096
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.13	0.13	2.98	4.15	0.01	0.12	0.27	0.39	0.10	0.10	0.20	—	895	895	0.04	0.02	0.16	903
2026	1.26	0.81	19.7	23.1	0.09	0.48	3.74	4.22	0.43	1.10	1.54	—	12,512	12,512	0.62	1.28	8.81	12,916
2027	6.75	6.70	10.9	18.8	0.02	0.42	1.12	1.55	0.38	0.26	0.65	—	3,433	3,433	0.11	0.10	1.79	3,468
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.02	0.02	0.54	0.76	< 0.005	0.02	0.05	0.07	0.02	0.02	0.04	—	148	148	0.01	< 0.005	0.03	149
2026	0.23	0.15	3.59	4.21	0.02	0.09	0.68	0.77	0.08	0.20	0.28	—	2,071	2,071	0.10	0.21	1.46	2,138
2027	1.23	1.22	2.00	3.43	< 0.005	0.08	0.21	0.28	0.07	0.05	0.12	—	568	568	0.02	0.02	0.30	574

2.3. Construction Emissions by Year, Mitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.33	3.31	78.7	100.0	0.24	3.04	10.9	11.2	2.71	3.30	3.89	—	33,486	33,486	1.73	4.23	65.5	34,856
2027	67.1	67.1	29.2	45.3	0.05	1.18	2.42	3.60	1.08	0.58	1.65	—	7,148	7,148	0.30	0.22	8.92	7,229
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.13	2.11	48.5	65.2	0.12	1.87	4.74	6.61	1.67	1.93	3.60	—	13,372	13,372	0.54	0.21	0.10	13,424
2026	3.33	3.31	78.7	99.8	0.19	3.04	4.13	7.17	2.71	1.18	3.89	—	20,479	20,479	0.83	0.24	0.26	20,561
2027	61.4	61.3	15.6	34.7	0.05	0.55	2.44	2.98	0.49	0.58	1.07	—	8,020	8,020	0.27	0.23	0.24	8,096
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.13	0.13	2.98	4.15	0.01	0.12	0.27	0.39	0.10	0.10	0.20	—	895	895	0.04	0.02	0.16	903
2026	1.26	0.81	19.7	23.1	0.09	0.48	3.74	4.22	0.43	1.10	1.54	—	12,512	12,512	0.62	1.28	8.81	12,916
2027	6.75	6.70	10.9	18.8	0.02	0.42	1.12	1.55	0.38	0.26	0.65	—	3,433	3,433	0.11	0.10	1.79	3,468
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.02	0.02	0.54	0.76	< 0.005	0.02	0.05	0.07	0.02	0.02	0.04	—	148	148	0.01	< 0.005	0.03	149
2026	0.23	0.15	3.59	4.21	0.02	0.09	0.68	0.77	0.08	0.20	0.28	—	2,071	2,071	0.10	0.21	1.46	2,138
2027	1.23	1.22	2.00	3.43	< 0.005	0.08	0.21	0.28	0.07	0.05	0.12	—	568	568	0.02	0.02	0.30	574

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	22.4	21.1	16.3	91.0	0.23	0.46	17.4	17.9	0.44	4.45	4.88	383	26,866	27,249	40.0	2.02	106	28,957
Mit.	22.4	21.1	16.3	91.0	0.23	0.46	17.4	17.9	0.44	4.45	4.88	383	26,804	27,187	40.0	2.02	106	28,894

% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	< 0.5%	< 0.5%	—	—	< 0.5%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	19.3	18.2	16.9	67.8	0.22	0.42	17.4	17.8	0.41	4.45	4.86	383	26,075	26,458	40.0	2.05	42.8	28,113
Mit.	19.3	18.2	16.9	67.8	0.22	0.42	17.4	17.8	0.41	4.45	4.86	383	26,013	26,396	40.0	2.05	42.8	28,050
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	< 0.5%	< 0.5%	—	—	< 0.5%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	19.4	18.4	12.5	74.9	0.21	0.23	16.4	16.6	0.21	4.19	4.40	383	24,446	24,829	39.9	1.96	67.7	26,479
Mit.	19.4	18.4	12.5	74.9	0.21	0.23	16.4	16.6	0.21	4.19	4.40	383	24,384	24,767	39.9	1.96	67.7	26,416
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	< 0.5%	< 0.5%	—	—	< 0.5%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.55	3.35	2.28	13.7	0.04	0.04	2.99	3.03	0.04	0.76	0.80	63.4	4,047	4,111	6.61	0.32	11.2	4,384
Mit.	3.55	3.35	2.28	13.7	0.04	0.04	2.99	3.03	0.04	0.76	0.80	63.4	4,037	4,100	6.61	0.32	11.2	4,373
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	< 0.5%	< 0.5%	< 0.5%	—	< 0.5%

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.24	7.30	11.5	69.3	0.22	0.18	17.4	17.6	0.17	4.45	4.62	—	22,776	22,776	0.91	1.54	65.2	23,324
Area	12.4	12.2	0.15	17.5	< 0.005	0.03	—	0.03	0.02	—	0.02	—	72.1	72.1	< 0.005	< 0.005	—	72.3
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	2,555	2,555	0.24	0.03	—	2,570

Water	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Stationary	1.80	1.64	4.59	4.18	0.01	0.24	0.00	0.24	0.24	0.00	0.24	0.00	840	840	0.03	0.01	0.00	842
Total	22.4	21.1	16.3	91.0	0.23	0.46	17.4	17.9	0.44	4.45	4.88	383	26,866	27,249	40.0	2.02	106	28,957
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.21	7.26	12.3	63.7	0.21	0.18	17.4	17.6	0.17	4.45	4.62	—	22,057	22,057	0.95	1.58	1.69	22,552
Area	9.29	9.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	2,555	2,555	0.24	0.03	—	2,570
Water	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Stationary	1.80	1.64	4.59	4.18	0.01	0.24	0.00	0.24	0.24	0.00	0.24	0.00	840	840	0.03	0.01	0.00	842
Total	19.3	18.2	16.9	67.8	0.22	0.42	17.4	17.8	0.41	4.45	4.86	383	26,075	26,458	40.0	2.05	42.8	28,113
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.77	6.88	11.8	62.3	0.20	0.17	16.4	16.6	0.16	4.19	4.35	—	21,103	21,103	0.89	1.49	26.7	21,595
Area	11.4	11.3	0.10	12.0	< 0.005	0.02	—	0.02	0.02	—	0.02	—	49.4	49.4	< 0.005	< 0.005	—	49.5
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	2,555	2,555	0.24	0.03	—	2,570
Water	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Stationary	0.25	0.22	0.63	0.57	< 0.005	0.03	0.00	0.03	0.03	0.00	0.03	0.00	115	115	< 0.005	< 0.005	0.00	115
Total	19.4	18.4	12.5	74.9	0.21	0.23	16.4	16.6	0.21	4.19	4.40	383	24,446	24,829	39.9	1.96	67.7	26,479
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.42	1.25	2.14	11.4	0.04	0.03	2.99	3.02	0.03	0.76	0.79	—	3,494	3,494	0.15	0.25	4.42	3,575

Area	2.08	2.05	0.02	2.19	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.17	8.17	< 0.005	< 0.005	—	8.20
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	423	423	0.04	< 0.005	—	425
Water	—	—	—	—	—	—	—	—	—	—	—	29.6	103	133	3.04	0.07	—	231
Waste	—	—	—	—	—	—	—	—	—	—	—	33.8	0.00	33.8	3.38	0.00	—	118
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.80	6.80
Stationary	0.05	0.04	0.11	0.10	< 0.005	0.01	0.00	0.01	0.01	0.00	0.01	0.00	19.0	19.0	< 0.005	< 0.005	0.00	19.1
Total	3.55	3.35	2.28	13.7	0.04	0.04	2.99	3.03	0.04	0.76	0.80	63.4	4,047	4,111	6.61	0.32	11.2	4,384

2.6. Operations Emissions by Sector, Mitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.24	7.30	11.5	69.3	0.22	0.18	17.4	17.6	0.17	4.45	4.62	—	22,776	22,776	0.91	1.54	65.2	23,324
Area	12.4	12.2	0.15	17.5	< 0.005	0.03	—	0.03	0.02	—	0.02	—	72.1	72.1	< 0.005	< 0.005	—	72.3
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	2,492	2,492	0.24	0.03	—	2,507
Water	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Stationary	1.80	1.64	4.59	4.18	0.01	0.24	0.00	0.24	0.24	0.00	0.24	0.00	840	840	0.03	0.01	0.00	842
Total	22.4	21.1	16.3	91.0	0.23	0.46	17.4	17.9	0.44	4.45	4.88	383	26,804	27,187	40.0	2.02	106	28,894
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.21	7.26	12.3	63.7	0.21	0.18	17.4	17.6	0.17	4.45	4.62	—	22,057	22,057	0.95	1.58	1.69	22,552
Area	9.29	9.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	2,492	2,492	0.24	0.03	—	2,507

Water	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Stationary	1.80	1.64	4.59	4.18	0.01	0.24	0.00	0.24	0.24	0.00	0.24	0.00	840	840	0.03	0.01	0.00	842
Total	19.3	18.2	16.9	67.8	0.22	0.42	17.4	17.8	0.41	4.45	4.86	383	26,013	26,396	40.0	2.05	42.8	28,050
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.77	6.88	11.8	62.3	0.20	0.17	16.4	16.6	0.16	4.19	4.35	—	21,103	21,103	0.89	1.49	26.7	21,595
Area	11.4	11.3	0.10	12.0	< 0.005	0.02	—	0.02	0.02	—	0.02	—	49.4	49.4	< 0.005	< 0.005	—	49.5
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	2,492	2,492	0.24	0.03	—	2,507
Water	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Waste	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Stationary	0.25	0.22	0.63	0.57	< 0.005	0.03	0.00	0.03	0.03	0.00	0.03	0.00	115	115	< 0.005	< 0.005	0.00	115
Total	19.4	18.4	12.5	74.9	0.21	0.23	16.4	16.6	0.21	4.19	4.40	383	24,384	24,767	39.9	1.96	67.7	26,416
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.42	1.25	2.14	11.4	0.04	0.03	2.99	3.02	0.03	0.76	0.79	—	3,494	3,494	0.15	0.25	4.42	3,575
Area	2.08	2.05	0.02	2.19	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.17	8.17	< 0.005	< 0.005	—	8.20
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	413	413	0.04	< 0.005	—	415
Water	—	—	—	—	—	—	—	—	—	—	—	29.6	103	133	3.04	0.07	—	231
Waste	—	—	—	—	—	—	—	—	—	—	—	33.8	0.00	33.8	3.38	0.00	—	118
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.80	6.80
Stationary	0.05	0.04	0.11	0.10	< 0.005	0.01	0.00	0.01	0.01	0.00	0.01	0.00	19.0	19.0	< 0.005	< 0.005	0.00	19.1
Total	3.55	3.35	2.28	13.7	0.04	0.04	2.99	3.03	0.04	0.76	0.80	63.4	4,037	4,100	6.61	0.32	11.2	4,373

3. Construction Emissions Details

3.1. Clearing (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.18	0.93	9.33	0.02	0.04	—	0.04	0.04	—	0.04	—	2,138	2,138	0.09	0.02	—	2,146
Dust From Material Movement	—	—	—	—	—	—	0.28	0.28	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	29.3	29.3	< 0.005	< 0.005	—	29.4
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.85	4.85	< 0.005	< 0.005	—	4.87
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	197	197	0.01	0.01	0.02	199
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.7	31.7	< 0.005	< 0.005	< 0.005	33.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.73	2.73	< 0.005	< 0.005	< 0.005	2.77
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.45
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.45	0.45	< 0.005	< 0.005	< 0.005	0.46
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.07	0.07	< 0.005	< 0.005	< 0.005	0.08
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Clearing (2025) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.18	0.93	9.33	0.02	0.04	—	0.04	0.04	—	0.04	—	2,138	2,138	0.09	0.02	—	2,146
Dust From Material Movement	—	—	—	—	—	—	0.28	0.28	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	29.3	29.3	< 0.005	< 0.005	—	29.4
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.85	4.85	< 0.005	< 0.005	—	4.87

Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	197	197	0.01	0.01	0.02	199
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.7	31.7	< 0.005	< 0.005	< 0.005	33.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.73	2.73	< 0.005	< 0.005	< 0.005	2.77
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.45
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.45	0.45	< 0.005	< 0.005	< 0.005	0.46
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.07	0.07	< 0.005	< 0.005	< 0.005	0.08
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Earthwork (2025) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.05	2.05	48.3	64.2	0.12	1.87	—	1.87	1.67	—	1.67	—	13,048	13,048	0.53	0.11	—	13,093
Dust From Material Movement	—	—	—	—	—	—	4.51	4.51	—	1.87	1.87	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.10	2.25	2.99	0.01	0.09	—	0.09	0.08	—	0.08	—	608	608	0.02	< 0.005	—	610
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.09	0.09	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.41	0.55	< 0.005	0.02	—	0.02	0.01	—	0.01	—	101	101	< 0.005	< 0.005	—	101
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	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	197	197	0.01	0.01	0.02	199
Vendor	0.01	< 0.005	0.15	0.07	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	127	127	0.01	0.02	0.01	132
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.29	9.29	< 0.005	< 0.005	0.02	9.42
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.91	5.91	< 0.005	< 0.005	0.01	6.17
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.54	1.54	< 0.005	< 0.005	< 0.005	1.56
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.98	0.98	< 0.005	< 0.005	< 0.005	1.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Earthwork (2025) - Mitigated

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

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

Off-Road Equipment	2.05	2.05	48.3	64.2	0.12	1.87	—	1.87	1.67	—	1.67	—	13,048	13,048	0.53	0.11	—	13,093
Dust From Material Movement	—	—	—	—	—	—	4.51	4.51	—	1.87	1.87	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.10	2.25	2.99	0.01	0.09	—	0.09	0.08	—	0.08	—	608	608	0.02	< 0.005	—	610
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.09	0.09	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.41	0.55	< 0.005	0.02	—	0.02	0.01	—	0.01	—	101	101	< 0.005	< 0.005	—	101
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	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	197	197	0.01	0.01	0.02	199
Vendor	0.01	< 0.005	0.15	0.07	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	127	127	0.01	0.02	0.01	132
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.29	9.29	< 0.005	< 0.005	0.02	9.42
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.91	5.91	< 0.005	< 0.005	0.01	6.17
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.54	1.54	< 0.005	< 0.005	< 0.005	1.56
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.98	0.98	< 0.005	< 0.005	< 0.005	1.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Export/Remediation (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.27	7.15	11.0	0.01	0.33	—	0.33	0.30	—	0.30	—	1,565	1,565	0.06	0.01	—	1,570

Dust From Material Movement	—	—	—	—	—	—	0.14	0.14	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.57	0.88	< 0.005	0.03	—	0.03	0.02	—	0.02	—	126	126	0.01	< 0.005	—	126
Dust From Material Movement	—	—	—	—	—	—	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	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.10	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	20.8	20.8	< 0.005	< 0.005	—	20.9
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.3	98.3	< 0.005	< 0.005	0.01	99.5

Vendor	0.07	0.03	1.13	0.53	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	952	952	0.04	0.13	0.07	993
Hauling	0.03	0.01	0.47	0.18	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	367	367	0.02	0.06	0.02	385
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.00	8.00	< 0.005	< 0.005	0.01	8.11
Vendor	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	76.4	76.4	< 0.005	0.01	0.09	79.7
Hauling	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	29.4	29.4	< 0.005	< 0.005	0.03	30.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.33	1.33	< 0.005	< 0.005	< 0.005	1.34
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12.6	12.6	< 0.005	< 0.005	0.01	13.2
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.88	4.88	< 0.005	< 0.005	< 0.005	5.11

3.6. Export/Remediation (2025) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.27	7.15	11.0	0.01	0.33	—	0.33	0.30	—	0.30	—	1,565	1,565	0.06	0.01	—	1,570
Dust From Material Movement	—	—	—	—	—	—	0.14	0.14	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.57	0.88	< 0.005	0.03	—	0.03	0.02	—	0.02	—	126	126	0.01	< 0.005	—	126
Dust From Material Movement	—	—	—	—	—	—	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	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.10	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	20.8	20.8	< 0.005	< 0.005	—	20.9
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.3	98.3	< 0.005	< 0.005	0.01	99.5
Vendor	0.07	0.03	1.13	0.53	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	952	952	0.04	0.13	0.07	993
Hauling	0.03	0.01	0.47	0.18	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	367	367	0.02	0.06	0.02	385
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.00	8.00	< 0.005	< 0.005	0.01	8.11

Vendor	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	76.4	76.4	< 0.005	0.01	0.09	79.7
Hauling	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	29.4	29.4	< 0.005	< 0.005	0.03	30.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.33	1.33	< 0.005	< 0.005	< 0.005	1.34
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12.6	12.6	< 0.005	< 0.005	0.01	13.2
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.88	4.88	< 0.005	< 0.005	< 0.005	5.11

3.7. Export/Remediation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.27	7.15	11.0	0.01	0.33	—	0.33	0.30	—	0.30	—	1,565	1,565	0.06	0.01	—	1,571
Dust From Material Movement	—	—	—	—	—	—	0.14	0.14	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.27	7.15	11.0	0.01	0.33	—	0.33	0.30	—	0.30	—	1,565	1,565	0.06	0.01	—	1,571

Dust From Material Movement	—	—	—	—	—	—	0.14	0.14	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.07	1.75	2.68	< 0.005	0.08	—	0.08	0.07	—	0.07	—	383	383	0.02	< 0.005	—	384
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.32	0.49	< 0.005	0.01	—	0.01	0.01	—	0.01	—	63.4	63.4	< 0.005	< 0.005	—	63.6
Dust From Material Movement	—	—	—	—	—	—	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	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.48	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	102	102	< 0.005	< 0.005	0.34	103
Vendor	0.07	0.03	1.03	0.50	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	935	935	0.04	0.13	2.53	979
Hauling	0.03	0.01	0.43	0.17	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	360	360	0.02	0.06	0.81	379

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.41	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	96.3	96.3	< 0.005	< 0.005	0.01	97.5
Vendor	0.07	0.03	1.08	0.51	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	936	936	0.04	0.13	0.07	977
Hauling	0.03	0.01	0.45	0.17	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	360	360	0.02	0.06	0.02	378
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.9	23.9	< 0.005	< 0.005	0.04	24.2
Vendor	0.02	0.01	0.27	0.12	< 0.005	< 0.005	0.06	0.07	< 0.005	0.02	0.02	—	229	229	0.01	0.03	0.27	239
Hauling	0.01	< 0.005	0.11	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	88.1	88.1	< 0.005	0.01	0.08	92.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.96	3.96	< 0.005	< 0.005	0.01	4.01
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	37.9	37.9	< 0.005	0.01	0.04	39.6
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	14.6	14.6	< 0.005	< 0.005	0.01	15.3

3.8. Export/Remediation (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.27	7.15	11.0	0.01	0.33	—	0.33	0.30	—	0.30	—	1,565	1,565	0.06	0.01	—	1,571
Dust From Material Movement	—	—	—	—	—	—	0.14	0.14	—	0.02	0.02	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.27	7.15	11.0	0.01	0.33	—	0.33	0.30	—	0.30	—	1,565	1,565	0.06	0.01	—	1,571
Dust From Material Movement	—	—	—	—	—	—	0.14	0.14	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.07	1.75	2.68	< 0.005	0.08	—	0.08	0.07	—	0.07	—	383	383	0.02	< 0.005	—	384
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.32	0.49	< 0.005	0.01	—	0.01	0.01	—	0.01	—	63.4	63.4	< 0.005	< 0.005	—	63.6
Dust From Material Movement	—	—	—	—	—	—	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	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.48	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	102	102	< 0.005	< 0.005	0.34	103
Vendor	0.07	0.03	1.03	0.50	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	935	935	0.04	0.13	2.53	979
Hauling	0.03	0.01	0.43	0.17	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	360	360	0.02	0.06	0.81	379
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.41	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	96.3	96.3	< 0.005	< 0.005	0.01	97.5
Vendor	0.07	0.03	1.08	0.51	0.01	0.01	0.26	0.27	0.01	0.07	0.08	—	936	936	0.04	0.13	0.07	977
Hauling	0.03	0.01	0.45	0.17	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	360	360	0.02	0.06	0.02	378
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.9	23.9	< 0.005	< 0.005	0.04	24.2
Vendor	0.02	0.01	0.27	0.12	< 0.005	< 0.005	0.06	0.07	< 0.005	0.02	0.02	—	229	229	0.01	0.03	0.27	239
Hauling	0.01	< 0.005	0.11	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	88.1	88.1	< 0.005	0.01	0.08	92.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.96	3.96	< 0.005	< 0.005	0.01	4.01
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	37.9	37.9	< 0.005	0.01	0.04	39.6
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	14.6	14.6	< 0.005	< 0.005	0.01	15.3

3.9. Import (2026) - Unmitigated

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

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

Off-Road	0.19	0.19	2.17	9.35	0.06	0.03	—	0.03	0.03	—	0.03	—	5,534	5,534	0.22	0.04	—	5,553
Dust From Material Movement	—	—	—	—	—	—	1.77	1.77	—	0.89	0.89	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	0.61	2.61	0.02	0.01	—	0.01	0.01	—	0.01	—	1,546	1,546	0.06	0.01	—	1,552
Dust From Material Movement	—	—	—	—	—	—	0.49	0.49	—	0.25	0.25	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.11	0.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	256	256	0.01	< 0.005	—	257
Dust From Material Movement	—	—	—	—	—	—	0.09	0.09	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.65	0.58	0.61	10.2	0.00	0.00	2.06	2.06	0.00	0.48	0.48	—	2,134	2,134	0.09	0.07	7.22	2,166
Vendor	0.06	0.02	0.89	0.43	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	811	811	0.03	0.12	2.19	848
Hauling	1.81	0.40	30.1	11.8	0.17	0.32	6.82	7.14	0.32	1.87	2.19	—	25,008	25,008	1.39	4.00	56.1	26,289
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.18	0.16	0.21	2.54	0.00	0.00	0.57	0.57	0.00	0.13	0.13	—	574	574	0.03	0.02	0.87	581
Vendor	0.02	0.01	0.26	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	227	227	0.01	0.03	0.26	237
Hauling	0.50	0.11	8.84	3.32	0.05	0.09	1.89	1.98	0.09	0.52	0.61	—	6,990	6,990	0.39	1.12	6.74	7,339
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.04	0.46	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	95.0	95.0	< 0.005	< 0.005	0.14	96.3
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	37.5	37.5	< 0.005	0.01	0.04	39.2
Hauling	0.09	0.02	1.61	0.61	0.01	0.02	0.34	0.36	0.02	0.09	0.11	—	1,157	1,157	0.06	0.18	1.12	1,215

3.10. Import (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.19	2.17	9.35	0.06	0.03	—	0.03	0.03	—	0.03	—	5,534	5,534	0.22	0.04	—	5,553

Dust From Material Movement	—	—	—	—	—	—	1.77	1.77	—	0.89	0.89	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	0.61	2.61	0.02	0.01	—	0.01	0.01	—	0.01	—	1,546	1,546	0.06	0.01	—	1,552
Dust From Material Movement	—	—	—	—	—	—	0.49	0.49	—	0.25	0.25	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.11	0.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	256	256	0.01	< 0.005	—	257
Dust From Material Movement	—	—	—	—	—	—	0.09	0.09	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.65	0.58	0.61	10.2	0.00	0.00	2.06	2.06	0.00	0.48	0.48	—	2,134	2,134	0.09	0.07	7.22	2,166

Vendor	0.06	0.02	0.89	0.43	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	811	811	0.03	0.12	2.19	848
Hauling	1.81	0.40	30.1	11.8	0.17	0.32	6.82	7.14	0.32	1.87	2.19	—	25,008	25,008	1.39	4.00	56.1	26,289
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.18	0.16	0.21	2.54	0.00	0.00	0.57	0.57	0.00	0.13	0.13	—	574	574	0.03	0.02	0.87	581
Vendor	0.02	0.01	0.26	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	227	227	0.01	0.03	0.26	237
Hauling	0.50	0.11	8.84	3.32	0.05	0.09	1.89	1.98	0.09	0.52	0.61	—	6,990	6,990	0.39	1.12	6.74	7,339
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.04	0.46	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	95.0	95.0	< 0.005	< 0.005	0.14	96.3
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	37.5	37.5	< 0.005	0.01	0.04	39.2
Hauling	0.09	0.02	1.61	0.61	0.01	0.02	0.34	0.36	0.02	0.09	0.11	—	1,157	1,157	0.06	0.18	1.12	1,215

3.11. Rough Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.22	3.22	78.4	98.4	0.18	3.04	—	3.04	2.71	—	2.71	—	19,972	19,972	0.81	0.16	—	20,040
Dust From Material Movement	—	—	—	—	—	—	3.77	3.77	—	1.10	1.10	—	—	—	—	—	—	—
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	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.22	3.22	78.4	98.4	0.18	3.04	—	3.04	2.71	—	2.71	—	19,972	19,972	0.81	0.16	—	20,040
Dust From Material Movement	—	—	—	—	—	—	3.77	3.77	—	1.10	1.10	—	—	—	—	—	—	—
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	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.24	0.24	5.80	7.28	0.01	0.22	—	0.22	0.20	—	0.20	—	1,477	1,477	0.06	0.01	—	1,482
Dust From Material Movement	—	—	—	—	—	—	0.28	0.28	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	1.06	1.33	< 0.005	0.04	—	0.04	0.04	—	0.04	—	245	245	0.01	< 0.005	—	245
Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.09	1.45	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	305	305	0.01	0.01	1.03	309
Vendor	0.02	0.01	0.24	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	218	218	0.01	0.03	0.59	228
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.10	1.24	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	289	289	0.01	0.01	0.03	293
Vendor	0.02	0.01	0.25	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	218	218	0.01	0.03	0.02	228
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.7	21.7	< 0.005	< 0.005	0.03	22.0
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	16.1	16.1	< 0.005	< 0.005	0.02	16.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.59	3.59	< 0.005	< 0.005	0.01	3.64
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.67	2.67	< 0.005	< 0.005	< 0.005	2.79
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Rough Grading (2026) - Mitigated

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

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

Off-Road Equipm	3.22	3.22	78.4	98.4	0.18	3.04	—	3.04	2.71	—	2.71	—	19,972	19,972	0.81	0.16	—	20,040
Dust From Material Movement	—	—	—	—	—	—	3.77	3.77	—	1.10	1.10	—	—	—	—	—	—	—
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	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.22	3.22	78.4	98.4	0.18	3.04	—	3.04	2.71	—	2.71	—	19,972	19,972	0.81	0.16	—	20,040
Dust From Material Movement	—	—	—	—	—	—	3.77	3.77	—	1.10	1.10	—	—	—	—	—	—	—
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	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.24	0.24	5.80	7.28	0.01	0.22	—	0.22	0.20	—	0.20	—	1,477	1,477	0.06	0.01	—	1,482
Dust From Material Movement	—	—	—	—	—	—	0.28	0.28	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.04	0.04	1.06	1.33	< 0.005	0.04	—	0.04	0.04	—	0.04	—	245	245	0.01	< 0.005	—	245
Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.09	1.45	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	305	305	0.01	0.01	1.03	309
Vendor	0.02	0.01	0.24	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	218	218	0.01	0.03	0.59	228
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.10	1.24	0.00	0.00	0.29	0.29	0.00	0.07	0.07	—	289	289	0.01	0.01	0.03	293
Vendor	0.02	0.01	0.25	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	218	218	0.01	0.03	0.02	228
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.7	21.7	< 0.005	< 0.005	0.03	22.0
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	16.1	16.1	< 0.005	< 0.005	0.02	16.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.59	3.59	< 0.005	< 0.005	0.01	3.64
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.67	2.67	< 0.005	< 0.005	< 0.005	2.79
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Site Work Fine Grading (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	0.50	9.71	20.0	0.03	0.29	—	0.29	0.27	—	0.27	—	3,756	3,756	0.15	0.03	—	3,769
Dust From Material Movement	—	—	—	—	—	—	0.55	0.55	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	0.50	9.71	20.0	0.03	0.29	—	0.29	0.27	—	0.27	—	3,756	3,756	0.15	0.03	—	3,769
Dust From Material Movement	—	—	—	—	—	—	0.55	0.55	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.32	0.66	< 0.005	0.01	—	0.01	0.01	—	0.01	—	123	123	0.01	< 0.005	—	124

Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.06	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	20.4	20.4	< 0.005	< 0.005	—	20.5
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.90	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	199	199	0.01	0.01	0.62	202
Vendor	0.01	< 0.005	0.10	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	91.7	91.7	< 0.005	0.01	0.24	95.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.76	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	189	189	< 0.005	0.01	0.02	191
Vendor	0.01	< 0.005	0.10	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	91.8	91.8	< 0.005	0.01	0.01	95.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.30	6.30	< 0.005	< 0.005	0.01	6.39
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.02	3.02	< 0.005	< 0.005	< 0.005	3.15

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.04	1.04	< 0.005	< 0.005	< 0.005	1.06
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.50	0.50	< 0.005	< 0.005	< 0.005	0.52
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Site Work Fine Grading (2027) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	0.50	9.71	20.0	0.03	0.29	—	0.29	0.27	—	0.27	—	3,756	3,756	0.15	0.03	—	3,769
Dust From Material Movement	—	—	—	—	—	—	0.55	0.55	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	0.50	9.71	20.0	0.03	0.29	—	0.29	0.27	—	0.27	—	3,756	3,756	0.15	0.03	—	3,769
Dust From Material Movement	—	—	—	—	—	—	0.55	0.55	—	0.06	0.06	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.32	0.66	< 0.005	0.01	—	0.01	0.01	—	0.01	—	123	123	0.01	< 0.005	—	124
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.06	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	20.4	20.4	< 0.005	< 0.005	—	20.5
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.90	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	199	199	0.01	0.01	0.62	202
Vendor	0.01	< 0.005	0.10	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	91.7	91.7	< 0.005	0.01	0.24	95.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.76	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	189	189	< 0.005	0.01	0.02	191

Vendor	0.01	< 0.005	0.10	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	91.8	91.8	< 0.005	0.01	0.01	95.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.30	6.30	< 0.005	< 0.005	0.01	6.39
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.02	3.02	< 0.005	< 0.005	< 0.005	3.15
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.04	1.04	< 0.005	< 0.005	< 0.005	1.06
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.50	0.50	< 0.005	< 0.005	< 0.005	0.52
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Vertical Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.71	0.71	14.0	25.7	0.05	0.54	—	0.54	0.49	—	0.49	—	5,093	5,093	0.21	0.04	—	5,110
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.08	0.08	1.62	2.96	0.01	0.06	—	0.06	0.06	—	0.06	—	588	588	0.02	< 0.005	—	590
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.30	0.54	< 0.005	0.01	—	0.01	0.01	—	0.01	—	97.4	97.4	< 0.005	< 0.005	—	97.7
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.70	0.62	0.74	9.33	0.00	0.00	2.21	2.21	0.00	0.52	0.52	—	2,174	2,174	0.10	0.08	0.20	2,201
Vendor	0.06	0.02	0.93	0.44	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	811	811	0.03	0.12	0.06	846
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.09	1.13	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	255	255	0.01	0.01	0.39	258
Vendor	0.01	< 0.005	0.11	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	93.6	93.6	< 0.005	0.01	0.11	97.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.02	0.21	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	42.2	42.2	< 0.005	< 0.005	0.06	42.7
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.5	15.5	< 0.005	< 0.005	0.02	16.2
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	0.00	0.00	0.00

3.16. Vertical Construction (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.71	0.71	14.0	25.7	0.05	0.54	—	0.54	0.49	—	0.49	—	5,093	5,093	0.21	0.04	—	5,110
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.08	1.62	2.96	0.01	0.06	—	0.06	0.06	—	0.06	—	588	588	0.02	< 0.005	—	590
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.30	0.54	< 0.005	0.01	—	0.01	0.01	—	0.01	—	97.4	97.4	< 0.005	< 0.005	—	97.7
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.70	0.62	0.74	9.33	0.00	0.00	2.21	2.21	0.00	0.52	0.52	—	2,174	2,174	0.10	0.08	0.20	2,201
Vendor	0.06	0.02	0.93	0.44	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	811	811	0.03	0.12	0.06	846
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.09	1.13	0.00	0.00	0.25	0.25	0.00	0.06	0.06	—	255	255	0.01	0.01	0.39	258
Vendor	0.01	< 0.005	0.11	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	93.6	93.6	< 0.005	0.01	0.11	97.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.02	0.21	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	42.2	42.2	< 0.005	< 0.005	0.06	42.7
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.5	15.5	< 0.005	< 0.005	0.02	16.2
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	0.00	0.00	0.00

3.17. Vertical Construction (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.71	0.71	14.0	25.7	0.05	0.54	—	0.54	0.49	—	0.49	—	5,092	5,092	0.21	0.04	—	5,110
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.11	2.28	4.17	0.01	0.09	—	0.09	0.08	—	0.08	—	827	827	0.03	0.01	—	830
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.42	0.76	< 0.005	0.02	—	0.02	0.01	—	0.01	—	137	137	0.01	< 0.005	—	137
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.67	0.59	0.73	8.61	0.00	0.00	2.21	2.21	0.00	0.52	0.52	—	2,133	2,133	0.03	0.08	0.18	2,158
Vendor	0.05	0.02	0.89	0.42	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	795	795	0.03	0.11	0.05	829
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.10	0.12	1.47	0.00	0.00	0.36	0.36	0.00	0.08	0.08	—	352	352	< 0.005	0.01	0.49	356
Vendor	0.01	< 0.005	0.15	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	129	129	0.01	0.02	0.15	135
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.27	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	58.2	58.2	< 0.005	< 0.005	0.08	58.9
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.4	21.4	< 0.005	< 0.005	0.02	22.3
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	0.00	0.00	0.00

3.18. Vertical Construction (2027) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.71	0.71	14.0	25.7	0.05	0.54	—	0.54	0.49	—	0.49	—	5,092	5,092	0.21	0.04	—	5,110
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.11	2.28	4.17	0.01	0.09	—	0.09	0.08	—	0.08	—	827	827	0.03	0.01	—	830
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.42	0.76	< 0.005	0.02	—	0.02	0.01	—	0.01	—	137	137	0.01	< 0.005	—	137
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.67	0.59	0.73	8.61	0.00	0.00	2.21	2.21	0.00	0.52	0.52	—	2,133	2,133	0.03	0.08	0.18	2,158
Vendor	0.05	0.02	0.89	0.42	0.01	0.01	0.22	0.23	0.01	0.06	0.07	—	795	795	0.03	0.11	0.05	829
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.10	0.12	1.47	0.00	0.00	0.36	0.36	0.00	0.08	0.08	—	352	352	< 0.005	0.01	0.49	356
Vendor	0.01	< 0.005	0.15	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	129	129	0.01	0.02	0.15	135
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.27	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	58.2	58.2	< 0.005	< 0.005	0.08	58.9
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.4	21.4	< 0.005	< 0.005	0.02	22.3
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	0.00	0.00	0.00

3.19. Building Construction (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.00	1.00	27.8	34.8	0.04	1.18	—	1.18	1.07	—	1.07	—	4,165	4,165	0.17	0.03	—	4,179
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.25	0.25	7.09	8.86	0.01	0.30	—	0.30	0.27	—	0.27	—	1,061	1,061	0.04	0.01	—	1,065
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	1.29	1.62	< 0.005	0.05	—	0.05	0.05	—	0.05	—	176	176	0.01	< 0.005	—	176
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.68	0.60	0.58	10.2	0.00	0.00	2.21	2.21	0.00	0.52	0.52	—	2,250	2,250	0.10	0.08	7.01	2,283
Vendor	0.05	0.02	0.79	0.38	0.01	0.01	0.21	0.21	0.01	0.06	0.06	—	734	734	0.03	0.10	1.91	767
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.15	0.19	2.31	0.00	0.00	0.56	0.56	0.00	0.13	0.13	—	551	551	0.01	0.02	0.77	558
Vendor	0.01	0.01	0.21	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	187	187	0.01	0.03	0.21	195
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.42	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	91.3	91.3	< 0.005	< 0.005	0.13	92.5
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.0	31.0	< 0.005	< 0.005	0.03	32.3
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	0.00	0.00	0.00

3.20. Building Construction (2027) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.00	1.00	27.8	34.8	0.04	1.18	—	1.18	1.07	—	1.07	—	4,165	4,165	0.17	0.03	—	4,179
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.25	0.25	7.09	8.86	0.01	0.30	—	0.30	0.27	—	0.27	—	1,061	1,061	0.04	0.01	—	1,065
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	1.29	1.62	< 0.005	0.05	—	0.05	0.05	—	0.05	—	176	176	0.01	< 0.005	—	176
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.68	0.60	0.58	10.2	0.00	0.00	2.21	2.21	0.00	0.52	0.52	—	2,250	2,250	0.10	0.08	7.01	2,283
Vendor	0.05	0.02	0.79	0.38	0.01	0.01	0.21	0.21	0.01	0.06	0.06	—	734	734	0.03	0.10	1.91	767
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.15	0.19	2.31	0.00	0.00	0.56	0.56	0.00	0.13	0.13	—	551	551	0.01	0.02	0.77	558
Vendor	0.01	0.01	0.21	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	187	187	0.01	0.03	0.21	195
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.42	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	91.3	91.3	< 0.005	< 0.005	0.13	92.5
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.0	31.0	< 0.005	< 0.005	0.03	32.3
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	0.00	0.00	0.00

3.21. Paving (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42	0.42	11.3	17.3	0.02	0.51	—	0.51	0.47	—	0.47	—	2,469	2,469	0.10	0.02	—	2,477
Paving	5.26	5.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.34	0.52	< 0.005	0.02	—	0.02	0.01	—	0.01	—	74.4	74.4	< 0.005	< 0.005	—	74.7
Paving	0.16	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.06	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.3	12.3	< 0.005	< 0.005	—	12.4
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.90	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	199	199	0.01	0.01	0.62	202
Vendor	0.01	< 0.005	0.10	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	91.7	91.7	< 0.005	0.01	0.24	95.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.78	5.78	< 0.005	< 0.005	0.01	5.85
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.76	2.76	< 0.005	< 0.005	< 0.005	2.88

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.96	0.96	< 0.005	< 0.005	< 0.005	0.97
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.46	0.46	< 0.005	< 0.005	< 0.005	0.48
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.22. Paving (2027) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42	0.42	11.3	17.3	0.02	0.51	—	0.51	0.47	—	0.47	—	2,469	2,469	0.10	0.02	—	2,477
Paving	5.26	5.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.34	0.52	< 0.005	0.02	—	0.02	0.01	—	0.01	—	74.4	74.4	< 0.005	< 0.005	—	74.7
Paving	0.16	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	< 0.005	< 0.005	0.06	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.3	12.3	< 0.005	< 0.005	—	12.4
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.90	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	199	199	0.01	0.01	0.62	202
Vendor	0.01	< 0.005	0.10	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	91.7	91.7	< 0.005	0.01	0.24	95.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.78	5.78	< 0.005	< 0.005	0.01	5.85
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.76	2.76	< 0.005	< 0.005	< 0.005	2.88
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.96	0.96	< 0.005	< 0.005	< 0.005	0.97
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.46	0.46	< 0.005	< 0.005	< 0.005	0.48
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.23. Architectural Coating (2027) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.06	1.81	2.44	—	0.07	—	0.07	0.07	—	0.07	—	—	—	—	—	—	—
Architectural Coatings	61.0	61.0	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.06	1.81	2.44	—	0.07	—	0.07	0.07	—	0.07	—	—	—	—	—	—	—
Architectural Coatings	61.0	61.0	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.17	0.23	—	0.01	—	0.01	0.01	—	0.01	—	—	—	—	—	—	—
Architectural Coatings	5.85	5.85	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	—	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	—	—	—	—	—	—
Architectural Coatings	1.07	1.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.24	0.23	4.07	0.00	0.00	0.89	0.89	0.00	0.21	0.21	—	900	900	0.04	0.03	2.80	913
Vendor	0.02	0.01	0.30	0.14	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	275	275	0.01	0.04	0.72	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	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.24	0.29	3.45	0.00	0.00	0.89	0.89	0.00	0.21	0.21	—	853	853	0.01	0.03	0.07	863
Vendor	0.02	0.01	0.31	0.14	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	275	275	0.01	0.04	0.02	287
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.03	0.35	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	83.0	83.0	< 0.005	< 0.005	0.12	84.1
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	26.4	26.4	< 0.005	< 0.005	0.03	27.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.06	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	13.7	13.7	< 0.005	< 0.005	0.02	13.9
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.37	4.37	< 0.005	< 0.005	< 0.005	4.56
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.24. Architectural Coating (2027) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.06	1.81	2.44	—	0.07	—	0.07	0.07	—	0.07	—	—	—	—	—	—	—
Architectural Coatings	61.0	61.0	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.06	1.81	2.44	—	0.07	—	0.07	0.07	—	0.07	—	—	—	—	—	—	—
Architectural Coatings	61.0	61.0	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.17	0.23	—	0.01	—	0.01	0.01	—	0.01	—	—	—	—	—	—	—

Architect Coatings	5.85	5.85	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	—	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	—	—	—	—	—	—
Architectural Coatings	1.07	1.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.24	0.23	4.07	0.00	0.00	0.89	0.89	0.00	0.21	0.21	—	900	900	0.04	0.03	2.80	913
Vendor	0.02	0.01	0.30	0.14	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	275	275	0.01	0.04	0.72	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	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.24	0.29	3.45	0.00	0.00	0.89	0.89	0.00	0.21	0.21	—	853	853	0.01	0.03	0.07	863
Vendor	0.02	0.01	0.31	0.14	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	275	275	0.01	0.04	0.02	287
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.03	0.35	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	83.0	83.0	< 0.005	< 0.005	0.12	84.1
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	26.4	26.4	< 0.005	< 0.005	0.03	27.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.01	0.06	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	13.7	13.7	< 0.005	< 0.005	0.02	13.9
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.37	4.37	< 0.005	< 0.005	< 0.005	4.56
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.37	0.13	5.93	2.67	0.05	0.08	1.90	1.98	0.08	0.51	0.59	—	5,972	5,972	0.23	0.86	16.2	6,251
Refrigerated Warehouse-No Rail	0.15	0.06	2.09	1.11	0.02	0.03	0.75	0.78	0.03	0.20	0.23	—	2,123	2,123	0.08	0.29	6.73	2,219
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	7.72	7.11	3.53	65.5	0.15	0.07	14.8	14.8	0.07	3.74	3.80	—	14,681	14,681	0.60	0.38	42.3	14,853
Total	8.24	7.30	11.5	69.3	0.22	0.18	17.4	17.6	0.17	4.45	4.62	—	22,776	22,776	0.91	1.54	65.2	23,324

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.37	0.13	6.17	2.68	0.05	0.08	1.90	1.98	0.08	0.51	0.59	—	5,973	5,973	0.23	0.86	0.42	6,237
Refrigerated Warehouse-No Rail	0.14	0.06	2.17	1.11	0.02	0.03	0.75	0.78	0.03	0.20	0.23	—	2,123	2,123	0.08	0.30	0.17	2,213
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	7.70	7.08	3.98	59.9	0.14	0.07	14.8	14.8	0.07	3.74	3.80	—	13,960	13,960	0.64	0.42	1.10	14,102
Total	8.21	7.26	12.3	63.7	0.21	0.18	17.4	17.6	0.17	4.45	4.62	—	22,057	22,057	0.95	1.58	1.69	22,552
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.06	0.02	1.09	0.47	0.01	0.01	0.33	0.34	0.01	0.09	0.10	—	948	948	0.04	0.14	1.11	991
Refrigerated Warehouse-No Rail	0.02	0.01	0.35	0.18	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.04	—	307	307	0.01	0.04	0.42	321
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

User Defined Industrial	1.33	1.22	0.70	10.7	0.02	0.01	2.55	2.56	0.01	0.64	0.66	—	2,239	2,239	0.10	0.07	2.89	2,264
Total	1.42	1.25	2.14	11.4	0.04	0.03	2.99	3.02	0.03	0.76	0.79	—	3,494	3,494	0.15	0.25	4.42	3,575

4.1.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.37	0.13	5.93	2.67	0.05	0.08	1.90	1.98	0.08	0.51	0.59	—	5,972	5,972	0.23	0.86	16.2	6,251
Refrigerated Warehouse-No Rail	0.15	0.06	2.09	1.11	0.02	0.03	0.75	0.78	0.03	0.20	0.23	—	2,123	2,123	0.08	0.29	6.73	2,219
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	7.72	7.11	3.53	65.5	0.15	0.07	14.8	14.8	0.07	3.74	3.80	—	14,681	14,681	0.60	0.38	42.3	14,853
Total	8.24	7.30	11.5	69.3	0.22	0.18	17.4	17.6	0.17	4.45	4.62	—	22,776	22,776	0.91	1.54	65.2	23,324
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No Rail	0.37	0.13	6.17	2.68	0.05	0.08	1.90	1.98	0.08	0.51	0.59	—	5,973	5,973	0.23	0.86	0.42	6,237
Refrigerated Warehouse-No Rail	0.14	0.06	2.17	1.11	0.02	0.03	0.75	0.78	0.03	0.20	0.23	—	2,123	2,123	0.08	0.30	0.17	2,213
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	7.70	7.08	3.98	59.9	0.14	0.07	14.8	14.8	0.07	3.74	3.80	—	13,960	13,960	0.64	0.42	1.10	14,102
Total	8.21	7.26	12.3	63.7	0.21	0.18	17.4	17.6	0.17	4.45	4.62	—	22,057	22,057	0.95	1.58	1.69	22,552
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.06	0.02	1.09	0.47	0.01	0.01	0.33	0.34	0.01	0.09	0.10	—	948	948	0.04	0.14	1.11	991
Refrigerated Warehouse-No Rail	0.02	0.01	0.35	0.18	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.04	—	307	307	0.01	0.04	0.42	321
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	1.33	1.22	0.70	10.7	0.02	0.01	2.55	2.56	0.01	0.64	0.66	—	2,239	2,239	0.10	0.07	2.89	2,264
Total	1.42	1.25	2.14	11.4	0.04	0.03	2.99	3.02	0.03	0.76	0.79	—	3,494	3,494	0.15	0.25	4.42	3,575

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,610	1,610	0.15	0.02	—	1,620
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	739	739	0.07	0.01	—	744
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	205	205	0.02	< 0.005	—	206
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,555	2,555	0.24	0.03	—	2,570
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,610	1,610	0.15	0.02	—	1,620

Refriger Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	739	739	0.07	0.01	—	744
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	205	205	0.02	< 0.005	—	206
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,555	2,555	0.24	0.03	—	2,570
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	267	267	0.03	< 0.005	—	268
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	122	122	0.01	< 0.005	—	123
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	34.0	34.0	< 0.005	< 0.005	—	34.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	423	423	0.04	< 0.005	—	425

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,548	1,548	0.15	0.02	—	1,557
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	739	739	0.07	0.01	—	744
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	205	205	0.02	< 0.005	—	206
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,492	2,492	0.24	0.03	—	2,507
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,548	1,548	0.15	0.02	—	1,557
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	739	739	0.07	0.01	—	744

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	205	205	0.02	< 0.005	—	206
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,492	2,492	0.24	0.03	—	2,507
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	256	256	0.02	< 0.005	—	258
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	122	122	0.01	< 0.005	—	123
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	34.0	34.0	< 0.005	< 0.005	—	34.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	413	413	0.04	< 0.005	—	415

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	—	0.00
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	—	0.00
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	—	0.00
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

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

Unrefrigerated	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	—	0.00
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	—	0.00
Refrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	8.70	8.70	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	0.59	0.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	3.12	2.88	0.15	17.5	< 0.005	0.03	—	0.03	0.02	—	0.02	—	72.1	72.1	< 0.005	< 0.005	—	72.3
Total	12.4	12.2	0.15	17.5	< 0.005	0.03	—	0.03	0.02	—	0.02	—	72.1	72.1	< 0.005	< 0.005	—	72.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	8.70	8.70	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.59	0.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	9.29	9.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.59	1.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.39	0.36	0.02	2.19	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.17	8.17	< 0.005	< 0.005	—	8.20
Total	2.08	2.05	0.02	2.19	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.17	8.17	< 0.005	< 0.005	—	8.20

4.3.2. Mitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	8.70	8.70	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.59	0.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	3.12	2.88	0.15	17.5	< 0.005	0.03	—	0.03	0.02	—	0.02	—	72.1	72.1	< 0.005	< 0.005	—	72.3
Total	12.4	12.2	0.15	17.5	< 0.005	0.03	—	0.03	0.02	—	0.02	—	72.1	72.1	< 0.005	< 0.005	—	72.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	8.70	8.70	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.59	0.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	9.29	9.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.59	1.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coating	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.39	0.36	0.02	2.19	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.17	8.17	< 0.005	< 0.005	—	8.20
Total	2.08	2.05	0.02	2.19	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.17	8.17	< 0.005	< 0.005	—	8.20

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	161	562	722	16.5	0.40	—	1,254
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	17.9	62.4	80.3	1.84	0.04	—	139
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	161	562	722	16.5	0.40	—	1,254
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	17.9	62.4	80.3	1.84	0.04	—	139
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	26.6	93.0	120	2.74	0.07	—	208
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.96	10.3	13.3	0.30	0.01	—	23.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	29.6	103	133	3.04	0.07	—	231

4.4.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	161	562	722	16.5	0.40	—	1,254
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	17.9	62.4	80.3	1.84	0.04	—	139
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	161	562	722	16.5	0.40	—	1,254
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	17.9	62.4	80.3	1.84	0.04	—	139
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	179	624	803	18.4	0.44	—	1,394
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	26.6	93.0	120	2.74	0.07	—	208
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	2.96	10.3	13.3	0.30	0.01	—	23.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	29.6	103	133	3.04	0.07	—	231

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	184	0.00	184	18.4	0.00	—	643
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	20.4	0.00	20.4	2.04	0.00	—	71.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrig Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	184	0.00	184	18.4	0.00	—	643
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	20.4	0.00	20.4	2.04	0.00	—	71.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	30.4	0.00	30.4	3.04	0.00	—	106
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.38	0.00	3.38	0.34	0.00	—	11.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	33.8	0.00	33.8	3.38	0.00	—	118

4.5.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	184	0.00	184	18.4	0.00	—	643
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	20.4	0.00	20.4	2.04	0.00	—	71.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	184	0.00	184	18.4	0.00	—	643

Refrigerated Warehouse-No	—	—	—	—	—	—	—	—	—	—	—	20.4	0.00	20.4	2.04	0.00	—	71.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	204	0.00	204	20.4	0.00	—	714
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	30.4	0.00	30.4	3.04	0.00	—	106
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	3.38	0.00	3.38	0.34	0.00	—	11.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	33.8	0.00	33.8	3.38	0.00	—	118

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.80	6.80
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.80	6.80

4.6.2. Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	41.1	41.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.80	6.80
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.80	6.80

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

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Fire Pump	0.54	0.49	1.38	1.26	< 0.005	0.07	0.00	0.07	0.07	0.00	0.07	0.00	252	252	0.01	< 0.005	0.00	253
Emergency Generator	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Total	1.80	1.64	4.59	4.18	0.01	0.24	0.00	0.24	0.24	0.00	0.24	0.00	840	840	0.03	0.01	0.00	842
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Fire Pump	0.54	0.49	1.38	1.26	< 0.005	0.07	0.00	0.07	0.07	0.00	0.07	0.00	252	252	0.01	< 0.005	0.00	253
Emergency Generator	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Total	1.80	1.64	4.59	4.18	0.01	0.24	0.00	0.24	0.24	0.00	0.24	0.00	840	840	0.03	0.01	0.00	842
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Fire Pump	0.01	0.01	0.03	0.03	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	5.71	5.71	< 0.005	< 0.005	0.00	5.73
Emergency Generator	0.03	0.03	0.08	0.07	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	13.3	13.3	< 0.005	< 0.005	0.00	13.4
Total	0.05	0.04	0.11	0.10	< 0.005	0.01	0.00	0.01	0.01	0.00	0.01	0.00	19.0	19.0	< 0.005	< 0.005	0.00	19.1

4.8.2. Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Fire Pump	0.54	0.49	1.38	1.26	< 0.005	0.07	0.00	0.07	0.07	0.00	0.07	0.00	252	252	0.01	< 0.005	0.00	253
Emergency Generator	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Total	1.80	1.64	4.59	4.18	0.01	0.24	0.00	0.24	0.24	0.00	0.24	0.00	840	840	0.03	0.01	0.00	842
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Fire Pump	0.54	0.49	1.38	1.26	< 0.005	0.07	0.00	0.07	0.07	0.00	0.07	0.00	252	252	0.01	< 0.005	0.00	253
Emergency Generator	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Total	1.80	1.64	4.59	4.18	0.01	0.24	0.00	0.24	0.24	0.00	0.24	0.00	840	840	0.03	0.01	0.00	842
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Fire Pump	0.01	0.01	0.03	0.03	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	5.71	5.71	< 0.005	< 0.005	0.00	5.73
Emergency Generator	0.03	0.03	0.08	0.07	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	13.3	13.3	< 0.005	< 0.005	0.00	13.4
Total	0.05	0.04	0.11	0.10	< 0.005	0.01	0.00	0.01	0.01	0.00	0.01	0.00	19.0	19.0	< 0.005	< 0.005	0.00	19.1

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.9.2. Mitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

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

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

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

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

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Clearing	Site Preparation	10/22/2025	10/28/2025	5.00	5.00	5
Earthwork	Grading	10/29/2025	11/20/2025	5.00	17.0	15
Export/Remediation	Grading	11/21/2025	5/5/2026	5.00	118	110
Import	Grading	5/6/2026	9/24/2026	5.00	102	96
Rough Grading	Grading	9/25/2026	11/2/2026	5.00	27.0	27
Site Work Fine Grading	Grading	3/25/2027	4/9/2027	5.00	12.0	10
Vertical Construction	Building Construction	11/3/2026	3/24/2027	5.00	102	94
Building Construction	Building Construction	4/10/2027	8/18/2027	5.00	93.0	90
Paving	Paving	8/19/2027	9/2/2027	5.00	11.0	11
Architectural Coating	Architectural Coating	8/19/2027	10/6/2027	5.00	35.0	11

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

Clearing	Dumpers/Tenders	Diesel	Tier 4 Final	4.00	8.00	16.0	0.38
Clearing	Crawler Tractors	Diesel	Tier 4 Final	2.00	8.00	275	0.37
Earthwork	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	405	0.40
Earthwork	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	215	0.40
Earthwork	Scrapers	Diesel	Tier 3	4.00	8.00	600	0.48
Export/Remediation	Excavators	Diesel	Tier 3	1.00	8.00	158	0.38
Export/Remediation	Other Construction Equipment	Diesel	Tier 3	1.00	8.00	172	0.42
Export/Remediation	Crawler Tractors	Diesel	Tier 3	1.00	8.00	97.0	0.37
Import	Dumpers/Tenders	Diesel	Tier 4 Final	61.0	8.00	16.0	0.38
Import	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	405	0.40
Import	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	64.0	0.46
Rough Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	238	0.41
Rough Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	405	0.40
Rough Grading	Scrapers	Diesel	Tier 3	1.00	8.00	330	0.48
Rough Grading	Scrapers	Diesel	Tier 3	6.00	8.00	600	0.48
Site Work Fine Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	180	0.41
Site Work Fine Grading	Rollers	Diesel	Tier 4 Final	1.00	8.00	80.0	0.38
Site Work Fine Grading	Scrapers	Diesel	Tier 3	1.00	8.00	330	0.48
Site Work Fine Grading	Skid Steer Loaders	Diesel	Tier 4 Final	2.00	8.00	65.0	0.37
Site Work Fine Grading	Crawler Tractors	Diesel	Tier 4 Final	1.00	8.00	250	0.37
Vertical Construction	Graders	Diesel	Tier 4 Final	1.00	8.00	238	0.41
Vertical Construction	Rollers	Diesel	Tier 4 Final	1.00	8.00	80.0	0.38
Vertical Construction	Scrapers	Diesel	Tier 3	2.00	8.00	330	0.48
Vertical Construction	Tractors/Loaders/Back hoes	Diesel	Tier 4 Final	1.00	8.00	275	0.37

Building Construction	Cranes	Diesel	Tier 3	2.00	8.00	231	0.29
Building Construction	Forklifts	Diesel	Tier 3	5.00	8.00	89.0	0.20
Building Construction	Generator Sets	Diesel	Tier 3	2.00	8.00	84.0	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Tier 3	5.00	8.00	97.0	0.37
Building Construction	Welders	Diesel	Tier 3	2.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Tier 3	2.00	8.00	130	0.42
Paving	Paving Equipment	Diesel	Tier 3	2.00	8.00	132	0.36
Paving	Rollers	Diesel	Tier 3	2.00	8.00	80.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 3	1.00	8.00	78.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Clearing	Dumpers/Tenders	Diesel	Tier 4 Final	4.00	8.00	16.0	0.38
Clearing	Crawler Tractors	Diesel	Tier 4 Final	2.00	8.00	275	0.37
Earthwork	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	405	0.40
Earthwork	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	215	0.40
Earthwork	Scrapers	Diesel	Tier 3	4.00	8.00	600	0.48
Export/Remediation	Excavators	Diesel	Tier 3	1.00	8.00	158	0.38
Export/Remediation	Other Construction Equipment	Diesel	Tier 3	1.00	8.00	172	0.42
Export/Remediation	Crawler Tractors	Diesel	Tier 3	1.00	8.00	97.0	0.37
Import	Dumpers/Tenders	Diesel	Tier 4 Final	61.0	8.00	16.0	0.38
Import	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	405	0.40
Import	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	64.0	0.46
Rough Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	238	0.41
Rough Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	405	0.40
Rough Grading	Scrapers	Diesel	Tier 3	1.00	8.00	330	0.48
Rough Grading	Scrapers	Diesel	Tier 3	6.00	8.00	600	0.48

Site Work Fine Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	180	0.41
Site Work Fine Grading	Rollers	Diesel	Tier 4 Final	1.00	8.00	80.0	0.38
Site Work Fine Grading	Scrapers	Diesel	Tier 3	1.00	8.00	330	0.48
Site Work Fine Grading	Skid Steer Loaders	Diesel	Tier 4 Final	2.00	8.00	65.0	0.37
Site Work Fine Grading	Crawler Tractors	Diesel	Tier 4 Final	1.00	8.00	250	0.37
Vertical Construction	Graders	Diesel	Tier 4 Final	1.00	8.00	238	0.41
Vertical Construction	Rollers	Diesel	Tier 4 Final	1.00	8.00	80.0	0.38
Vertical Construction	Scrapers	Diesel	Tier 3	2.00	8.00	330	0.48
Vertical Construction	Tractors/Loaders/Back hoes	Diesel	Tier 4 Final	1.00	8.00	275	0.37
Building Construction	Cranes	Diesel	Tier 3	2.00	8.00	231	0.29
Building Construction	Forklifts	Diesel	Tier 3	5.00	8.00	89.0	0.20
Building Construction	Generator Sets	Diesel	Tier 3	2.00	8.00	84.0	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Tier 3	5.00	8.00	97.0	0.37
Building Construction	Welders	Diesel	Tier 3	2.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Tier 3	2.00	8.00	130	0.42
Paving	Paving Equipment	Diesel	Tier 3	2.00	8.00	132	0.36
Paving	Rollers	Diesel	Tier 3	2.00	8.00	80.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 3	1.00	8.00	78.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Clearing	—	—	—	—

Clearing	Worker	15.0	18.5	LDA,LDT1,LDT2
Clearing	Vendor	1.00	10.2	HHDT,MHDT
Clearing	Hauling	0.00	20.0	HHDT
Clearing	Onsite truck	—	—	HHDT
Earthwork	—	—	—	—
Earthwork	Worker	15.0	18.5	LDA,LDT1,LDT2
Earthwork	Vendor	4.00	10.2	HHDT,MHDT
Earthwork	Hauling	0.00	20.0	HHDT
Earthwork	Onsite truck	—	—	HHDT
Export/Remediation	—	—	—	—
Export/Remediation	Worker	7.50	18.5	LDA,LDT1,LDT2
Export/Remediation	Vendor	30.0	10.2	HHDT,MHDT
Export/Remediation	Hauling	5.30	20.0	HHDT
Export/Remediation	Onsite truck	—	—	HHDT
Import	—	—	—	—
Import	Worker	158	18.5	LDA,LDT1,LDT2
Import	Vendor	26.0	10.2	HHDT,MHDT
Import	Hauling	368	20.0	HHDT
Import	Onsite truck	—	—	HHDT
Rough Grading	—	—	—	—
Rough Grading	Worker	22.5	18.5	LDA,LDT1,LDT2
Rough Grading	Vendor	7.00	10.2	HHDT,MHDT
Rough Grading	Hauling	0.00	20.0	HHDT
Rough Grading	Onsite truck	—	—	HHDT
Site Work Fine Grading	—	—	—	—
Site Work Fine Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Site Work Fine Grading	Vendor	3.00	10.2	HHDT,MHDT
Site Work Fine Grading	Hauling	0.00	20.0	HHDT

Site Work Fine Grading	Onsite truck	—	—	HHDT
Vertical Construction	—	—	—	—
Vertical Construction	Worker	169	18.5	LDA,LDT1,LDT2
Vertical Construction	Vendor	26.0	10.2	HHDT,MHDT
Vertical Construction	Hauling	0.00	20.0	HHDT
Vertical Construction	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	169	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	24.0	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	3.00	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	67.7	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	9.00	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
Clearing	—	—	—	—
Clearing	Worker	15.0	18.5	LDA,LDT1,LDT2
Clearing	Vendor	1.00	10.2	HHDT,MHDT
Clearing	Hauling	0.00	20.0	HHDT

Clearing	Onsite truck	—	—	HHDT
Earthwork	—	—	—	—
Earthwork	Worker	15.0	18.5	LDA,LDT1,LDT2
Earthwork	Vendor	4.00	10.2	HHDT,MHDT
Earthwork	Hauling	0.00	20.0	HHDT
Earthwork	Onsite truck	—	—	HHDT
Export/Remediation	—	—	—	—
Export/Remediation	Worker	7.50	18.5	LDA,LDT1,LDT2
Export/Remediation	Vendor	30.0	10.2	HHDT,MHDT
Export/Remediation	Hauling	5.30	20.0	HHDT
Export/Remediation	Onsite truck	—	—	HHDT
Import	—	—	—	—
Import	Worker	158	18.5	LDA,LDT1,LDT2
Import	Vendor	26.0	10.2	HHDT,MHDT
Import	Hauling	368	20.0	HHDT
Import	Onsite truck	—	—	HHDT
Rough Grading	—	—	—	—
Rough Grading	Worker	22.5	18.5	LDA,LDT1,LDT2
Rough Grading	Vendor	7.00	10.2	HHDT,MHDT
Rough Grading	Hauling	0.00	20.0	HHDT
Rough Grading	Onsite truck	—	—	HHDT
Site Work Fine Grading	—	—	—	—
Site Work Fine Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Site Work Fine Grading	Vendor	3.00	10.2	HHDT,MHDT
Site Work Fine Grading	Hauling	0.00	20.0	HHDT
Site Work Fine Grading	Onsite truck	—	—	HHDT
Vertical Construction	—	—	—	—
Vertical Construction	Worker	169	18.5	LDA,LDT1,LDT2

Vertical Construction	Vendor	26.0	10.2	HHDT,MHDT
Vertical Construction	Hauling	0.00	20.0	HHDT
Vertical Construction	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	169	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	24.0	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	3.00	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	67.7	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	9.00	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	604,550	201,517	57,682

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Clearing	—	—	5.00	0.00	—
Earthwork	—	—	85.0	0.00	—
Export/Remediation	—	5,000	59.0	0.00	—
Import	300,000	—	51.0	0.00	—
Rough Grading	—	—	216	0.00	—
Site Work Fine Grading	—	—	24.0	0.00	—
Paving	0.00	0.00	0.00	0.00	22.1

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Refrigerated Warehouse-No Rail	0.00	0%
Parking Lot	5.67	100%
Other Asphalt Surfaces	16.4	100%
User Defined Industrial	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O

2025	0.00	349	0.03	< 0.005
2026	0.00	346	0.03	< 0.005
2027	0.00	346	0.03	< 0.005

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	70.0	60.2	59.5	24,493	2,138	1,839	1,817	748,027
Refrigerated Warehouse-No Rail	30.0	17.1	16.4	9,566	848	484	464	270,433
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	2,324	1,970	1,951	810,329	21,090	17,883	17,703	7,354,111

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	70.0	60.2	59.5	24,493	2,138	1,839	1,817	748,027
Refrigerated Warehouse-No Rail	30.0	17.1	16.4	9,566	848	484	464	270,433
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	2,324	1,970	1,951	810,329	21,090	17,883	17,703	7,354,111

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	604,550	201,517	57,682

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	1,697,708	346	0.0330	0.0040	0.00
Refrigerated Warehouse-No Rail	779,382	346	0.0330	0.0040	0.00
Parking Lot	216,359	346	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00
User Defined Industrial	0.00	346	0.0330	0.0040	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	1,631,916	346	0.0330	0.0040	0.00
Refrigerated Warehouse-No Rail	779,382	346	0.0330	0.0040	0.00
Parking Lot	216,359	346	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00
User Defined Industrial	0.00	346	0.0330	0.0040	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	83,881,313	3,979,055
Refrigerated Warehouse-No Rail	9,320,069	442,111
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00
User Defined Industrial	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	83,881,313	3,979,055
Refrigerated Warehouse-No Rail	9,320,069	442,111
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00
User Defined Industrial	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	341	—
Refrigerated Warehouse-No Rail	37.9	—
Parking Lot	0.00	—
Other Asphalt Surfaces	0.00	—
User Defined Industrial	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	341	—
Refrigerated Warehouse-No Rail	37.9	—
Parking Lot	0.00	—
Other Asphalt Surfaces	0.00	—
User Defined Industrial	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
Refrigerated Warehouse-No Rail	Cold storage	User Defined	150	7.50	7.50	7.50	25.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Refrigerated Warehouse-No Rail	Cold storage	User Defined	150	7.50	7.50	7.50	25.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.15.2. Mitigated

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

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
Fire Pump	Diesel	1.00	1.00	50.0	300	0.73
Emergency Generator	Diesel	1.00	1.00	50.0	700	0.73

5.16.2. Process Boilers

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

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

5.18.2.2. Mitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	4.89	annual days of extreme heat
Extreme Precipitation	4.25	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	24.9
AQ-PM	77.1
AQ-DPM	42.0
Drinking Water	29.9
Lead Risk Housing	65.4
Pesticides	66.7
Toxic Releases	98.1
Traffic	72.2
Effect Indicators	—
CleanUp Sites	81.6
Groundwater	90.1
Haz Waste Facilities/Generators	97.8
Impaired Water Bodies	0.00
Solid Waste	80.6
Sensitive Population	—
Asthma	19.8
Cardio-vascular	32.0
Low Birth Weights	70.2
Socioeconomic Factor Indicators	—
Education	17.2
Housing	22.1
Linguistic	39.8
Poverty	18.2
Unemployment	48.3

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	82.07365584
Employed	83.35685872
Median HI	84.17810856
Education	—
Bachelor's or higher	71.73104068
High school enrollment	100
Preschool enrollment	87.91222892
Transportation	—
Auto Access	72.44963429
Active commuting	21.35249583
Social	—
2-parent households	89.99101758
Voting	76.90234826
Neighborhood	—
Alcohol availability	63.86500706
Park access	81.35506224
Retail density	45.11741306
Supermarket access	56.5635827
Tree canopy	47.87629924
Housing	—
Homeownership	66.77787758
Housing habitability	90.5812909
Low-inc homeowner severe housing cost burden	93.19902477
Low-inc renter severe housing cost burden	90.14500192
Uncrowded housing	43.11561658
Health Outcomes	—

Insured adults	78.54484794
Arthritis	45.8
Asthma ER Admissions	79.0
High Blood Pressure	49.4
Cancer (excluding skin)	19.8
Asthma	92.9
Coronary Heart Disease	51.0
Chronic Obstructive Pulmonary Disease	74.0
Diagnosed Diabetes	62.8
Life Expectancy at Birth	36.9
Cognitively Disabled	50.3
Physically Disabled	76.0
Heart Attack ER Admissions	74.5
Mental Health Not Good	84.7
Chronic Kidney Disease	73.0
Obesity	88.9
Pedestrian Injuries	53.9
Physical Health Not Good	73.7
Stroke	64.5
Health Risk Behaviors	—
Binge Drinking	75.2
Current Smoker	83.5
No Leisure Time for Physical Activity	71.9
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	59.5
Elderly	36.3

English Speaking	52.9
Foreign-born	49.0
Outdoor Workers	54.4
Climate Change Adaptive Capacity	—
Impervious Surface Cover	24.5
Traffic Density	54.0
Traffic Access	87.4
Other Indices	—
Hardship	26.4
Other Decision Support	—
2016 Voting	63.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	55.0
Healthy Places Index Score for Project Location (b)	88.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Project info taken from site plan
Operations: Vehicle Data	Trip Characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Energy Use	Natural gas will not be utilized
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively
Construction: Construction Phases	Construction schedule provided by Project applicant
Construction: Off-Road Equipment	Construction equipment provided by Project Applicant
Construction: Trips and VMT	CalEEMod only assumes Vendor Trips during Vertical Construction and Building Construction phases. The CalEEMod default trips were ratioed between each phase based on the number of days."
Construction: Architectural Coatings	SCAQMD Rule 1113

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