

AIR QUALITY AND GREENHOUSE GAS STUDY

MAGNOLIA PUBLIC SCHOOL PROJECT

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MAY 2024

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EXECUTIVE SUMMARY

The purpose of this air quality and greenhouse gas analysis is to provide an assessment of the impacts resulting from the Magnolia Public School Project (Project) and to identify any measures that may be necessary to reduce potentially significant impacts.

Standard Air Quality, Energy and GHG Regulatory Conditions

The proposed project would be required to comply with the following regulatory conditions from the South Coast Air Quality Management District (SCAQMD) and State of California (State):

South Coast Air Quality Management District Rules

The following lists the SCAQMD rules that are applicable, but not limited to, the proposed project:

- Rule 402 (Nuisance): Controls the emissions of odors and other air contaminants;
- Rule 403 (Fugitive Dust): Controls the emissions of fugitive dust;
- Rule 1186 (Paved Road and Public Unpaved Roads): Controls the emissions of fugitive dust generators;
- Rule 1113 (Architectural Coating): Establishes VOC content limits

State of California Rules

The following lists the State of California Code of Regulations (CCR) air quality emission rules that are applicable, but not limited to, the proposed project.

- CCR Title 13, Article 4.8, Chapter 9, Section 2449: In use Off-Road Diesel Vehicles
- CCR Title 13, Section 2025: On-Road Diesel Truck Fleets;
- CCR Title 24 Part 6: California Building Energy Standards; and
- CCR Title 24 Part 11: California Green Building Standards.

Construction Source Emissions

Construction emissions would not contribute to short- or long-term emissions that would increase the carcinogenic effects on sensitive receptors. Construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Potential construction-source odor impacts are therefore not considered significant.

Operational Source Emissions

Operational emissions would not contribute to short- or long-term emissions that would increase the carcinogenic effects on sensitive receptors. Emissions associated with operation would not exceed the SCAQMD-recommended thresholds. Thus, the Project would not result in a regional violation of applicable air quality standards or jeopardize the timely attainment of such standards in the South Coast Air Basin.

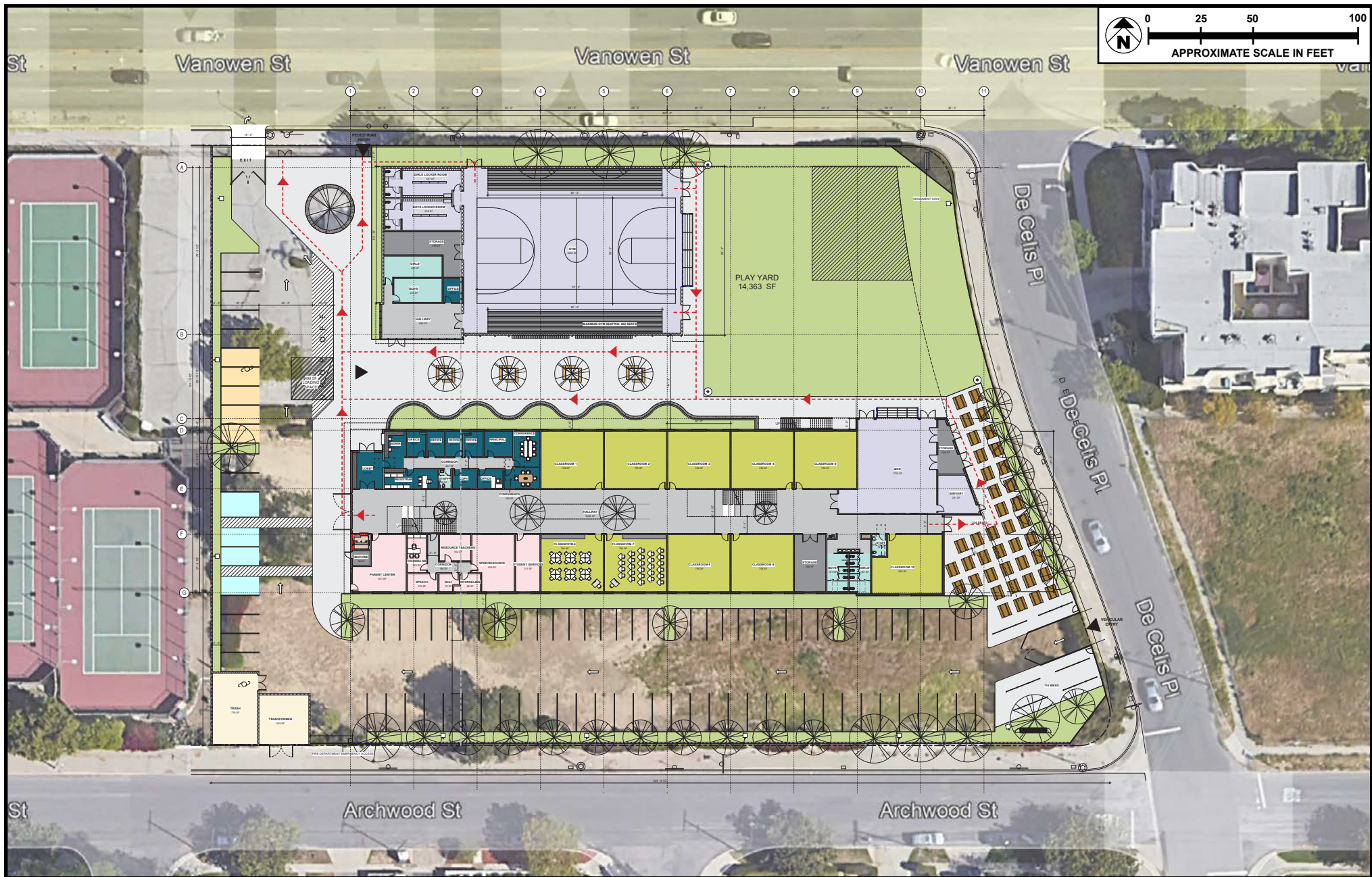
Greenhouse Gases

There are no federal, State, or local quantitative adopted thresholds of significance for addressing a project's GHG emissions. In the absence of any adopted numeric threshold, this analysis evaluates the significance of a project by considering whether the project conflicts with applicable regulations or requirements adopted to implement a Statewide, regional, or local plan. The Project is committed to meeting the requirements of the CALGreen Code by incorporating strategies such as low-flow toilets, low-flow faucets and other energy and resource conservation measures. The Project would comply with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CALGreen standards. The Project would comply with applicable goals and policies in the Scoping Plan, Connect SoCal 2024, Green LA Actions and the Green New Deal.

PROJECT DESCRIPTION

The Project site is located at 16600 and 16602 W. Vanowen Street within the Van Nuys neighborhood in the City of Los Angeles, as shown in **Figure 1: Project Site Location**. The 2.5-acre (108,938.3 square foot) Project site is currently vacant and is located within the R1-1 (One-Family) zone and River Implementation Overlay District (RIO). The Project site is bounded by Vanowen Street to the north, Archwood Street to the south and De Celis Place to the east. The proposed development includes removal of the existing uses to construct the Magnolia Public School (Public School) consisting of a 47,997 square foot two-story classroom building and a gym to accommodate 564 students.

More specifically, the Public School will include 27 classrooms (including 1 lab and 3 science classrooms), administration office space, multipurpose room with a server, outdoor play space (for 6th to 12th grades), onsite parking for 91 parking spaces (pick-up and drop-off within the site), and bicycle racks (108 short-term and 3 long-term).



SOURCE: Google Earth - 2023

FIGURE 1

REGULATORY SETTING

AIR QUALITY

In California, jurisdiction over air quality management, enforcement, and planning is divided among 35 geographic regions. Within each region, a local air district is responsible for oversight of air quality monitoring, modeling, permitting, and enforcement to ensure that regulatory violations are avoided wherever possible.

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) shares responsibility with CARB for ensuring that all State and federal AAQS are achieved and maintained over an area of approximately 10,743 square miles. This area includes the South Coast and Salton Sea Air Basins, all of Orange County, and the nondesert portions of Los Angeles, Riverside, and San Bernardino Counties. It does not include the Antelope Valley or the nondesert portion of western San Bernardino County.

SCAQMD is responsible for controlling emissions, primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the air basins. SCAQMD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the air basins. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as being in nonattainment of the NAAQS or CAAQS. The term “nonattainment area” is used to refer to an air basin in which one or more AAQS are exceeded. SCAQMD also prepares the SIP for its jurisdiction and promulgates rules and regulations. The SIP includes strategies and tactics to be used to attain the federal ozone standards in the South Coast Air Basin. The SIP elements are taken from the most recent AQMP. SCAQMD adopted the 2022 AQMP on December 2, 2022.¹ The AQMP includes transportation control measures developed by SCAG from its Regional Transportation Plan/Sustainable Communities Strategy, as well as the integrated strategies and measures needed to meet the NAAQS. The AQMP demonstrates attainment of the 1-hour and 8-hour ozone NAAQS, as well as the latest 24-hour and annual PM_{2.5} standards.

SCAQMD is responsible for limiting the number of emissions generated throughout the air basins by various stationary, area, and mobile sources. Specific rules and regulations have been adopted by the SCAQMD Governing Board that identify specific pollution-reduction measures that must be implemented in association with various uses and activities. These rules regulate not only the emissions of the federal and State criteria pollutants, but also toxic air contaminants (TACs) and acutely hazardous materials. The rules are also subject to ongoing refinement by SCAQMD. Among the SCAQMD rules applicable to the Project are Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). Rule 403 requires the use of

¹ SCAQMD, Final 2022 Air Quality Management Plan, adopted December 2, 2022, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=10>. Accessed May 2023.

stringent best available control measures (BACMs) to minimize PM₁₀ emissions during grading and construction activities. Rule 1113 limits the VOC content of coatings, with a VOC content limit for flat coatings of 50 grams per liter (g/L).² Additional details regarding these rules and other potentially applicable rules are presented as follows.

Rule 402 (Nuisance). This rule states that a “person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”³

Rule 403 (Fugitive Dust). This rule requires fugitive dust sources to implement BACMs for all sources and prohibits all forms of visible particulate matter from crossing any property line. BACMs may include application of water or chemical stabilizers to disturbed soils covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); sweeping loose dirt from paved site-access roadways; cessation of construction activity when winds exceed 25 mph; and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM₁₀ emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186).

Rule 1113 (Architectural Coatings). This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Rule 1146.2 (Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters). This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_x emissions from natural-gas-fired water heaters, boilers, and process heaters as defined in this rule.

Rule 1186 (PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations). This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM₁₀ emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403). Stationary emissions sources subject to these rules are regulated through SCAQMD’s permitting process.

² SCAQMD, Rule 1113 Architectural Coating (amended September 6, 2013), <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>. Accessed May 2023.

³ SCAQMD, Rule 402—Nuisance, <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>. Accessed May 2023.

Through this permitting process, SCAQMD also monitors the number of stationary emissions being generated and uses this information in developing AQMPs.

GREENHOUSE GAS

Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy

On April 2024, SCAG's Regional Council adopted the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal2024, as required by federal and state regulations. Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies and strategies for achieving the region's shared goals through 2050. The Connect SoCal 2024 builds upon the progress made through implementation of the 2020-2045 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center-focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation.

Green LA/Climate LA Plans

The City of Los Angeles adopted *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (Green LA)*, in May 2007. Green LA set the goal of reducing the City's greenhouse gas emissions to 35 percent below 1990 levels by 2030. The emphasis of Green LA is on municipal facilities and operations followed by programs to reduce emissions in the community. To facilitate implementation of Green LA, the City adopted the Los Angeles Green Building Code. In addition, the Los Angeles Department of Water and Power (LADWP) will continue to implement programs to emphasize water conservation and will also pursue securing alternative water supplies, including recycled water and storm water capture. Furthermore, the City implemented the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) plan to meet solid waste reduction goals by expanding recycling to multifamily dwellings, commercial establishments, and restaurants. Under the RENEW LA plan, the City is also developing facilities that will convert solid waste to energy without incineration. These measures would serve to reduce overall emissions from the City. Green LA is being implemented through Climate LA, which provides detailed information about each action item discussed in the Green LA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption.

City of Los Angeles Sustainable City pLAn and Green New Deal

On April 8, 2015, Los Angeles released the Sustainable City pLAn, which covers a multitude of environmental, social, and economic sustainability issues related to GHG emission reduction either specifically or by association. Actionable goals include increasing the green building standard for new construction, creating a benchmarking policy for building energy use, developing “blue, green, and black” waste bin infrastructure, reducing water use by 20 percent, and possibly requiring LEED Silver or better certification for new construction. In 2019, the City of Los Angeles prepared the 2019 Green New Deal, which provided an expanded vision of the pLAn, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would reduce an additional 30 percent in GHG emissions above and beyond the 2015 pLAn and ensure that the City stays within its carbon budget between 2020 and 2050.

City of Los Angeles Green Building Code

Per Ordinance 186,488, the Los Angeles City Council amended Chapter IX, Article 9 of the LAMC to incorporate by reference the California Green Building Standards (CALGreen) Code with certain changes and modifications. Mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings. Specific requirements under the Los Angeles Green Building Code for new non-residential projects include:

- 30 percent of the total number of parking spaces must be EV spaces.
- For new non-residential buildings, 10 percent of the total number of parking spaces must be equipped with EV charging stations.
- Provide permanently anchored bicycle racks conveniently accessed with a minimum of four two-bike capacity racks per new building.
- Provide permanent, secure bicycle parking conveniently accessed with a minimum of two staff bicycle parking spaces per new building. Acceptable bicycle parking facilities shall be convenient from the street or staff parking area and shall meet one of the following:
 - Covered, lockable enclosures with permanently anchored racks for bicycles.
 - Lockable bicycle rooms with permanently anchored racks.
 - Lockable, permanently anchored bicycle lockers.
- Minimum standards for three-year aged solar reflectance, thermal emittance, and Solar Reflectance Index values for roofs must be met.

City of Los Angeles General Plan

The City of Los Angeles General Plan does not have a specific element aimed at reducing GHG emissions and does not include any goals, objectives, or policies specific to reducing GHG emissions. However, five goals and their respective objectives from the Air Quality Element of the General Plan would also serve to reduce GHG emissions.

- **Goal 2:** Less reliance on single-occupancy vehicle from fewer commute and non-work trips.
 - Objective 2.1: Reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.
- **Goal 3:** Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques.
 - Objective 3.2: Reduce vehicular traffic during peak periods.
- **Goal 4:** Minimal impacts of existing land use pattern and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
 - Objective 4.2: Reduce vehicle trips and VMT associated with land use patterns.
- **Goal 5:** Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures, including passive measures, such as site orientation and tree planting.
 - Objective 5.1: Increase energy efficiency of City facilities and private developments.
 - Objective 5.2: Have a portion of the City's service fleet be comprised of alternative fuel powered vehicles, subject to availability of funding and practical feasibility.
 - Objective 5.3: Reduce the use of polluting fuels in stationary sources.
- **Goal 6:** Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.
 - Objective 6.1: Make air quality education and citizen participation a priority in the City's effort to achieve clean air standards.

ENVIRONMENTAL SETTING

AIR QUALITY

Ambient air quality emissions present complex environmental issues that require regulatory attention on both large and small scales. The cumulative nature of project-level and localized emissions contributing to greater regional conditions warrants that regulatory policies be instituted on national, State, and regional levels to address air quality concerns. The following sections outline the applicable regulatory framework that exists at the national, State, and regional levels for air quality.

Regional Air Quality

USEPA is the federal agency responsible for overseeing the country's air quality and setting the NAAQS for the CAPs. The NAAQS were devised based on extensive modeling and monitoring of air pollution across the country; they are designed to protect public health and prevent the formation of atmospheric ozone. Air quality of a region is considered to be in attainment of the NAAQS if the measured ambient air pollutant levels do not exceed the applicable concentration threshold.

As noted previously, CARB is the State agency responsible for setting the CAAQS. Air quality of a region is considered to be in attainment of the CAAQS if the measured ambient air pollutant levels for O₃, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and Pb are not exceeded, and all other standards are not equaled or exceeded at any time in any consecutive 3-year period.

For evaluation purposes, the SCAQMD territory is divided into 38 source receptor areas (SRAs). These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area. The Project site is within SRA 6, West San Fernando Valley.⁴ The nearest air monitoring station SCAQMD operates is located at 18330 Gault Street within the Reseda neighborhood. This station monitors O₃, NO₂ and PM_{2.5}. **Table 1: Air Quality Monitoring Summary** summarizes published monitoring data from 2019 through 2021, the most recent 3-year period available. The data shows that during the past few years, the region has exceeded the O₃ and PM_{2.5} standards.

4 SCAQMD, General Forecast Areas and Air Monitoring Areas, map, <http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf>. Accessed May 2023.

TABLE 1 AIR QUALITY MONITORING SUMMARY				
Air Pollutant	Average Time (Units)	2019	2020	2021
Ozone (O3)	State Max 1 hour (ppm)	0.122	0.142	0.110
	Days > CAAQS threshold (0.09 ppm)	14	33	4
	National Max 8 hour (ppm)	0.094	0.115	0.083
	Days > NAAQS threshold (0.075 ppm)	34	62	31
	State Max 8 hour (ppm)	0.094	0.116	0.083
	Days > CAAQS threshold (0.07 ppm)	37	65	33
Carbon monoxide (CO)		—	—	—
Nitrogen dioxide (NO2)	National Max 1 hour (ppm)	0.064	0.049	0.054
	Days > NAAQS threshold (0.100 ppm)	0	0	0
	State Max 1 hour (ppm)	0.064	0.049	0.054
	Days > CAAQS threshold (0.18 ppm)	0	0	0
Respirable particulate matter (PM10)	National Max (µg/m3)	—	—	—
	National Annual Average (µg/m3)	—	—	—
	Days > NAAQS threshold (35 µg/m3)	—	—	—
	State Max (µg/m3)	—	—	—
	State Annual Average (µg/m3)	—	—	—
Fine particulate matter (PM2.5)	National Max (µg/m3)	30.0	73.8	55.5
	National Annual Average (µg/m3)	9.1	11.0	10.0
	Days > NAAQS threshold (35 µg/m3)	0	3	3
	State Max (µg/m3)	120.9	80.1	55.5
	State Annual Average (µg/m3)	11.9	111.0	11.6

Source: CARB, iADAM: Air Quality Data Statistics.

Note: (—) = Data not available.

USEPA and the CARB designate air basins where AAQS are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” Federal nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. The current attainment designations for the Basin are shown in **Table 2: South Coast Air Basin Attainment Status**. The Basin is currently designated as being in nonattainment at the federal level for O3 and PM2.5; and at the State level for O3, PM10, and PM2.5.

**TABLE 2
SOUTH COAST AIR BASIN ATTAINMENT STATUS**

Pollutant	State Status	National Status
Ozone (O3)	Nonattainment	Nonattainment
Carbon monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen dioxide (NO2)	Attainment	Unclassified/Attainment
Sulfur dioxide (SO2)	Attainment	Unclassified/Attainment
Respirable particulate matter (PM10)	Nonattainment	Attainment
Fine particulate matter (PM2.5)	Nonattainment	Nonattainment

Source: California Air Resources Board (CARB) Area Designation Maps / State and National, <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Accessed May 2023.

GREENHOUSE GAS SETTING

California is the second largest contributor of GHGs in the United States and the 16th largest in the world.⁵ In 2020, California produced 418.2 million metric tons of carbon dioxide equivalents (MMTCO₂e), including imported electricity, and excluding combustion of international fuels and carbon sinks or storage. The major source of GHGs in California is transportation, contributing to 40 percent of the State's total GHG emissions. The Statewide inventory of GHGs by sector is shown in **Table 3: California GHG Inventory 2012-2020**.

5 California Energy Commission, Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, Staff Final Report, CEC-600-2006-013-SF (December 2006).

**TABLE 3
CALIFORNIA GHG INVENTORY 2012-2020**

Main Sector	Emissions (MMTCO ₂ e)								
	2012	2013	2014	2015	2016	2017	2018	2019	2020
Transportation	156.9	157.0	157.7	161.5	165.2	166.6	165.3	162.4	135.8
Industrial ^{a,b}	80.7	83.0	85.2	83.2	81.6	81.7	81.9	80.4	73.3
Electric Power	98.9	93.4	89.8	86.0	70.4	64.2	65.0	60.2	59.5
Commercial and Residential	39.2	39.1	35.6	36.3	37.2	37.6	37.4	40.5	38.7
Agriculture	35.2	33.9	33.9	32.6	32.2	31.7	32.2	31.4	31.6
High GWP ^{c,d}	15.5	16.8	17.7	18.6	19.4	20.1	20.5	20.7	21.3
Recycled and waste	8.2	8.3	8.3	8.4	8.5	8.6	8.7	8.8	8.9
Total Emissions	434.7	431.5	428.2	426.6	414.4	410.6	411.0	404.5	369.2

Source: CARB, GHG Current California Emission Inventory Data, https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/ghg_inventory_scopingplan_sum_2000-20.pdf. Accessed May 2023.

^a Includes equipment used in construction, mining, oil drilling, industrial and airport ground operations.

^b Reflects emissions from combustion of natural gas, diesel, and lease fuel plus fugitive emissions.

^c These categories are listed in the Industrial sector of CARB's GHG Emission Inventory sectors.

^d This category is listed in the Electric Power sector of CARB's GHG Emission Inventory sectors.

^e The exceptional Aliso Canyon natural gas leak event released 1.96 MMTCO₂e of unanticipated emissions in calendar year 2015 and an additional 0.53 MMTCO₂e in 2016. These emissions will be mitigated in the future according to legal settlement and are presented alongside but tracked separately from routine inventory emissions.

Note: MMTCO₂e - million metric tons of carbon dioxide equivalent emissions

Existing Operational Emission

As mentioned previously, the Project site is currently vacant with a total area of 108,938.3 square feet (2.5 acres). Therefore, there are no existing operational emissions that are generated from the Project site.

Sensitive Receptors

SCAQMD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Locations evaluated for exposure to air pollution include but are not limited to residences, schools, hospitals, and convalescent facilities. As shown in **Figure 2: Sensitive Receptor Map**, the parcels to the south and west are zoned R1-1-RIO and contain single-family residential uses and an unoccupied Tennis Ranch. The parcels to the east across De Celis Place are zoned both R1-1-RIO and RD2-1-RIO and contain multi-family residential uses. The parcels to the north across Vanowen Street are zoned RD2 and consist of restricted density multiple dwellings.

GENERALIZED ZONING

- OS
- R1
- RD, R3
- C2
- MR, M1
- P



SOURCE: ZIMAS - 2023

FIGURE 2

AIR QUALITY

Construction

Emissions are estimated using the latest CalEEMod software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in **Appendix A**.

Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment and through vehicle trips generated from workers and haul trucks traveling to and from the Project site. Mobile-source emissions, primarily NO_x, would result from the use of construction equipment. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The input values used in this analysis were adjusted to be project-specific for the equipment and construction schedule. The CalEEMod program uses the CARB on-road vehicle emissions model (EMFAC2021) to calculate the emission rates specific for the Los Angeles County for construction-related employee vehicle trips and the CARB off-road emissions model (OFFROAD2011) to calculate emission rates for heavy truck operations. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of project construction. The maximum daily emissions are compared to the SCAQMD screening numeric indicators.

Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces can all be sources of fugitive dust. The Project would be required to comply with SCAQMD Rule 403, which identifies measures to reduce fugitive dust and is required to be implemented at all construction sites located within SCAB. Therefore, the following condition—required to reduce fugitive dust in compliance with SCAQMD Rule 403—was included in CalEEMod as a regulatory compliance measure:

- **Control Efficiency of PM₁₀**. During construction, methods and techniques should be applied to various operations or equipment when appropriate to reduce estimated emissions related to

particulate matter. This includes replacing ground cover in disturbed areas as quick as possible, yielding to emission reduction efficiency of 15 - 49 percent.⁶

In addition, SCAQMD Staff recommends that the Lead Agency require the use of Tier 4 construction equipment of 50 horsepower or greater during construction. Alternative, applicable strategies include equipment outfitted with Best Available Control Technology (BACT) devices and CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions.⁷ Therefore, the following condition would be considered a regulatory compliance measure:

- **Construction Equipment Controls.** During construction, all off-road construction equipment greater than 50 horsepower shall meet USEPA Tier 3 emission standards with Level 3 DPF to minimize emissions of NOx associated with diesel construction equipment.

Toxic Air Contaminant

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. According to the Office of Environmental Health Hazard Assessment (OEHHA)⁸, health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 30-year) resident exposure duration. Given the temporary and short-term construction schedule (approximately 12 months), the project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of project construction. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any regional thresholds.

The project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the renovation and construction activities. Therefore, impacts from TACs during construction would be less than significant and not further assessed in this report.

Odors

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing

6 SCAQMD, CEQA Handbook, Tables 11-4, p. 11-15 and A11-9-A, page A11-77, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-sample-construction-scenario-report.pdf>. Accessed May 2023.

7 California Air Resources Board, Verification Procedure: Stationary, <https://ww2.arb.ca.gov/our-work/programs/verification-procedure-warranty-and-use-compliance-requirements-use-strategies-4>. Accessed May 2023.

8 Office of Environmental Health Hazard Assessment, *Air Toxic Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessment*, February 2015, <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>, accessed March 2024.

materials being utilized, no significant impact related to odors would occur during construction of the proposed project. Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Therefore, impacts from construction-related odor is not further assessed in this report.

Operation

The operations-related criteria air quality impacts created by the proposed project have been analyzed through the use of the CalEEMod model. The operating emissions were based on the year 2027, which is the first year following construction when the project is fully operational. The operations emissions printouts from the CalEEMod model are provided in **Appendix A**. The CalEEMod analyzes operational emissions from area sources, energy usage, and mobile sources, which are discussed below.

Mobile

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from the Project site. The weekday and weekend daily trips were based on the CalEEMod default ITE trip generation rates for a High School. In calculating mobile-source emissions, trip-length values were based on the distances provided in CalEEMod.

Area

In addition, emissions would result from area sources on site, such as natural gas combustion, landscaping equipment, and use of consumer products. Area-source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product (including paint) usage rates provided in CalEEMod. As specifics were not known about the landscaping equipment fleet, CalEEMod defaults were used to estimate emissions from landscaping equipment. Natural gas usage factors in CalEEMod are based on the California Energy Commission's California Commercial End Use Survey data set, which provides energy demand by building type and climate zone. No other changes were made to the default area source parameters.

Energy

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.

GREENHOUSE GAS

The analysis of the Project's GHG emissions consists of a quantitative analysis of the GHG emissions generated by the construction and operation activities and a qualitative analysis of the proposed Project's consistency with adopted GHG-related legislation, plans, and policies. This approach is in accordance with CEQA Guidelines Section 15064.4(a), which affirms the discretion of a lead agency to

determine, in the context of a particular project, whether to use quantitative and/or qualitative methodologies to determine the significance of a project's impacts.

Emissions Inventory Modeling

The total GHG emissions from the Project were quantified to determine the level of the Project's estimated annual GHG emissions. As with the Air Quality section calculations, construction emissions were estimated using CalEEMod by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile-source emissions factors. The modeling used the same input values as previously discussed under the methodology section for air quality. SCAQMD's *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold*⁹ recognizes that construction-related GHG emissions from projects occur over a relatively short-term period of time and contributes a relatively small portion of a project's overall lifetime GHG emissions. The guidance recommends that a project's construction-related GHG emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operation GHG reduction strategies. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in **Appendix A**.

CalEEMod was also used to estimate operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, and landscaping equipment. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. Mobile-source emissions were estimated based on the CARB EMFAC model. For mobile sources, CalEEMod was used to generate the vehicle miles traveled from Project operation.

With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Energy demand rates were estimated based on square footage as well as predicted water supply needs for this use. Energy demand (off-site electricity generation and on-site natural gas consumption) for the Project was calculated within CalEEMod using the CEC's CEUS data set, which provides energy demand by building type and climate zone.

Emissions of GHGs from solid waste disposal were also calculated using CalEEMod software. The emissions are based on the waste disposal rate for the land uses, the waste diversion rate, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for methane, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery), which are Statewide averages, were used in this assessment.

9 SCAQMD, *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (October 2008).

Emissions of GHGs from water and wastewater result from the required energy to supply and distribute the water and treat the wastewater. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions are calculated using CalEEMod and are based on the water usage rate for the proposed use; the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment; the GHG emission factors for the electricity utility provider; and the emission factors for the wastewater treatment process.

SIGNIFICANCE THRESHOLDS

AIR QUALITY

Significance Criteria

The determination of a project's significance on air quality shall be made considering the factors provided in the SCAQMD *CEQA Air Quality Handbook* (Handbook). The City has not adopted specific Citywide significance thresholds for air quality impacts; rather, the thresholds and methodologies contained in the SCAQMD Handbook for both construction and operational emissions are utilized for evaluating projects in the City. These thresholds are described below.

Construction Emission Thresholds

The Project will have a significant impact if it exceeds the construction thresholds listed in **Table 4: Construction Thresholds**.

TABLE 4 CONSTRUCTION THRESHOLDS	
Pollutant	Construction Emissions (pounds/day)
Volatile organic compounds (VOCs)	75
Nitrogen dioxide (NO ₂)	100
Carbon monoxide (CO)	550
Sulfur dioxide (SO ₂)	150
Respirable particulate matter (PM ₁₀)	150
Fine particulate matter (PM _{2.5})	55

Construction and Operational Localized Significance Thresholds

The local significance thresholds are based on the SCAQMD's Final *Localized Significance Threshold (LST) Methodology* (LST Methodology)¹⁰ guidance document for short-duration construction activities. The SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project site because of construction activities. The SCAQMD provides voluntary guidance on the evaluation of localized air quality impacts to public agencies conducting environmental review of projects located within its jurisdiction. Localized air quality impacts are evaluated by examining the on-site generation of pollutants and their resulting downwind concentrations. For construction, pollutant concentrations are compared to significance thresholds for particulates (PM₁₀

¹⁰ South Coast Air Quality Management District, Final Localized Significance Threshold (LST) Methodology, (June 2003, rev. July 2008).

and PM2.5), CO, and NO2. The significance threshold for PM10 represents compliance with SCAQMD Rule 403 (Fugitive Dust). The threshold for PM2.5 is designed to limit emissions and to allow progress toward attainment of the AAQS. Thresholds for CO and NO2 represent the allowable increase in concentrations above background levels that would not cause or contribute to an exceedance of their respective AAQS.

The LST Methodology provides lookup tables of emissions that are based on construction projects of up to 5 acres in size. These LST lookup tables were developed to assist lead agencies with a simple tool for evaluating the impacts from small typical projects. Ambient conditions for West San Fernando Valley, as recorded in SRA 6 by the SCAQMD, were used for ambient conditions in determining appropriate threshold levels. Thresholds for each criteria pollutant (2.5 acres) for construction activity and Project are listed in **Table 5: Localized Significance Thresholds**.

TABLE 5 LOCALIZED SIGNIFICANCE THRESHOLDS		
Pollutant	Construction	Operational
	pounds/day	
Nitrogen dioxide (NO2)	159	159
Carbon monoxide (CO)	730	730
Respirable particulate matter (PM10)	7	2
Fine particulate matter (PM2.5)	4	1

Notes: Based on a distance to sensitive receptors of 25 meters. SCAQMD's Localized Significance Threshold (LST) Methodology for CEQA Evaluations guidance document provides that projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.

Based on the SCAQMD Handbook, thresholds for each criteria pollutant for the operations of the Project are provided in **Table 6: Operational Thresholds**.

TABLE 6 OPERATIONAL THRESHOLDS	
Pollutant	Operational Emissions (pounds/day)
Volatile organic compounds (VOCs)	55
Nitrogen dioxide (NO ₂)	55
Carbon monoxide (CO)	550
Sulfur dioxide (SO ₂)	150
Respirable particulate matter (PM ₁₀)	150
Fine particulate matter (PM _{2.5})	55

Toxic Air Contaminants

As set forth in the SCAQMD Handbook, the determination of significance of a project with respect TACs shall be made on a case-by-case basis, considering the following factors:

- Regulatory framework for toxic materials and process involved;
- Proximity of TACs to sensitive receptors;
- Quantity, volume, and toxicity of the contaminants expected to be emitted;
- Likelihood and potential level of exposure; and
- Degree to which project design will reduce risk of exposure.

Consistency with Applicable Air Quality Plans

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD Handbook, the following criteria were used to evaluate the Project's consistency with SCAQMD and SCAG regional plans and policies:

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

Cumulative Threshold

SCAQMD recommends that a project be considered to result in a cumulatively considerable impact to air quality if any construction-related emissions and operational emissions from individual development projects exceed the mass daily emissions thresholds for individual projects.¹¹ The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. A project is also considered to result in a cumulatively considerable contribution to significant impacts if the population and employment projections for the project exceed the rate of growth defined in SCAQMD's AQMP.

GREENHOUSE GAS

The majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environment effects. However, the environmental effects of a project's GHG emission can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited. The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a project's contribution towards climate change is cumulatively considerable. Cumulative considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Neither the SCAQMD, the California Office of Planning and Research, CARB, CAPCOA, or any other state or relevant regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Therefore, in recent environmental impact reports certified by the City of Los Angeles, the City has evaluated the significance of projects' potential impacts with regard to GHG emissions and climate change solely on consistency with plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change. The City has also quantified the project's GHG emissions for informational purposes but does not compare the quantified GHG emissions to a numeric threshold. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the Connect SoCal 2024, the City's LA Green Plan, and the Sustainable City pLAn/Green New Deal.

11 SCAQMD, White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, board meeting, Agenda No. 29 (September 5, 2003), Appendix D, p. D-3.

IMPACT ANALYSIS

Emissions of air pollutants were estimated for construction and operation of the Project. In California, the California Air Pollution Control Officer's Association recommends the use CalEEMod to calculate and organize emissions data for new development projects. CalEEMod is a program that relies on project-specific information pertaining to geographic setting, utility service provision, construction scheduling and equipment inventory, and operational design features to generate estimates of air pollutant and GHG emissions.

Table 7: Project Construction Schedule provides the dates and durations of each of the activities that will take place during construction, as well as a brief description of the scope of work. Future dates represent approximations based on the general Project timeline and are subject to change pending unpredictable circumstances that may arise. It is important to note project delays that affect the corresponding time period in which construction activities would occur compared to the analysis time period would result in lower emissions due to newer equipment, regulatory requirements, and greater engine efficiencies. Therefore, the reported construction emissions are overstated compared to the emissions associated with a delayed construction schedule.

TABLE 7 PROJECT CONSTRUCTION SCHEDULE				
Construction Activity	Approximate Start Date	Approximate End Date	Duration (Days)	Description
Grading	1/6/2025	1/13/2025	6	Grading of the Project site
Building Construction	1/14/2025	1/6/2026	256	Construction of Proposed Project
Paving	12/24/2025	1/6/2026	10	Paving of asphalt surfaces
Architectural Coating	12/24/2025	1/6/2026	10	Application of architectural coatings to building materials

Note: Refer to Appendix A for CalEEMod Output Sheet.

An assessment of air pollutant emissions was prepared utilizing the construction schedule in **Table 7**. **Table 8: Project Construction Diesel Equipment Inventory** displays the construction equipment required for each activity described in **Table 7**. Under regulatory compliance measures in CalEEMod, it was assumed that all construction activities would adhere to SCAQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). Additionally, regulatory compliance measures not modeled would require all heavy-duty diesel equipment engines meet minimum Tier 3 standards in accordance with CARB fleet requirements.

**TABLE 8
PROJECT CONSTRUCTION DIESEL EQUIPMENT INVENTORY**

Phase	Off-Road Equipment Type	Amount	Daily Hours	Horsepower [HP] (Load Factor)
Grading	Graders	1	8	148 (0.41)
	Rubber Tired Dozers	1	8	367 (0.40)
	Tractors/Loaders/Backhoes	2	7	84 (0.37)
Building Construction	Cranes	1	6	367 (0.29)
	Forklifts	1	6	82 (0.20)
	Generator Sets	1	8	14 (0.74)
	Tractors/Loaders/Backhoes	1	6	84 (0.37)
	Welders	3	8	46 (0.45)
Paving	Pavers	1	6	81 (0.42)
	Paving Equipment	1	8	89 (0.36)
	Rollers	1	7	36 (0.38)
	Tractors/Loaders/Backhoes	1	8	84 (0.37)
Architectural Coating	Air Compressors	1	6	37 (0.48)

Refer to Appendix A for CalEEMod Output Sheets.

AIR QUALITY

Construction

Maximum daily emissions of air pollutants during construction of the Project were calculated using CalEEMod. **Table 9: Maximum Construction Emissions** identifies daily emissions that are estimated for peak construction days for each construction year. Based on the modeling, construction of the Project would not exceed regional VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} concentration thresholds. All criteria air pollutants would be below SCAQMD construction thresholds. As such, construction of the Project would not generate any significant environmental impacts associated with air quality compliance.

**TABLE 9
MAXIMUM CONSTRUCTION EMISSIONS**

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds/day					
2025	47.9	14.9	20.0	<0.1	2.6	1.5
2026	47.8	14.3	19.7	<0.1	1.1	0.6
Maximum	47.9	14.9	20.0	<0.1	2.6	1.5
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.

Refer to Appendix A for CalEEMod Output Sheets.

Operation

Operational emissions would result primarily from passenger vehicles traveling to and from the Project site. The results presented in **Table 10: Maximum Operational Emissions** are compared to the SCAQMD-established operational significance thresholds. As shown in **Table 10**, the operational emissions would not exceed the regional VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} concentration thresholds. Additionally, the operational emissions provided below would be further reduced when taking into account trip reductions from these public transit options located within the Project vicinity. As such, operation of the Project would not generate any significant environmental impacts associated with air quality compliance.

TABLE 10 MAXIMUM OPERATIONAL EMISSIONS						
Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds/day					
Mobile	3.7	2.8	33.3	<0.1	7.8	2.0
Area	1.5	<0.1	2.1	<0.1	<0.1	<0.1
Energy	<0.1	0.3	0.2	<0.1	<0.1	<0.1
Total	5.2	3.1	35.6	<0.1	7.8	2.0
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.

Refer to Appendix A for CalEEMod Output Sheets.

Localized Significance Thresholds

The results of the LST analysis are provided in **Table 11: Localized Construction and Operational Emissions**. These estimates assume the maximum area that would be disturbed during construction on any given day during Project buildout. It is important to note, emissions presented in **Table 11** include regulatory compliance measures such as control efficiency of PM10 (dust control measures). As shown in **Table 11**, emissions would not exceed the localized significance construction and operational thresholds.

TABLE 11 LOCALIZED CONSTRUCTION AND OPERATIONAL EMISSIONS				
Source	NOx	CO	PM10	PM2.5
On-Site Emissions (pounds/day)				
Construction				
Total maximum emissions	14.1	14.5	2.5	1.5
LST threshold	159	730	7	4
Threshold Exceeded?	No	No	No	No
Operational				
Project area/energy emissions	0.3	2.2	<0.1	<0.1
LST threshold	159	730	4	1
Threshold Exceeded?	No	No	No	No

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.

CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Refer to Appendix A for CalEEMod Output Sheets.

Toxic Air Contaminants

Project construction would result in short-term emissions of diesel particulate matter, which is a TAC. Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period. As mentioned previously, single- and multi-family residential uses are located adjacent to the site. Localized diesel particulate emissions (strongly correlated with PM2.5 emissions) would be minimal and would be substantially below localized thresholds, as shown in **Table 11**. Project compliance with the CARB anti-idling measure, which limits idling to no more than 5 minutes at any location for diesel-fueled commercial vehicles, would further minimize diesel particulate matter emissions in the Project area.

Project operations would generate only minor amounts of diesel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce emission from existing diesel trucks. In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed uses within the Project site. Based on the uses expected on the Project site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance.

Odors

As shown in **Table 11**, the construction of the Project would result in emissions below the localized significance thresholds. Mandatory compliance with SCAQMD Rule 1113 would limit the number of VOCs in architectural coatings and solvents. According to SCAQMD, while almost any source may emit objectionable odors, some land uses are more likely to produce odors because of their operation. Land uses more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding manufacturing, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. The Project does not contain any active manufacturing activities and would not convert current agricultural land to residential land uses. Therefore, objectionable odors would not be emitted by the proposed uses.

Any unforeseen odors generated by the Project will be controlled in accordance with SCAQMD Rule 402. As previously noted, Rule 402 prohibits the discharge of air contaminants that harm, endanger, or annoy individuals or the public; endanger the comfort, health or safety of individuals or the public; or cause injury or damage to business or property. Failure to comply with Rule 402 could subject the offending facility to possible fines and/or operational limitations in an approved odor control or odor abatement plan.

Consistency with AQMP

The Basin is designated nonattainment at the federal level for O₃ and PM_{2.5} and State level for O₃, PM₁₀, and PM_{2.5}. SCAQMD developed regional emissions thresholds, as shown in **Table 4** and **Table 6** to determine whether a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Basin.

As shown in **Table 9**, temporary emissions associated with construction of the Project would fall below SCAQMD thresholds for VOCs, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. As shown in **Table 10**, long-term emissions associated with operation of the Project would not exceed SCAQMD thresholds for VOCs, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. The Project's maximum potential NO_x, CO, PM₁₀, and PM_{2.5} daily emissions during construction and operation were analyzed to determine potential effects on localized concentrations and to determine if the potential exists for such emissions to cause or affect a violation of an applicable AAQS. As shown in **Table 11**, NO_x, CO, PM₁₀, and PM_{2.5} emissions would not exceed the SCAQMD localized significance thresholds.

The Project is also located in an urban area, which would reduce vehicle trips and vehicle miles traveled due to the Project's urban infill characteristic and proximity to public transit stops. These measures and features are consistent with existing recommendations to reduce air emissions.

GREENHOUSE GAS

The forecasting of construction-related GHG emissions requires assumptions regarding the timing of construction as the emission factors for some of the Project's construction-related GHG emission sources decline over time. As shown in **Table 12: Construction GHG Emissions**, total construction emissions would be 277 metric tons of CO₂e (MTCO₂e). One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame because this is a typical interval before a new building requires its first major renovation.¹² As shown in **Table 12**, when amortized over an average 30-year Project lifetime, average annual construction emissions from the Project would be 9 MTCO₂e per year.

TABLE 12 CONSTRUCTION GHG EMISSIONS	
Construction Phase	MTCO ₂ e/Year
2025	277
2026	7
Total Construction Emissions	284
30-Year Annual Amortized Rate	9

Refer to Appendix A for CalEEMod Output Sheets.

Notes: GHG = greenhouse gas; MTCO₂e = metric tons of carbon dioxide equivalent.

Operation of the Project has the potential to generate GHG emissions through vehicle trips traveling to and from the Project site. In addition, emissions would result from area sources on site, such as natural gas combustion, landscaping equipment, and use of consumer products. Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after full development of the uses allowed by the Project. Operational Project emissions from area sources, energy sources, mobile sources, solid waste, and water and wastewater conveyance are shown in **Table 13: Operational GHG Emissions** below. As shown in **Table 13**, annual operational emissions from the Project would be 1,283 MTCO₂e per year. As such, impacts related to greenhouse gas emissions would not be considered significant.

12 International Energy Agency (IEA), Energy Efficiency Requirements in Building Codes, Energy Efficiency Policies for New Buildings, IEA Information Paper (2008).

**TABLE 13
OPERATIONAL GHG EMISSIONS**

Source	Unmitigated MTCO ₂ e per year
Construction (amortized)	9
Mobile	1,059
Area	1
Energy	172
Water	10
Waste	32
Refrigerant	<1
Total	1,283

Refer to Appendix A for CalEEMod Output Sheets.

Abbreviation: MTCO₂e = metric tons of carbon dioxide emissions.

Consistency With Applicable Plans and Policies

The proposed Project is required to comply with Title 13-Section 2449 of the CCR and the CalRecycle Sustainable (Green) Building Program regulations, which include implementation of standard control measures for equipment emissions. Adherence to these regulations, including the implementation of Best Available Control Measures (BACMs) is a standard requirement for any construction or ground-disturbance activity occurring within the Basin.

BACMs include, but are not limited to, requirements that the project proponent utilize only low sulfur fuel (i.e., having a sulfur content of 15 ppm by weight or less); ensure off-road vehicles (i.e., self-propelled diesel fueled vehicles 25 horsepower and up that were not designed to be driven on road) limit vehicle idling to five minutes or less; register and label vehicles in accordance with the ARB Diesel Off-Road Online Reporting System; restrict the inclusion of older vehicles into fleets; and retire, replace, or repower older engines or install Verified Diesel Emission Control Strategies (i.e. exhaust retrofits). Additionally, the construction contractor will recycle/reuse at least 50 percent of the construction material (including, but not limited to, proposed aggregate base, soil, mulch, vegetation, concrete, lumber, metal, and cardboard) and use “Green Building Materials,” such as those materials that are rapidly renewable or resource efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project, in accordance with CalRecycle regulations.

Long-term operational emissions typically include emissions from use of consumer products, energy and water usage, vehicles and land use emissions.

The Project is committed to meeting the requirements of the CALGreen Code by incorporating strategies such as low-flow toilets, low-flow faucets and other energy and resource conservation measures. The Project would comply with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CALGreen standards.

Senate Bill 32 and 2017 Scoping Plan

There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan is SB 32, the follow up to AB 32, the California Global Warming Solutions Act of 2006. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. CARB's 2017 Scoping Plan, which outlines a framework to achieve SB 32's 2030 target, emphasizes innovation, adoption of existing technology, and strategic investment to support its strategies for GHG emissions reductions. Statewide plans and regulations in support of these strategies, such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at the statewide level; as such, compliance at a project-level would occur as implementation continues statewide. Therefore, the Project would be consistent with SB 32 and the 2017 Scoping Plan.

Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy

Connect SoCal 2024 is forecast to help California reach its GHG reduction goals. The Connect SoCal 2024 includes implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. **Table 14: Project Consistency with Applicable SCAG RTP/SCS GHG Emission Reduction Strategies** summarize the Project's consistency with applicable strategies and actions. As shown therein, the Proposed Project would be consistent with the GHG emission reduction strategies contained in Connect SoCal 2024.

TABLE 14
PROJECT CONSISTENCY WITH APPLICABLE SCAG RTP/SCS GHG EMISSION REDUCTION STRATEGIES

Action	Project Consistency
Focus Growth Near Destinations & Mobility Options	
<ul style="list-style-type: none"> • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main street • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking) 	<p>Consistent. The Proposed Project is an infill development that would involve construction of a new school. The Project site is located within walking distance of existing residential and commercial uses. Additionally, the Project is within 0.5-mile of bus stops for Metro bus routes including the Vanowen/Forbes and Balboa/Hart stations. Therefore, the Project would focus growth near destinations and mobility options.</p>
Leverage Technology Innovations	
<ul style="list-style-type: none"> • Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supporting and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology - such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation 	<p>Consistent. Related to energy production and usage, the Project would exceed the required standard of 10 percent of the total number of on-site parking spaces with EV charging stations by designating 24 stalls of parking spaces as EV spaces (26 percent), in accordance with LAMC Sections 99.05.106.5.3.3 and 99.05.106.5.3.6.</p>
Support Implementation of Sustainability Policies	
<ul style="list-style-type: none"> • Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes 	<p>Consistent. The Project would be designed and operated to meet the applicable requirements of CALGreen and the City’s Green Building Code. The Project’s indoor water use would be minimized by 20 percent. Furthermore, energy use would be reduced by implementing the requirements of current Title 24 standards, including energy-efficient lighting and appliances. Therefore, the Project would support implementation of sustainability policies.</p>
Promote a Green Region	

TABLE 14
PROJECT CONSISTENCY WITH APPLICABLE SCAG RTP/SCS GHG EMISSION REDUCTION STRATEGIES

Action	Project Consistency
<ul style="list-style-type: none"> • Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space 	<p>Consistent. The Project is an infill development that would involve construction of a new school. Because the project is an infill development, it would not interfere with regional wildlife connectivity or convert agricultural land. The Project would comply with Sustainable City pLAn, Green New Deal, Title 24, and CALGreen. Therefore, the Project would support development of a green region.</p>

Green LA Actions

Table 15: Project Consistency with Applicable Green LA Actions summarize the Project’s consistency with applicable Green LA actions. As discussed herein, the Project would be consistent with the actions and measures contained in these local GHG reduction plans.

TABLE 15 PROJECT CONSISTENCY WITH APPLICABLE GREEN LA ACTIONS	
Action	Project Consistency
Energy	
Present a comprehensive set of green building policies to guide and support private sector development.	Consistent. The Project would be designed and operated to meet the applicable requirements of CALGreen and the City’s Green Building Code.
Water	
Meet all additional demand for water resulting from growth through water conservation and recycling. Reduce per capita water consumption by 20 percent	Consistent. While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features, such as low-flow fixtures, required pursuant to the current California Plumbing Code, CALGreen, and Los Angeles Plumbing Code, and Los Angeles Green Building Code. Furthermore, current CALGreen requirements require a 20 percent increase in indoor water use efficiency relative to previous building requirements.
Transportation	
Promote walking and biking to work, within neighborhoods, and to large events and venues	Consistent. The Proposed Project is an infill development that would involve construction of a new school. The Project site is located within walking distance of existing residential and commercial uses. Additionally, the Project is within 0.5-mile of bus stops for Metro bus routes including the Vanowen/Forbes and Balboa/Hart stations. Therefore, the Project would focus growth near destinations and mobility options.
Waste	
Recycle 70 percent trash by 2015	Consistent. The City of Los Angeles has achieved a landfill diversion rate of 76 percent. The Project would be subject to the requirements of the statewide commercial recycling program, which established a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and State programs would achieve consistency with this measure.

Sustainable City pLAn/Green New Deal

Table 16: Project Consistency with Applicable Sustainable City pLAn/Green New Deal Measures summarize the Project’s consistency with applicable Sustainable City pLAn/Green New Deal measures. As discussed, the Project would be consistent with the actions and measures contained in these local GHG reduction plans.

TABLE 16 PROJECT CONSISTENCY WITH APPLICABLE SUSTAINABLE CITY PLAN/GREEN NEW DEAL MEASURES	
Action	Project Consistency
Renewable Energy	
<ul style="list-style-type: none"> LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045. Increase cumulative megawatts by 2025; 2035; and 2050 of <ul style="list-style-type: none"> Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW Demand response (DR) programs to 234 MW (2025) and 600 MW (2035) 	<p>Consistent. While this action primarily applies to the City and LADWP, LADWP is required to generate electricity that would increase renewable energy resources to 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045 under SB 100. Because LADWP would provide electricity service to the Project Site, the Project would use electricity consistent with the requirements of SB 100 and City goals.</p>
Local Water	
<ul style="list-style-type: none"> Source 70% of L.A.’s water locally and capture 150,000 acre-feet per year of stormwater by 2035. Recycle 100% of all wastewater for beneficial reuse by 2035. Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050. Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain reduce 2035 per capita water use through 2050. Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035. 	<p>Consistent. While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be required to comply with the City’s water use restrictions on timing, area, frequency, and duration of specified allowable water usage. The Project would also be required to comply with the Title 24 standards for Water Efficiency and Conservation that are in effect at the time of development. These standards include actions such as separate water submeters for subsystems, prescriptive reduced flow rates for water and fixtures, wall-mounted urinals, and plumbing fixtures and fittings.</p>
Clean and Healthy Buildings	
<ul style="list-style-type: none"> All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050. Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050. 	<p>Consistent. The Project would be constructed in accordance with the applicable requirements of CALGreen and the City’s Green Building Code.</p>
Mobility & Public Transit	

TABLE 16
PROJECT CONSISTENCY WITH APPLICABLE SUSTAINABLE CITY PLAN/GREEN NEW DEAL MEASURES

Action	Project Consistency
<ul style="list-style-type: none"> • Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050. • Reduce vehicle miles traveled per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050. • Ensure Los Angeles is prepared for Autonomous Vehicles (AV) by the 2028 Olympic and Paralympic Games. 	<p>Consistent. The Proposed Project is an infill development that would involve construction of a new school. The Project site is located within walking distance of existing residential and commercial uses. Additionally, the Project is within 0.5-mile of bus stops for Metro bus routes including the Vanowen/Forbes and Balboa/Hart stations. Therefore, the Project would focus growth near destinations and mobility options.</p>
Zero Emissions Vehicles	
<ul style="list-style-type: none"> • Increase the percentage of electric and zero emission vehicles in the city by 25% by 2025; 80% by 2035; and 100% by 2050. • Electrify 100% of LA Metro and LADOT buses by 2030. • Reduce port-related GHG emissions by 80% by 2050. 	<p>Consistent. In accordance with LAMC Sections 99.05.106.5.3.3 and 99.05.106.5.3.6, the Project would equip at least 10 percent of the required on-site parking spaces with EV charging stations and designate at least 30 percent of parking spaces as EV/clean air vehicle spaces.</p>
Waste and Resource Recovery	
<ul style="list-style-type: none"> • Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050 • Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028 • Eliminate organic waste going to landfill by 2028 increase proportion of waste products and recyclables productively reused and/or repurposed within Los Angeles County to at least 25% by 2025; and 50% by 2035. 	<p>Consistent. The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Sanitation and Environment 2022). The Project would be subject to the requirements of the statewide commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and State programs would achieve consistency with this measure.</p>
Urban Ecosystems and Resilience	
<ul style="list-style-type: none"> • Increase tree canopy in areas of greatest need by at least 50% by 2028. • Complete or initiate restoration identified in the 'ARBOR' Plan by 2035. • Create a fully connected LARiverWay public access system that includes 32 miles of bike paths and trails by 2028. • Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035. • Ensure proportion of Angelenos living within ½ mile of a park or open space is at least 65% by 2025; 75% by 2035; and 100% by 2050. • Achieve and maintain 'no-net-loss' of native biodiversity by 2035. 	<p>Consistent. The Project would be an infill development in an urbanized area and thus would not adversely impact native biodiversity.</p>

Cumulative Impacts

Development of the Project in conjunction with the related projects near the Project site would result in an increase in construction and operational emissions in an already urbanized area of the City. However, cumulative air quality impacts from construction, based on SCAQMD guidelines, are not analyzed in a manner similar to project-specific air quality impacts. Instead, SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. According to SCAQMD, individual development projects that generate construction or operational emissions that exceed SCAQMD recommended daily regional or localized thresholds for project-specific impacts, would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

With the implementation of regulatory compliance measures such as Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coating), the Project's construction and operational emissions are not expected to significantly contribute to cumulative emissions for CO, NO_x, PM₁₀, and PM_{2.5}. As such, the Project's contribution to cumulative air quality emissions in combination with the related projects would not be cumulatively considerable.

As discussed previously, the Project would not jeopardize the attainment of air quality standards in the AQMP for the South Coast Air Basin and the Los Angeles County portion of the South Coast Air Basin. As such, the Project would not have a cumulatively considerable contribution to a potential conflict with or obstruction of the implementation of the AQMP regional reduction plans.

CERTIFICATION

The contents of this Air Quality and Greenhouse Gas Study represent an accurate depiction of the air quality environment and impacts associated with the proposed Magnolia Public School Project. The information contained in this study is based on the best available information at the time of preparation. If you have any questions, please contact me directly at (818) 415-7274.



Christ Kirikian

Principal | Director of Air Quality & Acoustics

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APPENDIX A

CalEEMod Air Quality Emission Output Files

Magnolia Public School (Vanowen) Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Magnolia Public School (Vanowen)
Construction Start Date	1/3/2025
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	18.6
Location	16600 Vanowen St, Van Nuys, CA 91406, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	3853
EDFZ	17
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.23

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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High School	564	Student	0.79	47,977	25,253	25,253	—	—
Parking Lot	91.0	Space	1.09	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Transportation	T-34*	Provide Bike Parking

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.40	1.16	9.32	11.6	0.02	0.33	0.33	0.66	0.30	0.08	0.38	—	2,329	2,329	0.10	0.06	1.70	2,351
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.22	47.9	14.9	20.0	0.03	0.64	1.97	2.62	0.59	0.92	1.51	—	3,657	3,657	0.15	0.08	0.07	3,684
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.00	1.56	6.76	8.25	0.02	0.24	0.26	0.50	0.22	0.07	0.29	—	1,661	1,661	0.07	0.04	0.52	1,675
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.18	0.28	1.23	1.51	< 0.005	0.04	0.05	0.09	0.04	0.01	0.05	—	275	275	0.01	0.01	0.09	277

Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.40	1.16	9.32	11.6	0.02	0.33	0.33	0.66	0.30	0.08	0.38	—	2,329	2,329	0.10	0.06	1.70	2,351
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.22	47.9	14.9	20.0	0.03	0.64	1.97	2.62	0.59	0.92	1.51	—	3,657	3,657	0.15	0.08	0.07	3,684
2026	2.10	47.8	14.3	19.7	0.03	0.50	0.55	1.05	0.46	0.13	0.59	—	3,642	3,642	0.15	0.08	0.06	3,669
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.00	1.56	6.76	8.25	0.02	0.24	0.26	0.50	0.22	0.07	0.29	—	1,661	1,661	0.07	0.04	0.52	1,675
2026	0.02	0.56	0.17	0.23	< 0.005	0.01	0.01	0.01	0.01	< 0.005	0.01	—	42.8	42.8	< 0.005	< 0.005	0.01	43.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.18	0.28	1.23	1.51	< 0.005	0.04	0.05	0.09	0.04	0.01	0.05	—	275	275	0.01	0.01	0.09	277

2026	< 0.005	0.10	0.03	0.04	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.09	7.09	< 0.005	< 0.005	< 0.005	7.15
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2.3. Construction Emissions by Year, Mitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.40	1.16	9.32	11.6	0.02	0.33	0.33	0.66	0.30	0.08	0.38	—	2,329	2,329	0.10	0.06	1.70	2,351
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.22	47.9	14.9	20.0	0.03	0.64	1.97	2.62	0.59	0.92	1.51	—	3,657	3,657	0.15	0.08	0.07	3,684
2026	2.10	47.8	14.3	19.7	0.03	0.50	0.55	1.05	0.46	0.13	0.59	—	3,642	3,642	0.15	0.08	0.06	3,669
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.00	1.56	6.76	8.25	0.02	0.24	0.26	0.50	0.22	0.07	0.29	—	1,661	1,661	0.07	0.04	0.52	1,675
2026	0.02	0.56	0.17	0.23	< 0.005	0.01	0.01	0.01	0.01	< 0.005	0.01	—	42.8	42.8	< 0.005	< 0.005	0.01	43.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.18	0.28	1.23	1.51	< 0.005	0.04	0.05	0.09	0.04	0.01	0.05	—	275	275	0.01	0.01	0.09	277
2026	< 0.005	0.10	0.03	0.04	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.09	7.09	< 0.005	< 0.005	< 0.005	7.15

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.	4.48	5.19	3.09	35.6	0.08	0.07	7.74	7.81	0.07	1.97	2.03	60.2	9,496	9,556	6.49	0.34	26.0	9,846

Mit.	4.48	5.19	3.09	35.6	0.08	0.07	7.74	7.81	0.07	1.97	2.03	60.2	9,496	9,556	6.49	0.34	26.0	9,846
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.06	4.81	3.34	30.7	0.08	0.07	7.74	7.81	0.07	1.97	2.03	60.2	9,136	9,197	6.51	0.36	0.85	9,466
Mit.	4.06	4.81	3.34	30.7	0.08	0.07	7.74	7.81	0.07	1.97	2.03	60.2	9,136	9,197	6.51	0.36	0.85	9,466
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.38	4.19	2.68	25.9	0.06	0.06	5.91	5.97	0.06	1.50	1.56	60.2	7,382	7,443	6.42	0.28	8.80	7,696
Mit.	3.38	4.19	2.68	25.9	0.06	0.06	5.91	5.97	0.06	1.50	1.56	60.2	7,382	7,443	6.42	0.28	8.80	7,696
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.62	0.77	0.49	4.72	0.01	0.01	1.08	1.09	0.01	0.27	0.28	9.97	1,222	1,232	1.06	0.05	1.46	1,274
Mit.	0.62	0.77	0.49	4.72	0.01	0.01	1.08	1.09	0.01	0.27	0.28	9.97	1,222	1,232	1.06	0.05	1.46	1,274
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

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	4.07	3.68	2.81	33.3	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,414	8,414	0.38	0.32	25.8	8,545
Area	0.37	1.50	0.02	2.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.58	8.58	< 0.005	< 0.005	—	8.61
Energy	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,033	1,033	0.08	0.01	—	1,037
Water	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Waste	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	4.48	5.19	3.09	35.6	0.08	0.07	7.74	7.81	0.07	1.97	2.03	60.2	9,496	9,556	6.49	0.34	26.0	9,846
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.03	3.64	3.08	30.5	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,064	8,064	0.40	0.34	0.67	8,175
Area	—	1.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,033	1,033	0.08	0.01	—	1,037
Water	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Waste	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	4.06	4.81	3.34	30.7	0.08	0.07	7.74	7.81	0.07	1.97	2.03	60.2	9,136	9,197	6.51	0.36	0.85	9,466
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	3.10	2.79	2.40	24.2	0.06	0.04	5.91	5.95	0.04	1.50	1.54	—	6,304	6,304	0.30	0.26	8.61	6,398
Area	0.25	1.39	0.01	1.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.88	5.88	< 0.005	< 0.005	—	5.90
Energy	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,033	1,033	0.08	0.01	—	1,037
Water	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Waste	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	3.38	4.19	2.68	25.9	0.06	0.06	5.91	5.97	0.06	1.50	1.56	60.2	7,382	7,443	6.42	0.28	8.80	7,696
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.57	0.51	0.44	4.42	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,044	1,044	0.05	0.04	1.43	1,059
Area	0.05	0.25	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.97	0.97	< 0.005	< 0.005	—	0.98
Energy	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	171	171	0.01	< 0.005	—	172
Water	—	—	—	—	—	—	—	—	—	—	—	0.79	6.60	7.39	0.08	< 0.005	—	10.0
Waste	—	—	—	—	—	—	—	—	—	—	—	9.18	0.00	9.18	0.92	0.00	—	32.1
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.62	0.77	0.49	4.72	0.01	0.01	1.08	1.09	0.01	0.27	0.28	9.97	1,222	1,232	1.06	0.05	1.46	1,274

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	4.07	3.68	2.81	33.3	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,414	8,414	0.38	0.32	25.8	8,545
Area	0.37	1.50	0.02	2.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.58	8.58	< 0.005	< 0.005	—	8.61
Energy	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,033	1,033	0.08	0.01	—	1,037
Water	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Waste	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19

Total	4.48	5.19	3.09	35.6	0.08	0.07	7.74	7.81	0.07	1.97	2.03	60.2	9,496	9,556	6.49	0.34	26.0	9,846
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.03	3.64	3.08	30.5	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,064	8,064	0.40	0.34	0.67	8,175
Area	—	1.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,033	1,033	0.08	0.01	—	1,037
Water	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Waste	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	4.06	4.81	3.34	30.7	0.08	0.07	7.74	7.81	0.07	1.97	2.03	60.2	9,136	9,197	6.51	0.36	0.85	9,466
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.10	2.79	2.40	24.2	0.06	0.04	5.91	5.95	0.04	1.50	1.54	—	6,304	6,304	0.30	0.26	8.61	6,398
Area	0.25	1.39	0.01	1.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.88	5.88	< 0.005	< 0.005	—	5.90
Energy	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,033	1,033	0.08	0.01	—	1,037
Water	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Waste	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	3.38	4.19	2.68	25.9	0.06	0.06	5.91	5.97	0.06	1.50	1.56	60.2	7,382	7,443	6.42	0.28	8.80	7,696
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.57	0.51	0.44	4.42	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,044	1,044	0.05	0.04	1.43	1,059
Area	0.05	0.25	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.97	0.97	< 0.005	< 0.005	—	0.98
Energy	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	171	171	0.01	< 0.005	—	172
Water	—	—	—	—	—	—	—	—	—	—	—	0.79	6.60	7.39	0.08	< 0.005	—	10.0
Waste	—	—	—	—	—	—	—	—	—	—	—	9.18	0.00	9.18	0.92	0.00	—	32.1
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.62	0.77	0.49	4.72	0.01	0.01	1.08	1.09	0.01	0.27	0.28	9.97	1,222	1,232	1.06	0.05	1.46	1,274

3. Construction Emissions Details

3.1. Grading (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.80	1.51	14.1	14.5	0.02	0.64	—	0.64	0.59	—	0.59	—	2,455	2,455	0.10	0.02	—	2,463
Dust From Material Movement	—	—	—	—	—	—	1.84	1.84	—	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.23	0.24	< 0.005	0.01	—	0.01	0.01	—	0.01	—	40.4	40.4	< 0.005	< 0.005	—	40.5
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.68	6.68	< 0.005	< 0.005	—	6.70

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.05	0.59	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	131	131	0.01	< 0.005	0.01	133
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.19	2.19	< 0.005	< 0.005	< 0.005	2.22
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.36	0.36	< 0.005	< 0.005	< 0.005	0.37
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Grading (2025) - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.80	1.51	14.1	14.5	0.02	0.64	—	0.64	0.59	—	0.59	—	2,455	2,455	0.10	0.02	—	2,463
Dust From Material Movement	—	—	—	—	—	—	1.84	1.84	—	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.23	0.24	< 0.005	0.01	—	0.01	0.01	—	0.01	—	40.4	40.4	< 0.005	< 0.005	—	40.5
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.68	6.68	< 0.005	< 0.005	—	6.70
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.05	0.59	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	131	131	0.01	< 0.005	0.01	133
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.19	2.19	< 0.005	< 0.005	< 0.005	2.22
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.36	0.36	< 0.005	< 0.005	< 0.005	0.37
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Building Construction (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	8.95	10.0	0.02	0.33	—	0.33	0.30	—	0.30	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	8.95	10.0	0.02	0.33	—	0.33	0.30	—	0.30	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.88	0.73	6.16	6.91	0.01	0.23	—	0.23	0.21	—	0.21	—	1,241	1,241	0.05	0.01	—	1,245
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.16	0.13	1.12	1.26	< 0.005	0.04	—	0.04	0.04	—	0.04	—	205	205	0.01	< 0.005	—	206
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.10	0.09	0.09	1.40	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	279	279	0.01	0.01	1.02	283
Vendor	0.02	0.01	0.28	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	249	249	0.01	0.03	0.68	261
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	0.10	0.09	0.10	1.19	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	264	264	0.01	0.01	0.03	267
Vendor	0.02	0.01	0.30	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	250	250	0.01	0.03	0.02	260
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	0.07	0.06	0.07	0.86	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	185	185	0.01	0.01	0.30	187
Vendor	0.01	< 0.005	0.20	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	172	172	0.01	0.02	0.20	179
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	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	30.6	30.6	< 0.005	< 0.005	0.05	31.0
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	28.5	28.5	< 0.005	< 0.005	0.03	29.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Building Construction (2025) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	8.95	10.0	0.02	0.33	—	0.33	0.30	—	0.30	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	8.95	10.0	0.02	0.33	—	0.33	0.30	—	0.30	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.88	0.73	6.16	6.91	0.01	0.23	—	0.23	0.21	—	0.21	—	1,241	1,241	0.05	0.01	—	1,245

Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.16	0.13	1.12	1.26	< 0.005	0.04	—	0.04	0.04	—	0.04	—	205	205	0.01	< 0.005	—	206
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.10	0.09	0.09	1.40	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	279	279	0.01	0.01	1.02	283
Vendor	0.02	0.01	0.28	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	249	249	0.01	0.03	0.68	261
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	0.10	0.09	0.10	1.19	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	264	264	0.01	0.01	0.03	267
Vendor	0.02	0.01	0.30	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	250	250	0.01	0.03	0.02	260
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	0.07	0.06	0.07	0.86	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	185	185	0.01	0.01	0.30	187
Vendor	0.01	< 0.005	0.20	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	172	172	0.01	0.02	0.20	179
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	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	30.6	30.6	< 0.005	< 0.005	0.05	31.0
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	28.5	28.5	< 0.005	< 0.005	0.03	29.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.22	1.01	8.57	9.96	0.02	0.29	—	0.29	0.27	—	0.27	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.10	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21.1	21.1	< 0.005	< 0.005	—	21.2
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.50	3.50	< 0.005	< 0.005	—	3.51
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.08	0.07	0.09	1.11	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	259	259	0.01	0.01	0.02	262
Vendor	0.02	0.01	0.28	0.13	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	245	245	0.01	0.03	0.02	256
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	—	3.08	3.08	< 0.005	< 0.005	< 0.005	3.13
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.88	2.88	< 0.005	< 0.005	< 0.005	3.01
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	—	0.51	0.51	< 0.005	< 0.005	< 0.005	0.52
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.48	0.48	< 0.005	< 0.005	< 0.005	0.50
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.22	1.01	8.57	9.96	0.02	0.29	—	0.29	0.27	—	0.27	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.10	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21.1	21.1	< 0.005	< 0.005	—	21.2
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.50	3.50	< 0.005	< 0.005	—	3.51
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.09	1.11	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	259	259	0.01	0.01	0.02	262
Vendor	0.02	0.01	0.28	0.13	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	245	245	0.01	0.03	0.02	256
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	—	3.08	3.08	< 0.005	< 0.005	< 0.005	3.13
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.88	2.88	< 0.005	< 0.005	< 0.005	3.01
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	—	0.51	0.51	< 0.005	< 0.005	< 0.005	0.52
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.48	0.48	< 0.005	< 0.005	< 0.005	0.50
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Paving (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.63	6.50	0.01	0.20	—	0.20	0.19	—	0.19	—	992	992	0.04	0.01	—	995
Paving	—	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.5	15.5	< 0.005	< 0.005	—	15.6
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.57	2.57	< 0.005	< 0.005	—	2.58
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.74	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	164	164	0.01	0.01	0.02	166
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.60	2.60	< 0.005	< 0.005	< 0.005	2.64
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	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	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.44
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Paving (2025) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.63	6.50	0.01	0.20	—	0.20	0.19	—	0.19	—	992	992	0.04	0.01	—	995
Paving	—	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.5	15.5	< 0.005	< 0.005	—	15.6
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.57	2.57	< 0.005	< 0.005	—	2.58
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.74	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	164	164	0.01	0.01	0.02	166
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.60	2.60	< 0.005	< 0.005	< 0.005	2.64
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	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	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.44

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (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	0.56	0.47	4.41	6.48	0.01	0.18	—	0.18	0.17	—	0.17	—	991	991	0.04	0.01	—	995
Paving	—	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.6	11.6	< 0.005	< 0.005	—	11.7
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.93	1.93	< 0.005	< 0.005	—	1.93
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.05	0.69	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	161	161	0.01	0.01	0.01	163
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.91	1.91	< 0.005	< 0.005	< 0.005	1.94
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.32	0.32	< 0.005	< 0.005	< 0.005	0.32
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Paving (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	0.56	0.47	4.41	6.48	0.01	0.18	—	0.18	0.17	—	0.17	—	991	991	0.04	0.01	—	995
Paving	—	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.6	11.6	< 0.005	< 0.005	—	11.7
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.93	1.93	< 0.005	< 0.005	—	1.93
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.05	0.69	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	161	161	0.01	0.01	0.01	163
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.91	1.91	< 0.005	< 0.005	< 0.005	1.94
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.32	0.32	< 0.005	< 0.005	< 0.005	0.32
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (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	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	—	45.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.09	2.09	< 0.005	< 0.005	—	2.10
Architect ural Coatings	—	0.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.35	0.35	< 0.005	< 0.005	—	0.35
Architectural Coatings	—	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.02	0.02	0.02	0.24	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	52.8	52.8	< 0.005	< 0.005	0.01	53.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.84	0.84	< 0.005	< 0.005	< 0.005	0.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.14	0.14	< 0.005	< 0.005	< 0.005	0.14
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Architectural Coating (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	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	—	45.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.09	2.09	< 0.005	< 0.005	—	2.10
Architect ural Coatings	—	0.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.35	0.35	< 0.005	< 0.005	—	0.35
Architect ural Coatings	—	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.02	0.02	0.02	0.24	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	52.8	52.8	< 0.005	< 0.005	0.01	53.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.84	0.84	< 0.005	< 0.005	< 0.005	0.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.14	0.14	< 0.005	< 0.005	< 0.005	0.14
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (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	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134

Architect Coatings	—	45.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.57	1.57	< 0.005	< 0.005	—	1.57
Architect ural Coatings	—	0.54	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.26	0.26	< 0.005	< 0.005	—	0.26
Architect ural Coatings	—	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	51.8	51.8	< 0.005	< 0.005	< 0.005	52.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.62	0.62	< 0.005	< 0.005	< 0.005	0.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	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	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	—	45.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.57	1.57	< 0.005	< 0.005	—	1.57
Architect ural Coatings	—	0.54	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	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	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.26	0.26	< 0.005	< 0.005	—	0.26
Architectural Coatings	—	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	51.8	51.8	< 0.005	< 0.005	< 0.005	52.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.62	0.62	< 0.005	< 0.005	< 0.005	0.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	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	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	4.07	3.68	2.81	33.3	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,414	8,414	0.38	0.32	25.8	8,545
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
Total	4.07	3.68	2.81	33.3	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,414	8,414	0.38	0.32	25.8	8,545
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	4.03	3.64	3.08	30.5	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,064	8,064	0.40	0.34	0.67	8,175
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
Total	4.03	3.64	3.08	30.5	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,064	8,064	0.40	0.34	0.67	8,175
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.57	0.51	0.44	4.42	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,044	1,044	0.05	0.04	1.43	1,059
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
Total	0.57	0.51	0.44	4.42	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,044	1,044	0.05	0.04	1.43	1,059

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	4.07	3.68	2.81	33.3	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,414	8,414	0.38	0.32	25.8	8,545
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
Total	4.07	3.68	2.81	33.3	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,414	8,414	0.38	0.32	25.8	8,545
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	4.03	3.64	3.08	30.5	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,064	8,064	0.40	0.34	0.67	8,175
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
Total	4.03	3.64	3.08	30.5	0.08	0.05	7.74	7.79	0.05	1.97	2.01	—	8,064	8,064	0.40	0.34	0.67	8,175
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.57	0.51	0.44	4.42	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,044	1,044	0.05	0.04	1.43	1,059
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
Total	0.57	0.51	0.44	4.42	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,044	1,044	0.05	0.04	1.43	1,059

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	642	642	0.05	0.01	—	645
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	78.7	78.7	0.01	< 0.005	—	79.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	720	720	0.05	0.01	—	724
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	642	642	0.05	0.01	—	645
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	78.7	78.7	0.01	< 0.005	—	79.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	720	720	0.05	0.01	—	724
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	106	106	0.01	< 0.005	—	107
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0	< 0.005	< 0.005	—	13.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	119	119	0.01	< 0.005	—	120

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

High School	—	—	—	—	—	—	—	—	—	—	—	—	642	642	0.05	0.01	—	645
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	78.7	78.7	0.01	< 0.005	—	79.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	720	720	0.05	0.01	—	724
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	642	642	0.05	0.01	—	645
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	78.7	78.7	0.01	< 0.005	—	79.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	720	720	0.05	0.01	—	724
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	106	106	0.01	< 0.005	—	107
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0	< 0.005	< 0.005	—	13.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	119	119	0.01	< 0.005	—	120

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	313	313	0.03	< 0.005	—	313
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	313	313	0.03	< 0.005	—	313

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	313	313	0.03	< 0.005	—	313
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	313	313	0.03	< 0.005	—	313
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	51.7	51.7	< 0.005	< 0.005	—	51.9
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	51.7	51.7	< 0.005	< 0.005	—	51.9

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	313	313	0.03	< 0.005	—	313
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	313	313	0.03	< 0.005	—	313
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	313	313	0.03	< 0.005	—	313

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.26	0.22	< 0.005	0.02	—	0.02	0.02	—	0.02	—	313	313	0.03	< 0.005	—	313
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	51.7	51.7	< 0.005	< 0.005	—	51.9
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	51.7	51.7	< 0.005	< 0.005	—	51.9

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	—	1.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.37	0.34	0.02	2.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.58	8.58	< 0.005	< 0.005	—	8.61
Total	0.37	1.50	0.02	2.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.58	8.58	< 0.005	< 0.005	—	8.61
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer	—	1.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	1.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.04	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.97	0.97	< 0.005	< 0.005	—	0.98
Total	0.05	0.25	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.97	0.97	< 0.005	< 0.005	—	0.98

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	—	1.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape Equipment	0.37	0.34	0.02	2.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.58	8.58	< 0.005	< 0.005	—	8.61
Total	0.37	1.50	0.02	2.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.58	8.58	< 0.005	< 0.005	—	8.61
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	1.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.04	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.97	0.97	< 0.005	< 0.005	—	0.98
Total	0.05	0.25	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.97	0.97	< 0.005	< 0.005	—	0.98

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.79	6.60	7.39	0.08	< 0.005	—	10.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.79	6.60	7.39	0.08	< 0.005	—	10.0

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.76	39.9	44.7	0.49	0.01	—	60.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.79	6.60	7.39	0.08	< 0.005	—	10.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.79	6.60	7.39	0.08	< 0.005	—	10.0

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	9.18	0.00	9.18	0.92	0.00	—	32.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	9.18	0.00	9.18	0.92	0.00	—	32.1

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	55.5	0.00	55.5	5.54	0.00	—	194
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	9.18	0.00	9.18	0.92	0.00	—	32.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	9.18	0.00	9.18	0.92	0.00	—	32.1

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03

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

4.8.2. Mitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.9.2. Mitigated

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

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

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

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Grading	Grading	1/6/2025	1/13/2025	5.00	6.00	—
Building Construction	Building Construction	1/14/2025	1/6/2026	5.00	256	—
Paving	Paving	12/24/2025	1/6/2026	5.00	10.0	—
Architectural Coating	Architectural Coating	12/24/2025	1/6/2026	5.00	10.0	—

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
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Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74

Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Grading	—	—	—	—
Grading	Worker	10.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	20.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	7.86	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	18.5	LDA,LDT1,LDT2

Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	4.03	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Grading	—	—	—	—
Grading	Worker	10.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	20.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	7.86	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—

Architectural Coating	Worker	4.03	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%
Sweep paved roads once per month	9%	9%

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	71,966	23,989	2,849

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)
Grading	—	—	6.00	0.00	—
Paving	0.00	0.00	0.00	0.00	1.09

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
High School	0.00	0%
Parking Lot	1.09	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

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

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
High School	1,145	327	141	322,906	10,910	3,117	1,344	3,076,886
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
High School	1,145	327	141	322,906	10,910	3,117	1,344	3,076,886
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	71,966	23,989	2,849

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)
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High School	339,205	690	0.0489	0.0069	975,261
Parking Lot	41,593	690	0.0489	0.0069	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)
High School	339,205	690	0.0489	0.0069	975,261
Parking Lot	41,593	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
High School	2,484,397	787,023
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
High School	2,484,397	787,023
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
High School	103	—
Parking Lot	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
High School	103	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
High School	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
High School	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
High School	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
High School	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
High School	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
High School	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
High School	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
High School	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

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

5.16.1. Emergency Generators and Fire Pumps

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

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

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

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

Screen	Justification
Land Use	According to site plans dated 5-8-24
Construction: Construction Phases	Preliminary construction schedule