

# **APPENDIX A**

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## Air Quality Study

# STOCKER STREET CREATIVE PROJECT

## Air Quality Impacts Study

Prepared for:

*The City of Los Angeles Department of City Planning*

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## 1.0 SUMMARY OF FINDINGS

Terry A. Hayes Associates Inc. (TAHA) completed an Air Quality Impact Study (Study) for the proposed Stocker Street Creative Project (Project). This Study addresses potential environmental impacts associated with air pollutant emissions that would be generated by the short-term construction activities and long-term future operation of the Project in accordance with South Coast Air Quality Management District (SCAQMD) guidance methodologies. Conclusions that address impact significance determinations under the California Environmental Quality Act (CEQA) Environmental Checklist criteria are shown in **Table 1-1, Summary of Impact Statements**. The Study concludes that construction and future operation of the Project would result in less-than-significant impacts related to air quality.

| TABLE 1-1: SUMMARY OF IMPACT STATEMENTS                                                                                                                                                                         |                                        |                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|--------------------------------|
| Impact Criteria                                                                                                                                                                                                 | Proposed Project Level of Significance | Applicable Mitigation Measures |
| Would the Project conflict with or obstruct implementation of the applicable air quality plan?                                                                                                                  | Less-Than-Significant Impact           | None                           |
| Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard? | Less-Than-Significant Impact           | None                           |
| Would the Project expose sensitive receptors to substantial pollutant concentrations?                                                                                                                           | Less-Than-Significant Impact           | None                           |
| Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?                                                                                | Less-Than-Significant Impact           | None                           |
| SOURCE: TAHA, 2024.                                                                                                                                                                                             |                                        |                                |

## **2.0 INTRODUCTION**

### **2.1. PURPOSE OF REPORT**

The CEQA Guidelines require the identification and disclosure of potential environmental impacts of proposed discretionary projects prior to approval by the Lead Agency. The purpose of this Study is to evaluate the potential significance of environmental impacts related to air quality resulting from implementation of the Project. Consistent with SCAQMD guidance and City of Los Angeles (City) standard environmental planning practice, potential impacts to air quality are characterized by comparing daily emissions of air pollutants that would be generated during construction and operation of the Project to the applicable Air Quality Significance Thresholds, at both regional and localized scales. The Lead Agency is the City.

### **2.2. PROJECT DESCRIPTION**

The Project consists of the demolition of five substantially unoccupied office buildings, totaling approximately 123,354 square feet and the construction of a campus for studio and sound stage production, totaling approximately 256,758 square feet exclusive of the parking garage (114,405 square feet), on an approximately five-acre site that slopes about approximately 35 feet northwest to northeast.

- Building A would be a three-story office building that would include retail space and a food court on the first floor.
- Building B would be a seven-story building with studio production support facilities on the first two floors and office space above. The roof (partial 7<sup>th</sup> floor) would include an enclosed restaurant with an adjacent open/garden area that would provide outdoor seating for the restaurant and be used for special events.
- Building C would be a one-story security office that would include a restroom, breakroom and surveillance monitors and computer equipment.
- Building D would be a one-story building with studio sound stages and back-of-house facilities.
- Building E would be a one-story building with a basement and mezzanine with studio sound stages, a mill shop for set production.
- Building F would be a five-story open parking garage with 344 parking stalls, (including eight Americans with Disabilities Act (ADA) stalls and 79 electric vehicles charging stalls) a retail/community room at street level, and back-of-house facilities. Five additional car parking spaces, including one ADA stall would be provided within the Upper Service Plaza Level. Parking spaces for the restaurant would only be available after 6:00 pm, the rest of the time it would be used by tenants of Buildings A and B.
- There would also be an open space area between Buildings A, B, and F designed for community gatherings and special events.

Vehicular access for visitors and tenants would be provided from Santa Rosalia Drive to the existing alley along the northern property line and then to the parking structure/garage (Building F). All vehicular access would be controlled through a ticketed gateway prior to entering the parking garage. Access to the existing alley from Don Felipe Drive would be limited to emergency vehicles and occasional VIP access.

Delivery trucks and studio trailers would access the Project site from a right turn in only via a truck-only entry driveway off Stocker Street. The truck entry driveway would be wide enough for two semi-

trucks to pull off Stocker Street, if necessary. All trucks entering from Stocker Street would exit on Santa Rosalia Drive via the existing fire road along the northern property line. No traffic would exit Stocker Street; only emergency vehicles and occasional VIP vehicles would exit on Don Felipe Drive.

The Project would operate a movie production studio containing a mix of uses, including restaurant and retail uses open to the public. The proposed studio would have operations 24 hours per day, seven days per week, but generally occur nine months per year. Staff members would manage studio and stage operations daily from 9:00 am to 6:00 pm.

Public visitors to the campus would have (controlled) access to Building A and Building F and the Green Plaza during daytime hours. The rooftop restaurant would be open to on-site employees during daytime hours and open to the public after 6:00 pm. Access to Building D and Building E and the Upper Service Plaza Level would be restricted to on-site office tenants, movie production talent and staff, and delivery vehicles during all hours of operation. The food court in Building A would operate 12 hours per day from 8:00 am to 8:00 pm. The community room located in Building F would be open for public use between 8:00 am and 8:00 pm.

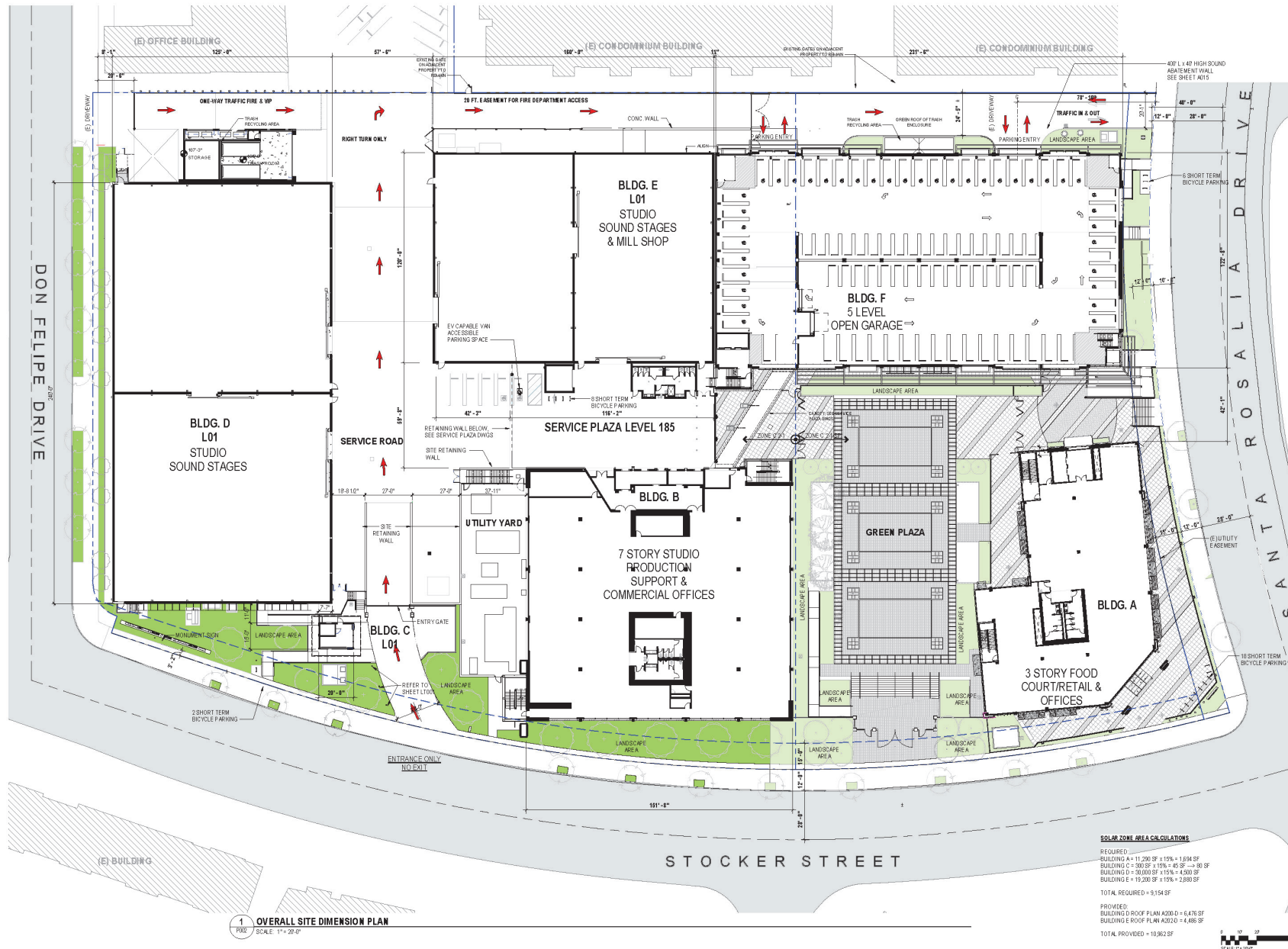
Special events for both building tenants and the public would occasionally occur within the Green Plaza. Additionally, the restaurant and green space on the rooftop of Building B could be utilized for private special events. Sound amplifying equipment during special events would be prohibited between the hours of 10:00 pm and 7:00 am.

**Figure 2-1, *Regional and Site Location Map***, shows the regional Project location within Los Angeles County and surrounding streets, and **Figure 2-2, *Site Plan***, depicts the proposed site plan.



Source: TAHA, 2024.

**FIGURE 2-1**  
**REGIONAL AND SITE LOCATION MAP**



Source: JGM Inc, 2025.

**FIGURE 2-2**  
**SITE PLAN**

### 3.0 AIR QUALITY

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by demolition of the existing building and whether Project emissions would conflict with or obstruct implementation of the applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions, such as those leading to odors, affecting a substantial number of people.

#### 3.1. AIR QUALITY BACKGROUND

##### 3.1.1. Air Quality and Public Health

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations—such as asthmatics, children, and the elderly with a margin of safety—and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.<sup>1</sup> As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (USEPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to the NAAQS.<sup>2</sup> The NAAQS and CAAQS are listed in **Table 3-1, Ambient Air Quality Standards**.

At the regional level, the SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties, including the Coachella Valley.<sup>3</sup> The City is located within the South Coast Air Basin (Air Basin), which is a distinct geographic subarea within the SCAQMD's jurisdiction. The SCAQMD, together with the Southern California Association of Governments (SCAG), has the responsibility for ensuring that national and state ambient air quality standards are achieved and maintained for the Air Basin. Failure to comply with these standards puts state and local agencies at risk for penalties in the form of lawsuits, fines, a federal takeover of state implementation plans, and a loss of funds from federal agencies, such as the Federal Highway Administration and Federal Transit Administration.

To meet the air quality standards, regional plans are developed, including the SCAQMD Air Quality Management Plan (AQMP), which incorporates regional demographic projections and integrated regional land use and transportation strategies from the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). These plans work together to examine multiple pollutants, cumulative effects, and transport issues related to attaining healthful air quality in the

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<sup>1</sup> United States Environmental Protection Agency, *NAAQS Table*, <https://www.epa.gov/criteria-air-pollutants/naaqs-table>, accessed April 9, 2024.

<sup>2</sup> South Coast Air Quality Management District, *Final 2022 AQMP – Appendix I: Health Effects (p. I-154)*, Adopted December 2, 2022.

<sup>3</sup> South Coast Air Quality Management District, *Map of Jurisdiction*, 1999.

region. In addition, a host of regulatory standards at the federal, State, regional, and local level function to identify and limit exposure of air pollutants and toxic air contaminants (TACs).

### **3.1.2. Local Air Quality and Air Pollution Sources**

As mentioned above, the City is located within the Air Basin, which is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

The Air Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid to late afternoons on hot summer days. Winter inversions frequently break by mid-morning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problem is the accumulation of carbon monoxide (CO) and nitrogen oxides (NO<sub>x</sub>) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO<sub>x</sub> to form photochemical smog.

Air pollutant emissions within the Air Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

### **3.1.3. Air Pollutant Types**

#### **3.1.3.1. Criteria Pollutants**

The six principal pollutants for which national and state criteria and standards have been promulgated and which are most relevant to current air quality planning and regulation in the Air Basin include ozone (O<sub>3</sub>), respirable and fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>, respectively), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and lead (Pb). These pollutants

are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them.

*i. Ozone (O<sub>3</sub>)*

O<sub>3</sub> is a gas that is formed when volatile organic compounds (VOCs) and NO<sub>x</sub> - both byproducts of internal combustion engine exhaust - undergo slow photochemical reactions in the presence of sunlight. O<sub>3</sub> concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O<sub>3</sub> irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

*ii. Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)*

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter—denoted as PM<sub>10</sub> and PM<sub>2.5</sub>—consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in urban areas, such as the City, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body’s defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM<sub>10</sub> and PM<sub>2.5</sub>. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

*iii. Carbon Monoxide (CO)*

CO is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In urban areas, such as the City, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O<sub>3</sub>, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Elevated concentrations of CO weaken the heart’s contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

*iv. Nitrogen Dioxide (NO<sub>2</sub>)*

NO<sub>2</sub> is a NO<sub>x</sub> compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO<sub>x</sub> compounds, NO<sub>2</sub> is the most abundant in the atmosphere. As ambient concentrations of NO<sub>2</sub> are related to traffic density, commuters in heavy traffic areas, particularly in urban areas, such as the City of Los Angeles, may be exposed to higher concentrations

of NO<sub>2</sub> than those indicated by regional monitors. NO<sub>2</sub> absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO<sub>2</sub> also contributes to the formation of PM<sub>10</sub>. NO<sub>x</sub> irritates the nose and throat and increases one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO<sub>x</sub> is as a precursor to the formation of O<sub>3</sub>.

v. *Sulfur Dioxide (SO<sub>2</sub>)*

Sulfur oxides (SO<sub>x</sub>) are compounds of sulfur and oxygen molecules. SO<sub>2</sub> is the predominant form found in the lower atmosphere and is a product of burning sulfur or materials that contain sulfur. Major sources of SO<sub>2</sub> include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO<sub>2</sub> are found near large industrial complexes. In recent years, SO<sub>2</sub> concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO<sub>2</sub> and limits on the sulfur content of fuels. Emissions of SO<sub>2</sub> aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO<sub>2</sub> potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO<sub>2</sub>, and long-term exposures to both pollutants lead to higher rates of respiratory illness.

vi. *Lead (Pb)*

Pb is a metal found naturally in the environment, as well as in manufactured products. The highest levels of Pb in the air are usually found near Pb smelters. The major sources of Pb emissions in the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Pb is also emitted from the sanding or removal of old lead-based paint (LBP). Pb emissions are primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

### 3.1.3.2. Additional Criteria Pollutants (California Only)

In addition to the national standards, the State of California regulates State-identified criteria pollutants, including sulfates (SO<sub>4</sub><sup>2-</sup>), hydrogen sulfide (H<sub>2</sub>S), visibility-reducing particles, and vinyl chloride. With respect to the State-identified criteria pollutants, most land use development projects either do not emit them (i.e., H<sub>2</sub>S [nuisance odor] and vinyl chloride), or otherwise account for these pollutants (i.e., SO<sub>4</sub><sup>2-</sup> and visibility reducing particles) through other criteria pollutants. For example, SO<sub>4</sub><sup>2-</sup> are associated with SO<sub>x</sub> emissions, and visibility-reducing particles are correlated with particulate matter emissions. A description of the health effects of the State-designated criteria air pollutants is provided below.

i. *Sulfates (SO<sub>4</sub><sup>2-</sup>)*

SO<sub>4</sub><sup>2-</sup> are the fully oxidized ionic form of sulfur. SO<sub>4</sub><sup>2-</sup> occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to SO<sub>4</sub><sup>2-</sup> compounds in the atmosphere. Effects of SO<sub>4</sub><sup>2-</sup> exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

ii. *Hydrogen Sulfide (H<sub>2</sub>S)*

H<sub>2</sub>S is a colorless gas with the odor of rotten eggs. The most common sources of H<sub>2</sub>S emissions are oil and natural gas extraction and processing and natural emissions from geothermal fields. Industrial sources of H<sub>2</sub>S include petrochemical plants and kraft paper mills. H<sub>2</sub>S is also formed during bacterial decomposition of human and animal wastes and is present in emissions from sewage treatment facilities and landfills.<sup>4</sup> Exposure to H<sub>2</sub>S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.<sup>5</sup> H<sub>2</sub>S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.<sup>6</sup>

iii. *Visibility Reducing Particles*

Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., SO<sub>4</sub><sup>2-</sup>, nitrates, organic carbon particles), which are the major constituents of particulate matter. As the number of visibility-reducing particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range.<sup>7</sup> Exposure to some haze-causing pollutants have been linked to adverse health impacts similar to PM<sub>10</sub> and PM<sub>2.5</sub>, as discussed above.<sup>8</sup>

iv. *Vinyl Chloride*

Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes. Other major sources of vinyl chloride have been detected near landfills, sewage plants, and hazardous waste sites due to microbial breakdown of chlorinated solvents.<sup>9</sup> Short-term health effects of exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.<sup>10</sup> Most health data on vinyl chloride relate to carcinogenicity; thus, the people most at risk are those who have long-term exposure to elevated levels, which is more likely to occur in occupational or industrial settings. However, control methodologies applied to industrial facilities generally prevent emissions to the ambient air.<sup>11</sup>

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<sup>4</sup> California Air Resources Board, *Hydrogen Sulfide & Health*, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>, accessed April 10, 2024.

<sup>5</sup> *Ibid.*

<sup>6</sup> *Ibid.*

<sup>7</sup> California Air Resources Board, *Visibility-Reducing Particles and Health*, <https://www.arb.ca.gov/resources/visibility-reducing-particles-and-health>, accessed April 10, 2024.

<sup>8</sup> *Ibid.*

<sup>9</sup> California Air Resources Board, *Vinyl Chloride & Health*, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>, Accessed April 10, 2024.

<sup>10</sup> *Ibid.*

<sup>11</sup> *Ibid.*

### 3.1.3.3. Volatile Organic Compounds (VOCs) and Toxic Air Contaminants (TACs)

Although the SCAQMD's primary mandate is attaining the NAAQS and the CAAQS for criteria pollutants within the district, SCAQMD also has a general responsibility to control emissions of air contaminants and prevent endangerment to public health. As a result, the SCAQMD has regulated pollutants other than criteria pollutants, such as VOCs, TACs, greenhouse gases (GHGs), and stratospheric O<sub>3</sub>-depleting compounds.

#### *i. Volatile Organic Compounds (VOCs)*

VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs are a prime component (along with NO<sub>x</sub>) of the photochemical processes by which such criteria pollutants as O<sub>3</sub>, NO<sub>2</sub>, and certain fine particles are formed. They are, therefore, regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products.

#### *ii. Toxic Air Contaminants (TACs)*

TACs is a classification used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and include both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the USEPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria" air pollutants. The greatest potential for TAC emissions during construction is related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently, ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

## 3.2. REGULATORY FRAMEWORK

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding air quality at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Federal Clean Air Act (CCA)
  - National Ambient Air Quality Standards (NAAQS)
- California Clean Air Act (CCAA)
  - California Ambient Air Quality Standards (CAAQS)
- California Code of Regulations (CCR)
- State Programs for Toxic Air Contaminants
- Diesel Risk Reduction Program

- South Coast Air Quality Management District (SCAQMD)
  - Air Quality Management Plan (AQMP)
  - Air Quality Guidance Documents
  - Rules and Regulations
- Southern California Association of Governments (SCAG)
  - Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- City of Los Angeles
  - Air Quality Element of the General Plan
  - Plan for a Healthy Los Angeles
  - Municipal Code, Ordinance No. 187,714

### 3.2.1. Federal

#### 3.2.1.1. Federal Clean Air Act

The federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the latest amendments occurring in 1990.<sup>12</sup> The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.<sup>13</sup> The USEPA is responsible for the implementation and enforcement of the CAA, which establishes the NAAQS, specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).<sup>14</sup>

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. **Table 3-1, *Ambient Air Quality Standards***, shows the NAAQS currently in effect for each criteria pollutant and their corresponding attainment status. The Air Basin fails to meet national standards for O<sub>3</sub> and PM<sub>2.5</sub> and, therefore, is considered a federal “non-attainment” area for these pollutants. In addition, Los Angeles County fails to meet the national standard for Pb and, therefore, is considered a federal non-attainment area for Pb.

Title II pertains to mobile sources, which include on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO<sub>x</sub> emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent. The NAAQS and the CAAQS for the California criteria air pollutants (discussed below) have been set at levels considered safe to protect public health, including the health of sensitive populations and to protect public welfare.

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<sup>12</sup> 42 United States Code §7401 et seq. (1970).

<sup>13</sup> United States Environmental Protection Agency, *Summary of the Clean Air Act*, <https://www.epa.gov/laws-regulations/summary-clean-air-act>, accessed April 10, 2024.

<sup>14</sup> United States Environmental Protection Agency, *Clean Air Act Overview – Clean Air Act Table of Contents by Title*, Last Updated May 3, 2023, <https://www.epa.gov/clean-air-act-overview/clean-air-act-text>, accessed April 10, 2024. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.

**TABLE 3-1: AMBIENT AIR QUALITY STANDARDS**

| Pollutant                                              | Averaging Period        | Federal Standard <sup>a,b</sup>    | California Standard <sup>a,b</sup> | South Coast Air Basin Attainment Status <sup>c</sup> |                                  |
|--------------------------------------------------------|-------------------------|------------------------------------|------------------------------------|------------------------------------------------------|----------------------------------|
|                                                        |                         |                                    |                                    | Federal Standard <sup>d</sup>                        | California Standard <sup>d</sup> |
| <b>Ozone (O<sub>3</sub>)</b>                           | 1-hour                  | —                                  | 0.09 ppm (180 µg/m <sup>3</sup> )  | —                                                    | Non-Attainment                   |
|                                                        | 8-hour                  | 0.070 ppm (137 µg/m <sup>3</sup> ) | 0.07 ppm (137 µg/m <sup>3</sup> )  | Non-Attainment (Extreme)                             | Non-Attainment                   |
| <b>Respirable Particulate Matter (PM<sub>10</sub>)</b> | 24-hour                 | 150 µg/m <sup>3</sup>              | 50 µg/m <sup>3</sup>               | Attainment                                           | Non-Attainment                   |
|                                                        | Annual                  | —                                  | 20 µg/m <sup>3</sup>               |                                                      |                                  |
| <b>Fine Particulate Matter (PM<sub>2.5</sub>)</b>      | 24-hour                 | 35 µg/m <sup>3</sup>               | —                                  | Non-Attainment (Serious)                             | Non-Attainment                   |
|                                                        | Annual                  | 9.0 µg/m <sup>3</sup>              | 12 µg/m <sup>3</sup>               |                                                      |                                  |
| <b>Carbon Monoxide (CO)</b>                            | 1-hour                  | 35 ppm (40 mg/m <sup>3</sup> )     | 20 ppm (23 mg/m <sup>3</sup> )     | Attainment                                           | Attainment                       |
|                                                        | 8-hour                  | 9 ppm (10 mg/m <sup>3</sup> )      | 9.0 ppm (10 mg/m <sup>3</sup> )    |                                                      |                                  |
| <b>Nitrogen Dioxide (NO<sub>2</sub>)</b>               | 1-hour                  | 0.10 ppm (188 µg/m <sup>3</sup> )  | 0.18 ppm (339 µg/m <sup>3</sup> )  | Unclassified/Attainment                              | Attainment                       |
|                                                        | Annual                  | 0.053 ppm (100 µg/m <sup>3</sup> ) | 0.030 ppm (57 µg/m <sup>3</sup> )  |                                                      |                                  |
| <b>Sulfur Dioxide (SO<sub>2</sub>)</b>                 | 1-hour                  | 0.075 ppm (196 µg/m <sup>3</sup> ) | 0.25 ppm (655 µg/m <sup>3</sup> )  | Unclassified/Attainment                              | Attainment                       |
|                                                        | 24-hour                 | 0.14 ppm (365 µg/m <sup>3</sup> )  | 0.04 ppm (105 µg/m <sup>3</sup> )  |                                                      |                                  |
|                                                        | Annual                  | 0.03 ppm (80 µg/m <sup>3</sup> )   | —                                  |                                                      |                                  |
| <b>Lead (Pb)</b>                                       | 30-day average          | —                                  | 1.5 µg/m <sup>3</sup>              | Partial Non-Attainment <sup>e</sup>                  | Attainment                       |
|                                                        | Rolling 3-month average | 0.15 µg/m <sup>3</sup>             | —                                  |                                                      |                                  |
| <b>Sulfates (~SO<sub>4</sub><sup>2-</sup>)</b>         | 24-hour                 | —                                  | 25 µg/m <sup>3</sup>               | —                                                    | Attainment                       |
| <b>Hydrogen Sulfide (H<sub>2</sub>S)</b>               | 1-hour                  | —                                  | 0.03 ppm (42 µg/m <sup>3</sup> )   | —                                                    | Unclassified                     |

ppm = parts per million by volume; µg/m<sup>3</sup> = micrograms per cubic meter

<sup>a</sup> An ambient air quality standard is a concentration level (expressed in either ppm or µg/m<sup>3</sup>) and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.

<sup>b</sup> Ambient Air Quality Standards based on the 2022 AQMP.

<sup>c</sup> "Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.

<sup>d</sup> California and Federal standard attainment status based on SCAQMD's 2022 AQMP and 2022 updates from CARB. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.

<sup>e</sup> An attainment re-designation request is pending.

Sources: United States Environmental Protection Agency, NAAQS Table, <https://www.epa.gov/criteria-air-pollutants/naaqs-table>. Accessed April 10, 2024. California Air Resources Board, *Ambient Air Quality Standards Table*, May 4, 2016, <https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf>. Accessed April 10, 2024.

### 3.2.2. State

#### 3.2.2.1. California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. **Table 3-1, *Ambient Air Quality Standards***, includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. As shown in **Table 3-1, *Ambient Air Quality Standards***, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and, therefore, is considered a State “non-attainment” area for these pollutants.

#### 3.2.2.2. California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by State agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

#### 3.2.2.3. State Programs for Toxic Air Contaminants

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or “listed,” as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures, such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment, in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the Assembly Bill (AB) 2588 Air Toxics “Hot Spots” program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

#### 3.2.2.4. Diesel Risk Reduction Program

CARB identified particulate emissions from diesel-fueled engines as TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which moved us into the risk management phase of the program. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines* and the *Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

#### 3.2.3. Regional

##### 3.2.3.1. South Coast Air Quality Management District

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the Air Basin. The Air Basin is a subregion within the western portion of the SCAQMD jurisdiction as the SCAQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County. The Air Basin and Project location are shown on **Figure 3-1, South Coast Air Basin**.

##### 3.2.3.2. Air Quality Management Plan and Regional Transportation Plan/Sustainable Communities Strategy

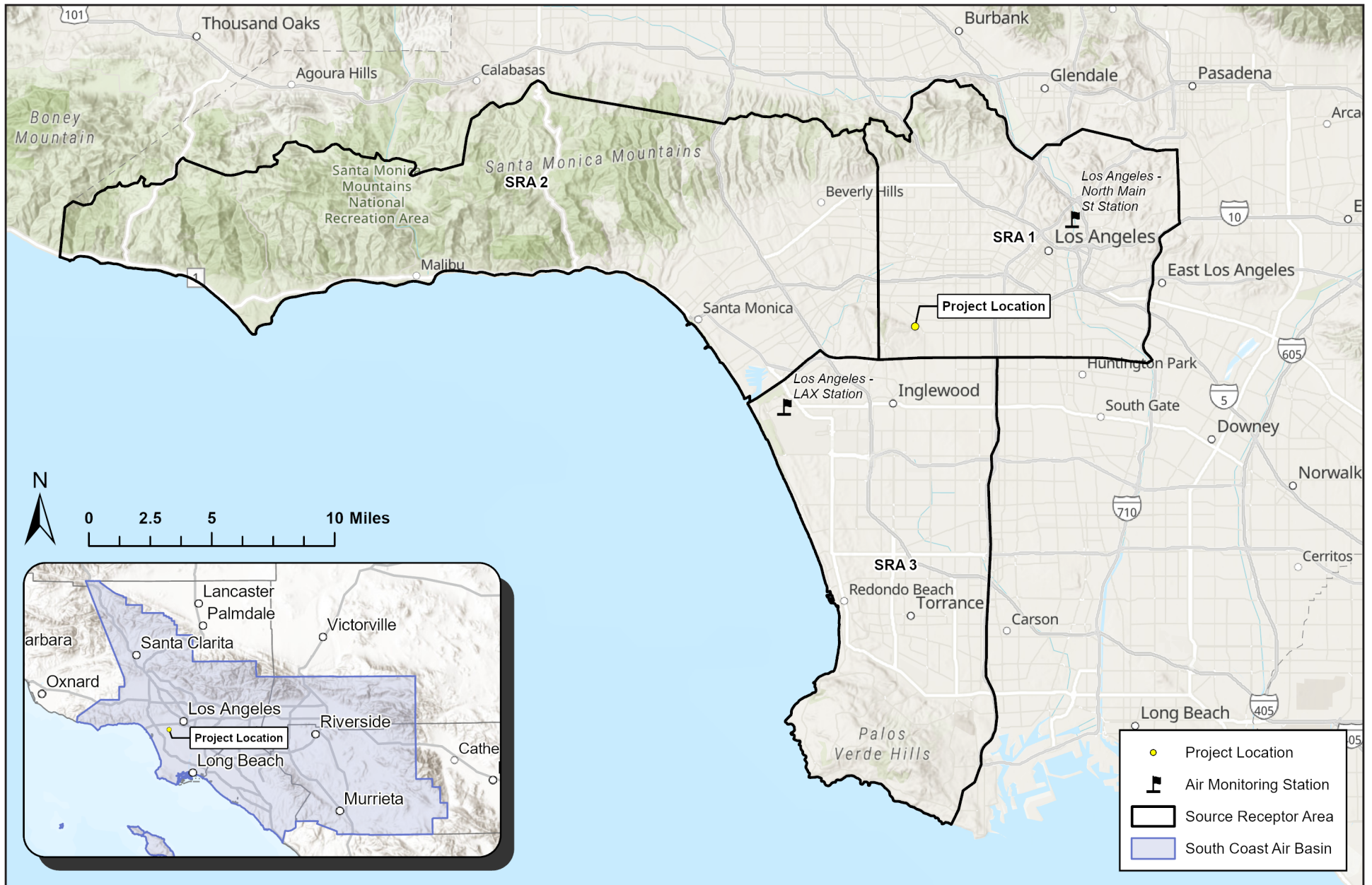
To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O<sub>3</sub> and PM<sub>2.5</sub> are met, and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO<sub>x</sub> emissions<sup>15</sup> sufficiently to meet the O<sub>3</sub> standard deadlines as NO<sub>x</sub> plays a critical role in the creation of O<sub>3</sub>. Since NO<sub>x</sub> emissions also lead to the formation of PM<sub>2.5</sub>, the NO<sub>x</sub> reductions needed to meet the O<sub>3</sub> standards will likewise lead to improvement of PM<sub>2.5</sub> levels and attainment of PM<sub>2.5</sub> standards.<sup>16</sup> The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies, such as regulation, accelerated development of available clean technologies, incentives and other CAA measures to achieve this standard.<sup>17</sup> The SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, state, and local levels and industries. The 2022 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with CARB and USEPA.

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<sup>15</sup> NO<sub>x</sub> emissions are a precursor to the formation of both O<sub>3</sub> and secondary PM<sub>2.5</sub> in the atmosphere.

<sup>16</sup> Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2022 AQMP for detailed discussion).

<sup>17</sup> South Coast Air Quality Management District, *Final 2022 AQMP (Page ES-2)*, Adopted December 2, 2022.



Source: TAHA, 2024.

**FIGURE 3-1**  
**SOUTH COAST AIR BASIN**

The AQMP also incorporates the transportation strategy and transportation control measures from the SCAG *Connect SoCal* 2020–2045 RTP/SCS Plan.<sup>18</sup> SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities “conform” to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG.<sup>19</sup> The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on the 2020–2045 RTP/SCS.

The 2022 AQMP forecasts the 2037 emissions inventories “with growth” based on SCAG’s 2020–2045 RTP/SCS. The region is projected to see a 12-percent growth in population, a 17-percent growth in housing units, an 11-percent growth in employment, and a 5-percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, State, and federal levels.<sup>20</sup> On September 3, 2020, SCAG’s Regional Council adopted the 2020–2045 RTP/SCS. The 2020–2045 RTP/SCS was determined to conform to the federally mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. On October 30, 2020, CARB also accepted SCAG’s determination that the SCS met the applicable state greenhouse gas emissions targets for the 2035 forecast year.

### 3.2.3.3. SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD Governing Board in 1993, most recently revised in 2001) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.<sup>21</sup> The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. However, the SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*. While this process is underway, the SCAQMD has provided supplemental guidance on the SCAQMD website to be used in conjunction with the Handbook.<sup>22</sup>

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.<sup>23</sup> SCAQMD’s siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD’s document introduces land

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<sup>18</sup> Southern California Association of Governments, *Final Connect SoCal 2020–2045 RTP/SCS*, Adopted September 3, 2020.

<sup>19</sup> South Coast Air Quality Management District, *Final 2022 AQMP (Page ES-2)*, December 2022.

<sup>20</sup> South Coast Air Quality Management District, *Final 2022 AQMP (Figure 1-4)*, December 2022.

<sup>21</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook (Version 3)*, Revised 2001.

<sup>22</sup> South Coast Air Quality Management District, *Air Quality Analysis Handbook*, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>, accessed April 11, 2024.

<sup>23</sup> South Coast Air Quality Management District, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. The SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has published a guidance document called the *Final Localized Significance Threshold Methodology* for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project.<sup>24</sup> The SCAQMD adopted additional guidance regarding PM<sub>2.5</sub> emissions in a document called *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM<sub>2.5</sub> Significance Thresholds*.<sup>25</sup> The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

#### 3.2.3.4. SCAQMD Rules and Regulations

The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for land use development projects, which include, but are not limited to, the following:

**Regulation IV – Prohibitions:** This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following is a list of rules that apply to the Project:

- **Rule 401 – Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **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 the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM<sub>10</sub> emissions to less than 50 micrograms per cubic meter (µg/m<sup>3</sup>), and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Best available control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, a contingency plan may be required if deemed necessary by the USEPA.

**Regulation XI – Source Specific Standards:** Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the Project:

- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the

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<sup>24</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised July 2008.

<sup>25</sup> South Coast Air Quality Management District, *Final Methodology to Calculate Particulate Matter (PM)2.5 and PM<sub>2.5</sub> Significance Thresholds*, October 2006.

use of these coatings, primarily by placing limits on the VOC content of various coating categories.

- **Rule 1138 – Control of Emissions from Restaurant Operations:** This rule specifies PM and VOC emissions and odor control requirements for commercial cooking operations that use chain-driven char-broilers to cook meat.
- **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<sub>x</sub> emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

**Regulation XIII – New Source Review (NSR):** Regulation XIII sets requirements for preconstruction review required under both federal and state statutes for new and modified sources located in areas that do not meet the CAA standards ("non-attainment" areas). NSR applies to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply Best Available Control Technology (BACT). Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the SCAQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

**Regulation XIV – Toxics and Other Non-Criteria Pollutants:** Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units, which emit TACs or other non-criteria pollutants. The following is a list of rules that may apply to the Project:

- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

### 3.2.4. Local

#### 3.2.4.1. City of Los Angeles General Plan

##### *i. Air Quality Element*

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. In general, the City of Los Angeles' General Plan (including the Framework, Air Quality, Mobility 2035, and Health and Wellness Elements) and the City of Los Angeles' Green New Deal contain policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and the City.

The most directly-related of those plans, the City's General Plan Air Quality Element, was adopted on November 24, 1992, and sets forth the goals, objectives, and policies that guide the City in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to land use development and relate to traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips,

managing traffic congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures, including passive measures, such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Through capital improvement programs, the City can fund infrastructure that contributes to improved air quality by requiring such improvements as bus turnouts as appropriate, installation of energy-efficient streetlights, and synchronization of traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation measures.

#### *ii. Plan for a Healthy Los Angeles*

The Plan for a Healthy Los Angeles, adopted by the City Council on March 31, 2015, and amended in November 2021, lays the foundation to create healthier communities for all residents in the City. As an element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods; a clean environment (i.e., improved ambient and indoor air quality); the opportunity to thrive; and access to health services, affordable housing, and healthy and sustainably produced food.

#### **3.2.4.2. City of Los Angeles Municipal Code (LAMC)**

Chapter IX of the LAMC, Sections 99.02.202, 99.04.106.8, and 99.05.106.14, requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas, such as space heating, water heating, cooking appliances and clothes drying, would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, hospitals, laboratories, and research and development uses.

### 3.3. EXISTING SETTING

#### 3.3.1. Regional Air Quality

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Air Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors, such as wind, sunlight, temperature, humidity, rainfall, and topography, affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential.

The greatest air pollution throughout the Air Basin occurs from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. O<sub>3</sub> concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California. However, the Air Basin still fails to meet the national standards for O<sub>3</sub> and PM<sub>2.5</sub>. In addition, Los Angeles County still fails to meet the national standard for lead.

SCAQMD has the responsibility for ensuring that all national and State ambient air quality standards are achieved and maintained throughout the Air Basin. To meet the standards, SCAQMD has adopted a series of AQMPs. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines are met, and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO<sub>x</sub> emissions sufficiently to meet the upcoming ozone standard deadlines.<sup>26</sup> The 2016 AQMP provides a baseline year 2018 inventory of 351 tons per day (tpd) of NO<sub>x</sub> and modeling results show that NO<sub>x</sub> emissions are projected to be 184 tpd in the 8-hour ozone attainment year of 2037, due to continued implementation of already adopted regulatory actions ("baseline emissions"). The 2022 AQMP analysis determined that total Air Basin emissions of NO<sub>x</sub> must be reduced to 60 tpd in 2037 to attain the 8-hour ozone standard, a reduction of approximately 83 percent below current (2018) levels. Although the existing air regulations and programs will continue to lower NO<sub>x</sub> emissions in the region, an additional 67 percent decrease in the year 2037 is necessary to attain the 8-hour ozone standard.<sup>27,28</sup>

The overall control strategy is an integral approach relying on fair-share emission reductions from federal, State and local levels. The 2022 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with CARB and USEPA.

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the AQMP with those prepared by SCAG. The RTP/SCS and Transportation Control Measures (TCMs)—included as

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<sup>26</sup> NO<sub>x</sub> emissions are a precursor to the formation of both ozone and secondary PM<sub>2.5</sub>.

<sup>27</sup> Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2022 AQMP for detailed discussion).

<sup>28</sup> South Coast Air Quality Management District, *Final 2022 AQMP*, December 2022, p. ES-4.

Appendix IV-C of the 2022 AQMP/SIP for the Air Basin—are based on SCAG’s 2020–2045 RTP/SCS. The 2022 AQMP forecasts the 2037 emissions inventories “with growth” based on SCAG’s 2020–2045 RTP/SCS. The region is projected to see a 12-percent growth in population, 17-percent growth in housing units, 11-percent growth in employment, and 5-percent growth in VMT between 2018 and 2037.<sup>29</sup> Despite this regional growth, air quality has improved substantially over the years, primarily due to the impacts of air quality control programs at the local, State and federal levels.

SCAQMD has released the Multiple Air Toxics Exposure Study (MATES-V). The MATES-V was aimed at estimating the cancer risk from toxic air emissions throughout the Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to fully characterize health risks for those living in the Air Basin. The MATES-V Study concluded that the average multi-pathway carcinogenic risk from air pollution in Los Angeles County is approximately 497 in one million over a 30-year period, and the average inhalation-only risk is approximately 462 in one million. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 50 percent of the risk is attributed to diesel particulate emissions, approximately 38 percent is attributed to other toxics associated with mobile sources—including benzene, butadiene, and carbonyls that constitute 25 percent combined—and approximately 12 percent of all carcinogenic risk is attributed to stationary sources (which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses, such as gas stations and chrome plating).<sup>30</sup>

As part of the MATES-V, SCAQMD developed a data visualization mapping tool that shows regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps’ estimates represent the number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 30 years) in parts of the area. The MATES-V map is the most recently available map to represent existing conditions near the Project area. The estimated cancer risk for the vast majority of the urbanized area within the Air Basin ranges from 200 to 800 cancers per million over a 30-year exposure duration.<sup>31</sup>

### 3.3.2. Local Air Quality

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial and industrial activity, space and water heating, landscape maintenance, consumer products, and mobile sources primarily consisting of automobile traffic. Motor vehicles are the primary source of pollutants in the local vicinity.

#### 3.3.2.1. Existing Pollutant Levels at Nearby Monitoring Stations

SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin and has divided the Air Basin into 38 source receptor areas (SRAs) in which 31 monitoring stations operate. Each monitoring station measures concentrations of air pollutants that are considered representative of the air quality in the respective SRA. The Project site is situated along the northwest side of Stocker Street between Santa Rosalia Drive and Don Felipe Drive in SRA 1 (Central LA County). The monitoring station that collects ambient air quality data in SRA 1 is the Los Angeles-

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<sup>29</sup> South Coast Air Quality Management District, *Final 2022 AQMP*, December 2022, p. 3-23.

<sup>30</sup> South Coast Air Quality Management District, *MATES-V Multiple Air Toxics Exposure Study in the South Coast AQMD Final Report*, August 2021.

<sup>31</sup> South Coast Air Quality Management District, *MATES Data Visualization – Cancer Risk*, 2021, <https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CCancer-Risk>.

North Main Street (LA-NMS) monitoring station located at 1630 North Main Street in the City of Los Angeles, approximately 7.6 miles northeast of the Project site.<sup>32</sup> Additionally, the Los Angeles International Airport (LAX) monitoring site for SRA 3 (Southwest Coastal LA County) is located 6.3 miles southwest of the Project site. **Figure 3-1, South Coast Air Basin**, includes the locations of the monitoring stations and identifies the Project location.

Due to local topography and meteorological conditions—the SRA 3 monitor is situated near the coast and recorded data is influenced by onshore breezes—air quality at the Project site is best characterized using a combination of air monitoring data from the two monitoring stations. The LA-NMS site monitor is equipped to measure and record concentrations of hourly average and eight-hour average O<sub>3</sub>, hourly NO<sub>2</sub>, and 24-hour average PM<sub>10</sub> and PM<sub>2.5</sub>.<sup>33</sup> The LAX monitor is equipped to measure concentrations of hourly average and eight-hour average O<sub>3</sub>, hourly average NO<sub>2</sub>, and 24-hour average PM<sub>10</sub>. The LAX site was deactivated in 2023 and is in the process of being relocated. **Table 3-2, Project Area Ambient Air Quality Data**, below displays measured pollutant concentrations at the two monitoring stations, the State and federal standards, and the frequency of concentrations recorded above the standards during the three-year period from 2021–2023.<sup>34,35</sup> SCAQMD has suspended reporting of CO and SO<sub>2</sub> at most locations throughout the Air Basin due to continued attainment of the air quality standards in recent years.

| TABLE 3-2: PROJECT AREA AMBIENT AIR QUALITY DATA |               |                                            |                                                                      |       |       |
|--------------------------------------------------|---------------|--------------------------------------------|----------------------------------------------------------------------|-------|-------|
| Pollutant                                        | Station (SRA) | Data Statistics and Air Quality Standards  | Maximum Concentrations and Frequencies of Exceeded Standards by Year |       |       |
|                                                  |               |                                            | 2021                                                                 | 2022  | 2023  |
| Ozone (O <sub>3</sub> )                          | LA-NMS (1)    | Maximum 1-hr. Concentration (ppm)          | 0.099                                                                | 0.138 | 0.097 |
|                                                  |               | Days > 0.09 ppm (State 1-hr. standard)     | 1                                                                    | 4     | 2     |
|                                                  |               | Maximum 8-hr. Concentration (ppm)          | 0.085                                                                | 0.090 | 0.082 |
|                                                  | LAX (3)       | Days > 0.070 ppm (State 8-hr. standard)    | 2                                                                    | 6     | 7     |
|                                                  |               | Days > 0.070 ppm (National 8-hr. standard) | 2                                                                    | 6     | 7     |
|                                                  |               | Maximum 1-hr. Concentration (ppm)          | 0.059                                                                | N/A   | N/A   |
| Nitrogen Dioxide (NO <sub>2</sub> )              | LA-NMS (1)    | Days > 0.09 ppm (State 1-hr. standard)     | 0                                                                    | N/A   | N/A   |
|                                                  |               | Maximum 8-hr. Concentration (ppm)          | 0.049                                                                | N/A   | N/A   |
|                                                  |               | Days > 0.070 ppm (State 8-hr. standard)    | 0                                                                    | N/A   | N/A   |
|                                                  | LAX (3)       | Days > 0.070 ppm (National 8-hr. standard) | 0                                                                    | N/A   | N/A   |
|                                                  |               | Maximum 1-hr. Concentration (ppm)          | 0.078                                                                | 0.075 | 0.051 |
|                                                  |               | Days > 0.18 ppm (State 1-hr. standard)     | 0                                                                    | 0     | 0     |
|                                                  | LAX (3)       | Days > 0.100 ppm (National 1-hr. standard) | 0                                                                    | 0     | 0     |
|                                                  |               | Maximum 1-hr. Concentration (ppm)          | 0.063                                                                | N/A   | N/A   |
|                                                  |               | Days > 0.18 ppm (State 1-hr. standard)     | 0                                                                    | N/A   | N/A   |
|                                                  | LAX (3)       | Days > 0.100 ppm (National 1-hr. standard) | 0                                                                    | N/A   | N/A   |

<sup>32</sup> California Air Resources Board, *PM<sub>2.5</sub> Monitoring Sites in California (Appendix A)*, <https://www.arb.ca.gov/aqd/pm25/pmfmon.htm>, accessed on April 16, 2024.

<sup>33</sup> South Coast Air Quality Management District, *Annual Air Quality Monitoring Network Plan*, July 1, 2023.

<sup>34</sup> California Air Resources Board, *Air Quality Data Statistics, Top 4 Summary*, <http://www.arb.ca.gov/adam/topfour/topfour1.php>, accessed on April 17, 2024.

<sup>35</sup> United States Environmental Protection Agency, *Monitor Values Report*, <https://www.epa.gov/outdoor-air-quality-data/monitor-values-report>, Accessed April 17, 2024.

**TABLE 3-2: PROJECT AREA AMBIENT AIR QUALITY DATA**

| Pollutant                                         | Station (SRA) | Data Statistics and Air Quality Standards                | Maximum Concentrations and Frequencies of Exceeded Standards by Year |      |      |
|---------------------------------------------------|---------------|----------------------------------------------------------|----------------------------------------------------------------------|------|------|
|                                                   |               |                                                          | 2021                                                                 | 2022 | 2023 |
| Respirable Particulate Matter (PM <sub>10</sub> ) | LA-NMS (1)    | Maximum 24-hr. Concentration (µg/m <sup>3</sup> )        | 67.7                                                                 | 61.0 | 39.0 |
|                                                   |               | Days > 50 µg/m <sup>3</sup> (State 24-hr. standard)      | 14                                                                   | 5    | 0    |
|                                                   |               | Days > 150 µg/m <sup>3</sup> (Federal 24-hr. standard)   | 0                                                                    | 0    | 0    |
|                                                   |               | Annual Concentration (µg/m <sup>3</sup> )                | 30.9                                                                 | 24.1 | 20.5 |
|                                                   | LAX (3)       | Exceed State Annual Standard (20 µg/m <sup>3</sup> )?    | Yes                                                                  | Yes  | Yes  |
|                                                   |               | Maximum 24-hr. Concentration (µg/m <sup>3</sup> )        | 33.3                                                                 | N/A  | N/A  |
|                                                   |               | Days > 50 µg/m <sup>3</sup> (State 24-hr. standard)      | 0                                                                    | N/A  | N/A  |
|                                                   |               | Days > 150 µg/m <sup>3</sup> (Federal 24-hr. standard)   | 0                                                                    | N/A  | N/A  |
| Fine Particulate Matter (PM <sub>2.5</sub> )      | LA-NMS (1)    | Annual Concentration (µg/m <sup>3</sup> )                | 14.1                                                                 | N/A  | N/A  |
|                                                   |               | Exceed State Annual Standard (20 µg/m <sup>3</sup> )?    | No                                                                   | N/A  | N/A  |
|                                                   | LA-NMS (1)    | Maximum 24-hr. Concentration (µg/m <sup>3</sup> )        | 61.1                                                                 | 38.0 | 30.6 |
|                                                   |               | Days > 35 µg/m <sup>3</sup> (National 24-hr. standard)   | 13                                                                   | 1    | 0    |
|                                                   |               | Annual Concentration (µg/m <sup>3</sup> )                | 14.8                                                                 | 11.1 | 8.5  |
|                                                   |               | Exceed State Annual Standard (12 µg/m <sup>3</sup> )?    | Yes                                                                  | No   | No   |
|                                                   |               | Exceed Federal Annual Standard (9.0 µg/m <sup>3</sup> )? | Yes                                                                  | Yes  | No   |
|                                                   |               |                                                          |                                                                      |      |      |

**SOURCE:** California Air Resources Board, *Air Quality Data Statistics, Top 4 Summary*, <http://www.arb.ca.gov/adam/topfour/topfour1.php>; United States Environmental Protection Agency, *Monitor Values Report*, <https://www.epa.gov/outdoor-air-quality-data/monitor-values-report>; Accessed April 18, 2024.

As shown in Error! Reference source not found., *Project Area Ambient Air Quality Data*, concentrations of O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> exceeded applicable standards at various times throughout the most recent three-year period. Particulate matter concentrations are substantially lower along the coastal region than in the urban center of Los Angeles. The concentrations measured at these monitors are consistent with the attainment status designations for the Air Basin.

### 3.3.2.2. Existing Health Risk in the Surrounding Area

Based on the MATES-V model data visualization tool, the estimated background carcinogenic risk in the Project area (zip code 90008) is approximately 470 in one million, of which approximately 65 percent (303 in one million) is attributed to DPM.<sup>36</sup> Cancer risk in the Los Angeles area is predominantly attributed to sources of DPM (e.g., major highways including Interstate 405 and Interstate 10). In general, ambient long-term carcinogenic risk at the Project site is comparable with other urbanized areas in Los Angeles, which typically range from 400–800 per million.

### 3.3.3. Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The CARB has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors are land uses where populations that are more susceptible to the adverse effects of air pollution exposure are likely to spend considerable amounts of time. The SCAQMD and CARB guidance recommend that sensitive receptor locations to be taken

<sup>36</sup> South Coast Air Quality Management District, *MATES Data Visualization – Cancer Risk*, 2021, <https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CCancer-Risk>.

into consideration include residences, schools, playgrounds, child-care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive receptors nearest to the Project site in each direction are listed below and identified on **Figure 3-2, Sensitive Receptors**. Sensitive receptors in closest proximity to the Project site include:

- A multi-family residential complex adjacent to the northern property boundary;
- Single- and multi-family residential developments located to the south and southeast of the site across Stocker Street, approximately 85 feet (26 meters) from the property boundary;
- The View Park Convalescent Center located approximately 275 feet (84 meters) northwest of the property boundary;
- A tract of single-family homes located approximately 315 feet (96 meters) west of the site.

Exposures to air pollution generated by construction and operation of the Project would occur at the residential locations during all hours of the day that residents are home, and exposures at the childcare center would occur during normal daytime business hours. Concentrations of air pollutants are higher at locations near sources and dissipate with downwind distance.



### 3.4. PROJECT IMPACTS

#### 3.4.1. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to air quality if it would:

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

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold Questions. The *L.A. CEQA Thresholds Guide* identifies the following factors to evaluate air quality impacts:

#### (1) Construction

##### *a. Combustion Emissions from Construction Equipment*

- Type, number of pieces and daily usage for each type of equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

- *Fugitive Dust – Grading, Excavation, and Hauling*

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation, and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route.

- *Fugitive Dust – Heavy-Duty Equipment Travel on Unpaved Roads*

- Length and type of road;
- Type, number of pieces, weight and usage of equipment; and
- Type of soil.

- *Other Mobile Source Emissions*

- Number and average length of construction worker trips to Project Site, per day; and
- Duration of construction activities.

## (2) Operation

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the daily thresholds presented below (as reproduced from the SCAQMD CEQA Air Quality Handbook):
  - ROG: 55 pounds per day
  - NOX: 55 pounds per day
  - CO: 550 pounds per day
  - PM<sub>10</sub>: 150 pounds per day
  - SO<sub>x</sub>: 150 pounds per day
- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The proposed project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or nine parts per million (ppm), respectively; or
  - The incremental increase due to the project is equal to or greater than one ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.
- The project creates an objectionable odor at the nearest sensitive receptor.

## (3) Toxic Air Contaminants

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

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

## (4) SCAQMD CEQA Air Quality Handbook

To assist in addressing the Appendix G Environmental Checklist Threshold questions and factors identified in the City's *L.A. CEQA Thresholds Guide* for purposes of this analysis, the City of Los Angeles utilizes the thresholds of significance contained in SCAQMD's *CEQA Air Quality Handbook*, as identified below in **Table 3-3, SCAQMD Air Quality Significance Thresholds**, to assess the significance of the Project's air quality impacts.

| TABLE 3-3: SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS                                                                                                                                      |                                                                                                                                                                                                                                   |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| MASS DAILY THRESHOLDS <sup>/a/</sup>                                                                                                                                                       |                                                                                                                                                                                                                                   |                                     |
| Pollutant                                                                                                                                                                                  | Construction (lbs./day) <sup>/b/</sup>                                                                                                                                                                                            | Operation (lbs./day) <sup>/c/</sup> |
| Volatile Organic Compounds (VOC)                                                                                                                                                           | 75                                                                                                                                                                                                                                | 55                                  |
| Nitrogen Oxides (NO <sub>x</sub> )                                                                                                                                                         | 100                                                                                                                                                                                                                               | 55                                  |
| Carbon Monoxide (CO)                                                                                                                                                                       | 550                                                                                                                                                                                                                               | 550                                 |
| Sulfur Oxides (SO <sub>x</sub> )                                                                                                                                                           | 150                                                                                                                                                                                                                               | 150                                 |
| Particulates (PM <sub>10</sub> )                                                                                                                                                           | 150                                                                                                                                                                                                                               | 150                                 |
| Fine Particulates (PM <sub>2.5</sub> )                                                                                                                                                     | 55                                                                                                                                                                                                                                | 55                                  |
| Lead (Pb)                                                                                                                                                                                  | 3                                                                                                                                                                                                                                 | 3                                   |
| TOXIC AIR CONTAMINANTS (TACS), ODOR, AND GHG THRESHOLDS                                                                                                                                    |                                                                                                                                                                                                                                   |                                     |
| TACs<br>(including carcinogens and non-carcinogens)                                                                                                                                        | Maximum Incremental Cancer Risk ≥ 10 in 1 million (1 x 10 <sup>-5</sup> )<br>Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million (1 x 10 <sup>-4</sup> )<br>Chronic & Acute Hazard Index ≥ 1.0 (project increment) |                                     |
| Odor                                                                                                                                                                                       | Project creates an odor nuisance pursuant to SCAQMD Rule 402                                                                                                                                                                      |                                     |
| GHG Emissions                                                                                                                                                                              | 10,000 MT/year CO <sub>2</sub> eq for industrial facilities                                                                                                                                                                       |                                     |
| AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS <sup>/d/</sup>                                                                                                                       |                                                                                                                                                                                                                                   |                                     |
| <u>NO<sub>2</sub></u><br>1-hour average<br>Annual arithmetic mean                                                                                                                          | South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:<br>0.18 ppm (state)<br>0.03 ppm (state) and 0.0534 ppm (federal)                    |                                     |
| <u>PM<sub>10</sub></u><br>24-hour average<br>Annual arithmetic mean                                                                                                                        | 10.4 µg/m <sup>3</sup> (construction) <sup>/e/</sup> & 2.5 µg/m <sup>3</sup> (operation)<br>1.0 µg/m <sup>3</sup>                                                                                                                 |                                     |
| <u>PM<sub>2.5</sub></u><br>24-hour average                                                                                                                                                 | 10.4 µg/m <sup>3</sup> (construction) & 2.5 µg/m <sup>3</sup> (operation)                                                                                                                                                         |                                     |
| <u>SO<sub>2</sub></u><br>1-hour average<br>24-hour average                                                                                                                                 | 0.25 ppm (state) & 0.075 ppm (federal – 99 <sup>th</sup> percentile)<br>0.04 ppm (state)                                                                                                                                          |                                     |
| <u>Sulfate</u><br>24-hour average                                                                                                                                                          | 25 µg/m <sup>3</sup> (state)                                                                                                                                                                                                      |                                     |
| <u>CO</u><br>1-hour average<br>8-hour average                                                                                                                                              | South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:<br>20 ppm (state) and 35 ppm (federal)<br>9.0 ppm (state/federal)                   |                                     |
| <u>Lead</u><br>30-day average<br>Rolling 3-month average                                                                                                                                   | 1.5 µg/m <sup>3</sup> (state)<br>0.15 µg/m <sup>3</sup> (federal)                                                                                                                                                                 |                                     |
| Note: lbs./day = pounds per day; ppm = parts per million; µg/m <sup>3</sup> = micrograms per cubic meter; MT/year CO <sub>2</sub> eq = metric tons per year of CO <sub>2</sub> equivalents |                                                                                                                                                                                                                                   |                                     |
| <sup>/a/</sup> : Source: South Coast AQMD <i>CEQA Air Quality Handbook</i> (South Coast AQMD, 1993)                                                                                        |                                                                                                                                                                                                                                   |                                     |
| <sup>/b/</sup> : Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).                                           |                                                                                                                                                                                                                                   |                                     |
| <sup>/c/</sup> : For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.                                                                |                                                                                                                                                                                                                                   |                                     |
| <sup>/d/</sup> : Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.                                            |                                                                                                                                                                                                                                   |                                     |
| <sup>/e/</sup> : Ambient air quality threshold based on South Coast AQMD Rule 403.                                                                                                         |                                                                                                                                                                                                                                   |                                     |
| SOURCE: SCAQMD, 2023.                                                                                                                                                                      |                                                                                                                                                                                                                                   |                                     |

(a) Construction

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook*, the Project would have a significant impact if the estimated construction emissions would cause any of the following to occur:<sup>37</sup>

- Emissions from the Project's direct and indirect sources would exceed any of the SCAQMD significance threshold levels identified in **Table 3-3, SCAQMD Air Quality Significance Thresholds**;
- Maximum on-site daily localized emissions exceed the localized significance thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the project site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m<sup>3</sup>] over a 1-hour period or 9.0 ppm [10,350 µg/m<sup>3</sup>] averaged over an 8-hour period) and NO<sub>2</sub> (0.18 ppm [338.4 µg/m<sup>3</sup>] over a 1-hour period, 0.1 ppm [188 µg/m<sup>3</sup>] over a three-year average of the 98<sup>th</sup> percentile of the daily maximum 1-hour average, or 0.03 ppm [56.4 µg/m<sup>3</sup>] averaged over an annual period).
- Maximum on-site localized PM<sub>10</sub> or PM<sub>2.5</sub> emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the project site to exceed the incremental 24-hour threshold of 10.4 µg/m<sup>3</sup> or 1.0 µg/m<sup>3</sup> PM<sub>10</sub> averaged over an annual period.

(b) Operation

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook*, the Project would have a significant impact if the estimated operational emissions would cause any of the following to occur:<sup>38</sup>

- Emissions from the Project's direct and indirect sources would exceed any of the SCAQMD significance threshold levels identified in **Table 3-3, SCAQMD Air Quality Significance Thresholds**;
- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the project site greater than the most stringent ambient air quality standards for CO (20 ppm over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO<sub>2</sub> (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98<sup>th</sup> percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).
- Maximum on-site localized operational PM<sub>10</sub> and PM<sub>2.5</sub> emissions exceed the incremental 24-hour threshold of 2.5 µg/m<sup>3</sup> or 1.0 µg/m<sup>3</sup> PM<sub>10</sub> averaged over an annual period.
- The project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or,
- The project creates an odor nuisance pursuant to SCAQMD Rule 402 (i.e., objectionable odor at the nearest sensitive receptor).

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<sup>37</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

<sup>38</sup> *Ibid.*

(c) *Toxic Air Contaminants*

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

- The Project emits carcinogenic or TACs that exceed the maximum incremental chronic and acute cancer risk as provided in **Table 3-3, SCAQMD Air Quality Significance Thresholds**.

In assessing impacts related to TACs in this section, the City will use Appendix G Threshold [c] as the threshold of significance. The criteria identified above from the L.A. CEQA Thresholds Guide will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. In addition, the following criteria set forth in SCAQMD's CEQA Air Quality Handbook serve as quantitative air quality standards to be used to evaluate project impacts under Appendix G thresholds.

- The Project results in the exposure of sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 per million ( $1 \times 10^{-5}$ ) or an acute or chronic hazard index of 1.0. For projects with a maximum incremental cancer risk between one per million and 10 per million, a project would result in a significant impact if the cancer burden exceeded 0.5 excess cancer cases.

(d) *Consistency with Applicable Air Quality Plans*

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

- Criterion 1: Whether the Project will:
  1. Result in an increase in the frequency or severity of existing air quality violations;
  2. Cause or contribute to new air quality violations; and/or,
  3. Delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.
- Criterion 2: Whether the Project will exceed the assumptions in the AQMP in the horizon year or increments based on the year of project build-out and phase; for residential projects:
  1. Is the Project consistent with population, housing, and employment growth projections upon which the AQMP regional emission inventory forecast is based?
  2. Does the Project incorporate mitigation measures to reduce potentially significant impacts? and,
  3. Is the Project consistent with AQMP land use policies and control measures?

The Project's impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's AQMP. In addition, the Project's consistency with the City's Air Quality Element of the General Plan is also discussed.

### (e) Cumulative Impacts

Based on SCAQMD guidance, individual CEQA projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants that the Air Basin is currently designated as non-attainment of an air quality standard. As discussed in SCAQMD's *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*:<sup>39</sup>

*Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.*

Furthermore,

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

In accordance with the cumulative impact assessment approach promulgated by the SCAQMD, the cumulative analysis for the Project considers emissions that would be generated during construction and operation in the context of the CEQA project-specific thresholds of significance presented in Error! Reference source not found., *SCAQMD Air Quality Significance Thresholds*.

### 3.4.2. Methodology

This analysis focuses on the potential changes in the air quality environment due to implementation of the Project. Air pollutant emissions would result from both construction and operation of the Project. Specific methodologies used to evaluate these emissions are discussed below.

Although SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with new development projects within the Air Basin, such as the Project. Instead, SCAQMD published the *CEQA Air Quality Handbook* in November 1993 to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the Air Basin. The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*.<sup>40</sup>

In order to assist the CEQA practitioner in conducting an air quality analysis in the interim while the replacement *Air Quality Analysis Guidance Handbook* is being prepared, supplemental guidance/information is provided on the SCAQMD website and includes:<sup>41</sup> (1) Emission FACTor

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<sup>39</sup> South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003.

<sup>40</sup> South Coast Air Quality Management District, *Air Quality Analysis Handbook*, website: [www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook), accessed April 24, 2024.

<sup>41</sup> *Ibid*.

model (EMFAC) on-road vehicle emission factors; (2) background CO concentrations; (3) localized significance thresholds; (4) mitigation measures and control efficiencies; (5) mobile source toxics analysis; (6) off-road mobile source emission factors; (7) PM<sub>2.5</sub> significance thresholds and calculation methodology; and (8) updated SCAQMD Air Quality Significance Thresholds. SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod). These recommendations were followed in the preparation of this analysis.

SCAQMD has also adopted land use planning guidelines in the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005, which considers impacts to sensitive receptors from facilities that emit TAC emissions.<sup>42</sup> SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity of freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The assessment of potential impacts to regional and local air quality as a result of the Project implementation addresses both temporary emissions associated with construction activities as well as long-term operational emissions. Emissions are generally quantified on a daily basis and expressed in terms of pounds per day (lbs./day). Detailed emissions modeling files can be found in the Appendix. Specific methodologies used to evaluate these emissions are discussed below.

#### 3.4.2.1. Construction

##### a. Regional Emissions

The Project's "regional" emissions refer to emissions that will be evaluated based on regional significance thresholds established by SCAQMD, as discussed above. Daily regional emissions during construction are estimated by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying mobile source and fugitive dust emissions factors. The emissions are estimated using CalEEMod (Version 2022.1.1) software, an emissions inventory software program recommended by SCAQMD.<sup>43</sup> The CalEEMod model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with SCAQMD and received input from other California air districts and is currently used by numerous lead agencies in the Los Angeles area and within the state for quantifying the emissions associated with development projects undergoing environmental review, including by the City of Los Angeles. CalEEMod is based on outputs from Off-Road Emissions Inventory Program model (OFFROAD) and EMFAC model, which are emissions estimation models developed by CARB, and used to calculate emissions from construction activities, including off- and on-road vehicles, respectively. CalEEMod also relies upon known emissions data associated with certain activities or equipment (often referred to as "default" data, values or factors) that can be used if site-specific information is not available.<sup>44</sup> CalEEMod contains default values to use in each specific local

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<sup>42</sup> South Coast Air Quality Management District, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 2005.

<sup>43</sup> California Air Pollution Control Officers Association, *California Emissions Estimator Model (Version 2022.1) User Guide*, April 2022.

<sup>44</sup> California Air Pollution Control Officers Association, *California Emissions Estimator Model (Version 2022.1) User Guide*, April 2022.

air district region. Appropriate statewide default values can be used if regional default values are not defined.

The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. **Table 3-4, Construction Schedule Summary**, provides a summary of the general construction schedule and the daily personnel and equipment and vehicle activity that would be required for each phase of construction. Demolition debris (123,000 square feet of building floor area) and excavated soil (69,000 CY) will be transported off-site for disposal. To be conservative, this analysis evaluates the Project's air quality impacts during construction based on reasonably expected maximum construction emissions even though such emissions would not occur throughout the entire construction phase. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in the **Appendix**.

| <b>TABLE 3-4: CONSTRUCTION SCHEDULE SUMMARY</b>                                                                                                                                                                  |                          |                                |                                     |                    |                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------------|-------------------------------------|--------------------|--------------------------|
| <b>Phase Description</b>                                                                                                                                                                                         | <b>Duration (Months)</b> | <b>Maximum Daily Equipment</b> | <b>Maximum Daily One-Way Trips*</b> |                    |                          |
|                                                                                                                                                                                                                  |                          |                                | <b>Workers</b>                      | <b>Haul Trucks</b> | <b>Vendor Deliveries</b> |
| Demolition & Clearing                                                                                                                                                                                            | 3.5                      | 16                             | 80                                  | 80                 | 16                       |
| Excavation & Grading                                                                                                                                                                                             | 3.5                      | 15                             | 80                                  | 120                | 16                       |
| Building Construction*                                                                                                                                                                                           | 20.5                     | 6                              | 160                                 | 0                  | 64                       |
| Paving & Finishing*                                                                                                                                                                                              | 2                        | 15                             | 40                                  | 0                  | 16                       |
| <b>Note:</b> Emissions modeling assumed simultaneous overlap of building construction and paving/finishing/landscaping activities.<br><b>SOURCE:</b> Jenkins Gales and Martinez, Inc. Architects, November 2023. |                          |                                |                                     |                    |                          |

#### b. Localized Emissions

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate, to assess whether the Project's local emissions would exceed SCAQMD's significance thresholds, as described above.<sup>45</sup> SCAQMD provides LSTs applicable to the following criteria pollutants: NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>.<sup>46</sup> SCAQMD does not provide an LST for SO<sub>2</sub> since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O<sub>3</sub> formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. SCAQMD developed mass rate look-up tables for each source receptor area and to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. The appropriate LST values were selected using the SCAQMD guidance document *Fact Sheet for Applying CalEEMod to Localized*

<sup>45</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, July 2008.

<sup>46</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology: Appendix C – Localized Significance Threshold Screening Tables*, October 2009.

**Significance Thresholds.**<sup>47</sup> The Project site is located in SRA 1 and the maximum active construction area is anticipated to be two acres. As identified above, sensitive receptors are within approximately 50 feet—less than 25 meters—from the Project site boundary.

### c. Emissions Calculations

Construction activities would generate emissions from off-road equipment usage, on-road vehicle travel (truck hauling, vendor deliveries, and workers commuting), architectural coating, and paving. Each of these source types is discussed in more detail below. The Project's construction emissions were calculated using the SCAQMD recommended CalEEMod (Version 2020.4.0). **Table 3-5, Construction Emissions Sources**, provides an overview of the sources of air pollutant emissions that are accounted for in CalEEMod during Project construction. CalEEMod default values were used for equipment and vehicle emission factors, equipment load factors, and vehicle trip lengths with the exception of haul routes (which were assumed to be 36 miles each way as mentioned above). Maximum daily emissions calculated in CalEEMod represent conservative estimates of the worst-case daily emissions in each phase of construction based on continuous equipment activity.

| TABLE 3-5: CONSTRUCTION EMISSIONS SOURCES |                          |                                |                                                                                   |
|-------------------------------------------|--------------------------|--------------------------------|-----------------------------------------------------------------------------------|
| Phase(s)                                  | Activity                 | Source(s)                      | Pollutants                                                                        |
| All Phases                                | Off-Road Equipment Use   | Engine Exhaust                 | VOC, NO <sub>x</sub> , CO, SO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> |
| All Phases                                | On-Road Vehicle Trips    | Engine Exhaust                 | VOC, NO <sub>x</sub> , CO, SO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> |
| All Phases                                | On-Road Vehicle Trips    | Engine Evaporative Losses      | VOC                                                                               |
| All Phases                                | On-Road Vehicle Trips    | Brake & Tire Wear              | PM <sub>10</sub> , PM <sub>2.5</sub>                                              |
| All Phases                                | On-Road Vehicle Trips    | Re-Entrained Road Dust         | PM <sub>10</sub> , PM <sub>2.5</sub>                                              |
| Demolition                                | Mechanical Pulverization | Demolition Debris Dust         | PM <sub>10</sub> , PM <sub>2.5</sub>                                              |
| Demolition, Excavation                    | Truck Loading            | Fugitive Dust                  | PM <sub>10</sub> , PM <sub>2.5</sub>                                              |
| Site Clearing, Grading                    | Ground Disturbance       | Fugitive Dust (Dozers/Graders) | PM <sub>10</sub> , PM <sub>2.5</sub>                                              |
| Building Construction                     | Architectural Coating    | Off-Gassing (Evaporation)      | VOC                                                                               |
| Building Construction                     | Paving                   | Off-Gassing (Evaporation)      | VOC                                                                               |
| SOURCE: CAPCOA, 2022.                     |                          |                                |                                                                                   |

### Construction Equipment Exhaust Emissions

Since the majority of off-road equipment units used for construction projects are diesel-fueled, CalEEMod assumes all of the equipment operates on diesel fuel. CalEEMod employs the following equation to estimate daily emissions of VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from diesel-fueled off-road construction equipment exhaust:

$$Emission_{DieselEx}[grams] = \sum_i (EF_i \times Pop_i \times AvgHp_i \times Load_i \times Activity_i)$$

Where:

EF<sub>i</sub> = Emission factor in grams per horsepower-hour [g/hp-hr.] from OFFROAD2017

<sup>47</sup> South Coast Air Quality Management District, *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*, 2013.

- $Pop_i$  = Population, or number of pieces of equipment  
 $AvgHP_i$  = Maximum rated average horsepower [HP]  
 $Load_i$  = Load factor (average ratio of actual output to the maximum output, unitless)  
 $Activity_i$  = Daily hours of operation  
 $I$  = Equipment type

The OFFROAD model is the statewide emissions inventory for off-road equipment compiled by the CARB; factors from OFFROAD are built into the CalEEMod software based on the project location. CalEEMod provides options for specifying equipment types, horsepower ratings, load factors, and operational hours per day during each activity. Construction equipment inventories were provided by the Applicant for ease phase of construction, and default average equipment horsepower and default load factors derived from the statewide inventory for each type of equipment were relied upon to estimate daily emissions. Daily emissions from construction equipment during each phase were estimated using the equation above and converted from grams to pounds dividing by 453.592 grams per pound.

CalEEMod also estimates fugitive dust emissions associated with construction equipment use in grading activities, demolition debris truck loading, and excavated soil truck loading. As recommended by the SCAQMD, the fugitive dust emissions ( $PM_{10}$  and  $PM_{2.5}$ ) from grading and leveling activities are calculating using the methodology described in USEPA AP-42. The CalEEMod software assumes that graders, tractors, and bulldozers will disturb 0.5 acres per day of ground cover during eight hours of use. Detailed equations used to estimate fugitive dust emissions associated with various equipment types—as well as demolition dust and haul truck loading of debris and excavated soil—can be found in Section 4.3 and Section 4.4 of the technical calculation appendix to the CalEEMod User's Guide.<sup>48</sup>

#### On-Road Vehicle Trips Mobile Source Emissions

Additionally, construction activities generate air pollutant emissions from on-road vehicle exhaust and evaporative and dust emissions from personal vehicles for worker commuting, vendor deliveries of equipment and materials, and trucks for soil and debris hauling. These emissions are based on the number of trips and the vehicle miles traveled (VMT), along with emission factors from EMFAC2021, the CARB on-road mobile source emissions model. CalEEMod estimates running exhaust emissions, running evaporative loss VOC emissions, and PM emissions from tire and brake wear as well as entrained road dust. Running exhaust emissions of VOC,  $NO_x$ , CO,  $SO_2$ ,  $PM_{10}$ , and  $PM_{2.5}$  are estimated in CalEEMod using the following equation:

$$Emissions_{pollutant} = VMT \times EF_{running,pollutant}$$

#### Where:

- $Emissions_{pollutant}$  = Emissions from vehicle running for each pollutant [grams]  
 $VMT$  = Vehicle miles traveled  
 $EF_{running,pollutant}$  = Emission factor for running exhaust emissions in grams per mile [g/mi]

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<sup>48</sup> California Air Pollution Control Officers Association, *California Emissions Estimator Model (CalEEMod) User Guide Version 2022.1 Appendix C: Emissions Calculation Details for CalEEMod*, April 2022.

The CalEEMod program contains default trip lengths for workers, vendors, and material hauling based on regional survey data. The EMFAC2021 mobile source emission rates are built into the program as well. Running exhaust is the primary mobile source of VOC, NO<sub>x</sub>, CO, and SO<sub>2</sub> emissions associated with vehicle travel. Vehicle trip PM<sub>10</sub> and PM<sub>2.5</sub> emissions are predominantly attributed to particulate matter generated by degradation of brakes and tires on the road surface, with running exhaust being a secondary contributor to total mobile source emissions. Detailed equations used for calculating PM<sub>10</sub> and PM<sub>2.5</sub> emissions associated with brake and tire wear—as well as re-entrained dust from paved road travel—can be found in the CalEEMod technical appendix.<sup>49</sup>

### Architectural Coating Emissions

CalEEMod estimates emissions of VOC off-gassing from the application of architectural surface coatings containing solvents. The CalEEMod program uses the following equation to estimate evaporative emissions during architectural coating activities:

$$Emissions_{VOC}[lbs] = EF_{VOC,coating} \times A_{Paint} \times F$$

#### Where:

- Emissions<sub>VOC</sub> = Emissions of VOC in pounds [lbs.]
- EF<sub>VOC,coating</sub> = Emission factor in pounds VOC per square foot [lbs./sq. ft]
- A<sub>Paint</sub> = Building Surface Area [square footage]
- F = Fraction of surface area [%]

#### CalEEMod Default Values:

- Interior Surfaces = 75% of Building Surface Area
- Exterior Shell = 25% of Building Surface Area
- Parking Surfaces = 6% of Parking Area

CalEEMod assumes the total surface area for painting equals 2.7 times the building floor area square footage for residential uses and twice the building floor area square footage for non-residential uses. Based on preliminary design renderings, it is anticipated that no more than approximately 25 percent of the exterior surface area and 75 percent of the interior surface area will require the application of architectural coatings. A majority of the materials for building construction will arrive with coatings pre-applied. CalEEMod assigns the appropriate surface coating emission factor (EF<sub>VOC,coating</sub>) to interior and exterior surfaces and parking surfaces. CalEEMod calculates the surface coating emission factor using the following equation:

$$EF_{VOC,coating} \left[ \frac{lb}{sq. ft} \right] = \frac{C_{VOC}}{453.592 \frac{g}{lb}} \times \frac{3.785 \frac{L}{Gal}}{180 sq. ft}$$

#### Where:

- EF<sub>VOC,coating</sub> = Emission factor in pounds VOC per square foot [lbs./sq. ft]
- C<sub>VOC</sub> = VOC content of coating in grams per liter [g/L]; SCAQMD Limit 50 g/L

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<sup>49</sup> Ibid.

The emission factors for coating categories are calculated using the equation above based on default VOC content provided by the air districts or CARB's statewide limits. Project-specific VOC contents for architectural coatings can be entered into CalEEMod if included as a Project design feature. The SCAQMD has a building envelope coating limit of 50 g/L for all new structures within its jurisdiction beginning in 2019. Construction of the Project would only utilize building envelope coatings with a VOC content of less than or equal to 50 g/L for all structural applications in accordance with SCAQMD Rule 1113 (Architectural Coatings).

### Paving Emissions

The CalEEMod software does not contain an input screen for asphalt paving emissions. However, CalEEMod estimates VOC off-gassing emissions from asphalt paving of parking lots using the following equation based on the acreage of the parking lot entered on the land use input screen:

$$E_{VOC,paving} [lbs] = EF_{paving} \times A_{parking}$$

### Where:

|                  |                                                                            |
|------------------|----------------------------------------------------------------------------|
| $E_{VOC,paving}$ | = Emissions of VOC in pounds                                               |
| $EF_{paving}$    | = Emission factor in pounds per acre [lbs./acre]; Default = 2.62 lbs./acre |
| $A_{parking}$    | = Area of the parking lot [acres]                                          |

VOC off-gassing emissions associated with paving activities are attributed to surface parking lots and other asphalt surfaces. Subterranean parking structures are typically constructed with concrete. Therefore, minimal VOC off-gassing would occur during construction of the Project.

### **3.4.2.2. Operations**

#### **a. Regional Emissions**

Analysis of the Project's impact on regional air quality during long-term Project operations (i.e., after construction is complete) takes into consideration four types of sources: (1) area; (2) energy; (3) mobile; and (4) stationary. Area source emissions are generated by, among other things, landscape equipment, fireplaces, and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is used (e.g., natural gas for heat or cooking). Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project site associated with operation of the Project. Stationary source emissions are generated from proposed emergency generators during routine maintenance/testing.

Criteria pollutants are emitted during the generation of electricity at fossil fuel power plants. When electricity is used in buildings, the electricity generation typically takes place at off-site power plants, the majority of which burn fossil fuels. Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, State, and federal control measures, which can be considered to be the maximum feasible level of mitigation for stack emissions. CalEEMod, therefore, does not calculate criteria pollutant emissions from regional power plants associated with building electricity use.

SCAQMD's CalEEMod model was used to estimate Project emissions during operation. Mobile-source emissions were calculated using CalEEMod. However, CalEEMod default VMT was

bypassed to account for the Project-related VMT provided using the Los Angeles Department of Transportation (LADOT) VMT Calculator. The VMT Calculator was developed by the City and LADOT to comply with SB 743, which requires lead agencies to adopt VMT criteria to determine transportation related impacts. Daily Project trips and VMT were obtained from the *Transportation Assessment* and incorporated into the emissions modeling exercise. CalEEMod calculates mobile-source emissions using the Project's VMT, trip generation, and emission factors based on EMFAC2021.<sup>50</sup> Area source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Natural gas usage factors in CalEEMod are based on the California Energy Commission *California Commercial End Use Survey* data set, which provides energy demand by building type and climate zone.

To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the Project was compared against SCAQMD's significance thresholds presented in **Table 3-3, SCAQMD Air Quality Significance Thresholds**.<sup>51</sup> To be conservative, this analysis evaluates the Project's air quality impacts during operations based on reasonably expected maximum operational emissions even though such emissions would not occur throughout the entire operational phase. Refer to the **Appendix** for detailed operational modeling data.

b. Localized Emissions

i) On-Site Emissions

Localized impacts from Project operations include calculation of on-site emissions (e.g., combustion from natural gas usage) using SCAQMD's recommended CalEEMod and evaluation of these emissions consistent with SCAQMD's LST methodology discussed above.

ii) Off-Site Emissions

Potential localized CO concentrations from induced traffic at nearby intersections are also addressed, consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP.<sup>52</sup> It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections.<sup>53,54</sup> Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in the 1950s were typically emitting about 87 grams of CO per mile.<sup>55</sup> Currently, the CO standard in California is a maximum of 3.4 grams/mile for passenger cars (with provisions for certain cars to emit even less).<sup>56</sup> With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Air Basin have steadily declined.

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<sup>50</sup> California Air Pollution Control Officers Association, *California Emissions Estimator Model (CalEEMod) Version 2022.1 User's Guide Appendix C Emissions Calculation Details for CalEEMod*, April 2022.

<sup>51</sup> South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds*, March 2023.

<sup>52</sup> South Coast Air Quality Management District, *Air Quality Management Plan*, 2003.

<sup>53</sup> United States Environmental Protection Agency, *Air Quality Criteria for Carbon Monoxide [EPA 600/P-099/001F]*, 2000.

<sup>54</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

<sup>55</sup> United States Environmental Protection Agency, *Timeline of Major Accomplishments in Transportation, Air Pollution, and Climate Change*, accessed April 24, 2024.

<sup>56</sup> California Air Resources Board, *California Exhaust Emission Standards and Test Procedures for 2001 and Subsequent Model Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles*, amended September 2010.

The analysis prepared for CO attainment in the Air Basin by SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).<sup>57</sup> As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.<sup>58</sup> The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations.

The Los Angeles County Metropolitan Transportation Authority (Metro) evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level E at peak morning traffic and Level F at peak afternoon traffic.<sup>59,60</sup> As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. If a project would potentially result in a CO hotspot based on the initial screening, detailed modeling may be performed using California LINE Source Dispersion Model, version 4 (CALINE4), which is a model used to assess air quality impacts near transportation facilities (i.e., roadways, intersections, street canyons, and parking facilities). Given that fleet-average CO emission rates have decreased substantially since publication of the 2003 AQMP and that growth in the City has not quadrupled traffic volumes, the likelihood of CO hot spots occurring from a single project's contribution to nearby intersection volumes is extremely low.

#### c. Emissions Calculations

Future operation of the Project would generate emissions of air pollutants from a variety of sources, including mobile source on-road vehicle trips, and area sources including natural gas combustion from water heaters, landscaping equipment, and the use of consumer products. Periodic re-application of architectural coatings would generate VOC off-gassing emissions on a recurring yet infrequent basis; CalEEMod assumes the re-application rate is once every 10 years. CalEEMod estimates emissions from these sources based on the land use type and size, as well as default or Project -specific trip generation data. Area source emissions are based on natural gas combustion rates for building heating, water heaters and cooking, landscape equipment fuel combustion, and consumer products usage (including paints) rates built into the CalEEMod program. Natural gas usage factors in CalEEMod are based on the California Energy Commission (CEC) Commercial End Use Survey data set, which provides energy demand by building type and climate zone. The Project

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<sup>57</sup> South Coast Air Quality Management District, *Federal Attainment Plan for Carbon Monoxide*, 1992.

<sup>58</sup> Based on extrapolation of the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

<sup>59</sup> Metro measured traffic volumes and calculated the LOS for the intersection of Wilshire Blvd/Sepulveda Ave, which is a block west along Wilshire Blvd and east of Interstate 405.

<sup>60</sup> Los Angeles County Metropolitan Transportation Authority, *Congestion Management Plan for Los Angeles County*, 2004.

does not include fireplaces in the design of the residential units, and the Los Angeles Green Building Code prevents the installation of woodstoves. The following discussions provide a succinct overview of the operational emissions sources and processes that are accounted for in the CalEEMod program. CalEEMod was used to estimate daily regional and localized air pollutant emissions produced by the existing uses on the Project site as well as the Project in the anticipated year of completion, 2027.

#### On-Road Vehicle Trips Mobile Source Emissions

CalEEMod calculates the emissions associated with on-road mobile sources once a project is fully operational and/or inhabited. The *Transportation Assessment* prepared for the Project determined that future operations would produce 2,935 daily vehicle trips and approximately 21,618 daily VMT. As described above, emissions associated with on-road mobile sources include running and starting exhaust emissions, evaporative emissions, brake and tire wear, and re-entrained dust from paved and unpaved roads. Starting and evaporative emissions are associated with the number of vehicle-starts or time between vehicle uses, and all other emission processes are based on VMT. The operational mobile source emissions analysis was prepared using Project-specific trip information and regional fleet mix inventories provided within CalEEMod based on EMFAC.

CalEEMod provides options for populating Project-specific information related to operational vehicle activity. Operational emissions in the opening year of 2027 were estimated using 2,935 daily trips and an average trip distance of 7.37 miles based on the *Transportation Assessment*. The daily VMT per capita would be approximately 10.4. The vehicle fleet mix is regionally determined based on the CARB statewide EMFAC emission inventory for on-road vehicle travel. Mobile source emissions (excluding evaporative losses and vehicle-start emissions) from operational vehicle trips are estimated using the following equation for each trip type and the aggregate CARB EMFAC inventory emission factor based on the distribution of vehicle types within the fleet mix:

$$Emission_{exhaust,brake/tire\ wear}[lbs] = \frac{\sum_i (EF_i \times Pop_i \times ADT_i \times D_{trip,i})}{453.592 \frac{g}{lb}}$$

#### Where:

- EF<sub>i</sub> = Vehicle-specific emission factor in grams per mile [g/mi] from EMFAC2014
- Pop<sub>i</sub> = Population, or number of vehicles of each type
- ADT<sub>i</sub> = Average daily trip rate for each vehicle type and trip type
- D<sub>trip,i</sub> = Trip distance
- / = Vehicle type

Emissions from motor vehicles are dependent on model years and the specific types of vehicles. The emissions were calculated using a representative motor vehicle fleet mix provided by CalEEMod for a project in the Los Angeles County portion of the Air Basin.

#### Area Source Emissions

Area source emissions were calculated using CalEEMod default assumptions for the multi-family residential (mid-rise apartments) land uses. Area sources include VOC off-gassing from consumer products use and architectural coatings, as well as emissions from landscape maintenance equipment. Consumer products are chemically formulated products used by household and

institutional consumers—such as detergents, cleaning compounds, polishes, floor finishes, personal care products, disinfectants, and sanitizers—but does not include other paint products, furniture coatings, or architectural coatings. The SCAQMD conducted an evaluation of consumer products use as it correlated with the total square footage of buildings using data from the CARB consumer product emissions inventory and determined a VOC emission rate for consumer products within the SCAQMD jurisdiction.<sup>61</sup> CalEEMod uses the following equation to calculate daily VOC emissions from consumer products use:

$$E_{VOC, consumer\ products} [lbs] = EF_{VOC, consumer\ products} [lbs/sq.ft] \times A_{building} [sq.ft]$$

Where:

|                                |   |                                                                                                                                               |
|--------------------------------|---|-----------------------------------------------------------------------------------------------------------------------------------------------|
| $E_{VOC, consumer\ products}$  | = | Emissions of VOC in pounds per day                                                                                                            |
| $EF_{VOC, consumer\ products}$ | = | Emission factor in pounds per square foot of building area per day<br><u>SCAQMD Default Value:</u><br>1.98 x 10 <sup>-5</sup> lbs./sq. ft/day |
| $A_{building}$                 | = | Total square footage (floor area) of all buildings                                                                                            |

In addition to consumer products use, CalEEMod estimates daily and annual VOC emissions from operational application of architectural coatings. Operational architectural coating VOC emissions are estimated using the same equation presented above under construction sources assuming an average reapplication rate of once every 10 years.

Landscape Equipment

Operational emissions associated with landscape maintenance equipment are also estimated in CalEEMod, which include fuel combustion emissions from equipment such as lawn mowers, roto tillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers. The emissions associated with landscape equipment use were processed using data from CARB's Small Off-Road Engines Model v1.1 (SORE2020).<sup>62</sup> The CARB used the results of the inventory-wide emissions processing to derive two landscaping emissions factors: one for commercial landscape equipment in terms of grams per square foot of non-residential building space per day, and a second for residential landscape equipment in terms of grams per dwelling unit per day. These emission factors are multiplied by the number of operational days per year to estimate annual emissions within CalEEMod. Annual operating days are assumed to be 250 days per year for non-residential and 330 days per year for residential land uses.

Building Energy Use

The consumption of fossil fuels to generate electricity and to provide heating and hot water generates criteria pollutants. Future fuel consumption rates are estimated based on the specific square footage of the multi-family residences and the ancillary facilities and amenities included in the Project. Refer to the CalEEMod output files in the **Appendix** for a detailed breakdown of the land use types that were included in the CalEEMod emissions modeling exercise. Energy use (i.e., off-site electricity generation and on-site natural gas combustion) requirements for the Project is calculated within CalEEMod using the CEC's 2018–2030 Uncalibrated Commercial Sector Forecast (Commercial

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<sup>61</sup> California Air Pollution Control Officers Association, *CalEEMod User Guide Version 2022.1 Appendix D: Technical Source Documentation for Emissions Calculations (Appendix D3 – Consumer Products Use Technical Source Documentation)*, October 2017.

<sup>62</sup> California Air Pollution Control Officers Association, *CalEEMod User Guide Version 2022.1*, April 2022.

Forecast) and the 2019 Residential Appliance Saturation Survey (RASS) data sets.<sup>63</sup> This data set provides energy intensities of different land uses throughout the state and in different climate zones. Since the data contained in the CEUS is from 2002, the CalEEMod software incorporates correction factors to reflect compliance with the Title 24 Building Standards Code. CalEEMod defaults are the 2019 Title 24 energy efficiency standards. The Title 24 energy efficiency standards are updated every three years. All new construction associated with the Project will be subject to the requirements of the 2022 Title 24 energy efficiency standards, which went into effect in January 2023. Therefore, electricity and natural gas consumption estimated for the Project using CalEEMod represent conservative approximations of future operational building energy use in 2027.

### 3.4.2.3. Toxic Air Contaminants – Construction & Operations

Potential TAC impacts are initially evaluated by conducting a qualitative analysis consistent with the CARB Handbook and SCAQMD guidance, both of which are discussed in detail below. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources and evaluating the potential for such sources to cause significant TAC impacts. If the qualitative evaluation determines the potential for significant impacts from a new TAC source, or modification of an existing TAC emissions source, a more detailed dispersion analysis is conducted to evaluate estimated Project TAC emissions against the applicable SCAQMD significance thresholds based on downwind sensitive receptor locations.

#### a. State Guidance

CARB published the *Air Quality and Land Use Handbook* (CARB Handbook) on April 28, 2005, to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of TAC emissions.<sup>64</sup> The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

CARB published a supplemental technical advisory entitled *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways* as a follow-up to the *Handbook*. It is intended to provide planners and other stakeholders involved in land use planning and decision-making with information on scientifically based strategies (e.g., solid barriers, vegetation buffers for pollutant dispersion, and indoor high efficiency filtration) to reduce exposure to traffic emissions near high-volume roadways in order to protect public health and promote equity and environmental justice.

#### b. Regional Guidance

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<sup>63</sup> California Air Pollution Control Officers Association, *CalEEMod User Guide Version 2022.1 Appendix D: Technical Source Documentation for Emissions Calculations (Appendix D5: Analysis of Building Energy Use Data)*, April 2022.

<sup>64</sup> California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005.

SCAQMD has also adopted land use planning guidelines in the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.<sup>65</sup> SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity of freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

SCAQMD has adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities. Significant risk facilities are those facilities which have an increased cancer risk exceeding 10 in 1 million or a total hazard index exceeding 1.0. Examples include landfills, paint booths, refineries and oil production facilities, among others.

### 3.4.3. Analysis of Project Impacts

#### **[a] Would the Project conflict with or obstruct implementation of the applicable air quality plan? (*Less-Than-Significant Impact*)**

#### **Impact Analysis**

##### **A. SCAQMD CEQA Air Quality Handbook Policy Analysis**

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with the procedures established in SCAQMD's *CEQA Air Quality Handbook*, the impact discussion addresses the following criteria to determine whether the Project is consistent with applicable SCAQMD and SCAG planning objectives:

- 1) Would the Project create any impacts related to air quality violations, such as:
  - An increase in the frequency or severity of existing air quality violations;
  - Causing or contributing to new air quality violations; or,
  - Delaying timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- 2) Would 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 incorporate mitigation measures to reduce potentially significant impacts; and/or,
  - To what extent is Project development consistent with the AQMP land use policies and control measures?

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<sup>65</sup> South Coast Air Quality Management District, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 2005.

Air quality violations occur when facilities are out of compliance with applicable SCAQMD rule requirements, permit conditions or legal requirements, or with applicable state or federal air pollution regulations. The regional and localized air quality significance thresholds were designed as a screening tool to avoid the potential occurrence and exacerbation of air quality violations resulting from construction and operation of individual CEQA projects based on the designation of emissions sources warranting advanced permitting and regulation.

The second indicator of AQMP consistency is assessed by determining potential effects of permanent facility operations on population, housing, and employment assumptions that were used in the development of the AQMP and the RTP/SCS. If implementation of the Project would render the assumptions invalid by introducing growth within the SCAQMD jurisdiction that exceeds projections incorporated into the AQMP, a significant air quality impact may occur.

#### I. Criterion 1: Air Quality Violations

With respect to the first criterion—and as discussed in greater detail under the analysis for **Threshold [b]** and **Threshold [c]**, below—emissions of NO<sub>x</sub> (as a surrogate for NO<sub>2</sub>), CO, PM<sub>10</sub>, and PM<sub>2.5</sub> have been analyzed for the Project. SO<sub>2</sub> emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or affect a violation of the SO<sub>2</sub> ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O<sub>3</sub> formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

##### a) Construction

Air quality violations are determined by an SCAQMD Air Quality Inspector when a business is out of compliance with applicable SCAQMD rule requirements, permit conditions or legal requirements, or with applicable State or federal air pollution regulations. Air quality violations typically involve large industrial facilities that emit vast quantities of stringently regulated pollutants and are not common among typical infill land use development projects. Construction of the Project would be conducted in accordance with the BMPs provided in SCAQMD Regulation IV, Rule 401 (Visible Emissions) and Rule 403 (Fugitive Dust). These BMPs include the application of water as a dust suppressant to material stockpiles and disturbed ground areas. The application of these BMPs would reduce fugitive dust emissions during construction activities by approximately 61 percent. All construction equipment and vehicles would be maintained and operated within manufacturer specifications to limit unnecessary emissions during use, and any vehicles traveling on unpaved surfaces would be required to limit their speed to 15 miles per hour or less. Construction of the proposed project would not have the potential to obstruct or conflict with implementation of the AQMP in the context of SCAQMD rule requirements. Additionally, SCAQMD Rule 1113 limits the VOC content of paints and other architectural coatings to 50 grams per Liter (50 g/L) for all building envelope applications. These control measures were accounted for in CalEEMod as standard features under the unmitigated conditions.

Estimates of maximum daily air pollutant emissions that would be generated by construction activities can be used to demonstrate that the Project would not conflict with or obstruct implementation of the AQMP with regards to increasing the frequency or severity of existing air quality violations. SCAQMD devised its mass daily thresholds of significance as a screening tool for determining the potential significance of air pollutant emissions from CEQA projects. Emissions of air pollutants that would be generated by construction activities were calculated using the CalEEMod, Version 2022.1.1.21. CalEEMod 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 emissions from a variety of land use projects. CalEEMod was developed in

collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming 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 construction schedule and the equipment used was based on CalEEMod defaults. Sources of air pollutant emissions associated with Project construction include heavy-duty diesel equipment exhaust, fugitive dust generation from material movement, off-gassing of volatile compounds from architectural finishing, haul truck trips, vendor material delivery trips, and construction worker trips.

Construction activities associated with the Project will result in emissions of VOCs, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Construction related emissions are expected from the following activities: demolition, site preparation, grading, building construction, paving, and architectural coating. Construction is expected to begin in May 2025 and last for approximately 27.5 months, ending in September 2027. The construction schedule utilized in the analysis, as summarized in **Table 3-4, Construction Schedule Summary**, represents a “worst-case” analysis scenario even if construction were to occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.

Comparing regional and localized emissions that would be generated during construction of the Project to the SCAQMD mass daily thresholds serves as a screening method for evaluating whether further assessment of potential air quality violations is warranted. As shown in **Table 3-7, Estimated Regional Construction Emissions**, within the **Threshold [b]** analysis, the regional increases in PM<sub>10</sub> and PM<sub>2.5</sub> emissions during construction would not exceed the SCAQMD threshold values, nor would emissions from on-site sources exceed the applicable LST values as presented in **Table 3-9, Estimated Localized Construction Emissions**, within the **Threshold [c]** discussion. Additionally, the Project’s maximum potential daily NO<sub>x</sub> and CO emissions during construction were analyzed to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard near the Project site. As shown in **Table 3-7, Estimated Regional Construction Emissions**, and **Table 3-9, Estimated Localized Construction Emissions**, in the **Threshold [b]** and **Threshold [c]** analyses, respectively, and detailed in the **Appendix** (CalEEMod Construction Output file), regional and localized unmitigated emissions of NO<sub>x</sub> and CO would not exceed the corresponding SCAQMD thresholds. Therefore, Project construction would not result in a significant impact with regard to localized air quality.

#### b) Operations

Because the Project would not introduce any substantial stationary sources of emissions (e.g., gasoline stations, dry cleaners, chrome plating operations), CO is the preferred benchmark pollutant for assessing local area air quality impacts from postconstruction motor vehicle operations. As indicated below, under the analysis for **Threshold [c]**, no intersections would require a CO hotspot analysis, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations. Operation of the Project would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

## II. Criterion 2

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's *Connect SoCal* 2020–2045 RTP/SCS and the 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) Project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's 2020–2045 RTP/SCS. The *Connect SoCal* 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. Economic assumptions, including employment rates and migration due to jobs, are also included as part of the 2020–2045 RTP/SCS forecast projections.

### a) Construction

Construction of the Project would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for construction would be taken from the labor pool currently residing in the City or County. Thus, the construction phase of the Project will be temporary, lasting for approximately 27.5 months, and will not create permanent growth in population, housing, or employment within the City or within SCAQMD jurisdiction. Therefore, construction of the Project would have no impact on regional growth projections accounted for in SCAQMD and SCAG plans.

### b) Operations

Implementation of the Project would introduce new non-residential land uses to the area through infill development, including commercial office space, retail and restaurant spaces, sound stage studio spaces, and a parking garage near multiple major transit stops. SCAG defines a major transit stop as a site containing an existing or planned rail or bus rapid transit station, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. The Project would be located within ¼-mile of the Metro K Line Martin Luther King Jr. Station on Crenshaw Boulevard, as well as several bus routes (i.e., Metro Lines 40, 102, 105, and 210 at the Crenshaw Boulevard/Stocker Street intersection and the DASH Crenshaw Line). The Project would be an infill development providing a net increase of approximately 889 jobs in the City that can be filled by the local labor force, increasing job density within a Priority Development Area (PDA) that qualifies as both a Transit Priority Area (TPA) and a

Neighborhood Mobility Area (NMA). SCAG acknowledges that projects located within multiple PDAs indicate a greater alignment with Plan goals.

- Does the Project incorporate mitigation measures to reduce potentially significant impacts?

The Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) as required by SCAQMD, as summarized above. The Project also would incorporate project design features to support and promote environmental sustainability. While these features are designed primarily to reduce GHG emissions, they would also serve to reduce the criteria air pollutants.

- To what extent is Project development consistent with the AQMP land use policies and control measures?

With regard to land use developments, such as the Project, the *Connect SoCal* land use control measures (i.e., goals and policies) focus on locating future growth within PDAs and the reduction of vehicle trips and VMT. The Project is an infill development near transit within an existing urbanized area that would concentrate new creative office/retail, restaurant, and sound stage studio uses within a TPA, thus reducing per capita VMT. The Project would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. The Project would not result in daily regional emissions that exceed the applicable SCAQMD thresholds, which were established to ensure that individual projects would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. The Project represents an infill development near transit within an existing urbanized area that would concentrate new residential, retail, and office uses within a TPA and NMA, thus reducing VMT. The *Transportation Assessment* for the Project determined that the per-capita VMT for the proposed development would be 10.4 work VMT per employee, which is less than the South LA Area Planning Commission threshold of 11.6 VMT per capita established within the City's *Transportation Assessment Guidelines (TAG)*. The Project would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement measures for control of NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The Project would also be consistent with the goals and policies of the AQMP for the control of fugitive dust. As discussed above, the Project would be consistent with the goals and policies of the AQMP.

#### B. City of Los Angeles Policy Analysis

As discussed above, the Air Quality Element of the City's General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted to provide flexibility in the implementation of its policies and objectives. As shown in **Table 3-6, *Project Consistency with City of Los Angeles General Plan (Air Quality Element)***, the Project would not conflict with goals, objectives, and policies in the Air Quality Element of the City's General Plan.

| <b>TABLE 3-6: PROJECT CONSISTENCY WITH CITY OF LOS ANGELES GENERAL PLAN (AIR QUALITY ELEMENT)</b>                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Recommendation</b>                                                                                                                                                                                                                                                                                                            | <b>Analysis of Project Consistency</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Goal 1:</b> Good air quality and mobility in an environment of continued population growth and healthy economic structure.                                                                                                                                                                                                    | <b>No Conflict.</b> The Project site is located in proximity to a regional job center (i.e., Downtown Los Angeles). Future residents would also have access to local bus and rail lines as well as the use of bicycle parking spaces provided on the Project site. The proximity to job centers and the option to use alternative modes of transportation would reduce reliance on single-occupant vehicles, consistent with this goal.                                                                                                                                                                                                                                            |
| <b>Objective 1.1:</b> It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan, increase traffic mobility, and sustain economic growth citywide.                                                                                                         | <b>No Conflict.</b> Existing transit service in proximity to the Project site includes Metro bus service for line 102 at the intersections of Stocker Street and both Santa Rosalia Drive to the north as well as Don Felipe Drive to the south. Additional Metro bus lines 40, 102, 105, and 210 stops are located at the intersection of Stocker Street and Crenshaw Boulevard, approximately 0.2 miles from the Project site. The Project would also be located within ¼-mile of the Metro K Line Martin Luther King, Jr. Station located on Crenshaw Boulevard. The nature of the Project as an infill development in both a TPA and NMA would be consistent with City policy. |
| <b>Objective 1.3:</b> It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.                                                                                                                                                    | <b>No Conflict.</b> The Project would comply with SCAQMD Rule 403, which requires dust control measures during construction activities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Goal 2:</b> Less reliance on single-occupant vehicles with fewer commute and non-work trips.                                                                                                                                                                                                                                  | <b>No Conflict.</b> The Project would locate residential uses near major employment centers (i.e., Downtown Los Angeles), which would reduce trips and encourage employees to utilize alternative modes of transportation.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Objective 2.1:</b> It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.                                                                                                                                 | <b>No Conflict.</b> As mentioned previously the Project site is located in a TPA with several available transit connections nearby. Future employees and patrons would also have access to the use of bicycle parking spaces provided on the Project site. The proximity to job centers and the option to use alternative modes of transportation would reduce reliance on single-occupant vehicles, consistent with this goal.                                                                                                                                                                                                                                                    |
| <b>Policy 2.1.1:</b> Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion. | <b>No Conflict.</b> Existing transit service in proximity to the Project site includes Metro bus service for lines 40, 102, 105, and 210, and Crenshaw Clockwise DASH service at the intersection of Stocker Street and Santa Rosalia Drive adjacent to the Project site. The Project would locate new commercial uses near multimodal transit, which would reduce trips and encourage employees to utilize alternative modes of transportation.                                                                                                                                                                                                                                   |
| <b>Goal 4:</b> Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.                                                                                                                                   | <b>No Conflict.</b> The infill development project would locate commercial and retail uses near multimodal transit access points and provide bicycle parking infrastructure to encourage active transportation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Objective 4.1:</b> It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.                                                                                                                                            | <b>No Conflict.</b> The Project analysis of potential air quality impacts relied upon numeric indicators stabled by the SCAQMD, which considers attainment of the ambient air quality standards. The Project also incorporates land use characteristics that would reduce land use planning-related air pollutant emissions.                                                                                                                                                                                                                                                                                                                                                       |
| <b>Policy 4.2.2:</b> Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.                                                                                                                                                                                         | <b>No Conflict.</b> The infill development project would locate commercial and retail uses near multiple METRO and LADOT DASH transit lines, as well as within ¼-mile of the Metro K Line light rail station on Crenshaw Boulevard.                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| TABLE 3-6: PROJECT CONSISTENCY WITH CITY OF LOS ANGELES GENERAL PLAN (AIR QUALITY ELEMENT)                                         |                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Recommendation                                                                                                                     | Analysis of Project Consistency                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Policy 4.2.3:</b> Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles. | <b>No Conflict.</b> The Project would incorporate pedestrian pathways that would connect to the existing sidewalk network. In addition, the Project would provide bicycle parking spaces consistent with City code requirements. The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within parking areas. |
| <b>Policy 4.2.4:</b> Require that air quality impacts be a consideration in the review and approval of all discretionary projects. | <b>No Conflict.</b> The environmental review conducted for the Project includes an analysis of air quality impacts. Decision-maker(s) for the discretionary actions would be responsible for determining that the environmental review was conducted in compliance with CEQA.                                                                                                                           |
| <b>Policy 4.2.5:</b> Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.  | <b>No Conflict.</b> The infill development project would locate new commercial and retail uses having access to multiple connections to public transportation within 0.25 mile of the Project site. In addition, the Project would provide bicycle parking spaces consistent with City code requirements.                                                                                               |
| <b>SOURCE:</b> TAHA, 2024.                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                         |

The Project would promote the City of Los Angeles General Plan Air Quality Element goals, objectives and policies discussed above in the regulatory framework. Specifically, the Project would provide a sufficient number of bicycle parking spaces to meet City of Los Angeles bicycle parking requirements per LAMC Section 12.21.A.16 by providing 32 short term bicycle parking spaces, long term bicycles spaces, and showers and secure lockers in Buildings A and B. The Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking to nearby destinations, thereby facilitating a reduction in VMT. Design features of the Project to accommodate active transportation include new sidewalks and street trees along the perimeter, improved street and pedestrian lighting, and a pedestrian network within the site that would connect to the surrounding pedestrian system. In addition, the Project would be consistent with the developing land use pattern in the vicinity that features greater concentration of urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and within 0.15 mile of major transit stops.

Based on the above, the Project is consistent with applicable policies of the City of Los Angeles Air Quality Element.

### C. Conclusion

In conclusion, analysis of **Threshold [a]** was based on the Project's consistency with the AQMP, as well as the City of Los Angeles plans and policies. The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the State and federal standards, the Project would also not delay the timely attainment of air quality standards or interim emission reductions specified in the AQMP.

In addition, because the Project is consistent with growth projections that form the basis of the 2022 AQMP, the Project would be consistent with the emissions forecasts and attainment demonstration in the AQMP. Furthermore, while the Project does not implement any air quality mitigation measures, the Project would comply with all applicable regulatory standards and would incorporate the project

design features that would serve to reduce the criteria air pollutants discussed herein. Additionally, as the Project would support the City of Los Angeles and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures. Thus, the Project would not conflict with or obstruct implementation of the AQMP. With regard to City policies, as discussed above, the Project would serve to implement applicable policies of the City pertaining to air quality. Based on the above, impacts to **Threshold [a]** would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

### **Level of Significance After Mitigation**

Project impacts with regard to implementation of the AQMP during both construction and operation would be less than significant without mitigation.

**[b] Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard? (*Less-Than-Significant Impact*)**

### **Impact Analysis**

The Los Angeles County portion of the Air Basin is presently designated as nonattainment of either the federal or state ambient air quality standards for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Therefore, there is an ongoing regional cumulative impact associated with these air pollutants. The SCAQMD published guidance addressing the evaluation of potential cumulative impacts for CEQA projects. The SCAQMD asserts that if construction or operation of a project would produce maximum daily emissions exceeding the applicable project-specific thresholds, those emissions would also be considered cumulatively significant. For this reason, the SCAQMD applies the same project-level thresholds to cumulative assessments. Conversely, if construction and operation of a project would not generate emissions of sufficient quantity to exceed any of the applicable mass daily thresholds, then that project and its associated emissions would be considered less than significant in the cumulative context.

#### **A. Construction**

Construction of the Project has the potential to create air quality impacts through emissions generated using heavy-duty construction equipment and through vehicle trips associated with construction worker commutes and haul and delivery vehicles traveling to and from the Project site. Fugitive dust emissions would primarily result from site preparation (e.g., demolition and grading) activities. It is mandatory for all construction projects in the Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce fugitive PM<sub>2.5</sub> and PM<sub>10</sub> emissions associated with construction activities by approximately 61 percent. NO<sub>x</sub> emissions would predominantly result from the use of construction equipment and haul truck trips. The assessment of construction air quality impacts considers all of these emissions sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Construction is expected to begin in the second quarter of 2025 and last for approximately 27.5 months with Project buildout and commencement of occupancy anticipated in September 2027. Construction activities would generally involve demolition and site clearing, grading and excavation, building construction, paving of driveways and access points, and landscaping and architectural finishing. Error! Reference source not found., *Construction Schedule Summary*, above, provides a succinct overview of the construction schedule, maximum daily equipment inventory, and construction traffic estimates for each activity involved. The air quality analysis focuses on maximum daily emissions during construction activities. It is unlikely that the maximum number of daily haul truck loads would be required throughout the duration of each activity. Project-specific information was provided describing the schedule of construction activities and the equipment inventory required. Details pertaining to the schedule and equipment can be found in the CalEEMod, Version 2020.4.0 output files in the **Appendix**.

Demolition would require the dismantling and removal of approximately 123,000 square feet of existing building floor area as well as asphalt and pavement hardscape on the site. Demolition is expected to last for approximately three months, and maximum daily hauling activity during demolition would not exceed 40 truckloads per day, or 80 one-way trips. Following demolition, excavation of the site to accommodate the building foundations would produce approximately 69,000 cubic yards of material to be exported. The maximum daily emissions were estimated using the equipment inventories and crew workforce estimates for each construction phase presented in Error! Reference source not found., *Construction Schedule Summary*, based on information provided by the Applicant. Maximum daily emissions during construction are compared to the applicable SCAQMD mass daily thresholds of significance in **Table 3-7, Estimated Regional Construction Emissions**. Construction of the Project would not generate daily emissions of criteria pollutants or O<sub>3</sub> precursors in excess of any SCAQMD regional threshold. Thus, construction of the Project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and would not obstruct timely implementation of the AQMP by exacerbating air quality violations within the Air Basin.

| <b>TABLE 3-7: ESTIMATED REGIONAL CONSTRUCTION EMISSIONS</b>                                                           |                                                 |                       |             |                       |                        |                         |
|-----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------|-------------|-----------------------|------------------------|-------------------------|
| <b>Construction Activity</b>                                                                                          | <b>Maximum Daily Emissions (Pounds Per Day)</b> |                       |             |                       |                        |                         |
|                                                                                                                       | <b>VOC</b>                                      | <b>NO<sub>x</sub></b> | <b>CO</b>   | <b>SO<sub>x</sub></b> | <b>PM<sub>10</sub></b> | <b>PM<sub>2.5</sub></b> |
| Demolition                                                                                                            | 2.5                                             | 22.5                  | 31.1        | <0.1                  | 4.7                    | 1.5                     |
| Site Preparation                                                                                                      | 1.9                                             | 20.3                  | 24.9        | <0.1                  | 6.8                    | 1.7                     |
| Grading                                                                                                               | 2.6                                             | 29.9                  | 32.6        | <0.1                  | 5.7                    | 2.0                     |
| Building Construction                                                                                                 | 5.0                                             | 40.6                  | 56.2        | <0.1                  | 4.0                    | 1.8                     |
| Paving                                                                                                                | 1.9                                             | 16.5                  | 25.6        | <0.1                  | 1.3                    | 0.7                     |
| Architectural Coating                                                                                                 | 25.2                                            | 5.0                   | 7.2         | <0.1                  | 0.8                    | 0.3                     |
| <b>Overlapping Activities</b>                                                                                         |                                                 |                       |             |                       |                        |                         |
| Building Construction + Paving                                                                                        | 7.0                                             | 57.1                  | 81.7        | <0.1                  | 5.3                    | 2.5                     |
| Building Construction + Architectural Coating                                                                         | 30.2                                            | 45.6                  | 63.3        | <0.1                  | 4.7                    | 2.1                     |
|                                                                                                                       |                                                 |                       |             |                       |                        |                         |
| <b>Maximum Daily Emissions</b>                                                                                        | <b>30.2</b>                                     | <b>57.1</b>           | <b>81.7</b> | <b>&lt;0.1</b>        | <b>6.8</b>             | <b>2.5</b>              |
| Regional Significance Threshold                                                                                       | 75                                              | 100                   | 550         | 150                   | 150                    | 55                      |
| <b>Exceed Threshold?</b>                                                                                              | <b>No</b>                                       | <b>No</b>             | <b>No</b>   | <b>No</b>             | <b>No</b>              | <b>No</b>               |
| <b>Note:</b> Emissions modeling files can be found in <b>Appendix A</b> .<br><b>SOURCE:</b> TAHA, 2024; SCAQMD, 2023. |                                                 |                       |             |                       |                        |                         |

The regional analysis in **Table 3-7, Estimated Regional Construction Emissions**, identifies the maximum daily emissions that would occur during construction of the Project and compares those emissions to the applicable SCAQMD regional mass daily threshold of significance. Daily construction activities would fluctuate throughout the 27.5-month construction period, and the maximum daily emissions identified in **Table 3-7, Estimated Regional Construction Emissions**, that are compared to the regional thresholds do not represent emissions that would be occurring every day of construction. Emissions would not exceed the SCAQMD significance thresholds. Construction of the Project would therefore result in a less than significant impact to air quality related to the creation or exacerbation of air quality violations within the SCAQMD jurisdiction.

## B. Operations

The Project would generate regional operational emissions from vehicle trips, area sources, and energy use. As discussed above, CalEEMod was used to estimate daily operational air pollutant emissions using the project-specific trip and VMT. The *Transportation Assessment* prepared for the Project determined that operations would result in approximately 2,935 daily trips and approximately 21,618 daily VMT. **Table 3-8, Proposed Project Regional Operational Emissions**, presents the CalEEMod results for operational emissions estimates of the Project at full occupancy in 2027. Daily emissions of ozone precursors and criteria pollutants would remain substantially below the SCAQMD operational thresholds. Sources located on the Project site would be consistent with studio production space, commercial office space, and retail and restaurant uses. Future operation of the Project would not introduce a new substantial source of air pollutant emissions to the Project area. Therefore, regional Project emissions during future operation would result in a less than significant impact related to emissions of nonattainment pollutants. This impact would be less than significant, and no mitigation measures are required.

| <b>TABLE 3-8: PROPOSED PROJECT REGIONAL OPERATIONAL EMISSIONS</b>                            |                                                 |                       |              |                       |                        |                         |
|----------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------|--------------|-----------------------|------------------------|-------------------------|
| <b>Operational Activity</b>                                                                  | <b>Maximum Daily Emissions (Pounds Per Day)</b> |                       |              |                       |                        |                         |
|                                                                                              | <b>VOC</b>                                      | <b>NO<sub>x</sub></b> | <b>CO</b>    | <b>SO<sub>x</sub></b> | <b>PM<sub>10</sub></b> | <b>PM<sub>2.5</sub></b> |
| <b>EMISSIONS ANALYSIS</b>                                                                    |                                                 |                       |              |                       |                        |                         |
| Area Sources                                                                                 | 8.1                                             | 0.1                   | 15.4         | <0.1                  | <0.1                   | <0.1                    |
| Energy Sources                                                                               | 0.1                                             | 1.8                   | 1.5          | <0.1                  | 0.1                    | 0.1                     |
| Mobile Sources                                                                               | 9.0                                             | 6.6                   | 69.6         | 0.2                   | 15.4                   | 4.0                     |
| Off-Road Equipment                                                                           | 1.5                                             | 16.0                  | 23.6         | <0.1                  | 0.5                    | 0.5                     |
| <b>IMPACT ANALYSIS</b>                                                                       |                                                 |                       |              |                       |                        |                         |
| <b>Daily Operational Emissions</b>                                                           | <b>18.7</b>                                     | <b>24.4</b>           | <b>110.0</b> | <b>0.2</b>            | <b>16.1</b>            | <b>4.6</b>              |
| Regional Threshold                                                                           | 55                                              | 55                    | 550          | 150                   | 150                    | 55                      |
| <b>Exceed Threshold?</b>                                                                     | <b>No</b>                                       | <b>No</b>             | <b>No</b>    | <b>No</b>             | <b>No</b>              | <b>No</b>               |
| Emissions modeling files can be found in the <b>Appendix</b> .<br><b>SOURCE:</b> TAHA, 2024. |                                                 |                       |              |                       |                        |                         |

## C. Conclusion

According to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is on non-attainment. Daily emissions would not exceed the SCAQMD's regional significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts due to localized emissions would also not be cumulatively considerable and therefore would be less than significant. As such, the Project would not result in a

cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

### Mitigation Measures

No mitigation measures are required.

### Level of Significance After Mitigation

This impact would be less than significant, and no mitigation measures are required.

### **[c] Would the Project expose sensitive receptors to substantial pollutant concentrations? (Less-Than-Significant Impact)**

### Impact Analysis

A comprehensive land use survey was conducted to identify the closest sensitive receptors to the Project site. As identified in **Figure 3-2, Sensitive Receptors**, there are numerous sensitive land uses surrounding the Project. Sensitive receptors in closest proximity to the Project would include:

- A multi-family residential complex adjacent to the northern property boundary;
- Single- and multi-family residential developments located to the south and southeast of the site across Stocker Street, approximately 85 feet (26 meters) from the property boundary;
- The View Park Convalescent Center located approximately 275 feet (84 meters) northwest of the property boundary;
- A tract of single-family homes located approximately 315 feet (96 meters) west of the site.

The air quality analysis focuses on the closest receptors to the Project site.

#### I. Construction

##### a. On-Site Construction Activities (Criteria Pollutants)

As discussed above in the methodology subsection, the localized construction air quality analysis was conducted using the LST methodology promulgated by the SCAQMD. The SCAQMD published look-up tables with daily mass emissions screening values that correspond to a project's SRA, the area of maximum daily ground disturbance during construction, and the proximity of sensitive receptors to the project site. The LST screening values represent the maximum allowable emissions from a project that are not expected to cause or contribute to ambient air quality standards being exceeded. Maximum daily on-site unmitigated construction emissions were estimated in CalEEMod and are presented in **Table 3-9, Estimated Localized Construction Emissions**, below. Also presented are the applicable LST screening values for a project with maximum daily disturbance of two acres in SRA 1 that is within approximately 82 feet (25 meters) of sensitive receptors. As shown in **Table 3-9, Estimated Localized Construction Emissions**, construction of the Project would not result in localized emissions exceeding any applicable SCAQMD LST screening value, even in the unmitigated condition. Therefore, emissions from on-site sources during Project construction would not have the potential to expose nearby sensitive receptors to substantial pollutant concentrations and this impact would be less than significant.

| TABLE 3-9: ESTIMATED LOCALIZED CONSTRUCTION EMISSIONS                                                                                                                                                                                            |                                                  |             |                  |                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|-------------|------------------|-------------------|
| Construction Activity                                                                                                                                                                                                                            | Maximum Daily On-Site Emissions (Pounds Per Day) |             |                  |                   |
|                                                                                                                                                                                                                                                  | NO <sub>x</sub>                                  | CO          | PM <sub>10</sub> | PM <sub>2.5</sub> |
| Demolition                                                                                                                                                                                                                                       | 18.8                                             | 24.2        | 2.9              | 1.0               |
| Site Preparation                                                                                                                                                                                                                                 | 12.5                                             | 16.4        | 4.0              | 1.0               |
| Grading                                                                                                                                                                                                                                          | 18.3                                             | 22.7        | 2.2              | 1.0               |
| Building Construction                                                                                                                                                                                                                            | 37.4                                             | 45.6        | 1.3              | 1.2               |
| Building Construction + Paving                                                                                                                                                                                                                   | 53.2                                             | 68.5        | 2.0              | 1.7               |
| Building Construction + Architectural Coating                                                                                                                                                                                                    | 41.7                                             | 50.1        | 1.4              | 1.3               |
| <b>Maximum Daily Localized Emissions</b>                                                                                                                                                                                                         | <b>53.2</b>                                      | <b>68.5</b> | <b>4.0</b>       | <b>1.7</b>        |
| Localized Significance Threshold /a/                                                                                                                                                                                                             | 108                                              | 1,048       | 8                | 5                 |
| <b>Exceed Threshold?</b>                                                                                                                                                                                                                         | <b>No</b>                                        | <b>No</b>   | <b>No</b>        | <b>No</b>         |
| <a href="#">/a/</a> LST values correspond to a two-acre disturbance area in SRA 1 within 25 meters of the nearest sensitive receptor.<br><b>Note:</b> Emissions modeling files can be found in <b>Appendix A</b> .<br><b>SOURCE:</b> TAHA, 2024. |                                                  |             |                  |                   |

b. On-Site Construction Activities (Toxic Air Contaminants)

With regards to TAC emissions, carcinogenic risks, and non-carcinogenic hazards, the use of heavy-duty construction equipment and haul trucks during construction activities would release diesel PM to the atmosphere through exhaust emissions. Diesel PM is a known carcinogen, and extended exposure to elevated concentrations of diesel PM can increase excess cancer risks in individuals. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs over a 70-year lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction TAC emissions. Given the temporary and short-term construction schedule (approximately 25 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of Project construction. Furthermore, as shown above, none of the Project's emissions exceed any local or regional thresholds. In addition, the construction activities associated with the Project would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations of these emissions.

Construction of the Project is forecasted to last for approximately 27.5 months according to the preliminary schedule. Over the course of the construction duration, the analysis in CalEEMod determined that average diesel PM emissions from on-site heavy-duty equipment would be approximately 1.13 pounds per working day, spread across the five-acre site. This magnitude of diesel PM emissions is a conservative estimate based on the assumed near-continuous operation of equipment during the workday, when in reality there may be considerable downtime throughout days of active construction. Emissions would be distributed across the construction site where equipment is active and would be dispersed quickly due to the elevated atmospheric mixing height and higher wind speeds during the daytime. It is unlikely that diesel PM concentrations would reach levels of any public health concern at sensitive receptor locations in the project vicinity during the construction period, and diesel PM emissions would cease upon completion of construction activities. Therefore, the Project would result in a less-than-significant impact related to construction TAC emissions, concentrations, and exposures.

## II. Operation

### a. On-Site Operational Activities (Criteria Pollutants)

The Project does not include an industrial component that would constitute a new substantial stationary source of operational air pollutant emissions and does not include a land use that would generate a substantial number of heavy-duty truck trips within the region. The Project would not generate air toxic emissions capable of exposing sensitive receptors to substantial pollutant concentrations. Therefore, the Project would result in a less-than-significant impact related to substantial pollutant concentrations during operational activities.

### b. Off-Site Operational Activities (CO “Hot Spots” Analysis)

Traditionally, CO has been the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future forecasted CO levels to the state and federal CO standards which were presented above. Consistent with the CO methodology presented above, if a subject intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

The Project would generate a total of 2,935 daily vehicle trips. According to the *Transportation Assessment*, the most-impacted intersection in the Project site vicinity would be located at Crenshaw Boulevard and Stocker Street. The intersection’s peak hourly traffic (Average Daily Traffic [ADT]) volume at this location would be 4,222 vehicles per hour. Conservatively assuming this value represents approximately 10 percent of the daily traffic, the busiest intersection would not exceed 42,250 vehicles per day. As this intersection has a volume that falls far short of 100,000 vehicles per day, no CO “hot spot” modeling was performed, and no significant long term air quality impact is anticipated to local air quality with the ongoing use of the Project. Therefore, this impact would be less than significant, and no mitigation would be required.

### c. Toxic Air Contaminants

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the *Air Quality and Land Use Handbook: A Community Health Perspective*, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Together, CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary source of potential air toxics associated with operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, on-site equipment used to support production studio activities. However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that HRAs be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions. The Project would not

include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily trucks to the Project site would not exceed 100 trucks per day or more than 100 trucks per or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle no more than five minutes at any given time, which would further limit diesel particulate emissions.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that the quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the Project. As such, the Project would not release substantial amounts of TACs, and impacts on human health would be less than significant.

### **Mitigation Measures**

No mitigation measures are required.

### **Level of Significance After Mitigation**

Implementation of the Project would result in less than significant air quality impacts related to substantial pollutant concentrations during both construction and operation without mitigation.

### **[d] Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Less-Than-Significant Impact)**

### **Impact Analysis**

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of an integrated production studios campus that would include four production sound stages totaling 51,200 square feet, 6,500 square feet of retail space, 44,400 square feet of production support office space for accessory uses that include writers' rooms, hair and makeup, 123,100 square feet of general office space, 18,500 square feet of restaurant uses, and a 13,000-square-foot mill shop for set production.

#### **I. Construction**

A significant impact would occur if construction or operation of the Project would result in the creation of nuisance odors that would be noxious to a substantial number of people, or visible dust plumes. Potential sources that may produce objectionable odors during construction activities include equipment exhaust, application of asphalt and architectural coatings, and other interior and exterior finishes. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project site and would be temporary in nature and would not persist beyond the termination of construction activities. All construction activities would be conducted in accordance with the BMPs set forth in SCAQMD Rule 403. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also

decrease and would be quickly diluted. Therefore, the Project would result in a less-than-significant impact related to construction odors.

## II. Operations

According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project comprises a combination of production design studio space, commercial office space, and retail and restaurant uses. On-site trash receptacles would have the potential to create adverse odors. The facility would properly maintain odors associated with trash in compliance with the LAMC. Therefore, the Project would result in a less-than-significant impact related to operations odors.

### **Mitigation Measures**

No mitigation measures are required.

### **Level of Significance After Mitigation**

Impacts would be less than significant during both construction and operation of the Project.

## **3.4.4. Cumulative Impacts**

### **Impact Analysis**

Ambient air quality conditions and pollutant concentrations are generally influenced by the cumulative effect of air pollutant emissions from all sources within a particular region, and attainment dates and control strategies incorporated into air quality plans are contingent upon compliance with regulatory standards and enforcement at the administrative level as well as the facility and project level. The Los Angeles County portion of the Air Basin is presently designated as nonattainment of either the federal or state ambient air quality standards for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Therefore, there is an ongoing regionally significant cumulative impact associated with these air pollutants as an existing condition prior to implementation of the Project.

The SCAQMD published guidance addressing the evaluation of potential cumulative impacts for CEQA projects. The SCAQMD asserts that if construction or operation of a project would produce maximum daily emissions exceeding the applicable project-specific thresholds, then those emissions would also be considered cumulatively significant. For this reason, the SCAQMD applies the same project-level thresholds to cumulative assessments. Conversely, if construction and operation of a project would not generate emissions of sufficient quantity to exceed any of the applicable mass daily thresholds, then that project and its associated emissions would be considered less than significant in the cumulative context despite the existing cumulatively significant conditions. Emissions that would be generated by construction and operation of the Project are addressed in accordance with the rationale established by the SCAQMD.

## I. Construction

Construction of the Project would involve temporary emissions sources of air pollutants that include ozone precursors and particulate matter, for which there is an ongoing cumulative impact in the region. **Table 3-7, *Estimated Regional Construction Emissions***, above, presents the results of the construction emissions modeling. Construction emissions of ozone precursors VOC and NO<sub>x</sub> as well as nonattainment pollutants PM<sub>10</sub> and PM<sub>2.5</sub> would remain below applicable SCAQMD thresholds. Therefore, short-term operation of the Project would result in a less than significant cumulative

impact related to emissions of nonattainment pollutants according to the SCAQMD guidance. Construction emissions would not significantly contribute to the existing cumulatively considerable impact.

## II. Operations

Future operation of the Project would introduce permanent sources of air pollutants that include ozone precursors and particulate matter, for which there is an ongoing cumulative impact in the region. **Table 3-8, *Proposed Project Regional Operational Emissions***, above, presents the results of the operational emissions modeling. Operational emissions of ozone precursors VOC and NO<sub>x</sub> as well as nonattainment pollutants PM<sub>10</sub> and PM<sub>2.5</sub> would remain below applicable SCAQMD thresholds. Therefore, long-term operation of the Project would result in a less than significant cumulative impact related to emissions of nonattainment pollutants according to the SCAQMD guidance. Operational emissions would not significantly contribute to the existing cumulatively considerable impact.

### **Mitigation Measures**

No mitigation measures are required.

### **Level of Significance After Mitigation**

Impacts would be less than significant during both construction and operation of the Project.

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## **APPENDIX**

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- Stocker Street Creative CalEEMod Output – Detailed Report

# Stocker Street Creative Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

| Data Field                  | Value                                   |
|-----------------------------|-----------------------------------------|
| Project Name                | Stocker Street Creative                 |
| Construction Start Date     | 5/12/2025                               |
| Operational Year            | 2027                                    |
| Lead Agency                 | City of Los Angeles                     |
| Land Use Scale              | Project/site                            |
| Analysis Level for Defaults | County                                  |
| Windspeed (m/s)             | 0.50                                    |
| Precipitation (days)        | 18.4                                    |
| Location                    | 34.00694939890681, -118.33858716362877  |
| County                      | Los Angeles-South Coast                 |
| City                        | Los Angeles                             |
| Air District                | South Coast AQMD                        |
| Air Basin                   | South Coast                             |
| TAZ                         | 4449                                    |
| EDFZ                        | 16                                      |
| Electric Utility            | Los Angeles Department of Water & Power |
| Gas Utility                 | Southern California Gas                 |
| App Version                 | 2022.1.1.22                             |

## 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 |
|------------------|------|------|-------------|-----------------------|------------------------|--------------------------------|------------|-------------|
|------------------|------|------|-------------|-----------------------|------------------------|--------------------------------|------------|-------------|

|                                     |      |          |      |         |        |        |   |                           |
|-------------------------------------|------|----------|------|---------|--------|--------|---|---------------------------|
| Office Park                         | 44.4 | 1000sqft | 0.55 | 44,400  | 0.00   | 0.00   | — | BLDG B Support            |
| Unenclosed Parking with Elevator    | 122  | 1000sqft | 0.67 | 122,200 | 0.00   | 0.00   | — | BLDG F                    |
| Strip Mall                          | 0.50 | 1000sqft | 0.01 | 500     | 0.00   | 0.00   | — | BLDG A                    |
| Arena                               | 32.0 | 1000sqft | 0.75 | 32,000  | 0.00   | 0.00   | — | BLDG D                    |
| General Office Building             | 90.1 | 1000sqft | 0.00 | 90,060  | 0.00   | 0.00   | — | BLDG B Office             |
| High Turnover (Sit Down Restaurant) | 9.50 | 1000sqft | 0.22 | 9,500   | 0.00   | 0.00   | — | BLDG A                    |
| High Turnover (Sit Down Restaurant) | 9.00 | 1000sqft | 0.00 | 9,000   | 2,500  | 2,500  | — | BLDG B Rooftop Restaurant |
| Office Park                         | 0.30 | 1000sqft | 0.01 | 300     | 0.00   | 0.00   | — | BLDG C                    |
| Arena                               | 19.2 | 1000sqft | 0.44 | 19,200  | 0.00   | 0.00   | — | BLDG E Studio             |
| Manufacturing                       | 13.0 | 1000sqft | 0.00 | 13,000  | 0.00   | 0.00   | — | BLDG E Workshop           |
| Office Park                         | 7.60 | 1000sqft | 0.00 | 7,600   | 0.00   | 0.00   | — | BLDG E Support            |
| Strip Mall                          | 3.00 | 1000sqft | 0.00 | 3,000   | 0.00   | 0.00   | — | BLDG F Retail             |
| Office Park                         | 2.70 | 1000sqft | 0.00 | 2,700   | 0.00   | 0.00   | — | BLDG F Support            |
| Other Non-Asphalt Surfaces          | 81.5 | 1000sqft | 1.87 | 0.00    | 23,500 | 23,500 | — | Ground level hardscape    |

1.3. User-Selected Emission Reduction Measures by Emissions Sector

| Sector         | #       | Measure Title                                                  |
|----------------|---------|----------------------------------------------------------------|
| Construction   | C-2*    | Limit Heavy-Duty Diesel Vehicle Idling                         |
| Construction   | C-4*    | Use Local and Sustainable Building Materials                   |
| Transportation | T-14*   | Provide Electric Vehicle Charging Infrastructure               |
| Transportation | T-31-A* | Locate Project in Area with High Destination Accessibility     |
| Transportation | T-32*   | Orient Project Toward Transit, Bicycle, or Pedestrian Facility |
| Transportation | T-34*   | Provide Bike Parking                                           |
| Transportation | T-53*   | Electrify Loading Docks                                        |

|        |     |                                                                              |
|--------|-----|------------------------------------------------------------------------------|
| Energy | E-1 | Buildings Exceed 2019 Title 24 Building Envelope Energy Efficiency Standards |
| Energy | E-2 | Require Energy Efficient Appliances                                          |
| Water  | W-4 | Require Low-Flow Water Fixtures                                              |
| Water  | W-5 | Design Water-Efficient Landscapes                                            |

\* 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.              | 7.76 | 29.8 | 54.0 | 81.4 | 0.14 | 1.63  | 6.14  | 6.75  | 1.50   | 1.17   | 2.31   | —    | 16,598 | 16,598 | 0.68 | 1.44 | 24.8 | 16,786 |
| Mit.                | 7.76 | 29.8 | 54.0 | 81.4 | 0.14 | 1.63  | 6.14  | 6.75  | 1.50   | 1.17   | 2.31   | —    | 16,598 | 16,598 | 0.68 | 1.44 | 24.8 | 16,786 |
| % Reduced           | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —      | —      | —    | —    | —    | —      |
| Daily, Winter (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —      | —      | —    | —    | —    | —      |
| Unmit.              | 6.06 | 5.03 | 40.6 | 56.2 | 0.10 | 1.30  | 4.68  | 5.70  | 1.19   | 1.02   | 1.96   | —    | 13,248 | 13,248 | 0.66 | 1.45 | 0.64 | 13,696 |
| Mit.                | 6.06 | 5.03 | 40.6 | 56.2 | 0.10 | 1.30  | 4.68  | 5.70  | 1.19   | 1.02   | 1.96   | —    | 13,248 | 13,248 | 0.66 | 1.45 | 0.64 | 13,696 |
| % Reduced           | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —      | —      | —    | —    | —    | —      |
| Average Daily (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —      | —      | —    | —    | —    | —      |
| Unmit.              | 4.10 | 5.54 | 27.9 | 39.8 | 0.07 | 0.84  | 1.91  | 2.70  | 0.76   | 0.45   | 1.21   | —    | 8,622  | 8,622  | 0.36 | 0.43 | 3.93 | 8,726  |
| Mit.                | 4.10 | 5.54 | 27.9 | 39.8 | 0.07 | 0.84  | 1.91  | 2.70  | 0.76   | 0.45   | 1.21   | —    | 8,622  | 8,622  | 0.36 | 0.43 | 3.93 | 8,726  |

|                         |      |      |      |      |      |      |      |      |      |      |      |   |       |       |      |      |      |       |
|-------------------------|------|------|------|------|------|------|------|------|------|------|------|---|-------|-------|------|------|------|-------|
| % Reduced               | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —     | —     | —    | —    | —    | —     |
| Annual (Max)            | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —     | —     | —    | —    | —    | —     |
| Unmit.                  | 0.75 | 1.01 | 5.09 | 7.26 | 0.01 | 0.15 | 0.35 | 0.49 | 0.14 | 0.08 | 0.22 | — | 1,428 | 1,428 | 0.06 | 0.07 | 0.65 | 1,445 |
| Mit.                    | 0.75 | 1.01 | 5.09 | 7.26 | 0.01 | 0.15 | 0.35 | 0.49 | 0.14 | 0.08 | 0.22 | — | 1,428 | 1,428 | 0.06 | 0.07 | 0.65 | 1,445 |
| % Reduced               | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —     | —     | —    | —    | —    | —     |
| Exceeds (Daily Max)     | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —     | —     | —    | —    | —    | —     |
| Threshold               | —    | 75.0 | 100  | 550  | 150  | —    | —    | 150  | —    | —    | 55.0 | — | —     | —     | —    | —    | —    | —     |
| Unmit.                  | —    | No   | No   | No   | No   | —    | —    | No   | —    | —    | No   | — | —     | —     | —    | —    | —    | —     |
| Mit.                    | —    | 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   | — | —     | —     | —    | —    | —    | —     |
| Mit.                    | —    | 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                 | 3.60 | 2.61 | 29.4 | 32.6 | 0.09 | 1.02  | 6.14  | 6.75  | 0.94   | 1.17   | 1.96   | —    | 13,302 | 13,302 | 0.66 | 1.44 | 24.8 | 13,774 |
| 2026                 | 5.74 | 4.75 | 38.8 | 56.8 | 0.10 | 1.17  | 2.64  | 3.81  | 1.07   | 0.64   | 1.71   | —    | 12,153 | 12,153 | 0.50 | 0.43 | 12.7 | 12,305 |

|                      |      |      |      |      |      |      |      |      |      |      |      |   |        |        |      |      |      |        |
|----------------------|------|------|------|------|------|------|------|------|------|------|------|---|--------|--------|------|------|------|--------|
| 2027                 | 7.76 | 29.8 | 54.0 | 81.4 | 0.14 | 1.63 | 3.40 | 5.03 | 1.50 | 0.81 | 2.31 | — | 16,598 | 16,598 | 0.68 | 0.53 | 14.7 | 16,786 |
| Daily - Winter (Max) | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —      | —      | —    | —    | —    | —      |
| 2025                 | 6.06 | 5.03 | 40.6 | 56.2 | 0.10 | 1.30 | 4.68 | 5.70 | 1.19 | 1.02 | 1.96 | — | 13,248 | 13,248 | 0.66 | 1.45 | 0.64 | 13,696 |
| 2026                 | 5.74 | 4.74 | 39.0 | 55.3 | 0.10 | 1.17 | 2.64 | 3.81 | 1.07 | 0.64 | 1.71 | — | 12,041 | 12,041 | 0.50 | 0.43 | 0.33 | 12,181 |
| 2027                 | 5.51 | 4.56 | 37.8 | 54.4 | 0.10 | 1.05 | 2.64 | 3.69 | 0.97 | 0.64 | 1.61 | — | 11,962 | 11,962 | 0.44 | 0.41 | 0.30 | 12,096 |
| Average Daily        | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —      | —      | —    | —    | —    | —      |
| 2025                 | 1.55 | 1.19 | 12.1 | 14.5 | 0.03 | 0.42 | 1.91 | 2.32 | 0.38 | 0.39 | 0.78 | — | 4,728  | 4,728  | 0.23 | 0.43 | 3.47 | 4,866  |
| 2026                 | 4.10 | 3.39 | 27.9 | 39.8 | 0.07 | 0.84 | 1.86 | 2.70 | 0.76 | 0.45 | 1.21 | — | 8,622  | 8,622  | 0.36 | 0.30 | 3.93 | 8,726  |
| 2027                 | 3.02 | 5.54 | 20.8 | 30.3 | 0.05 | 0.59 | 1.43 | 2.02 | 0.54 | 0.35 | 0.89 | — | 6,539  | 6,539  | 0.24 | 0.22 | 2.75 | 6,614  |
| Annual               | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —      | —      | —    | —    | —    | —      |
| 2025                 | 0.28 | 0.22 | 2.21 | 2.64 | 0.01 | 0.08 | 0.35 | 0.42 | 0.07 | 0.07 | 0.14 | — | 783    | 783    | 0.04 | 0.07 | 0.57 | 806    |
| 2026                 | 0.75 | 0.62 | 5.09 | 7.26 | 0.01 | 0.15 | 0.34 | 0.49 | 0.14 | 0.08 | 0.22 | — | 1,428  | 1,428  | 0.06 | 0.05 | 0.65 | 1,445  |
| 2027                 | 0.55 | 1.01 | 3.80 | 5.54 | 0.01 | 0.11 | 0.26 | 0.37 | 0.10 | 0.06 | 0.16 | — | 1,083  | 1,083  | 0.04 | 0.04 | 0.45 | 1,095  |

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                 | 3.60 | 2.61 | 29.4 | 32.6 | 0.09 | 1.02  | 6.14  | 6.75  | 0.94   | 1.17   | 1.96   | —    | 13,302 | 13,302 | 0.66 | 1.44 | 24.8 | 13,774 |
| 2026                 | 5.74 | 4.75 | 38.8 | 56.8 | 0.10 | 1.17  | 2.64  | 3.81  | 1.07   | 0.64   | 1.71   | —    | 12,153 | 12,153 | 0.50 | 0.43 | 12.7 | 12,305 |
| 2027                 | 7.76 | 29.8 | 54.0 | 81.4 | 0.14 | 1.63  | 3.40  | 5.03  | 1.50   | 0.81   | 2.31   | —    | 16,598 | 16,598 | 0.68 | 0.53 | 14.7 | 16,786 |
| Daily - Winter (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —      | —      | —    | —    | —    | —      |
| 2025                 | 6.06 | 5.03 | 40.6 | 56.2 | 0.10 | 1.30  | 4.68  | 5.70  | 1.19   | 1.02   | 1.96   | —    | 13,248 | 13,248 | 0.66 | 1.45 | 0.64 | 13,696 |

|               |      |      |      |      |      |      |      |      |      |      |      |   |        |        |      |      |      |        |
|---------------|------|------|------|------|------|------|------|------|------|------|------|---|--------|--------|------|------|------|--------|
| 2026          | 5.74 | 4.74 | 39.0 | 55.3 | 0.10 | 1.17 | 2.64 | 3.81 | 1.07 | 0.64 | 1.71 | — | 12,041 | 12,041 | 0.50 | 0.43 | 0.33 | 12,181 |
| 2027          | 5.51 | 4.56 | 37.8 | 54.4 | 0.10 | 1.05 | 2.64 | 3.69 | 0.97 | 0.64 | 1.61 | — | 11,962 | 11,962 | 0.44 | 0.41 | 0.30 | 12,096 |
| Average Daily | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —      | —      | —    | —    | —    | —      |
| 2025          | 1.55 | 1.19 | 12.1 | 14.5 | 0.03 | 0.42 | 1.91 | 2.32 | 0.38 | 0.39 | 0.78 | — | 4,728  | 4,728  | 0.23 | 0.43 | 3.47 | 4,866  |
| 2026          | 4.10 | 3.39 | 27.9 | 39.8 | 0.07 | 0.84 | 1.86 | 2.70 | 0.76 | 0.45 | 1.21 | — | 8,622  | 8,622  | 0.36 | 0.30 | 3.93 | 8,726  |
| 2027          | 3.02 | 5.54 | 20.8 | 30.3 | 0.05 | 0.59 | 1.43 | 2.02 | 0.54 | 0.35 | 0.89 | — | 6,539  | 6,539  | 0.24 | 0.22 | 2.75 | 6,614  |
| Annual        | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | —    | — | —      | —      | —    | —    | —    | —      |
| 2025          | 0.28 | 0.22 | 2.21 | 2.64 | 0.01 | 0.08 | 0.35 | 0.42 | 0.07 | 0.07 | 0.14 | — | 783    | 783    | 0.04 | 0.07 | 0.57 | 806    |
| 2026          | 0.75 | 0.62 | 5.09 | 7.26 | 0.01 | 0.15 | 0.34 | 0.49 | 0.14 | 0.08 | 0.22 | — | 1,428  | 1,428  | 0.06 | 0.05 | 0.65 | 1,445  |
| 2027          | 0.55 | 1.01 | 3.80 | 5.54 | 0.01 | 0.11 | 0.26 | 0.37 | 0.10 | 0.06 | 0.16 | — | 1,083  | 1,083  | 0.04 | 0.04 | 0.45 | 1,095  |

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.              | 14.5   | 18.6   | 24.0   | 110    | 0.21 | 0.77   | 15.3  | 16.1   | 0.72   | 3.89   | 4.61   | 311  | 29,574 | 29,885 | 33.2 | 1.06 | 84.2 | 31,115 |
| Mit.                | 14.5   | 18.6   | 24.0   | 110    | 0.21 | 0.77   | 15.3  | 16.1   | 0.72   | 3.89   | 4.61   | 302  | 29,239 | 29,541 | 32.2 | 1.04 | 84.2 | 30,739 |
| % Reduced           | < 0.5% | < 0.5% | < 0.5% | < 0.5% | —    | < 0.5% | —     | < 0.5% | < 0.5% | —      | < 0.5% | 3%   | 1%     | 1%     | 3%   | 3%   | —    | 1%     |
| Daily, Winter (Max) | —      | —      | —      | —      | —    | —      | —     | —      | —      | —      | —      | —    | —      | —      | —    | —    | —    | —      |
| Unmit.              | 11.7   | 16.0   | 24.5   | 89.9   | 0.21 | 0.75   | 15.3  | 16.1   | 0.70   | 3.89   | 4.59   | 311  | 28,817 | 29,128 | 33.2 | 1.10 | 34.3 | 30,320 |
| Mit.                | 11.7   | 16.0   | 24.4   | 89.9   | 0.20 | 0.74   | 15.3  | 16.1   | 0.70   | 3.89   | 4.59   | 302  | 28,482 | 28,784 | 32.2 | 1.07 | 34.3 | 29,943 |
| % Reduced           | < 0.5% | < 0.5% | < 0.5% | < 0.5% | —    | < 0.5% | —     | < 0.5% | < 0.5% | —      | < 0.5% | 3%   | 1%     | 1%     | 3%   | 2%   | —    | 1%     |

|                         |        |        |        |        |        |        |      |        |        |      |        |      |        |        |      |      |      |        |
|-------------------------|--------|--------|--------|--------|--------|--------|------|--------|--------|------|--------|------|--------|--------|------|------|------|--------|
| Average Daily (Max)     | —      | —      | —      | —      | —      | —      | —    | —      | —      | —    | —      | —    | —      | —      | —    | —    | —    | —      |
| Unmit.                  | 12.3   | 16.6   | 19.5   | 90.4   | 0.19   | 0.61   | 14.1 | 14.7   | 0.57   | 3.57 | 4.15   | 311  | 26,789 | 27,101 | 33.1 | 1.04 | 53.5 | 28,291 |
| Mit.                    | 12.3   | 16.6   | 19.5   | 90.4   | 0.19   | 0.61   | 14.1 | 14.7   | 0.57   | 3.57 | 4.14   | 302  | 26,455 | 26,757 | 32.1 | 1.01 | 53.5 | 27,915 |
| % Reduced               | < 0.5% | < 0.5% | < 0.5% | < 0.5% | —      | < 0.5% | —    | < 0.5% | < 0.5% | —    | < 0.5% | 3%   | 1%     | 1%     | 3%   | 3%   | —    | 1%     |
| Annual (Max)            | —      | —      | —      | —      | —      | —      | —    | —      | —      | —    | —      | —    | —      | —      | —    | —    | —    | —      |
| Unmit.                  | 2.24   | 3.03   | 3.56   | 16.5   | 0.03   | 0.11   | 2.57 | 2.68   | 0.10   | 0.65 | 0.76   | 51.6 | 4,435  | 4,487  | 5.48 | 0.17 | 8.86 | 4,684  |
| Mit.                    | 2.24   | 3.03   | 3.56   | 16.5   | 0.03   | 0.11   | 2.57 | 2.68   | 0.10   | 0.65 | 0.76   | 50.0 | 4,380  | 4,430  | 5.32 | 0.17 | 8.86 | 4,622  |
| % Reduced               | < 0.5% | < 0.5% | < 0.5% | < 0.5% | < 0.5% | < 0.5% | —    | < 0.5% | < 0.5% | —    | < 0.5% | 3%   | 1%     | 1%     | 3%   | 3%   | —    | 1%     |
| 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     | —    | —      | —      | —    | —    | —    | —      |
| Exceeds (Annual)        | —      | —      | —      | —      | —      | —      | —    | —      | —      | —    | —      | —    | —      | —      | —    | —    | —    | —      |
| Threshold               | —      | —      | —      | —      | —      | —      | —    | —      | —      | —    | —      | —    | —      | —      | —    | —    | —    | 3,000  |
| Unmit.                  | —      | —      | —      | —      | —      | —      | —    | —      | —      | —    | —      | —    | —      | —      | —    | —    | —    | Yes    |

|      |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |     |
|------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|-----|
| Mit. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | Yes |
|------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|-----|

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              | 9.82 | 8.99 | 6.03 | 69.6 | 0.16    | 0.10  | 15.3  | 15.4  | 0.10   | 3.89   | 3.99   | —    | 16,790 | 16,790 | 0.84    | 0.68    | 51.2 | 17,065 |
| Area                | 2.74 | 8.08 | 0.13 | 15.4 | < 0.005 | 0.03  | —     | 0.03  | 0.02   | —      | 0.02   | —    | 63.2   | 63.2   | < 0.005 | < 0.005 | —    | 63.4   |
| Energy              | 0.21 | 0.10 | 1.87 | 1.57 | 0.01    | 0.14  | —     | 0.14  | 0.14   | —      | 0.14   | —    | 8,309  | 8,309  | 0.72    | 0.08    | —    | 8,350  |
| Water               | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | 109  | 606    | 715    | 11.2    | 0.27    | —    | 1,076  |
| Waste               | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | 203  | 0.00   | 203    | 20.3    | 0.00    | —    | 709    |
| Refrig.             | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —      | —      | —       | —       | 33.0 | 33.0   |
| Off-Road            | 1.75 | 1.47 | 16.0 | 23.6 | 0.04    | 0.50  | —     | 0.50  | 0.46   | —      | 0.46   | —    | 3,806  | 3,806  | 0.15    | 0.03    | —    | 3,819  |
| Total               | 14.5 | 18.6 | 24.0 | 110  | 0.21    | 0.77  | 15.3  | 16.1  | 0.72   | 3.89   | 4.61   | 311  | 29,574 | 29,885 | 33.2    | 1.06    | 84.2 | 31,115 |
| Daily, Winter (Max) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —      | —      | —       | —       | —    | —      |
| Mobile              | 9.72 | 8.88 | 6.59 | 64.8 | 0.16    | 0.10  | 15.3  | 15.4  | 0.10   | 3.89   | 3.99   | —    | 16,096 | 16,096 | 0.88    | 0.71    | 1.33 | 16,332 |
| Area                | —    | 5.56 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —      | —      | —       | —       | —    | —      |
| Energy              | 0.21 | 0.10 | 1.87 | 1.57 | 0.01    | 0.14  | —     | 0.14  | 0.14   | —      | 0.14   | —    | 8,309  | 8,309  | 0.72    | 0.08    | —    | 8,350  |
| Water               | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | 109  | 606    | 715    | 11.2    | 0.27    | —    | 1,076  |
| Waste               | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | 203  | 0.00   | 203    | 20.3    | 0.00    | —    | 709    |
| Refrig.             | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —      | —      | —       | —       | 33.0 | 33.0   |
| Off-Road            | 1.75 | 1.47 | 16.0 | 23.6 | 0.04    | 0.50  | —     | 0.50  | 0.46   | —      | 0.46   | —    | 3,806  | 3,806  | 0.15    | 0.03    | —    | 3,819  |
| Total               | 11.7 | 16.0 | 24.5 | 89.9 | 0.21    | 0.75  | 15.3  | 16.1  | 0.70   | 3.89   | 4.59   | 311  | 28,817 | 29,128 | 33.2    | 1.10    | 34.3 | 30,320 |
| Average Daily       | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —      | —      | —       | —       | —    | —      |

|          |      |      |      |      |         |         |      |         |         |      |         |      |        |        |         |         |      |        |
|----------|------|------|------|------|---------|---------|------|---------|---------|------|---------|------|--------|--------|---------|---------|------|--------|
| Mobile   | 8.96 | 8.18 | 6.17 | 61.5 | 0.15    | 0.10    | 14.1 | 14.2    | 0.09    | 3.57 | 3.66    | —    | 15,120 | 15,120 | 0.81    | 0.66    | 20.5 | 15,359 |
| Area     | 1.87 | 7.28 | 0.09 | 10.5 | < 0.005 | 0.02    | —    | 0.02    | 0.01    | —    | 0.01    | —    | 43.3   | 43.3   | < 0.005 | < 0.005 | —    | 43.5   |
| Energy   | 0.21 | 0.10 | 1.87 | 1.57 | 0.01    | 0.14    | —    | 0.14    | 0.14    | —    | 0.14    | —    | 8,309  | 8,309  | 0.72    | 0.08    | —    | 8,350  |
| Water    | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 109  | 606    | 715    | 11.2    | 0.27    | —    | 1,076  |
| Waste    | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 203  | 0.00   | 203    | 20.3    | 0.00    | —    | 709    |
| Refrig.  | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | 33.0 | 33.0   |
| Off-Road | 1.25 | 1.05 | 11.4 | 16.8 | 0.03    | 0.36    | —    | 0.36    | 0.33    | —    | 0.33    | —    | 2,711  | 2,711  | 0.11    | 0.02    | —    | 2,720  |
| Total    | 12.3 | 16.6 | 19.5 | 90.4 | 0.19    | 0.61    | 14.1 | 14.7    | 0.57    | 3.57 | 4.15    | 311  | 26,789 | 27,101 | 33.1    | 1.04    | 53.5 | 28,291 |
| Annual   | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | —    | —      |
| Mobile   | 1.63 | 1.49 | 1.13 | 11.2 | 0.03    | 0.02    | 2.57 | 2.58    | 0.02    | 0.65 | 0.67    | —    | 2,503  | 2,503  | 0.13    | 0.11    | 3.40 | 2,543  |
| Area     | 0.34 | 1.33 | 0.02 | 1.92 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 7.17   | 7.17   | < 0.005 | < 0.005 | —    | 7.19   |
| Energy   | 0.04 | 0.02 | 0.34 | 0.29 | < 0.005 | 0.03    | —    | 0.03    | 0.03    | —    | 0.03    | —    | 1,376  | 1,376  | 0.12    | 0.01    | —    | 1,382  |
| Water    | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 18.0 | 100    | 118    | 1.85    | 0.05    | —    | 178    |
| Waste    | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 33.6 | 0.00   | 33.6   | 3.36    | 0.00    | —    | 117    |
| Refrig.  | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | 5.46 | 5.46   |
| Off-Road | 0.23 | 0.19 | 2.08 | 3.06 | < 0.005 | 0.07    | —    | 0.07    | 0.06    | —    | 0.06    | —    | 449    | 449    | 0.02    | < 0.005 | —    | 450    |
| Total    | 2.24 | 3.03 | 3.56 | 16.5 | 0.03    | 0.11    | 2.57 | 2.68    | 0.10    | 0.65 | 0.76    | 51.6 | 4,435  | 4,487  | 5.48    | 0.17    | 8.86 | 4,684  |

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              | 9.82 | 8.99 | 6.03 | 69.6 | 0.16    | 0.10  | 15.3  | 15.4  | 0.10   | 3.89   | 3.99   | —    | 16,790 | 16,790 | 0.84    | 0.68    | 51.2 | 17,065 |
| Area                | 2.74 | 8.08 | 0.13 | 15.4 | < 0.005 | 0.03  | —     | 0.03  | 0.02   | —      | 0.02   | —    | 63.2   | 63.2   | < 0.005 | < 0.005 | —    | 63.4   |
| Energy              | 0.20 | 0.10 | 1.84 | 1.54 | 0.01    | 0.14  | —     | 0.14  | 0.14   | —      | 0.14   | —    | 8,034  | 8,034  | 0.70    | 0.08    | —    | 8,074  |
| Water               | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | 99.3 | 547    | 646    | 10.2    | 0.25    | —    | 976    |

|                           |      |      |      |      |         |         |      |         |         |      |         |      |        |        |         |         |      |        |
|---------------------------|------|------|------|------|---------|---------|------|---------|---------|------|---------|------|--------|--------|---------|---------|------|--------|
| Waste                     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 203  | 0.00   | 203    | 20.3    | 0.00    | —    | 709    |
| Refrig.                   | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | 33.0 | 33.0   |
| Off-Road                  | 1.75 | 1.47 | 16.0 | 23.6 | 0.04    | 0.50    | —    | 0.50    | 0.46    | —    | 0.46    | —    | 3,806  | 3,806  | 0.15    | 0.03    | —    | 3,819  |
| Total                     | 14.5 | 18.6 | 24.0 | 110  | 0.21    | 0.77    | 15.3 | 16.1    | 0.72    | 3.89 | 4.61    | 302  | 29,239 | 29,541 | 32.2    | 1.04    | 84.2 | 30,739 |
| Daily,<br>Winter<br>(Max) | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | —    | —      |
| Mobile                    | 9.72 | 8.88 | 6.59 | 64.8 | 0.16    | 0.10    | 15.3 | 15.4    | 0.10    | 3.89 | 3.99    | —    | 16,096 | 16,096 | 0.88    | 0.71    | 1.33 | 16,332 |
| Area                      | —    | 5.56 | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | —    | —      |
| Energy                    | 0.20 | 0.10 | 1.84 | 1.54 | 0.01    | 0.14    | —    | 0.14    | 0.14    | —    | 0.14    | —    | 8,034  | 8,034  | 0.70    | 0.08    | —    | 8,074  |
| Water                     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 99.3 | 547    | 646    | 10.2    | 0.25    | —    | 976    |
| Waste                     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 203  | 0.00   | 203    | 20.3    | 0.00    | —    | 709    |
| Refrig.                   | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | 33.0 | 33.0   |
| Off-Road                  | 1.75 | 1.47 | 16.0 | 23.6 | 0.04    | 0.50    | —    | 0.50    | 0.46    | —    | 0.46    | —    | 3,806  | 3,806  | 0.15    | 0.03    | —    | 3,819  |
| Total                     | 11.7 | 16.0 | 24.4 | 89.9 | 0.20    | 0.74    | 15.3 | 16.1    | 0.70    | 3.89 | 4.59    | 302  | 28,482 | 28,784 | 32.2    | 1.07    | 34.3 | 29,943 |
| Average<br>Daily          | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | —    | —      |
| Mobile                    | 8.96 | 8.18 | 6.17 | 61.5 | 0.15    | 0.10    | 14.1 | 14.2    | 0.09    | 3.57 | 3.66    | —    | 15,120 | 15,120 | 0.81    | 0.66    | 20.5 | 15,359 |
| Area                      | 1.87 | 7.28 | 0.09 | 10.5 | < 0.005 | 0.02    | —    | 0.02    | 0.01    | —    | 0.01    | —    | 43.3   | 43.3   | < 0.005 | < 0.005 | —    | 43.5   |
| Energy                    | 0.20 | 0.10 | 1.84 | 1.54 | 0.01    | 0.14    | —    | 0.14    | 0.14    | —    | 0.14    | —    | 8,034  | 8,034  | 0.70    | 0.08    | —    | 8,074  |
| Water                     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 99.3 | 547    | 646    | 10.2    | 0.25    | —    | 976    |
| Waste                     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | 203  | 0.00   | 203    | 20.3    | 0.00    | —    | 709    |
| Refrig.                   | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | 33.0 | 33.0   |
| Off-Road                  | 1.25 | 1.05 | 11.4 | 16.8 | 0.03    | 0.36    | —    | 0.36    | 0.33    | —    | 0.33    | —    | 2,711  | 2,711  | 0.11    | 0.02    | —    | 2,720  |
| Total                     | 12.3 | 16.6 | 19.5 | 90.4 | 0.19    | 0.61    | 14.1 | 14.7    | 0.57    | 3.57 | 4.14    | 302  | 26,455 | 26,757 | 32.1    | 1.01    | 53.5 | 27,915 |
| Annual                    | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | —    | —      | —      | —       | —       | —    | —      |
| Mobile                    | 1.63 | 1.49 | 1.13 | 11.2 | 0.03    | 0.02    | 2.57 | 2.58    | 0.02    | 0.65 | 0.67    | —    | 2,503  | 2,503  | 0.13    | 0.11    | 3.40 | 2,543  |
| Area                      | 0.34 | 1.33 | 0.02 | 1.92 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 7.17   | 7.17   | < 0.005 | < 0.005 | —    | 7.19   |
| Energy                    | 0.04 | 0.02 | 0.34 | 0.28 | < 0.005 | 0.03    | —    | 0.03    | 0.03    | —    | 0.03    | —    | 1,330  | 1,330  | 0.12    | 0.01    | —    | 1,337  |

|          |      |      |      |      |         |      |      |      |      |      |      |      |       |       |      |         |      |       |
|----------|------|------|------|------|---------|------|------|------|------|------|------|------|-------|-------|------|---------|------|-------|
| Water    | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | 16.4 | 90.6  | 107   | 1.69 | 0.04    | —    | 162   |
| Waste    | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | 33.6 | 0.00  | 33.6  | 3.36 | 0.00    | —    | 117   |
| Refrig.  | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | —    | —     | —     | —    | —       | 5.46 | 5.46  |
| Off-Road | 0.23 | 0.19 | 2.08 | 3.06 | < 0.005 | 0.07 | —    | 0.07 | 0.06 | —    | 0.06 | —    | 449   | 449   | 0.02 | < 0.005 | —    | 450   |
| Total    | 2.24 | 3.03 | 3.56 | 16.5 | 0.03    | 0.11 | 2.57 | 2.68 | 0.10 | 0.65 | 0.76 | 50.0 | 4,380 | 4,430 | 5.32 | 0.17    | 8.86 | 4,622 |

3. Construction Emissions Details

3.1. Demolition (2025) - Unmitigated

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

| Location                    | TOG     | ROG     | NOx  | CO   | SO2     | PM10E   | PM10D | PM10T | PM2.5E  | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4     | N2O     | R    | CO2e  |
|-----------------------------|---------|---------|------|------|---------|---------|-------|-------|---------|--------|--------|------|-------|-------|---------|---------|------|-------|
| Onsite                      | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Daily, Summer (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 2.51    | 2.09    | 18.8 | 24.2 | 0.04    | 0.81    | —     | 0.81  | 0.74    | —      | 0.74   | —    | 3,535 | 3,535 | 0.14    | 0.03    | —    | 3,547 |
| Dust From Material Movement | —       | —       | —    | —    | —       | —       | 0.28  | 0.28  | —       | 0.03   | 0.03   | —    | —     | —     | —       | —       | —    | —     |
| Demolition                  | —       | —       | —    | —    | —       | —       | 1.23  | 1.23  | —       | 0.19   | 0.19   | —    | —     | —     | —       | —       | —    | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.04 | 0.03 | < 0.005 | < 0.005 | 0.57  | 0.57  | < 0.005 | 0.06   | 0.06   | —    | 16.9  | 16.9  | < 0.005 | < 0.005 | 0.03 | 17.8  |
| Daily, Winter (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Average Daily               | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 0.41    | 0.34    | 3.09 | 3.97 | 0.01    | 0.13    | —     | 0.13  | 0.12    | —      | 0.12   | —    | 581   | 581   | 0.02    | < 0.005 | —    | 583   |

|                             |         |         |         |         |         |         |      |      |         |         |         |   |       |       |         |         |         |       |
|-----------------------------|---------|---------|---------|---------|---------|---------|------|------|---------|---------|---------|---|-------|-------|---------|---------|---------|-------|
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.05 | 0.05 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Demolition                  | —       | —       | —       | —       | —       | —       | 0.20 | 0.20 | —       | 0.03    | 0.03    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.01    | < 0.005 | < 0.005 | < 0.005 | 0.09 | 0.09 | < 0.005 | 0.01    | 0.01    | — | 2.78  | 2.78  | < 0.005 | < 0.005 | < 0.005 | 2.93  |
| Annual                      | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 0.08    | 0.06    | 0.56    | 0.72    | < 0.005 | 0.02    | —    | 0.02 | 0.02    | —       | 0.02    | — | 96.2  | 96.2  | < 0.005 | < 0.005 | —       | 96.5  |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.01 | 0.01 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Demolition                  | —       | —       | —       | —       | —       | —       | 0.04 | 0.04 | —       | 0.01    | 0.01    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.02 | 0.02 | < 0.005 | < 0.005 | < 0.005 | — | 0.46  | 0.46  | < 0.005 | < 0.005 | < 0.005 | 0.48  |
| Offsite                     | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Summer (Max)         | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.38    | 0.34    | 0.35    | 5.57    | 0.00    | 0.00    | 1.05 | 1.05 | 0.00    | 0.25    | 0.25    | — | 1,106 | 1,106 | 0.05    | 0.04    | 4.05    | 1,123 |
| Vendor                      | 0.04    | 0.01    | 0.58    | 0.28    | < 0.005 | 0.01    | 0.14 | 0.14 | < 0.005 | 0.04    | 0.04    | — | 508   | 508   | 0.02    | 0.07    | 1.39    | 531   |
| Hauling                     | 0.17    | 0.03    | 2.72    | 1.06    | 0.01    | 0.03    | 0.59 | 0.62 | 0.03    | 0.16    | 0.19    | — | 2,217 | 2,217 | 0.12    | 0.35    | 5.15    | 2,329 |
| Daily, Winter (Max)         | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Average Daily               | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.06    | 0.06    | 0.07    | 0.81    | 0.00    | 0.00    | 0.17 | 0.17 | 0.00    | 0.04    | 0.04    | — | 175   | 175   | 0.01    | 0.01    | 0.29    | 177   |
| Vendor                      | 0.01    | < 0.005 | 0.10    | 0.05    | < 0.005 | < 0.005 | 0.02 | 0.02 | < 0.005 | 0.01    | 0.01    | — | 83.5  | 83.5  | < 0.005 | 0.01    | 0.10    | 87.1  |

|         |         |         |      |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|---------|---------|---------|------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Hauling | 0.03    | 0.01    | 0.47 | 0.17 | < 0.005 | < 0.005 | 0.10    | 0.10    | < 0.005 | 0.03    | 0.03    | — | 364  | 364  | 0.02    | 0.06    | 0.36 | 382  |
| Annual  | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker  | 0.01    | 0.01    | 0.01 | 0.15 | 0.00    | 0.00    | 0.03    | 0.03    | 0.00    | 0.01    | 0.01    | — | 29.0 | 29.0 | < 0.005 | < 0.005 | 0.05 | 29.3 |
| Vendor  | < 0.005 | < 0.005 | 0.02 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 13.8 | 13.8 | < 0.005 | < 0.005 | 0.02 | 14.4 |
| Hauling | 0.01    | < 0.005 | 0.09 | 0.03 | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | 0.01    | — | 60.3 | 60.3 | < 0.005 | 0.01    | 0.06 | 63.3 |

3.2. Demolition (2025) - Mitigated

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

| Location                    | TOG     | ROG     | NOx  | CO   | SO2     | PM10E   | PM10D | PM10T | PM2.5E  | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4     | N2O     | R    | CO2e  |
|-----------------------------|---------|---------|------|------|---------|---------|-------|-------|---------|--------|--------|------|-------|-------|---------|---------|------|-------|
| Onsite                      | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Daily, Summer (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 2.51    | 2.09    | 18.8 | 24.2 | 0.04    | 0.81    | —     | 0.81  | 0.74    | —      | 0.74   | —    | 3,535 | 3,535 | 0.14    | 0.03    | —    | 3,547 |
| Dust From Material Movement | —       | —       | —    | —    | —       | —       | 0.28  | 0.28  | —       | 0.03   | 0.03   | —    | —     | —     | —       | —       | —    | —     |
| Demolition                  | —       | —       | —    | —    | —       | —       | 1.23  | 1.23  | —       | 0.19   | 0.19   | —    | —     | —     | —       | —       | —    | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.04 | 0.03 | < 0.005 | < 0.005 | 0.57  | 0.57  | < 0.005 | 0.06   | 0.06   | —    | 16.9  | 16.9  | < 0.005 | < 0.005 | 0.03 | 17.8  |
| Daily, Winter (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Average Daily               | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 0.41    | 0.34    | 3.09 | 3.97 | 0.01    | 0.13    | —     | 0.13  | 0.12    | —      | 0.12   | —    | 581   | 581   | 0.02    | < 0.005 | —    | 583   |

|                             |         |         |         |         |         |         |      |      |         |         |         |   |       |       |         |         |         |       |
|-----------------------------|---------|---------|---------|---------|---------|---------|------|------|---------|---------|---------|---|-------|-------|---------|---------|---------|-------|
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.05 | 0.05 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Demolition                  | —       | —       | —       | —       | —       | —       | 0.20 | 0.20 | —       | 0.03    | 0.03    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.01    | < 0.005 | < 0.005 | < 0.005 | 0.09 | 0.09 | < 0.005 | 0.01    | 0.01    | — | 2.78  | 2.78  | < 0.005 | < 0.005 | < 0.005 | 2.93  |
| Annual                      | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 0.08    | 0.06    | 0.56    | 0.72    | < 0.005 | 0.02    | —    | 0.02 | 0.02    | —       | 0.02    | — | 96.2  | 96.2  | < 0.005 | < 0.005 | —       | 96.5  |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.01 | 0.01 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Demolition                  | —       | —       | —       | —       | —       | —       | 0.04 | 0.04 | —       | 0.01    | 0.01    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.02 | 0.02 | < 0.005 | < 0.005 | < 0.005 | — | 0.46  | 0.46  | < 0.005 | < 0.005 | < 0.005 | 0.48  |
| Offsite                     | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Summer (Max)         | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.38    | 0.34    | 0.35    | 5.57    | 0.00    | 0.00    | 1.05 | 1.05 | 0.00    | 0.25    | 0.25    | — | 1,106 | 1,106 | 0.05    | 0.04    | 4.05    | 1,123 |
| Vendor                      | 0.04    | 0.01    | 0.58    | 0.28    | < 0.005 | 0.01    | 0.14 | 0.14 | < 0.005 | 0.04    | 0.04    | — | 508   | 508   | 0.02    | 0.07    | 1.39    | 531   |
| Hauling                     | 0.17    | 0.03    | 2.72    | 1.06    | 0.01    | 0.03    | 0.59 | 0.62 | 0.03    | 0.16    | 0.19    | — | 2,217 | 2,217 | 0.12    | 0.35    | 5.15    | 2,329 |
| Daily, Winter (Max)         | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Average Daily               | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.06    | 0.06    | 0.07    | 0.81    | 0.00    | 0.00    | 0.17 | 0.17 | 0.00    | 0.04    | 0.04    | — | 175   | 175   | 0.01    | 0.01    | 0.29    | 177   |
| Vendor                      | 0.01    | < 0.005 | 0.10    | 0.05    | < 0.005 | < 0.005 | 0.02 | 0.02 | < 0.005 | 0.01    | 0.01    | — | 83.5  | 83.5  | < 0.005 | 0.01    | 0.10    | 87.1  |

|         |         |         |      |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|---------|---------|---------|------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Hauling | 0.03    | 0.01    | 0.47 | 0.17 | < 0.005 | < 0.005 | 0.10    | 0.10    | < 0.005 | 0.03    | 0.03    | — | 364  | 364  | 0.02    | 0.06    | 0.36 | 382  |
| Annual  | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker  | 0.01    | 0.01    | 0.01 | 0.15 | 0.00    | 0.00    | 0.03    | 0.03    | 0.00    | 0.01    | 0.01    | — | 29.0 | 29.0 | < 0.005 | < 0.005 | 0.05 | 29.3 |
| Vendor  | < 0.005 | < 0.005 | 0.02 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 13.8 | 13.8 | < 0.005 | < 0.005 | 0.02 | 14.4 |
| Hauling | 0.01    | < 0.005 | 0.09 | 0.03 | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | 0.01    | — | 60.3 | 60.3 | < 0.005 | 0.01    | 0.06 | 63.3 |

3.3. Site Preparation (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          | 1.69    | 1.41    | 12.5 | 16.4 | 0.02    | 0.53    | —     | 0.53  | 0.49    | —      | 0.49   | —    | 2,419 | 2,419 | 0.10    | 0.02    | —    | 2,428 |
| Dust From Material Movement | —       | —       | —    | —    | —       | —       | 0.14  | 0.14  | —       | 0.01   | 0.01   | —    | —     | —     | —       | —       | —    | —     |
| Demolition                  | —       | —       | —    | —    | —       | —       | 2.48  | 2.48  | —       | 0.38   | 0.38   | —    | —     | —     | —       | —       | —    | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.04 | 0.03 | < 0.005 | < 0.005 | 0.86  | 0.86  | < 0.005 | 0.09   | 0.09   | —    | 16.9  | 16.9  | < 0.005 | < 0.005 | 0.03 | 17.8  |
| Daily, Winter (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Average Daily               | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 0.07    | 0.06    | 0.51 | 0.67 | < 0.005 | 0.02    | —     | 0.02  | 0.02    | —      | 0.02   | —    | 99.4  | 99.4  | < 0.005 | < 0.005 | —    | 99.8  |

|                             |         |         |         |         |         |         |         |         |         |         |         |   |       |       |         |         |         |       |
|-----------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|-------|-------|---------|---------|---------|-------|
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.01    | 0.01    | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Demolition                  | —       | —       | —       | —       | —       | —       | 0.10    | 0.10    | —       | 0.02    | 0.02    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.03    | 0.03    | < 0.005 | < 0.005 | < 0.005 | — | 0.70  | 0.70  | < 0.005 | < 0.005 | < 0.005 | 0.73  |
| Annual                      | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 0.01    | 0.01    | 0.09    | 0.12    | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | —       | < 0.005 | — | 16.5  | 16.5  | < 0.005 | < 0.005 | —       | 16.5  |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Demolition                  | —       | —       | —       | —       | —       | —       | 0.02    | 0.02    | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 0.12  | 0.12  | < 0.005 | < 0.005 | < 0.005 | 0.12  |
| Offsite                     | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Summer (Max)         | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.38    | 0.34    | 0.35    | 5.57    | 0.00    | 0.00    | 1.05    | 1.05    | 0.00    | 0.25    | 0.25    | — | 1,106 | 1,106 | 0.05    | 0.04    | 4.05    | 1,123 |
| Vendor                      | 0.04    | 0.01    | 0.58    | 0.28    | < 0.005 | 0.01    | 0.14    | 0.14    | < 0.005 | 0.04    | 0.04    | — | 508   | 508   | 0.02    | 0.07    | 1.39    | 531   |
| Hauling                     | 0.43    | 0.09    | 6.80    | 2.65    | 0.04    | 0.07    | 1.48    | 1.55    | 0.07    | 0.41    | 0.48    | — | 5,542 | 5,542 | 0.30    | 0.87    | 12.9    | 5,822 |
| Daily, Winter (Max)         | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Average Daily               | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.02    | 0.01    | 0.02    | 0.20    | 0.00    | 0.00    | 0.04    | 0.04    | 0.00    | 0.01    | 0.01    | — | 43.7  | 43.7  | < 0.005 | < 0.005 | 0.07    | 44.3  |
| Vendor                      | < 0.005 | < 0.005 | 0.02    | 0.01    | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 20.9  | 20.9  | < 0.005 | < 0.005 | 0.02    | 21.8  |

|         |         |         |         |         |         |         |         |         |         |         |         |   |      |      |         |         |         |      |
|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|---------|------|
| Hauling | 0.02    | < 0.005 | 0.29    | 0.11    | < 0.005 | < 0.005 | 0.06    | 0.06    | < 0.005 | 0.02    | 0.02    | — | 228  | 228  | 0.01    | 0.04    | 0.23    | 239  |
| Annual  | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker  | < 0.005 | < 0.005 | < 0.005 | 0.04    | 0.00    | 0.00    | 0.01    | 0.01    | 0.00    | < 0.005 | < 0.005 | — | 7.24 | 7.24 | < 0.005 | < 0.005 | 0.01    | 7.34 |
| Vendor  | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 3.45 | 3.45 | < 0.005 | < 0.005 | < 0.005 | 3.61 |
| Hauling | < 0.005 | < 0.005 | 0.05    | 0.02    | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 37.7 | 37.7 | < 0.005 | 0.01    | 0.04    | 39.6 |

3.4. Site Preparation (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          | 1.69    | 1.41    | 12.5 | 16.4 | 0.02    | 0.53    | —     | 0.53  | 0.49    | —      | 0.49   | —    | 2,419 | 2,419 | 0.10    | 0.02    | —    | 2,428 |
| Dust From Material Movement | —       | —       | —    | —    | —       | —       | 0.14  | 0.14  | —       | 0.01   | 0.01   | —    | —     | —     | —       | —       | —    | —     |
| Demolition                  | —       | —       | —    | —    | —       | —       | 2.48  | 2.48  | —       | 0.38   | 0.38   | —    | —     | —     | —       | —       | —    | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.04 | 0.03 | < 0.005 | < 0.005 | 0.86  | 0.86  | < 0.005 | 0.09   | 0.09   | —    | 16.9  | 16.9  | < 0.005 | < 0.005 | 0.03 | 17.8  |
| Daily, Winter (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Average Daily               | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 0.07    | 0.06    | 0.51 | 0.67 | < 0.005 | 0.02    | —     | 0.02  | 0.02    | —      | 0.02   | —    | 99.4  | 99.4  | < 0.005 | < 0.005 | —    | 99.8  |

|                             |         |         |         |         |         |         |         |         |         |         |         |   |       |       |         |         |         |       |
|-----------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|-------|-------|---------|---------|---------|-------|
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.01    | 0.01    | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Demolition                  | —       | —       | —       | —       | —       | —       | 0.10    | 0.10    | —       | 0.02    | 0.02    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.03    | 0.03    | < 0.005 | < 0.005 | < 0.005 | — | 0.70  | 0.70  | < 0.005 | < 0.005 | < 0.005 | 0.73  |
| Annual                      | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 0.01    | 0.01    | 0.09    | 0.12    | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | —       | < 0.005 | — | 16.5  | 16.5  | < 0.005 | < 0.005 | —       | 16.5  |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Demolition                  | —       | —       | —       | —       | —       | —       | 0.02    | 0.02    | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 0.12  | 0.12  | < 0.005 | < 0.005 | < 0.005 | 0.12  |
| Offsite                     | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Summer (Max)         | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.38    | 0.34    | 0.35    | 5.57    | 0.00    | 0.00    | 1.05    | 1.05    | 0.00    | 0.25    | 0.25    | — | 1,106 | 1,106 | 0.05    | 0.04    | 4.05    | 1,123 |
| Vendor                      | 0.04    | 0.01    | 0.58    | 0.28    | < 0.005 | 0.01    | 0.14    | 0.14    | < 0.005 | 0.04    | 0.04    | — | 508   | 508   | 0.02    | 0.07    | 1.39    | 531   |
| Hauling                     | 0.43    | 0.09    | 6.80    | 2.65    | 0.04    | 0.07    | 1.48    | 1.55    | 0.07    | 0.41    | 0.48    | — | 5,542 | 5,542 | 0.30    | 0.87    | 12.9    | 5,822 |
| Daily, Winter (Max)         | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Average Daily               | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.02    | 0.01    | 0.02    | 0.20    | 0.00    | 0.00    | 0.04    | 0.04    | 0.00    | 0.01    | 0.01    | — | 43.7  | 43.7  | < 0.005 | < 0.005 | 0.07    | 44.3  |
| Vendor                      | < 0.005 | < 0.005 | 0.02    | 0.01    | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 20.9  | 20.9  | < 0.005 | < 0.005 | 0.02    | 21.8  |

|         |         |         |         |         |         |         |         |         |         |         |         |   |      |      |         |         |         |      |
|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|---------|------|
| Hauling | 0.02    | < 0.005 | 0.29    | 0.11    | < 0.005 | < 0.005 | 0.06    | 0.06    | < 0.005 | 0.02    | 0.02    | — | 228  | 228  | 0.01    | 0.04    | 0.23    | 239  |
| Annual  | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker  | < 0.005 | < 0.005 | < 0.005 | 0.04    | 0.00    | 0.00    | 0.01    | 0.01    | 0.00    | < 0.005 | < 0.005 | — | 7.24 | 7.24 | < 0.005 | < 0.005 | 0.01    | 7.34 |
| Vendor  | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 3.45 | 3.45 | < 0.005 | < 0.005 | < 0.005 | 3.61 |
| Hauling | < 0.005 | < 0.005 | 0.05    | 0.02    | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 37.7 | 37.7 | < 0.005 | 0.01    | 0.04    | 39.6 |

3.5. Grading (2025) - Unmitigated

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

| Location                    | TOG     | ROG     | NOx  | CO   | SO2     | PM10E   | PM10D | PM10T | PM2.5E  | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4     | N2O     | R       | CO2e  |
|-----------------------------|---------|---------|------|------|---------|---------|-------|-------|---------|--------|--------|------|-------|-------|---------|---------|---------|-------|
| Onsite                      | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —       | —     |
| Daily, Summer (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 2.53    | 2.12    | 18.3 | 22.7 | 0.03    | 0.90    | —     | 0.90  | 0.83    | —      | 0.83   | —    | 3,358 | 3,358 | 0.14    | 0.03    | —       | 3,370 |
| Dust From Material Movement | —       | —       | —    | —    | —       | —       | 0.42  | 0.42  | —       | 0.04   | 0.04   | —    | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.04 | 0.03 | < 0.005 | < 0.005 | 0.86  | 0.86  | < 0.005 | 0.09   | 0.09   | —    | 16.9  | 16.9  | < 0.005 | < 0.005 | 0.03    | 17.8  |
| Daily, Winter (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 2.53    | 2.12    | 18.3 | 22.7 | 0.03    | 0.90    | —     | 0.90  | 0.83    | —      | 0.83   | —    | 3,358 | 3,358 | 0.14    | 0.03    | —       | 3,370 |
| Dust From Material Movement | —       | —       | —    | —    | —       | —       | 0.42  | 0.42  | —       | 0.04   | 0.04   | —    | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.04 | 0.03 | < 0.005 | < 0.005 | 0.86  | 0.86  | < 0.005 | 0.09   | 0.09   | —    | 17.0  | 17.0  | < 0.005 | < 0.005 | < 0.005 | 17.8  |

|                             |         |         |         |         |         |         |      |      |         |         |         |   |       |       |         |         |         |       |
|-----------------------------|---------|---------|---------|---------|---------|---------|------|------|---------|---------|---------|---|-------|-------|---------|---------|---------|-------|
| Average Daily               | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 0.52    | 0.44    | 3.75    | 4.67    | 0.01    | 0.19    | —    | 0.19 | 0.17    | —       | 0.17    | — | 690   | 690   | 0.03    | 0.01    | —       | 692   |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.09 | 0.09 | —       | 0.01    | 0.01    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | 0.17 | 0.17 | < 0.005 | 0.02    | 0.02    | — | 3.48  | 3.48  | < 0.005 | < 0.005 | < 0.005 | 3.66  |
| Annual                      | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 0.09    | 0.08    | 0.68    | 0.85    | < 0.005 | 0.03    | —    | 0.03 | 0.03    | —       | 0.03    | — | 114   | 114   | < 0.005 | < 0.005 | —       | 115   |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.02 | 0.02 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | < 0.005 | < 0.005 | — | 0.58  | 0.58  | < 0.005 | < 0.005 | < 0.005 | 0.61  |
| Offsite                     | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Summer (Max)         | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.38    | 0.34    | 0.35    | 5.57    | 0.00    | 0.00    | 1.05 | 1.05 | 0.00    | 0.25    | 0.25    | — | 1,106 | 1,106 | 0.05    | 0.04    | 4.05    | 1,123 |
| Vendor                      | 0.04    | 0.01    | 0.58    | 0.28    | < 0.005 | 0.01    | 0.14 | 0.14 | < 0.005 | 0.04    | 0.04    | — | 508   | 508   | 0.02    | 0.07    | 1.39    | 531   |
| Hauling                     | 0.65    | 0.13    | 10.2    | 3.97    | 0.06    | 0.11    | 2.22 | 2.33 | 0.11    | 0.61    | 0.71    | — | 8,313 | 8,313 | 0.45    | 1.30    | 19.3    | 8,732 |
| Daily, Winter (Max)         | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.38    | 0.34    | 0.38    | 4.72    | 0.00    | 0.00    | 1.05 | 1.05 | 0.00    | 0.25    | 0.25    | — | 1,048 | 1,048 | 0.05    | 0.04    | 0.10    | 1,062 |
| Vendor                      | 0.04    | 0.01    | 0.60    | 0.29    | < 0.005 | 0.01    | 0.14 | 0.14 | < 0.005 | 0.04    | 0.04    | — | 508   | 508   | 0.02    | 0.07    | 0.04    | 530   |
| Hauling                     | 0.63    | 0.12    | 10.6    | 4.01    | 0.06    | 0.11    | 2.22 | 2.33 | 0.11    | 0.61    | 0.71    | — | 8,316 | 8,316 | 0.45    | 1.30    | 0.50    | 8,717 |

|               |         |         |      |      |         |         |      |      |         |         |         |   |       |       |         |         |      |       |
|---------------|---------|---------|------|------|---------|---------|------|------|---------|---------|---------|---|-------|-------|---------|---------|------|-------|
| Average Daily | —       | —       | —    | —    | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Worker        | 0.08    | 0.07    | 0.09 | 1.02 | 0.00    | 0.00    | 0.21 | 0.21 | 0.00    | 0.05    | 0.05    | — | 219   | 219   | 0.01    | 0.01    | 0.36 | 222   |
| Vendor        | 0.01    | < 0.005 | 0.12 | 0.06 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | 0.01    | 0.01    | — | 104   | 104   | < 0.005 | 0.01    | 0.12 | 109   |
| Hauling       | 0.13    | 0.03    | 2.20 | 0.82 | 0.01    | 0.02    | 0.45 | 0.47 | 0.02    | 0.12    | 0.15    | — | 1,708 | 1,708 | 0.09    | 0.27    | 1.71 | 1,792 |
| Annual        | —       | —       | —    | —    | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Worker        | 0.01    | 0.01    | 0.02 | 0.19 | 0.00    | 0.00    | 0.04 | 0.04 | 0.00    | 0.01    | 0.01    | — | 36.2  | 36.2  | < 0.005 | < 0.005 | 0.06 | 36.7  |
| Vendor        | < 0.005 | < 0.005 | 0.02 | 0.01 | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | < 0.005 | — | 17.3  | 17.3  | < 0.005 | < 0.005 | 0.02 | 18.0  |
| Hauling       | 0.02    | < 0.005 | 0.40 | 0.15 | < 0.005 | < 0.005 | 0.08 | 0.09 | < 0.005 | 0.02    | 0.03    | — | 283   | 283   | 0.02    | 0.04    | 0.28 | 297   |

3.6. Grading (2025) - Mitigated

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

| Location                    | TOG     | ROG     | NOx  | CO   | SO2     | PM10E   | PM10D | PM10T | PM2.5E  | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4     | N2O     | R    | CO2e  |
|-----------------------------|---------|---------|------|------|---------|---------|-------|-------|---------|--------|--------|------|-------|-------|---------|---------|------|-------|
| Onsite                      | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Daily, Summer (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 2.53    | 2.12    | 18.3 | 22.7 | 0.03    | 0.90    | —     | 0.90  | 0.83    | —      | 0.83   | —    | 3,358 | 3,358 | 0.14    | 0.03    | —    | 3,370 |
| Dust From Material Movement | —       | —       | —    | —    | —       | —       | 0.42  | 0.42  | —       | 0.04   | 0.04   | —    | —     | —     | —       | —       | —    | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.04 | 0.03 | < 0.005 | < 0.005 | 0.86  | 0.86  | < 0.005 | 0.09   | 0.09   | —    | 16.9  | 16.9  | < 0.005 | < 0.005 | 0.03 | 17.8  |
| Daily, Winter (Max)         | —       | —       | —    | —    | —       | —       | —     | —     | —       | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 2.53    | 2.12    | 18.3 | 22.7 | 0.03    | 0.90    | —     | 0.90  | 0.83    | —      | 0.83   | —    | 3,358 | 3,358 | 0.14    | 0.03    | —    | 3,370 |

|                             |         |         |         |         |         |         |      |      |         |         |         |   |       |       |         |         |         |       |
|-----------------------------|---------|---------|---------|---------|---------|---------|------|------|---------|---------|---------|---|-------|-------|---------|---------|---------|-------|
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.42 | 0.42 | —       | 0.04    | 0.04    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.04    | 0.03    | < 0.005 | < 0.005 | 0.86 | 0.86 | < 0.005 | 0.09    | 0.09    | — | 17.0  | 17.0  | < 0.005 | < 0.005 | < 0.005 | 17.8  |
| Average Daily               | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 0.52    | 0.44    | 3.75    | 4.67    | 0.01    | 0.19    | —    | 0.19 | 0.17    | —       | 0.17    | — | 690   | 690   | 0.03    | 0.01    | —       | 692   |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.09 | 0.09 | —       | 0.01    | 0.01    | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | 0.17 | 0.17 | < 0.005 | 0.02    | 0.02    | — | 3.48  | 3.48  | < 0.005 | < 0.005 | < 0.005 | 3.66  |
| Annual                      | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Off-Road Equipment          | 0.09    | 0.08    | 0.68    | 0.85    | < 0.005 | 0.03    | —    | 0.03 | 0.03    | —       | 0.03    | — | 114   | 114   | < 0.005 | < 0.005 | —       | 115   |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | 0.02 | 0.02 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | < 0.005 | < 0.005 | — | 0.58  | 0.58  | < 0.005 | < 0.005 | < 0.005 | 0.61  |
| Offsite                     | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Summer (Max)         | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.38    | 0.34    | 0.35    | 5.57    | 0.00    | 0.00    | 1.05 | 1.05 | 0.00    | 0.25    | 0.25    | — | 1,106 | 1,106 | 0.05    | 0.04    | 4.05    | 1,123 |
| Vendor                      | 0.04    | 0.01    | 0.58    | 0.28    | < 0.005 | 0.01    | 0.14 | 0.14 | < 0.005 | 0.04    | 0.04    | — | 508   | 508   | 0.02    | 0.07    | 1.39    | 531   |
| Hauling                     | 0.65    | 0.13    | 10.2    | 3.97    | 0.06    | 0.11    | 2.22 | 2.33 | 0.11    | 0.61    | 0.71    | — | 8,313 | 8,313 | 0.45    | 1.30    | 19.3    | 8,732 |
| Daily, Winter (Max)         | —       | —       | —       | —       | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |

|               |         |         |      |      |         |         |      |      |         |         |         |   |       |       |         |         |      |       |
|---------------|---------|---------|------|------|---------|---------|------|------|---------|---------|---------|---|-------|-------|---------|---------|------|-------|
| Worker        | 0.38    | 0.34    | 0.38 | 4.72 | 0.00    | 0.00    | 1.05 | 1.05 | 0.00    | 0.25    | 0.25    | — | 1,048 | 1,048 | 0.05    | 0.04    | 0.10 | 1,062 |
| Vendor        | 0.04    | 0.01    | 0.60 | 0.29 | < 0.005 | 0.01    | 0.14 | 0.14 | < 0.005 | 0.04    | 0.04    | — | 508   | 508   | 0.02    | 0.07    | 0.04 | 530   |
| Hauling       | 0.63    | 0.12    | 10.6 | 4.01 | 0.06    | 0.11    | 2.22 | 2.33 | 0.11    | 0.61    | 0.71    | — | 8,316 | 8,316 | 0.45    | 1.30    | 0.50 | 8,717 |
| Average Daily | —       | —       | —    | —    | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Worker        | 0.08    | 0.07    | 0.09 | 1.02 | 0.00    | 0.00    | 0.21 | 0.21 | 0.00    | 0.05    | 0.05    | — | 219   | 219   | 0.01    | 0.01    | 0.36 | 222   |
| Vendor        | 0.01    | < 0.005 | 0.12 | 0.06 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | 0.01    | 0.01    | — | 104   | 104   | < 0.005 | 0.01    | 0.12 | 109   |
| Hauling       | 0.13    | 0.03    | 2.20 | 0.82 | 0.01    | 0.02    | 0.45 | 0.47 | 0.02    | 0.12    | 0.15    | — | 1,708 | 1,708 | 0.09    | 0.27    | 1.71 | 1,792 |
| Annual        | —       | —       | —    | —    | —       | —       | —    | —    | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Worker        | 0.01    | 0.01    | 0.02 | 0.19 | 0.00    | 0.00    | 0.04 | 0.04 | 0.00    | 0.01    | 0.01    | — | 36.2  | 36.2  | < 0.005 | < 0.005 | 0.06 | 36.7  |
| Vendor        | < 0.005 | < 0.005 | 0.02 | 0.01 | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | < 0.005 | — | 17.3  | 17.3  | < 0.005 | < 0.005 | 0.02 | 18.0  |
| Hauling       | 0.02    | < 0.005 | 0.40 | 0.15 | < 0.005 | < 0.005 | 0.08 | 0.09 | < 0.005 | 0.02    | 0.03    | — | 283   | 283   | 0.02    | 0.04    | 0.28 | 297   |

3.7. 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) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Daily, Winter (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Off-Road Equipment  | 5.16 | 4.29 | 37.4 | 45.6 | 0.09 | 1.28  | —     | 1.28  | 1.17   | —      | 1.17   | —    | 7,989 | 7,989 | 0.32 | 0.06 | —    | 8,017 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 0.17    | 0.14    | 1.25 | 1.52 | < 0.005 | 0.04    | —       | 0.04    | 0.04    | —       | 0.04    | — | 266   | 266   | 0.01    | < 0.005 | —    | 267   |
| Onsite truck        | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00 | 0.00  |
| Annual              | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment  | 0.03    | 0.03    | 0.23 | 0.28 | < 0.005 | 0.01    | —       | 0.01    | 0.01    | —       | 0.01    | — | 44.0  | 44.0  | < 0.005 | < 0.005 | —    | 44.2  |
| 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  |
| Offsite             | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Daily, Summer (Max) | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Daily, Winter (Max) | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Worker              | 0.76    | 0.68    | 0.77 | 9.44 | 0.00    | 0.00    | 2.09    | 2.09    | 0.00    | 0.49    | 0.49    | — | 2,097 | 2,097 | 0.10    | 0.08    | 0.21 | 2,123 |
| Vendor              | 0.14    | 0.06    | 2.41 | 1.14 | 0.01    | 0.03    | 0.55    | 0.58    | 0.01    | 0.15    | 0.17    | — | 2,031 | 2,031 | 0.08    | 0.28    | 0.14 | 2,119 |
| Hauling             | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00 | 0.00  |
| Average Daily       | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Worker              | 0.03    | 0.02    | 0.03 | 0.33 | 0.00    | 0.00    | 0.07    | 0.07    | 0.00    | 0.02    | 0.02    | — | 70.8  | 70.8  | < 0.005 | < 0.005 | 0.12 | 71.7  |
| Vendor              | < 0.005 | < 0.005 | 0.08 | 0.04 | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | 0.01    | — | 67.6  | 67.6  | < 0.005 | 0.01    | 0.08 | 70.5  |
| Hauling             | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00 | 0.00  |
| Annual              | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —    | —     |
| Worker              | < 0.005 | < 0.005 | 0.01 | 0.06 | 0.00    | 0.00    | 0.01    | 0.01    | 0.00    | < 0.005 | < 0.005 | — | 11.7  | 11.7  | < 0.005 | < 0.005 | 0.02 | 11.9  |
| Vendor              | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 11.2  | 11.2  | < 0.005 | < 0.005 | 0.01 | 11.7  |
| 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  |

3.8. 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) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Daily, Winter (Max) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment  | 5.16 | 4.29 | 37.4 | 45.6 | 0.09    | 1.28  | —     | 1.28  | 1.17   | —      | 1.17   | —    | 7,989 | 7,989 | 0.32    | 0.06    | —    | 8,017 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 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  | 0.17 | 0.14 | 1.25 | 1.52 | < 0.005 | 0.04  | —     | 0.04  | 0.04   | —      | 0.04   | —    | 266   | 266   | 0.01    | < 0.005 | —    | 267   |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00  | 0.00  | 0.00   | 0.00   | 0.00   | —    | 0.00  | 0.00  | 0.00    | 0.00    | 0.00 | 0.00  |
| Annual              | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment  | 0.03 | 0.03 | 0.23 | 0.28 | < 0.005 | 0.01  | —     | 0.01  | 0.01   | —      | 0.01   | —    | 44.0  | 44.0  | < 0.005 | < 0.005 | —    | 44.2  |
| 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  |
| Offsite             | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Daily, Summer (Max) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Daily, Winter (Max) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —       | —       | —    | —     |
| Worker              | 0.76 | 0.68 | 0.77 | 9.44 | 0.00    | 0.00  | 2.09  | 2.09  | 0.00   | 0.49   | 0.49   | —    | 2,097 | 2,097 | 0.10    | 0.08    | 0.21 | 2,123 |
| Vendor              | 0.14 | 0.06 | 2.41 | 1.14 | 0.01    | 0.03  | 0.55  | 0.58  | 0.01   | 0.15   | 0.17   | —    | 2,031 | 2,031 | 0.08    | 0.28    | 0.14 | 2,119 |

|               |         |         |      |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|---------------|---------|---------|------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Hauling       | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Average Daily | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker        | 0.03    | 0.02    | 0.03 | 0.33 | 0.00    | 0.00    | 0.07    | 0.07    | 0.00    | 0.02    | 0.02    | — | 70.8 | 70.8 | < 0.005 | < 0.005 | 0.12 | 71.7 |
| Vendor        | < 0.005 | < 0.005 | 0.08 | 0.04 | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | 0.01    | — | 67.6 | 67.6 | < 0.005 | 0.01    | 0.08 | 70.5 |
| Hauling       | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual        | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker        | < 0.005 | < 0.005 | 0.01 | 0.06 | 0.00    | 0.00    | 0.01    | 0.01    | 0.00    | < 0.005 | < 0.005 | — | 11.7 | 11.7 | < 0.005 | < 0.005 | 0.02 | 11.9 |
| Vendor        | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 11.2 | 11.2 | < 0.005 | < 0.005 | 0.01 | 11.7 |
| 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 |

3.9. 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) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Off-Road Equipment  | 4.93 | 4.10 | 36.0 | 45.4 | 0.09 | 1.14  | —     | 1.14  | 1.05   | —      | 1.05   | —    | 7,990 | 7,990 | 0.32 | 0.06 | —    | 8,017 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 4.93 | 4.10 | 36.0 | 45.4 | 0.09 | 1.14  | —     | 1.14  | 1.05   | —      | 1.05   | —    | 7,990 | 7,990 | 0.32 | 0.06 | —    | 8,017 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 3.52 | 2.93 | 25.7 | 32.4 | 0.06    | 0.82    | —    | 0.82 | 0.75    | —    | 0.75 | — | 5,707 | 5,707 | 0.23 | 0.05 | —    | 5,727 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 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  | 0.64 | 0.53 | 4.69 | 5.92 | 0.01    | 0.15    | —    | 0.15 | 0.14    | —    | 0.14 | — | 945   | 945   | 0.04 | 0.01 | —    | 948   |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 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              | 0.66 | 0.59 | 0.62 | 10.3 | 0.00    | 0.00    | 2.09 | 2.09 | 0.00    | 0.49 | 0.49 | — | 2,168 | 2,168 | 0.09 | 0.08 | 7.33 | 2,200 |
| Vendor              | 0.14 | 0.06 | 2.20 | 1.06 | 0.01    | 0.03    | 0.55 | 0.58 | 0.01    | 0.15 | 0.17 | — | 1,995 | 1,995 | 0.08 | 0.28 | 5.39 | 2,088 |
| 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              | 0.66 | 0.59 | 0.70 | 8.82 | 0.00    | 0.00    | 2.09 | 2.09 | 0.00    | 0.49 | 0.49 | — | 2,055 | 2,055 | 0.09 | 0.08 | 0.19 | 2,080 |
| Vendor              | 0.14 | 0.06 | 2.30 | 1.09 | 0.01    | 0.03    | 0.55 | 0.58 | 0.01    | 0.15 | 0.17 | — | 1,996 | 1,996 | 0.08 | 0.28 | 0.14 | 2,083 |
| 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              | 0.47 | 0.42 | 0.54 | 6.59 | 0.00    | 0.00    | 1.48 | 1.48 | 0.00    | 0.35 | 0.35 | — | 1,490 | 1,490 | 0.07 | 0.05 | 2.27 | 1,510 |
| Vendor              | 0.10 | 0.04 | 1.65 | 0.77 | 0.01    | 0.02    | 0.39 | 0.41 | 0.01    | 0.11 | 0.12 | — | 1,426 | 1,426 | 0.06 | 0.20 | 1.66 | 1,489 |
| 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              | 0.09 | 0.08 | 0.10 | 1.20 | 0.00    | 0.00    | 0.27 | 0.27 | 0.00    | 0.06 | 0.06 | — | 247   | 247   | 0.01 | 0.01 | 0.38 | 250   |
| Vendor              | 0.02 | 0.01 | 0.30 | 0.14 | < 0.005 | < 0.005 | 0.07 | 0.07 | < 0.005 | 0.02 | 0.02 | — | 236   | 236   | 0.01 | 0.03 | 0.28 | 247   |
| 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. 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) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Off-Road Equipment  | 4.93 | 4.10 | 36.0 | 45.4 | 0.09 | 1.14  | —     | 1.14  | 1.05   | —      | 1.05   | —    | 7,990 | 7,990 | 0.32 | 0.06 | —    | 8,017 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 4.93 | 4.10 | 36.0 | 45.4 | 0.09 | 1.14  | —     | 1.14  | 1.05   | —      | 1.05   | —    | 7,990 | 7,990 | 0.32 | 0.06 | —    | 8,017 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 3.52 | 2.93 | 25.7 | 32.4 | 0.06 | 0.82  | —     | 0.82  | 0.75   | —      | 0.75   | —    | 5,707 | 5,707 | 0.23 | 0.05 | —    | 5,727 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 0.64 | 0.53 | 4.69 | 5.92 | 0.01 | 0.15  | —     | 0.15  | 0.14   | —      | 0.14   | —    | 945   | 945   | 0.04 | 0.01 | —    | 948   |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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              | 0.66 | 0.59 | 0.62 | 10.3 | 0.00    | 0.00    | 2.09 | 2.09 | 0.00    | 0.49 | 0.49 | — | 2,168 | 2,168 | 0.09 | 0.08 | 7.33 | 2,200 |
| Vendor              | 0.14 | 0.06 | 2.20 | 1.06 | 0.01    | 0.03    | 0.55 | 0.58 | 0.01    | 0.15 | 0.17 | — | 1,995 | 1,995 | 0.08 | 0.28 | 5.39 | 2,088 |
| 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              | 0.66 | 0.59 | 0.70 | 8.82 | 0.00    | 0.00    | 2.09 | 2.09 | 0.00    | 0.49 | 0.49 | — | 2,055 | 2,055 | 0.09 | 0.08 | 0.19 | 2,080 |
| Vendor              | 0.14 | 0.06 | 2.30 | 1.09 | 0.01    | 0.03    | 0.55 | 0.58 | 0.01    | 0.15 | 0.17 | — | 1,996 | 1,996 | 0.08 | 0.28 | 0.14 | 2,083 |
| 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              | 0.47 | 0.42 | 0.54 | 6.59 | 0.00    | 0.00    | 1.48 | 1.48 | 0.00    | 0.35 | 0.35 | — | 1,490 | 1,490 | 0.07 | 0.05 | 2.27 | 1,510 |
| Vendor              | 0.10 | 0.04 | 1.65 | 0.77 | 0.01    | 0.02    | 0.39 | 0.41 | 0.01    | 0.11 | 0.12 | — | 1,426 | 1,426 | 0.06 | 0.20 | 1.66 | 1,489 |
| 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              | 0.09 | 0.08 | 0.10 | 1.20 | 0.00    | 0.00    | 0.27 | 0.27 | 0.00    | 0.06 | 0.06 | — | 247   | 247   | 0.01 | 0.01 | 0.38 | 250   |
| Vendor              | 0.02 | 0.01 | 0.30 | 0.14 | < 0.005 | < 0.005 | 0.07 | 0.07 | < 0.005 | 0.02 | 0.02 | — | 236   | 236   | 0.01 | 0.03 | 0.28 | 247   |
| 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. Building Construction (2027) - Unmitigated

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

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

|                     |      |      |      |      |      |      |      |      |      |      |      |   |       |       |      |      |      |       |
|---------------------|------|------|------|------|------|------|------|------|------|------|------|---|-------|-------|------|------|------|-------|
| Off-Road Equipment  | 4.74 | 3.95 | 34.9 | 45.2 | 0.09 | 1.04 | —    | 1.04 | 0.95 | —    | 0.95 | — | 7,989 | 7,989 | 0.32 | 0.06 | —    | 8,016 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 4.74 | 3.95 | 34.9 | 45.2 | 0.09 | 1.04 | —    | 1.04 | 0.95 | —    | 0.95 | — | 7,989 | 7,989 | 0.32 | 0.06 | —    | 8,016 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 2.28 | 1.90 | 16.8 | 21.8 | 0.04 | 0.50 | —    | 0.50 | 0.46 | —    | 0.46 | — | 3,846 | 3,846 | 0.16 | 0.03 | —    | 3,859 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 0.42 | 0.35 | 3.07 | 3.97 | 0.01 | 0.09 | —    | 0.09 | 0.08 | —    | 0.08 | — | 637   | 637   | 0.03 | 0.01 | —    | 639   |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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              | 0.64 | 0.57 | 0.55 | 9.61 | 0.00 | 0.00 | 2.09 | 2.09 | 0.00 | 0.49 | 0.49 | — | 2,126 | 2,126 | 0.09 | 0.08 | 6.63 | 2,158 |
| Vendor              | 0.13 | 0.06 | 2.11 | 1.00 | 0.01 | 0.01 | 0.55 | 0.56 | 0.01 | 0.15 | 0.17 | — | 1,957 | 1,957 | 0.08 | 0.27 | 5.10 | 2,044 |
| 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              | 0.64 | 0.56 | 0.69 | 8.14 | 0.00 | 0.00 | 2.09 | 2.09 | 0.00 | 0.49 | 0.49 | — | 2,016 | 2,016 | 0.03 | 0.08 | 0.17 | 2,039 |

|               |      |      |      |      |         |         |      |      |         |      |      |   |       |       |         |      |      |       |
|---------------|------|------|------|------|---------|---------|------|------|---------|------|------|---|-------|-------|---------|------|------|-------|
| Vendor        | 0.13 | 0.06 | 2.19 | 1.03 | 0.01    | 0.01    | 0.55 | 0.56 | 0.01    | 0.15 | 0.17 | — | 1,958 | 1,958 | 0.08    | 0.27 | 0.13 | 2,041 |
| 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        | 0.31 | 0.27 | 0.33 | 4.12 | 0.00    | 0.00    | 0.99 | 0.99 | 0.00    | 0.23 | 0.23 | — | 985   | 985   | 0.01    | 0.04 | 1.37 | 997   |
| Vendor        | 0.06 | 0.03 | 1.06 | 0.49 | 0.01    | 0.01    | 0.26 | 0.27 | 0.01    | 0.07 | 0.08 | — | 942   | 942   | 0.04    | 0.13 | 1.06 | 983   |
| 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        | 0.06 | 0.05 | 0.06 | 0.75 | 0.00    | 0.00    | 0.18 | 0.18 | 0.00    | 0.04 | 0.04 | — | 163   | 163   | < 0.005 | 0.01 | 0.23 | 165   |
| Vendor        | 0.01 | 0.01 | 0.19 | 0.09 | < 0.005 | < 0.005 | 0.05 | 0.05 | < 0.005 | 0.01 | 0.01 | — | 156   | 156   | 0.01    | 0.02 | 0.18 | 163   |
| Hauling       | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00  | 0.00  | 0.00    | 0.00 | 0.00 | 0.00  |

3.12. Building Construction (2027) - Mitigated

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

| Location            | TOG  | ROG  | NOx  | CO   | SO2  | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4  | N2O  | R    | CO2e  |
|---------------------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|------|-------|-------|------|------|------|-------|
| Onsite              | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Daily, Summer (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Off-Road Equipment  | 4.74 | 3.95 | 34.9 | 45.2 | 0.09 | 1.04  | —     | 1.04  | 0.95   | —      | 0.95   | —    | 7,989 | 7,989 | 0.32 | 0.06 | —    | 8,016 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 4.74 | 3.95 | 34.9 | 45.2 | 0.09 | 1.04  | —     | 1.04  | 0.95   | —      | 0.95   | —    | 7,989 | 7,989 | 0.32 | 0.06 | —    | 8,016 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 2.28 | 1.90 | 16.8 | 21.8 | 0.04 | 0.50 | —    | 0.50 | 0.46 | —    | 0.46 | — | 3,846 | 3,846 | 0.16    | 0.03 | —    | 3,859 |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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  | 0.42 | 0.35 | 3.07 | 3.97 | 0.01 | 0.09 | —    | 0.09 | 0.08 | —    | 0.08 | — | 637   | 637   | 0.03    | 0.01 | —    | 639   |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 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              | 0.64 | 0.57 | 0.55 | 9.61 | 0.00 | 0.00 | 2.09 | 2.09 | 0.00 | 0.49 | 0.49 | — | 2,126 | 2,126 | 0.09    | 0.08 | 6.63 | 2,158 |
| Vendor              | 0.13 | 0.06 | 2.11 | 1.00 | 0.01 | 0.01 | 0.55 | 0.56 | 0.01 | 0.15 | 0.17 | — | 1,957 | 1,957 | 0.08    | 0.27 | 5.10 | 2,044 |
| 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              | 0.64 | 0.56 | 0.69 | 8.14 | 0.00 | 0.00 | 2.09 | 2.09 | 0.00 | 0.49 | 0.49 | — | 2,016 | 2,016 | 0.03    | 0.08 | 0.17 | 2,039 |
| Vendor              | 0.13 | 0.06 | 2.19 | 1.03 | 0.01 | 0.01 | 0.55 | 0.56 | 0.01 | 0.15 | 0.17 | — | 1,958 | 1,958 | 0.08    | 0.27 | 0.13 | 2,041 |
| 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              | 0.31 | 0.27 | 0.33 | 4.12 | 0.00 | 0.00 | 0.99 | 0.99 | 0.00 | 0.23 | 0.23 | — | 985   | 985   | 0.01    | 0.04 | 1.37 | 997   |
| Vendor              | 0.06 | 0.03 | 1.06 | 0.49 | 0.01 | 0.01 | 0.26 | 0.27 | 0.01 | 0.07 | 0.08 | — | 942   | 942   | 0.04    | 0.13 | 1.06 | 983   |
| 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              | 0.06 | 0.05 | 0.06 | 0.75 | 0.00 | 0.00 | 0.18 | 0.18 | 0.00 | 0.04 | 0.04 | — | 163   | 163   | < 0.005 | 0.01 | 0.23 | 165   |

|         |      |      |      |      |         |         |      |      |         |      |      |   |      |      |      |      |      |      |
|---------|------|------|------|------|---------|---------|------|------|---------|------|------|---|------|------|------|------|------|------|
| Vendor  | 0.01 | 0.01 | 0.19 | 0.09 | < 0.005 | < 0.005 | 0.05 | 0.05 | < 0.005 | 0.01 | 0.01 | — | 156  | 156  | 0.01 | 0.02 | 0.18 | 163  |
| 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. Paving (2027) - Unmitigated

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

| Location                    | TOG  | ROG  | NOx  | CO   | SO2     | PM10E | PM10D | PM10T | PM2.5E | PM2.5D  | PM2.5T  | BCO2 | NBCO2 | CO2T  | CH4  | N2O     | R    | CO2e  |
|-----------------------------|------|------|------|------|---------|-------|-------|-------|--------|---------|---------|------|-------|-------|------|---------|------|-------|
| Onsite                      | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —    | —       | —    | —     |
| Daily, Summer (Max)         | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —    | —       | —    | —     |
| Off-Road Equipment          | 2.05 | 1.72 | 15.8 | 22.9 | 0.04    | 0.58  | —     | 0.58  | 0.53   | —       | 0.53    | —    | 3,505 | 3,505 | 0.14 | 0.03    | —    | 3,517 |
| Dust From Material Movement | —    | —    | —    | —    | —       | —     | 0.10  | 0.10  | —      | 0.01    | 0.01    | —    | —     | —     | —    | —       | —    | —     |
| Paving                      | —    | 0.05 | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —    | —       | —    | —     |
| Onsite truck                | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00  | 0.00  | 0.00   | 0.00    | 0.00    | —    | 0.00  | 0.00  | 0.00 | 0.00    | 0.00 | 0.00  |
| Daily, Winter (Max)         | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —    | —       | —    | —     |
| Average Daily               | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —    | —       | —    | —     |
| Off-Road Equipment          | 0.25 | 0.21 | 1.95 | 2.82 | < 0.005 | 0.07  | —     | 0.07  | 0.07   | —       | 0.07    | —    | 432   | 432   | 0.02 | < 0.005 | —    | 434   |
| Dust From Material Movement | —    | —    | —    | —    | —       | —     | 0.01  | 0.01  | —      | < 0.005 | < 0.005 | —    | —     | —     | —    | —       | —    | —     |
| Paving                      | —    | 0.01 | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —    | —       | —    | —     |
| Onsite truck                | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00  | 0.00  | 0.00   | 0.00    | 0.00    | —    | 0.00  | 0.00  | 0.00 | 0.00    | 0.00 | 0.00  |

|                             |         |         |         |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|-----------------------------|---------|---------|---------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Annual                      | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment          | 0.05    | 0.04    | 0.36    | 0.52 | < 0.005 | 0.01    | —       | 0.01    | 0.01    | —       | 0.01    | — | 71.5 | 71.5 | < 0.005 | < 0.005 | —    | 71.8 |
| Dust From Material Movement | —       | —       | —       | —    | —       | —       | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | — | —    | —    | —       | —       | —    | —    |
| Paving                      | —       | < 0.005 | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck                | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Offsite                     | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Daily, Summer (Max)         | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                      | 0.16    | 0.14    | 0.14    | 2.40 | 0.00    | 0.00    | 0.52    | 0.52    | 0.00    | 0.12    | 0.12    | — | 532  | 532  | 0.02    | 0.02    | 1.66 | 539  |
| Vendor                      | 0.03    | 0.01    | 0.53    | 0.25 | < 0.005 | < 0.005 | 0.14    | 0.14    | < 0.005 | 0.04    | 0.04    | — | 489  | 489  | 0.02    | 0.07    | 1.28 | 511  |
| Hauling                     | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Daily, Winter (Max)         | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Average Daily               | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                      | 0.02    | 0.02    | 0.02    | 0.26 | 0.00    | 0.00    | 0.06    | 0.06    | 0.00    | 0.01    | 0.01    | — | 63.0 | 63.0 | < 0.005 | < 0.005 | 0.09 | 63.9 |
| Vendor                      | < 0.005 | < 0.005 | 0.07    | 0.03 | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | 0.01    | — | 60.3 | 60.3 | < 0.005 | 0.01    | 0.07 | 62.9 |
| Hauling                     | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                      | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                      | < 0.005 | < 0.005 | < 0.005 | 0.05 | 0.00    | 0.00    | 0.01    | 0.01    | 0.00    | < 0.005 | < 0.005 | — | 10.4 | 10.4 | < 0.005 | < 0.005 | 0.01 | 10.6 |
| Vendor                      | < 0.005 | < 0.005 | 0.01    | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 9.99 | 9.99 | < 0.005 | < 0.005 | 0.01 | 10.4 |
| Hauling                     | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |

3.14. Paving (2027) - Mitigated

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

| Location                    | TOG  | ROG  | NOx  | CO   | SO2     | PM10E | PM10D | PM10T | PM2.5E | PM2.5D  | PM2.5T  | BCO2 | NBCO2 | CO2T  | CH4     | N2O     | R    | CO2e  |
|-----------------------------|------|------|------|------|---------|-------|-------|-------|--------|---------|---------|------|-------|-------|---------|---------|------|-------|
| Onsite                      | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —       | —       | —    | —     |
| Daily, Summer (Max)         | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 2.05 | 1.72 | 15.8 | 22.9 | 0.04    | 0.58  | —     | 0.58  | 0.53   | —       | 0.53    | —    | 3,505 | 3,505 | 0.14    | 0.03    | —    | 3,517 |
| Dust From Material Movement | —    | —    | —    | —    | —       | —     | 0.10  | 0.10  | —      | 0.01    | 0.01    | —    | —     | —     | —       | —       | —    | —     |
| Paving                      | —    | 0.05 | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —       | —       | —    | —     |
| Onsite truck                | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00  | 0.00  | 0.00   | 0.00    | 0.00    | —    | 0.00  | 0.00  | 0.00    | 0.00    | 0.00 | 0.00  |
| Daily, Winter (Max)         | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —       | —       | —    | —     |
| Average Daily               | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 0.25 | 0.21 | 1.95 | 2.82 | < 0.005 | 0.07  | —     | 0.07  | 0.07   | —       | 0.07    | —    | 432   | 432   | 0.02    | < 0.005 | —    | 434   |
| Dust From Material Movement | —    | —    | —    | —    | —       | —     | 0.01  | 0.01  | —      | < 0.005 | < 0.005 | —    | —     | —     | —       | —       | —    | —     |
| Paving                      | —    | 0.01 | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —       | —       | —    | —     |
| Onsite truck                | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00  | 0.00  | 0.00   | 0.00    | 0.00    | —    | 0.00  | 0.00  | 0.00    | 0.00    | 0.00 | 0.00  |
| Annual                      | —    | —    | —    | —    | —       | —     | —     | —     | —      | —       | —       | —    | —     | —     | —       | —       | —    | —     |
| Off-Road Equipment          | 0.05 | 0.04 | 0.36 | 0.52 | < 0.005 | 0.01  | —     | 0.01  | 0.01   | —       | 0.01    | —    | 71.5  | 71.5  | < 0.005 | < 0.005 | —    | 71.8  |

|                             |         |         |         |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|-----------------------------|---------|---------|---------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Dust From Material Movement | —       | —       | —       | —    | —       | —       | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | — | —    | —    | —       | —       | —    | —    |
| Paving                      | —       | < 0.005 | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck                | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Offsite                     | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Daily, Summer (Max)         | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                      | 0.16    | 0.14    | 0.14    | 2.40 | 0.00    | 0.00    | 0.52    | 0.52    | 0.00    | 0.12    | 0.12    | — | 532  | 532  | 0.02    | 0.02    | 1.66 | 539  |
| Vendor                      | 0.03    | 0.01    | 0.53    | 0.25 | < 0.005 | < 0.005 | 0.14    | 0.14    | < 0.005 | 0.04    | 0.04    | — | 489  | 489  | 0.02    | 0.07    | 1.28 | 511  |
| Hauling                     | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Daily, Winter (Max)         | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Average Daily               | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                      | 0.02    | 0.02    | 0.02    | 0.26 | 0.00    | 0.00    | 0.06    | 0.06    | 0.00    | 0.01    | 0.01    | — | 63.0 | 63.0 | < 0.005 | < 0.005 | 0.09 | 63.9 |
| Vendor                      | < 0.005 | < 0.005 | 0.07    | 0.03 | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | 0.01    | — | 60.3 | 60.3 | < 0.005 | 0.01    | 0.07 | 62.9 |
| Hauling                     | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                      | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                      | < 0.005 | < 0.005 | < 0.005 | 0.05 | 0.00    | 0.00    | 0.01    | 0.01    | 0.00    | < 0.005 | < 0.005 | — | 10.4 | 10.4 | < 0.005 | < 0.005 | 0.01 | 10.6 |
| Vendor                      | < 0.005 | < 0.005 | 0.01    | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 9.99 | 9.99 | < 0.005 | < 0.005 | 0.01 | 10.4 |
| Hauling                     | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |

3.15. Architectural Coating (2027) - Unmitigated

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

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

|                         |      |      |      |      |         |         |      |         |         |      |         |   |      |      |         |         |      |      |
|-------------------------|------|------|------|------|---------|---------|------|---------|---------|------|---------|---|------|------|---------|---------|------|------|
| Onsite                  | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Daily, Summer (Max)     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment      | 0.56 | 0.46 | 4.30 | 4.51 | 0.01    | 0.10    | —    | 0.10    | 0.09    | —    | 0.09    | — | 707  | 707  | 0.03    | 0.01    | —    | 709  |
| Architect ural Coatings | —    | 24.6 | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Daily, Winter (Max)     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Average Daily           | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment      | 0.07 | 0.06 | 0.53 | 0.56 | < 0.005 | 0.01    | —    | 0.01    | 0.01    | —    | 0.01    | — | 87.2 | 87.2 | < 0.005 | < 0.005 | —    | 87.5 |
| Architect ural Coatings | —    | 3.03 | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                  | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment      | 0.01 | 0.01 | 0.10 | 0.10 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | — | 14.4 | 14.4 | < 0.005 | < 0.005 | —    | 14.5 |
| Architect ural Coatings | —    | 0.55 | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 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                    | 0.16    | 0.14    | 0.14    | 2.40 | 0.00    | 0.00    | 0.52    | 0.52    | 0.00    | 0.12    | 0.12    | — | 532  | 532  | 0.02    | 0.02    | 1.66 | 539  |
| Vendor                    | 0.03    | 0.01    | 0.53    | 0.25 | < 0.005 | < 0.005 | 0.14    | 0.14    | < 0.005 | 0.04    | 0.04    | — | 489  | 489  | 0.02    | 0.07    | 1.28 | 511  |
| 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,<br>Winter<br>(Max) | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Average<br>Daily          | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                    | 0.02    | 0.02    | 0.02    | 0.26 | 0.00    | 0.00    | 0.06    | 0.06    | 0.00    | 0.01    | 0.01    | — | 63.0 | 63.0 | < 0.005 | < 0.005 | 0.09 | 63.9 |
| Vendor                    | < 0.005 | < 0.005 | 0.07    | 0.03 | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | 0.01    | — | 60.3 | 60.3 | < 0.005 | 0.01    | 0.07 | 62.9 |
| Hauling                   | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                    | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                    | < 0.005 | < 0.005 | < 0.005 | 0.05 | 0.00    | 0.00    | 0.01    | 0.01    | 0.00    | < 0.005 | < 0.005 | — | 10.4 | 10.4 | < 0.005 | < 0.005 | 0.01 | 10.6 |
| Vendor                    | < 0.005 | < 0.005 | 0.01    | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 9.99 | 9.99 | < 0.005 | < 0.005 | 0.01 | 10.4 |
| Hauling                   | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |

3.16. Architectural Coating (2027) - Mitigated

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

| Location                      | TOG  | ROG  | NOx  | CO   | SO2  | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4  | N2O  | R    | CO2e |
|-------------------------------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|------|-------|------|------|------|------|------|
| Onsite                        | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | —    | —    |
| Daily,<br>Summer<br>(Max)     | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | —    | —    |
| Off-Road<br>Equipment         | 0.56 | 0.46 | 4.30 | 4.51 | 0.01 | 0.10  | —     | 0.10  | 0.09   | —      | 0.09   | —    | 707   | 707  | 0.03 | 0.01 | —    | 709  |
| Architect<br>ural<br>Coatings | —    | 24.6 | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | —    | —    |
| Onsite<br>truck               | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00  | 0.00  | 0.00  | 0.00   | 0.00   | 0.00   | —    | 0.00  | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

|                         |      |      |      |      |         |         |      |         |         |      |         |   |      |      |         |         |      |      |
|-------------------------|------|------|------|------|---------|---------|------|---------|---------|------|---------|---|------|------|---------|---------|------|------|
| Daily, Winter (Max)     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Average Daily           | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment      | 0.07 | 0.06 | 0.53 | 0.56 | < 0.005 | 0.01    | —    | 0.01    | 0.01    | —    | 0.01    | — | 87.2 | 87.2 | < 0.005 | < 0.005 | —    | 87.5 |
| Architect ural Coatings | —    | 3.03 | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                  | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment      | 0.01 | 0.01 | 0.10 | 0.10 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | — | 14.4 | 14.4 | < 0.005 | < 0.005 | —    | 14.5 |
| Architect ural Coatings | —    | 0.55 | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 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                  | 0.16 | 0.14 | 0.14 | 2.40 | 0.00    | 0.00    | 0.52 | 0.52    | 0.00    | 0.12 | 0.12    | — | 532  | 532  | 0.02    | 0.02    | 1.66 | 539  |
| Vendor                  | 0.03 | 0.01 | 0.53 | 0.25 | < 0.005 | < 0.005 | 0.14 | 0.14    | < 0.005 | 0.04 | 0.04    | — | 489  | 489  | 0.02    | 0.07    | 1.28 | 511  |
| Hauling                 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Daily, Winter (Max)     | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Average Daily           | —    | —    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                  | 0.02 | 0.02 | 0.02 | 0.26 | 0.00    | 0.00    | 0.06 | 0.06    | 0.00    | 0.01 | 0.01    | — | 63.0 | 63.0 | < 0.005 | < 0.005 | 0.09 | 63.9 |

|         |         |         |         |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|---------|---------|---------|---------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Vendor  | < 0.005 | < 0.005 | 0.07    | 0.03 | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | 0.01    | — | 60.3 | 60.3 | < 0.005 | 0.01    | 0.07 | 62.9 |
| Hauling | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual  | —       | —       | —       | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker  | < 0.005 | < 0.005 | < 0.005 | 0.05 | 0.00    | 0.00    | 0.01    | 0.01    | 0.00    | < 0.005 | < 0.005 | — | 10.4 | 10.4 | < 0.005 | < 0.005 | 0.01 | 10.6 |
| Vendor  | < 0.005 | < 0.005 | 0.01    | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 9.99 | 9.99 | < 0.005 | < 0.005 | 0.01 | 10.4 |
| Hauling | 0.00    | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.1.2. Mitigated

Mobile source emissions results are presented in Sections 2.5. No further detailed breakdown of emissions is available.

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) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | — | —     |
| Office Park         | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 1,361 | 1,361 | 0.12 | 0.02 | — | 1,369 |

|                                     |   |   |   |   |   |   |   |   |   |   |   |   |       |       |         |         |   |       |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|-------|-------|---------|---------|---|-------|
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | — | 535   | 535   | 0.05    | 0.01    | — | 538   |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | — | 54.1  | 54.1  | < 0.005 | < 0.005 | — | 54.4  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | — | 770   | 770   | 0.07    | 0.01    | — | 775   |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | — | 2,228 | 2,228 | 0.19    | 0.03    | — | 2,241 |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | — | 936   | 936   | 0.08    | 0.01    | — | 941   |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | — | 196   | 196   | 0.02    | < 0.005 | — | 197   |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | — | 6,080 | 6,080 | 0.52    | 0.07    | — | 6,116 |
| Daily, Winter (Max)                 | — | — | — | — | — | — | — | — | — | — | — | — | —     | —     | —       | —       | — | —     |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | — | 1,361 | 1,361 | 0.12    | 0.02    | — | 1,369 |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | — | 535   | 535   | 0.05    | 0.01    | — | 538   |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | — | 54.1  | 54.1  | < 0.005 | < 0.005 | — | 54.4  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | — | 770   | 770   | 0.07    | 0.01    | — | 775   |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | — | 2,228 | 2,228 | 0.19    | 0.03    | — | 2,241 |

|                                     |   |   |   |   |   |   |   |   |   |   |   |   |       |       |         |         |   |       |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|-------|-------|---------|---------|---|-------|
| High Turnover (Sit Down Restaurart) | — | — | — | — | — | — | — | — | — | — | — | — | 936   | 936   | 0.08    | 0.01    | — | 941   |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | — | 196   | 196   | 0.02    | < 0.005 | — | 197   |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | — | 6,080 | 6,080 | 0.52    | 0.07    | — | 6,116 |
| Annual                              | — | — | — | — | — | — | — | — | — | — | — | — | —     | —     | —       | —       | — | —     |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | — | 225   | 225   | 0.02    | < 0.005 | — | 227   |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | — | 88.6  | 88.6  | 0.01    | < 0.005 | — | 89.1  |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | — | 8.96  | 8.96  | < 0.005 | < 0.005 | — | 9.01  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | — | 128   | 128   | 0.01    | < 0.005 | — | 128   |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | — | 369   | 369   | 0.03    | < 0.005 | — | 371   |
| High Turnover (Sit Down Restaurart) | — | — | — | — | — | — | — | — | — | — | — | — | 155   | 155   | 0.01    | < 0.005 | — | 156   |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | — | 32.4  | 32.4  | < 0.005 | < 0.005 | — | 32.6  |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | — | 1,007 | 1,007 | 0.09    | 0.01    | — | 1,013 |

### 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)                 | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —     | —       | —       | — | —     |
| Office Park                         | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 1,324 | 1,324 | 0.11    | 0.02    | — | 1,332 |
| Unenclosed Parking with Elevator    | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 535   | 535   | 0.05    | 0.01    | — | 538   |
| Strip Mall                          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 52.5  | 52.5  | < 0.005 | < 0.005 | — | 52.8  |
| Arena                               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 751   | 751   | 0.06    | 0.01    | — | 755   |
| General Office Building             | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 2,168 | 2,168 | 0.19    | 0.03    | — | 2,181 |
| High Turnover (Sit Down Restaurant) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 819   | 819   | 0.07    | 0.01    | — | 824   |
| Manufacturing                       | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 191   | 191   | 0.02    | < 0.005 | — | 192   |
| Other Non-Asphalt Surfaces          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 5,840 | 5,840 | 0.50    | 0.07    | — | 5,874 |
| Daily, Winter (Max)                 | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —     | —       | —       | — | —     |
| Office Park                         | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 1,324 | 1,324 | 0.11    | 0.02    | — | 1,332 |

|                                     |   |   |   |   |   |   |   |   |   |   |   |   |       |       |         |         |   |       |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|-------|-------|---------|---------|---|-------|
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | — | 535   | 535   | 0.05    | 0.01    | — | 538   |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | — | 52.5  | 52.5  | < 0.005 | < 0.005 | — | 52.8  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | — | 751   | 751   | 0.06    | 0.01    | — | 755   |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | — | 2,168 | 2,168 | 0.19    | 0.03    | — | 2,181 |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | — | 819   | 819   | 0.07    | 0.01    | — | 824   |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | — | 191   | 191   | 0.02    | < 0.005 | — | 192   |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | — | 5,840 | 5,840 | 0.50    | 0.07    | — | 5,874 |
| Annual                              | — | — | — | — | — | — | — | — | — | — | — | — | —     | —     | —       | —       | — | —     |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | — | 219   | 219   | 0.02    | < 0.005 | — | 221   |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | — | 88.6  | 88.6  | 0.01    | < 0.005 | — | 89.1  |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | — | 8.69  | 8.69  | < 0.005 | < 0.005 | — | 8.74  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | — | 124   | 124   | 0.01    | < 0.005 | — | 125   |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | — | 359   | 359   | 0.03    | < 0.005 | — | 361   |

|                                     |   |   |   |   |   |   |   |   |   |   |   |   |      |      |         |         |   |      |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|------|------|---------|---------|---|------|
| High Turnover (Sit Down Restaurart) | — | — | — | — | — | — | — | — | — | — | — | — | 136  | 136  | 0.01    | < 0.005 | — | 136  |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | — | 31.6 | 31.6 | < 0.005 | < 0.005 | — | 31.7 |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | — | 967  | 967  | 0.08    | 0.01    | — | 973  |

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)                 | —       | —       | —       | —       | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Office Park                         | 0.03    | 0.02    | 0.30    | 0.25    | < 0.005 | 0.02    | —     | 0.02    | 0.02    | —      | 0.02    | —    | 354   | 354  | 0.03    | < 0.005 | — | 355  |
| Unenclosed Parking with Elevator    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | —     | 0.00    | 0.00    | —      | 0.00    | —    | 0.00  | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Strip Mall                          | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 5.52  | 5.52 | < 0.005 | < 0.005 | — | 5.54 |
| Arena                               | 0.05    | 0.03    | 0.49    | 0.41    | < 0.005 | 0.04    | —     | 0.04    | 0.04    | —      | 0.04    | —    | 580   | 580  | 0.05    | < 0.005 | — | 581  |
| General Office Building             | 0.05    | 0.03    | 0.49    | 0.41    | < 0.005 | 0.04    | —     | 0.04    | 0.04    | —      | 0.04    | —    | 580   | 580  | 0.05    | < 0.005 | — | 582  |
| High Turnover (Sit Down Restaurant) | 0.05    | 0.03    | 0.47    | 0.40    | < 0.005 | 0.04    | —     | 0.04    | 0.04    | —      | 0.04    | —    | 562   | 562  | 0.05    | < 0.005 | — | 563  |

|                                               |         |         |         |         |         |         |   |         |         |   |         |   |       |       |         |         |   |       |
|-----------------------------------------------|---------|---------|---------|---------|---------|---------|---|---------|---------|---|---------|---|-------|-------|---------|---------|---|-------|
| Manufact                                      | 0.01    | 0.01    | 0.12    | 0.10    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 147   | 147   | 0.01    | < 0.005 | — | 148   |
| Other<br>Non-Asphalt<br>Surfaces              | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                                         | 0.21    | 0.10    | 1.87    | 1.57    | 0.01    | 0.14    | — | 0.14    | 0.14    | — | 0.14    | — | 2,228 | 2,228 | 0.20    | < 0.005 | — | 2,234 |
| Daily,<br>Winter<br>(Max)                     | —       | —       | —       | —       | —       | —       | — | —       | —       | — | —       | — | —     | —     | —       | —       | — | —     |
| Office<br>Park                                | 0.03    | 0.02    | 0.30    | 0.25    | < 0.005 | 0.02    | — | 0.02    | 0.02    | — | 0.02    | — | 354   | 354   | 0.03    | < 0.005 | — | 355   |
| Unenclos<br>ed<br>Parking<br>with<br>Elevator | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Strip Mall                                    | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 5.52  | 5.52  | < 0.005 | < 0.005 | — | 5.54  |
| Arena                                         | 0.05    | 0.03    | 0.49    | 0.41    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 580   | 580   | 0.05    | < 0.005 | — | 581   |
| General<br>Office<br>Building                 | 0.05    | 0.03    | 0.49    | 0.41    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 580   | 580   | 0.05    | < 0.005 | — | 582   |
| High<br>Turnover<br>(Sit Down<br>Restaurart)  | 0.05    | 0.03    | 0.47    | 0.40    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 562   | 562   | 0.05    | < 0.005 | — | 563   |
| Manufact<br>uring                             | 0.01    | 0.01    | 0.12    | 0.10    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 147   | 147   | 0.01    | < 0.005 | — | 148   |
| Other<br>Non-Asphalt<br>Surfaces              | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                                         | 0.21    | 0.10    | 1.87    | 1.57    | 0.01    | 0.14    | — | 0.14    | 0.14    | — | 0.14    | — | 2,228 | 2,228 | 0.20    | < 0.005 | — | 2,234 |
| Annual                                        | —       | —       | —       | —       | —       | —       | — | —       | —       | — | —       | — | —     | —     | —       | —       | — | —     |
| Office<br>Park                                | 0.01    | < 0.005 | 0.05    | 0.05    | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 58.6  | 58.6  | 0.01    | < 0.005 | — | 58.8  |

|                                     |         |         |         |         |         |         |   |         |         |   |         |   |      |      |         |         |   |      |
|-------------------------------------|---------|---------|---------|---------|---------|---------|---|---------|---------|---|---------|---|------|------|---------|---------|---|------|
| Unenclosed Parking with Elevator    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Strip Mall                          | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 0.91 | 0.91 | < 0.005 | < 0.005 | — | 0.92 |
| Arena                               | 0.01    | < 0.005 | 0.09    | 0.07    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 96.0 | 96.0 | 0.01    | < 0.005 | — | 96.3 |
| General Office Building             | 0.01    | < 0.005 | 0.09    | 0.07    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 96.0 | 96.0 | 0.01    | < 0.005 | — | 96.3 |
| High Turnover (Sit Down Restaurant) | 0.01    | < 0.005 | 0.09    | 0.07    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 93.0 | 93.0 | 0.01    | < 0.005 | — | 93.2 |
| Manufacturing                       | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 24.4 | 24.4 | < 0.005 | < 0.005 | — | 24.4 |
| Other Non-Asphalt Surfaces          | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                               | 0.04    | 0.02    | 0.34    | 0.29    | < 0.005 | 0.03    | — | 0.03    | 0.03    | — | 0.03    | — | 369  | 369  | 0.03    | < 0.005 | — | 370  |

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)              | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —       | — | —    |
| Office Park                      | 0.03 | 0.02 | 0.29 | 0.24 | < 0.005 | 0.02  | —     | 0.02  | 0.02   | —      | 0.02   | —    | 343   | 343  | 0.03 | < 0.005 | — | 344  |
| Unenclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | —     | 0.00  | 0.00   | —      | 0.00   | —    | 0.00  | 0.00 | 0.00 | 0.00    | — | 0.00 |

|                                     |         |         |         |         |         |         |   |         |         |   |         |   |       |       |         |         |   |       |
|-------------------------------------|---------|---------|---------|---------|---------|---------|---|---------|---------|---|---------|---|-------|-------|---------|---------|---|-------|
| Strip Mall                          | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 5.51  | 5.51  | < 0.005 | < 0.005 | — | 5.52  |
| Arena                               | 0.05    | 0.03    | 0.48    | 0.41    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 576   | 576   | 0.05    | < 0.005 | — | 577   |
| General Office Building             | 0.05    | 0.03    | 0.47    | 0.40    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 562   | 562   | 0.05    | < 0.005 | — | 564   |
| High Turnover (Sit Down Restaurant) | 0.05    | 0.03    | 0.47    | 0.39    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 561   | 561   | 0.05    | < 0.005 | — | 562   |
| Manufacturing                       | 0.01    | 0.01    | 0.12    | 0.10    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 146   | 146   | 0.01    | < 0.005 | — | 147   |
| Other Non-Asphalt Surfaces          | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                               | 0.20    | 0.10    | 1.84    | 1.54    | 0.01    | 0.14    | — | 0.14    | 0.14    | — | 0.14    | — | 2,194 | 2,194 | 0.19    | < 0.005 | — | 2,200 |
| Daily, Winter (Max)                 | —       | —       | —       | —       | —       | —       | — | —       | —       | — | —       | — | —     | —     | —       | —       | — | —     |
| Office Park                         | 0.03    | 0.02    | 0.29    | 0.24    | < 0.005 | 0.02    | — | 0.02    | 0.02    | — | 0.02    | — | 343   | 343   | 0.03    | < 0.005 | — | 344   |
| Unenclosed Parking with Elevator    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Strip Mall                          | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 5.51  | 5.51  | < 0.005 | < 0.005 | — | 5.52  |
| Arena                               | 0.05    | 0.03    | 0.48    | 0.41    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 576   | 576   | 0.05    | < 0.005 | — | 577   |
| General Office Building             | 0.05    | 0.03    | 0.47    | 0.40    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 562   | 562   | 0.05    | < 0.005 | — | 564   |
| High Turnover (Sit Down Restaurant) | 0.05    | 0.03    | 0.47    | 0.39    | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 561   | 561   | 0.05    | < 0.005 | — | 562   |

|                                     |         |         |         |         |         |         |   |         |         |   |         |   |       |       |         |         |   |       |
|-------------------------------------|---------|---------|---------|---------|---------|---------|---|---------|---------|---|---------|---|-------|-------|---------|---------|---|-------|
| Manufacturing                       | 0.01    | 0.01    | 0.12    | 0.10    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 146   | 146   | 0.01    | < 0.005 | — | 147   |
| Other Non-Asphalt Surfaces          | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                               | 0.20    | 0.10    | 1.84    | 1.54    | 0.01    | 0.14    | — | 0.14    | 0.14    | — | 0.14    | — | 2,194 | 2,194 | 0.19    | < 0.005 | — | 2,200 |
| Annual                              | —       | —       | —       | —       | —       | —       | — | —       | —       | — | —       | — | —     | —     | —       | —       | — | —     |
| Office Park                         | 0.01    | < 0.005 | 0.05    | 0.04    | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 56.8  | 56.8  | 0.01    | < 0.005 | — | 57.0  |
| Unenclosed Parking with Elevator    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Strip Mall                          | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 0.91  | 0.91  | < 0.005 | < 0.005 | — | 0.91  |
| Arena                               | 0.01    | < 0.005 | 0.09    | 0.07    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 95.3  | 95.3  | 0.01    | < 0.005 | — | 95.6  |
| General Office Building             | 0.01    | < 0.005 | 0.09    | 0.07    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 93.1  | 93.1  | 0.01    | < 0.005 | — | 93.3  |
| High Turnover (Sit Down Restaurant) | 0.01    | < 0.005 | 0.09    | 0.07    | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 92.8  | 92.8  | 0.01    | < 0.005 | — | 93.1  |
| Manufacturing                       | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 24.2  | 24.2  | < 0.005 | < 0.005 | — | 24.3  |
| Other Non-Asphalt Surfaces          | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | — | 0.00  |
| Total                               | 0.04    | 0.02    | 0.34    | 0.28    | < 0.005 | 0.03    | — | 0.03    | 0.03    | — | 0.03    | — | 363   | 363   | 0.03    | < 0.005 | — | 364   |

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      | —    | 4.96 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.60 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Landscape Equipment    | 2.74 | 2.52 | 0.13 | 15.4 | < 0.005 | 0.03  | —     | 0.03  | 0.02   | —      | 0.02   | —    | 63.2  | 63.2 | < 0.005 | < 0.005 | — | 63.4 |
| Total                  | 2.74 | 8.08 | 0.13 | 15.4 | < 0.005 | 0.03  | —     | 0.03  | 0.02   | —      | 0.02   | —    | 63.2  | 63.2 | < 0.005 | < 0.005 | — | 63.4 |
| Daily, Winter (Max)    | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Consumer Products      | —    | 4.96 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.60 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Total                  | —    | 5.56 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Annual                 | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Consumer Products      | —    | 0.90 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.11 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |

|                     |      |      |      |      |         |         |   |         |         |   |         |   |      |      |         |         |   |      |
|---------------------|------|------|------|------|---------|---------|---|---------|---------|---|---------|---|------|------|---------|---------|---|------|
| Landscape Equipment | 0.34 | 0.32 | 0.02 | 1.92 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 7.17 | 7.17 | < 0.005 | < 0.005 | — | 7.19 |
| Total               | 0.34 | 1.33 | 0.02 | 1.92 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 7.17 | 7.17 | < 0.005 | < 0.005 | — | 7.19 |

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      | —    | 4.96 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.60 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Landscape Equipment    | 2.74 | 2.52 | 0.13 | 15.4 | < 0.005 | 0.03  | —     | 0.03  | 0.02   | —      | 0.02   | —    | 63.2  | 63.2 | < 0.005 | < 0.005 | — | 63.4 |
| Total                  | 2.74 | 8.08 | 0.13 | 15.4 | < 0.005 | 0.03  | —     | 0.03  | 0.02   | —      | 0.02   | —    | 63.2  | 63.2 | < 0.005 | < 0.005 | — | 63.4 |
| Daily, Winter (Max)    | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Consumer Products      | —    | 4.96 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.60 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Total                  | —    | 5.56 | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |
| Annual                 | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —       | —       | — | —    |

|                        |      |      |      |      |         |         |   |         |         |   |         |   |      |      |         |         |   |      |
|------------------------|------|------|------|------|---------|---------|---|---------|---------|---|---------|---|------|------|---------|---------|---|------|
| Consumer               | —    | 0.90 | —    | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.11 | —    | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Landscape Equipment    | 0.34 | 0.32 | 0.02 | 1.92 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 7.17 | 7.17 | < 0.005 | < 0.005 | — | 7.19 |
| Total                  | 0.34 | 1.33 | 0.02 | 1.92 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 7.17 | 7.17 | < 0.005 | < 0.005 | — | 7.19 |

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)              | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —       | — | —    |
| Office Park                      | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 18.7 | 103   | 122  | 1.93 | 0.05    | — | 184  |
| Unenclosed Parking with Elevator | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.00 | 0.00  | 0.00 | 0.00 | 0.00    | — | 0.00 |
| Strip Mall                       | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.50 | 2.74  | 3.24 | 0.05 | < 0.005 | — | 4.89 |
| Arena                            | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 42.3 | 233   | 275  | 4.35 | 0.11    | — | 416  |
| General Office Building          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 30.7 | 169   | 200  | 3.16 | 0.08    | — | 302  |

|                                     |   |   |   |   |   |   |   |   |   |   |   |      |      |      |         |         |   |       |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|---------|---------|---|-------|
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | 10.8 | 60.0 | 70.8 | 1.11    | 0.03    | — | 107   |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | 5.76 | 31.8 | 37.6 | 0.59    | 0.01    | — | 56.7  |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 6.04 | 6.04 | < 0.005 | < 0.005 | — | 6.07  |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | 109  | 606  | 715  | 11.2    | 0.27    | — | 1,076 |
| Daily, Winter (Max)                 | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —       | —       | — | —     |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | 18.7 | 103  | 122  | 1.93    | 0.05    | — | 184   |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00  |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | 0.50 | 2.74 | 3.24 | 0.05    | < 0.005 | — | 4.89  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | 42.3 | 233  | 275  | 4.35    | 0.11    | — | 416   |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | 30.7 | 169  | 200  | 3.16    | 0.08    | — | 302   |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | 10.8 | 60.0 | 70.8 | 1.11    | 0.03    | — | 107   |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | 5.76 | 31.8 | 37.6 | 0.59    | 0.01    | — | 56.7  |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 6.04 | 6.04 | < 0.005 | < 0.005 | — | 6.07  |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | 109  | 606  | 715  | 11.2    | 0.27    | — | 1,076 |

|                                     |   |   |   |   |   |   |   |   |   |   |   |      |      |      |         |         |   |      |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|---------|---------|---|------|
| Annual                              | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —       | —       | — | —    |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | 3.10 | 17.1 | 20.2 | 0.32    | 0.01    | — | 30.5 |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | 0.08 | 0.45 | 0.54 | 0.01    | < 0.005 | — | 0.81 |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | 7.00 | 38.6 | 45.6 | 0.72    | 0.02    | — | 68.9 |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | 5.08 | 28.0 | 33.1 | 0.52    | 0.01    | — | 50.0 |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | 1.78 | 9.94 | 11.7 | 0.18    | < 0.005 | — | 17.6 |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | 0.95 | 5.26 | 6.22 | 0.10    | < 0.005 | — | 9.38 |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 1.00 | 1.00 | < 0.005 | < 0.005 | — | 1.01 |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | 18.0 | 100  | 118  | 1.85    | 0.05    | — | 178  |

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) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | — | —    |
| Office Park         | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 17.0 | 93.8  | 111  | 1.75 | 0.04 | — | 167  |

|                                     |   |   |   |   |   |   |   |   |   |   |   |      |       |       |          |          |   |       |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|-------|-------|----------|----------|---|-------|
| Unenclosed                          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00  | 0.00  | 0.00     | 0.00     | — | 0.00  |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | 0.45 | 2.49  | 2.94  | 0.05     | < 0.005  | — | 4.44  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | 38.3 | 212   | 250   | 3.95     | 0.10     | — | 377   |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | 27.9 | 154   | 182   | 2.88     | 0.07     | — | 275   |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | 9.76 | 54.5  | 64.3  | 1.01     | 0.02     | — | 96.7  |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | 5.76 | 31.8  | 37.6  | 0.59     | 0.01     | — | 56.7  |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | -1.42 | -1.42 | > -0.005 | > -0.005 | — | -1.43 |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | 99.3 | 547   | 646   | 10.2     | 0.25     | — | 976   |
| Daily, Winter (Max)                 | — | — | — | — | — | — | — | — | — | — | — | —    | —     | —     | —        | —        | — | —     |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | 17.0 | 93.8  | 111   | 1.75     | 0.04     | — | 167   |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00  | 0.00  | 0.00     | 0.00     | — | 0.00  |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | 0.45 | 2.49  | 2.94  | 0.05     | < 0.005  | — | 4.44  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | 38.3 | 212   | 250   | 3.95     | 0.10     | — | 377   |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | 27.9 | 154   | 182   | 2.88     | 0.07     | — | 275   |

|                                     |   |   |   |   |   |   |   |   |   |   |   |      |       |       |          |          |   |       |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|-------|-------|----------|----------|---|-------|
| High Turnover (Sit Down Restaurart) | — | — | — | — | — | — | — | — | — | — | — | 9.76 | 54.5  | 64.3  | 1.01     | 0.02     | — | 96.7  |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | 5.76 | 31.8  | 37.6  | 0.59     | 0.01     | — | 56.7  |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | -1.42 | -1.42 | > -0.005 | > -0.005 | — | -1.43 |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | 99.3 | 547   | 646   | 10.2     | 0.25     | — | 976   |
| Annual                              | — | — | — | — | — | — | — | — | — | — | — | —    | —     | —     | —        | —        | — | —     |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | 2.81 | 15.5  | 18.3  | 0.29     | 0.01     | — | 27.7  |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00  | 0.00  | 0.00     | 0.00     | — | 0.00  |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | 0.07 | 0.41  | 0.49  | 0.01     | < 0.005  | — | 0.73  |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | 6.35 | 35.0  | 41.4  | 0.65     | 0.02     | — | 62.5  |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | 4.63 | 25.5  | 30.2  | 0.48     | 0.01     | — | 45.5  |
| High Turnover (Sit Down Restaurart) | — | — | — | — | — | — | — | — | — | — | — | 1.62 | 9.03  | 10.6  | 0.17     | < 0.005  | — | 16.0  |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | 0.95 | 5.26  | 6.22  | 0.10     | < 0.005  | — | 9.38  |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | -0.24 | -0.24 | > -0.005 | > -0.005 | — | -0.24 |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | 16.4 | 90.6  | 107   | 1.69     | 0.04     | — | 162   |

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)                 | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | — | —    |
| Office Park                         | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 27.6 | 0.00  | 27.6 | 2.76 | 0.00 | — | 96.4 |
| Unenclosed Parking with Elevator    | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.00 | 0.00  | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Strip Mall                          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 1.98 | 0.00  | 1.98 | 0.20 | 0.00 | — | 6.93 |
| Arena                               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.76 | 0.00  | 0.76 | 0.08 | 0.00 | — | 2.66 |
| General Office Building             | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 45.1 | 0.00  | 45.1 | 4.51 | 0.00 | — | 158  |
| High Turnover (Sit Down Restaurant) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 119  | 0.00  | 119  | 11.9 | 0.00 | — | 415  |
| Manufacturing                       | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 8.69 | 0.00  | 8.69 | 0.87 | 0.00 | — | 30.4 |
| Other Non-Asphalt Surfaces          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.00 | 0.00  | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 203  | 0.00  | 203  | 20.3 | 0.00 | — | 709  |
| Daily, Winter (Max)                 | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | — | —    |

|                                     |   |   |   |   |   |   |   |   |   |   |   |      |      |      |      |      |   |      |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|------|------|---|------|
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | 27.6 | 0.00 | 27.6 | 2.76 | 0.00 | — | 96.4 |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | 1.98 | 0.00 | 1.98 | 0.20 | 0.00 | — | 6.93 |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | 0.76 | 0.00 | 0.76 | 0.08 | 0.00 | — | 2.66 |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | 45.1 | 0.00 | 45.1 | 4.51 | 0.00 | — | 158  |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | 119  | 0.00 | 119  | 11.9 | 0.00 | — | 415  |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | 8.69 | 0.00 | 8.69 | 0.87 | 0.00 | — | 30.4 |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | 203  | 0.00 | 203  | 20.3 | 0.00 | — | 709  |
| Annual                              | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —    | — | —    |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | 4.56 | 0.00 | 4.56 | 0.46 | 0.00 | — | 16.0 |
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | 0.33 | 0.00 | 0.33 | 0.03 | 0.00 | — | 1.15 |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | 0.13 | 0.00 | 0.13 | 0.01 | 0.00 | — | 0.44 |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | 7.47 | 0.00 | 7.47 | 0.75 | 0.00 | — | 26.1 |

|                                    |   |   |   |   |   |   |   |   |   |   |   |      |      |      |      |      |   |      |
|------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|------|------|---|------|
| High Turnover (Sit Down Restaurnt) | — | — | — | — | — | — | — | — | — | — | — | 19.6 | 0.00 | 19.6 | 1.96 | 0.00 | — | 68.7 |
| Manufacturing                      | — | — | — | — | — | — | — | — | — | — | — | 1.44 | 0.00 | 1.44 | 0.14 | 0.00 | — | 5.03 |
| Other Non-Asphalt Surfaces         | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                              | — | — | — | — | — | — | — | — | — | — | — | 33.6 | 0.00 | 33.6 | 3.36 | 0.00 | — | 117  |

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)                 | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | — | —    |
| Office Park                         | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 27.6 | 0.00  | 27.6 | 2.76 | 0.00 | — | 96.4 |
| Unenclosed Parking with Elevator    | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.00 | 0.00  | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Strip Mall                          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 1.98 | 0.00  | 1.98 | 0.20 | 0.00 | — | 6.93 |
| Arena                               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.76 | 0.00  | 0.76 | 0.08 | 0.00 | — | 2.66 |
| General Office Building             | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 45.1 | 0.00  | 45.1 | 4.51 | 0.00 | — | 158  |
| High Turnover (Sit Down Restaurant) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 119  | 0.00  | 119  | 11.9 | 0.00 | — | 415  |

|                                               |   |   |   |   |   |   |   |   |   |   |   |      |      |      |      |      |   |      |
|-----------------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|------|------|---|------|
| Manufact                                      | — | — | — | — | — | — | — | — | — | — | — | 8.69 | 0.00 | 8.69 | 0.87 | 0.00 | — | 30.4 |
| Other<br>Non-Asphalt<br>Surfaces              | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                                         | — | — | — | — | — | — | — | — | — | — | — | 203  | 0.00 | 203  | 20.3 | 0.00 | — | 709  |
| Daily,<br>Winter<br>(Max)                     | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —    | — | —    |
| Office<br>Park                                | — | — | — | — | — | — | — | — | — | — | — | 27.6 | 0.00 | 27.6 | 2.76 | 0.00 | — | 96.4 |
| Unenclos<br>ed<br>Parking<br>with<br>Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Strip Mall                                    | — | — | — | — | — | — | — | — | — | — | — | 1.98 | 0.00 | 1.98 | 0.20 | 0.00 | — | 6.93 |
| Arena                                         | — | — | — | — | — | — | — | — | — | — | — | 0.76 | 0.00 | 0.76 | 0.08 | 0.00 | — | 2.66 |
| General<br>Office<br>Building                 | — | — | — | — | — | — | — | — | — | — | — | 45.1 | 0.00 | 45.1 | 4.51 | 0.00 | — | 158  |
| High<br>Turnover<br>(Sit Down<br>Restaurart)  | — | — | — | — | — | — | — | — | — | — | — | 119  | 0.00 | 119  | 11.9 | 0.00 | — | 415  |
| Manufact<br>uring                             | — | — | — | — | — | — | — | — | — | — | — | 8.69 | 0.00 | 8.69 | 0.87 | 0.00 | — | 30.4 |
| Other<br>Non-Asphalt<br>Surfaces              | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                                         | — | — | — | — | — | — | — | — | — | — | — | 203  | 0.00 | 203  | 20.3 | 0.00 | — | 709  |
| Annual                                        | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —    | — | —    |
| Office<br>Park                                | — | — | — | — | — | — | — | — | — | — | — | 4.56 | 0.00 | 4.56 | 0.46 | 0.00 | — | 16.0 |

|                                     |   |   |   |   |   |   |   |   |   |   |   |      |      |      |      |      |   |      |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|------|------|---|------|
| Unenclosed Parking with Elevator    | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | 0.33 | 0.00 | 0.33 | 0.03 | 0.00 | — | 1.15 |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | 0.13 | 0.00 | 0.13 | 0.01 | 0.00 | — | 0.44 |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | 7.47 | 0.00 | 7.47 | 0.75 | 0.00 | — | 26.1 |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | 19.6 | 0.00 | 19.6 | 1.96 | 0.00 | — | 68.7 |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | 1.44 | 0.00 | 1.44 | 0.14 | 0.00 | — | 5.03 |
| Other Non-Asphalt Surfaces          | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | 33.6 | 0.00 | 33.6 | 3.36 | 0.00 | — | 117  |

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) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | —    | —    |
| Office Park         | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 0.13 | 0.13 |
| Strip Mall          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 0.02 | 0.02 |

|                                     |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |         |         |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---------|---------|
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.32    | 0.32    |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.22    | 0.22    |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 28.9    | 28.9    |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 3.38    | 3.38    |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 33.0    | 33.0    |
| Daily, Winter (Max)                 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | —       | —       |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.13    | 0.13    |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.02    | 0.02    |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.32    | 0.32    |
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.22    | 0.22    |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 28.9    | 28.9    |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 3.38    | 3.38    |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 33.0    | 33.0    |
| Annual                              | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | —       | —       |
| Office Park                         | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.02    | 0.02    |
| Strip Mall                          | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | < 0.005 | < 0.005 |
| Arena                               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.05    | 0.05    |

|                                     |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |      |      |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|------|------|
| General Office Building             | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.04 | 0.04 |
| High Turnover (Sit Down Restaurant) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 4.79 | 4.79 |
| Manufacturing                       | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.56 | 0.56 |
| Total                               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 5.46 | 5.46 |

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)                 | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | —    | —    |
| Office Park                         | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 0.13 | 0.13 |
| Strip Mall                          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 0.02 | 0.02 |
| Arena                               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 0.32 | 0.32 |
| General Office Building             | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 0.22 | 0.22 |
| High Turnover (Sit Down Restaurant) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 28.9 | 28.9 |
| Manufacturing                       | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 3.38 | 3.38 |
| Total                               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 33.0 | 33.0 |

|                                              |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |         |         |
|----------------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---------|---------|
| Daily,<br>Winter<br>(Max)                    | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | —       | —       |
| Office<br>Park                               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.13    | 0.13    |
| Strip Mall                                   | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.02    | 0.02    |
| Arena                                        | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.32    | 0.32    |
| General<br>Office<br>Building                | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.22    | 0.22    |
| High<br>Turnover<br>(Sit Down<br>Restaurart) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 28.9    | 28.9    |
| Manufact<br>uring                            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 3.38    | 3.38    |
| Total                                        | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 33.0    | 33.0    |
| Annual                                       | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | —       | —       |
| Office<br>Park                               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.02    | 0.02    |
| Strip Mall                                   | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | < 0.005 | < 0.005 |
| Arena                                        | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.05    | 0.05    |
| General<br>Office<br>Building                | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.04    | 0.04    |
| High<br>Turnover<br>(Sit Down<br>Restaurart) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 4.79    | 4.79    |
| Manufact<br>uring                            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.56    | 0.56    |
| Total                                        | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 5.46    | 5.46    |

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)     | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —       | — | —     |
| Forklifts               | 0.94 | 0.79 | 7.47 | 12.4 | 0.02    | 0.32  | —     | 0.32  | 0.30   | —      | 0.30   | —    | 1,829 | 1,829 | 0.07 | 0.01    | — | 1,836 |
| Rough Terrain Forklifts | 0.27 | 0.23 | 3.29 | 6.53 | 0.01    | 0.07  | —     | 0.07  | 0.06   | —      | 0.06   | —    | 1,074 | 1,074 | 0.04 | 0.01    | — | 1,078 |
| Aerial Lifts            | 0.18 | 0.15 | 2.89 | 3.09 | 0.01    | 0.02  | —     | 0.02  | 0.02   | —      | 0.02   | —    | 590   | 590   | 0.02 | < 0.005 | — | 592   |
| Generator Sets          | 0.36 | 0.29 | 2.36 | 1.56 | < 0.005 | 0.09  | —     | 0.09  | 0.09   | —      | 0.09   | —    | 312   | 312   | 0.01 | < 0.005 | — | 313   |
| Total                   | 1.75 | 1.47 | 16.0 | 23.6 | 0.04    | 0.50  | —     | 0.50  | 0.46   | —      | 0.46   | —    | 3,806 | 3,806 | 0.15 | 0.03    | — | 3,819 |
| Daily, Winter (Max)     | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —       | — | —     |
| Forklifts               | 0.94 | 0.79 | 7.47 | 12.4 | 0.02    | 0.32  | —     | 0.32  | 0.30   | —      | 0.30   | —    | 1,829 | 1,829 | 0.07 | 0.01    | — | 1,836 |
| Rough Terrain Forklifts | 0.27 | 0.23 | 3.29 | 6.53 | 0.01    | 0.07  | —     | 0.07  | 0.06   | —      | 0.06   | —    | 1,074 | 1,074 | 0.04 | 0.01    | — | 1,078 |
| Aerial Lifts            | 0.18 | 0.15 | 2.89 | 3.09 | 0.01    | 0.02  | —     | 0.02  | 0.02   | —      | 0.02   | —    | 590   | 590   | 0.02 | < 0.005 | — | 592   |
| Generator Sets          | 0.36 | 0.29 | 2.36 | 1.56 | < 0.005 | 0.09  | —     | 0.09  | 0.09   | —      | 0.09   | —    | 312   | 312   | 0.01 | < 0.005 | — | 313   |
| Total                   | 1.75 | 1.47 | 16.0 | 23.6 | 0.04    | 0.50  | —     | 0.50  | 0.46   | —      | 0.46   | —    | 3,806 | 3,806 | 0.15 | 0.03    | — | 3,819 |

|                               |      |      |      |      |         |         |   |         |         |   |         |   |      |      |         |         |   |      |
|-------------------------------|------|------|------|------|---------|---------|---|---------|---------|---|---------|---|------|------|---------|---------|---|------|
| Annual                        | —    | —    | —    | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Forklifts                     | 0.12 | 0.10 | 0.97 | 1.61 | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 216  | 216  | 0.01    | < 0.005 | — | 216  |
| Rough<br>Terrain<br>Forklifts | 0.04 | 0.03 | 0.43 | 0.85 | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 127  | 127  | 0.01    | < 0.005 | — | 127  |
| Aerial<br>Lifts               | 0.02 | 0.02 | 0.38 | 0.40 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 69.6 | 69.6 | < 0.005 | < 0.005 | — | 69.9 |
| Generato<br>r<br>Sets         | 0.05 | 0.04 | 0.31 | 0.20 | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 36.7 | 36.7 | < 0.005 | < 0.005 | — | 36.9 |
| Total                         | 0.23 | 0.19 | 2.08 | 3.06 | < 0.005 | 0.07    | — | 0.07    | 0.06    | — | 0.06    | — | 449  | 449  | 0.02    | < 0.005 | — | 450  |

4.7.2. Mitigated

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

| Equipme<br>nt<br>Type         | TOG  | ROG  | NOx  | CO   | SO2     | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4  | N2O     | R | CO2e  |
|-------------------------------|------|------|------|------|---------|-------|-------|-------|--------|--------|--------|------|-------|-------|------|---------|---|-------|
| Daily,<br>Summer<br>(Max)     | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —       | — | —     |
| Forklifts                     | 0.94 | 0.79 | 7.47 | 12.4 | 0.02    | 0.32  | —     | 0.32  | 0.30   | —      | 0.30   | —    | 1,829 | 1,829 | 0.07 | 0.01    | — | 1,836 |
| Rough<br>Terrain<br>Forklifts | 0.27 | 0.23 | 3.29 | 6.53 | 0.01    | 0.07  | —     | 0.07  | 0.06   | —      | 0.06   | —    | 1,074 | 1,074 | 0.04 | 0.01    | — | 1,078 |
| Aerial<br>Lifts               | 0.18 | 0.15 | 2.89 | 3.09 | 0.01    | 0.02  | —     | 0.02  | 0.02   | —      | 0.02   | —    | 590   | 590   | 0.02 | < 0.005 | — | 592   |
| Generato<br>r<br>Sets         | 0.36 | 0.29 | 2.36 | 1.56 | < 0.005 | 0.09  | —     | 0.09  | 0.09   | —      | 0.09   | —    | 312   | 312   | 0.01 | < 0.005 | — | 313   |
| Total                         | 1.75 | 1.47 | 16.0 | 23.6 | 0.04    | 0.50  | —     | 0.50  | 0.46   | —      | 0.46   | —    | 3,806 | 3,806 | 0.15 | 0.03    | — | 3,819 |
| Daily,<br>Winter<br>(Max)     | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —       | — | —     |

|                         |      |      |      |      |         |         |   |         |         |   |         |   |       |       |         |         |   |       |
|-------------------------|------|------|------|------|---------|---------|---|---------|---------|---|---------|---|-------|-------|---------|---------|---|-------|
| Forklifts               | 0.94 | 0.79 | 7.47 | 12.4 | 0.02    | 0.32    | — | 0.32    | 0.30    | — | 0.30    | — | 1,829 | 1,829 | 0.07    | 0.01    | — | 1,836 |
| Rough Terrain Forklifts | 0.27 | 0.23 | 3.29 | 6.53 | 0.01    | 0.07    | — | 0.07    | 0.06    | — | 0.06    | — | 1,074 | 1,074 | 0.04    | 0.01    | — | 1,078 |
| Aerial Lifts            | 0.18 | 0.15 | 2.89 | 3.09 | 0.01    | 0.02    | — | 0.02    | 0.02    | — | 0.02    | — | 590   | 590   | 0.02    | < 0.005 | — | 592   |
| Generator Sets          | 0.36 | 0.29 | 2.36 | 1.56 | < 0.005 | 0.09    | — | 0.09    | 0.09    | — | 0.09    | — | 312   | 312   | 0.01    | < 0.005 | — | 313   |
| Total                   | 1.75 | 1.47 | 16.0 | 23.6 | 0.04    | 0.50    | — | 0.50    | 0.46    | — | 0.46    | — | 3,806 | 3,806 | 0.15    | 0.03    | — | 3,819 |
| Annual                  | —    | —    | —    | —    | —       | —       | — | —       | —       | — | —       | — | —     | —     | —       | —       | — | —     |
| Forklifts               | 0.12 | 0.10 | 0.97 | 1.61 | < 0.005 | 0.04    | — | 0.04    | 0.04    | — | 0.04    | — | 216   | 216   | 0.01    | < 0.005 | — | 216   |
| Rough Terrain Forklifts | 0.04 | 0.03 | 0.43 | 0.85 | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 127   | 127   | 0.01    | < 0.005 | — | 127   |
| Aerial Lifts            | 0.02 | 0.02 | 0.38 | 0.40 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 69.6  | 69.6  | < 0.005 | < 0.005 | — | 69.9  |
| Generator Sets          | 0.05 | 0.04 | 0.31 | 0.20 | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 36.7  | 36.7  | < 0.005 | < 0.005 | — | 36.9  |
| Total                   | 0.23 | 0.19 | 2.08 | 3.06 | < 0.005 | 0.07    | — | 0.07    | 0.06    | — | 0.06    | — | 449   | 449   | 0.02    | < 0.005 | — | 450   |

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

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

4.8.2. Mitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

|                     |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual              | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

4.9.2. Mitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

|                     |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided             | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered         | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed             | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| —                   | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided             | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered         | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed             | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| —                   | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual              | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided             | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered         | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal            | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

|             |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|-------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Remove<br>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)

| Vegetatio<br>n            | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---------------------------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|
| Daily,<br>Summer<br>(Max) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | — | —    |
| Total                     | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | — | —    |
| Daily,<br>Winter<br>(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<br>Use               | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---------------------------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|
| Daily,<br>Summer<br>(Max) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | — | —    |
| Total                     | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | — | —    |
| Daily,<br>Winter<br>(Max) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | — | —    |

|        |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|--------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Total  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

|             |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|-------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| —           | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual      | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided     | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal    | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal    | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed     | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal    | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| —           | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

5. Activity Data

5.1. Construction Schedule

| Phase Name            | Phase Type            | Start Date | End Date   | Days Per Week | Work Days per Phase | Phase Description                        |
|-----------------------|-----------------------|------------|------------|---------------|---------------------|------------------------------------------|
| Demolition            | Demolition            | 5/19/2025  | 8/8/2025   | 5.00          | 60.0                | Demolish existing buildings & hardscape. |
| Site Preparation      | Site Preparation      | 8/11/2025  | 8/29/2025  | 5.00          | 15.0                | Shoring.                                 |
| Grading               | Grading               | 9/1/2025   | 12/12/2025 | 5.00          | 75.0                | Earthwork.                               |
| Building Construction | Building Construction | 12/15/2025 | 9/3/2027   | 5.00          | 450                 | Construct buildings.                     |
| Paving                | Paving                | 5/3/2027   | 7/2/2027   | 5.00          | 45.0                | Pave access & service areas.             |
| Architectural Coating | Architectural Coating | 7/5/2027   | 9/3/2027   | 5.00          | 45.0                | Apply coatings & finishes to structures. |

5.2. Off-Road Equipment

5.2.1. Unmitigated

| Phase Name            | Equipment Type            | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|-----------------------|---------------------------|-----------|-------------|----------------|---------------|------------|-------------|
| Demolition            | Concrete/Industrial Saws  | Diesel    | Average     | 2.00           | 7.00          | 33.0       | 0.73        |
| Demolition            | Excavators                | Diesel    | Average     | 2.00           | 7.00          | 36.0       | 0.38        |
| Demolition            | Crawler Tractors          | Diesel    | Average     | 2.00           | 8.00          | 87.0       | 0.43        |
| Demolition            | Tractors/Loaders/Backhoes | Diesel    | Average     | 4.00           | 7.00          | 84.0       | 0.37        |
| Demolition            | Rough Terrain Forklifts   | Diesel    | Average     | 2.00           | 7.00          | 96.0       | 0.40        |
| Demolition            | Generator Sets            | Diesel    | Average     | 2.00           | 8.00          | 14.0       | 0.74        |
| Demolition            | Air Compressors           | Diesel    | Average     | 2.00           | 7.00          | 37.0       | 0.48        |
| Site Preparation      | Crawler Tractors          | Diesel    | Average     | 1.00           | 8.00          | 87.0       | 0.43        |
| Site Preparation      | Tractors/Loaders/Backhoes | Diesel    | Average     | 4.00           | 7.00          | 84.0       | 0.37        |
| Site Preparation      | Excavators                | Diesel    | Average     | 2.00           | 7.00          | 36.0       | 0.38        |
| Site Preparation      | Bore/Drill Rigs           | Diesel    | Average     | 1.00           | 6.00          | 83.0       | 0.50        |
| Site Preparation      | Generator Sets            | Diesel    | Average     | 2.00           | 8.00          | 14.0       | 0.74        |
| Site Preparation      | Air Compressors           | Diesel    | Average     | 2.00           | 7.00          | 37.0       | 0.48        |
| Grading               | Excavators                | Diesel    | Average     | 1.00           | 8.00          | 36.0       | 0.38        |
| Grading               | Graders                   | Diesel    | Average     | 1.00           | 8.00          | 148        | 0.41        |
| Grading               | Crawler Tractors          | Diesel    | Average     | 2.00           | 8.00          | 87.0       | 0.43        |
| Grading               | Tractors/Loaders/Backhoes | Diesel    | Average     | 4.00           | 7.00          | 84.0       | 0.37        |
| Grading               | Bore/Drill Rigs           | Diesel    | Average     | 1.00           | 6.00          | 83.0       | 0.50        |
| Grading               | Rollers                   | Diesel    | Average     | 1.00           | 7.00          | 36.0       | 0.38        |
| Grading               | Plate Compactors          | Diesel    | Average     | 1.00           | 7.00          | 8.00       | 0.43        |
| Grading               | Generator Sets            | Diesel    | Average     | 2.00           | 7.00          | 14.0       | 0.74        |
| Grading               | Air Compressors           | Diesel    | Average     | 2.00           | 7.00          | 37.0       | 0.48        |
| Building Construction | Cranes                    | Diesel    | Average     | 3.00           | 7.00          | 367        | 0.29        |
| Building Construction | Generator Sets            | Diesel    | Average     | 1.00           | 8.00          | 14.0       | 0.74        |

|                       |                           |        |         |      |      |      |      |
|-----------------------|---------------------------|--------|---------|------|------|------|------|
| Building Construction | Tractors/Loaders/Backh    | Diesel | Average | 4.00 | 7.00 | 84.0 | 0.37 |
| Building Construction | Welders                   | Diesel | Average | 10.0 | 7.00 | 46.0 | 0.45 |
| Building Construction | Bore/Drill Rigs           | Diesel | Average | 1.00 | 6.00 | 83.0 | 0.50 |
| Building Construction | Rough Terrain Forklifts   | Diesel | Average | 4.00 | 7.00 | 96.0 | 0.40 |
| Building Construction | Cement and Mortar Mixers  | Diesel | Average | 3.00 | 7.00 | 10.0 | 0.56 |
| Building Construction | Plate Compactors          | Diesel | Average | 1.00 | 6.00 | 8.00 | 0.43 |
| Building Construction | Air Compressors           | Diesel | Average | 3.00 | 7.00 | 37.0 | 0.48 |
| Building Construction | Generator Sets            | Diesel | Average | 3.00 | 7.00 | 14.0 | 0.74 |
| Paving                | Pavers                    | Diesel | Average | 2.00 | 7.00 | 81.0 | 0.42 |
| Paving                | Paving Equipment          | Diesel | Average | 2.00 | 7.00 | 89.0 | 0.36 |
| Paving                | Rollers                   | Diesel | Average | 1.00 | 7.00 | 36.0 | 0.38 |
| Paving                | Air Compressors           | Diesel | Average | 2.00 | 7.00 | 37.0 | 0.48 |
| Paving                | Generator Sets            | Diesel | Average | 2.00 | 7.00 | 14.0 | 0.74 |
| Paving                | Plate Compactors          | Diesel | Average | 1.00 | 7.00 | 8.00 | 0.43 |
| Paving                | Cement and Mortar Mixers  | Diesel | Average | 2.00 | 7.00 | 10.0 | 0.56 |
| Paving                | Excavators                | Diesel | Average | 1.00 | 7.00 | 36.0 | 0.38 |
| Paving                | Tractors/Loaders/Backhoes | Diesel | Average | 2.00 | 7.00 | 84.0 | 0.37 |
| Paving                | Graders                   | Diesel | Average | 1.00 | 6.00 | 148  | 0.41 |
| Paving                | Rough Terrain Forklifts   | Diesel | Average | 2.00 | 7.00 | 96.0 | 0.40 |
| Architectural Coating | Air Compressors           | Diesel | Average | 2.00 | 6.00 | 37.0 | 0.48 |
| Architectural Coating | Generator Sets            | Diesel | Average | 2.00 | 7.00 | 14.0 | 0.74 |
| Architectural Coating | Aerial Lifts              | Diesel | Average | 2.00 | 7.00 | 46.0 | 0.31 |

5.2.2. Mitigated

| Phase Name | Equipment Type | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|------------|----------------|-----------|-------------|----------------|---------------|------------|-------------|
|------------|----------------|-----------|-------------|----------------|---------------|------------|-------------|

|                       |                           |        |         |      |      |      |      |
|-----------------------|---------------------------|--------|---------|------|------|------|------|
| Demolition            | Concrete/Industrial Saws  | Diesel | Average | 2.00 | 7.00 | 33.0 | 0.73 |
| Demolition            | Excavators                | Diesel | Average | 2.00 | 7.00 | 36.0 | 0.38 |
| Demolition            | Crawler Tractors          | Diesel | Average | 2.00 | 8.00 | 87.0 | 0.43 |
| Demolition            | Tractors/Loaders/Backhoes | Diesel | Average | 4.00 | 7.00 | 84.0 | 0.37 |
| Demolition            | Rough Terrain Forklifts   | Diesel | Average | 2.00 | 7.00 | 96.0 | 0.40 |
| Demolition            | Generator Sets            | Diesel | Average | 2.00 | 8.00 | 14.0 | 0.74 |
| Demolition            | Air Compressors           | Diesel | Average | 2.00 | 7.00 | 37.0 | 0.48 |
| Site Preparation      | Crawler Tractors          | Diesel | Average | 1.00 | 8.00 | 87.0 | 0.43 |
| Site Preparation      | Tractors/Loaders/Backhoes | Diesel | Average | 4.00 | 7.00 | 84.0 | 0.37 |
| Site Preparation      | Excavators                | Diesel | Average | 2.00 | 7.00 | 36.0 | 0.38 |
| Site Preparation      | Bore/Drill Rigs           | Diesel | Average | 1.00 | 6.00 | 83.0 | 0.50 |
| Site Preparation      | Generator Sets            | Diesel | Average | 2.00 | 8.00 | 14.0 | 0.74 |
| Site Preparation      | Air Compressors           | Diesel | Average | 2.00 | 7.00 | 37.0 | 0.48 |
| Grading               | Excavators                | Diesel | Average | 1.00 | 8.00 | 36.0 | 0.38 |
| Grading               | Graders                   | Diesel | Average | 1.00 | 8.00 | 148  | 0.41 |
| Grading               | Crawler Tractors          | Diesel | Average | 2.00 | 8.00 | 87.0 | 0.43 |
| Grading               | Tractors/Loaders/Backhoes | Diesel | Average | 4.00 | 7.00 | 84.0 | 0.37 |
| Grading               | Bore/Drill Rigs           | Diesel | Average | 1.00 | 6.00 | 83.0 | 0.50 |
| Grading               | Rollers                   | Diesel | Average | 1.00 | 7.00 | 36.0 | 0.38 |
| Grading               | Plate Compactors          | Diesel | Average | 1.00 | 7.00 | 8.00 | 0.43 |
| Grading               | Generator Sets            | Diesel | Average | 2.00 | 7.00 | 14.0 | 0.74 |
| Grading               | Air Compressors           | Diesel | Average | 2.00 | 7.00 | 37.0 | 0.48 |
| Building Construction | Cranes                    | Diesel | Average | 3.00 | 7.00 | 367  | 0.29 |
| Building Construction | Generator Sets            | Diesel | Average | 1.00 | 8.00 | 14.0 | 0.74 |

|                       |                           |        |         |      |      |      |      |
|-----------------------|---------------------------|--------|---------|------|------|------|------|
| Building Construction | Tractors/Loaders/Backhoes | Diesel | Average | 4.00 | 7.00 | 84.0 | 0.37 |
| Building Construction | Welders                   | Diesel | Average | 10.0 | 7.00 | 46.0 | 0.45 |
| Building Construction | Bore/Drill Rigs           | Diesel | Average | 1.00 | 6.00 | 83.0 | 0.50 |
| Building Construction | Rough Terrain Forklifts   | Diesel | Average | 4.00 | 7.00 | 96.0 | 0.40 |
| Building Construction | Cement and Mortar Mixers  | Diesel | Average | 3.00 | 7.00 | 10.0 | 0.56 |
| Building Construction | Plate Compactors          | Diesel | Average | 1.00 | 6.00 | 8.00 | 0.43 |
| Building Construction | Air Compressors           | Diesel | Average | 3.00 | 7.00 | 37.0 | 0.48 |
| Building Construction | Generator Sets            | Diesel | Average | 3.00 | 7.00 | 14.0 | 0.74 |
| Paving                | Pavers                    | Diesel | Average | 2.00 | 7.00 | 81.0 | 0.42 |
| Paving                | Paving Equipment          | Diesel | Average | 2.00 | 7.00 | 89.0 | 0.36 |
| Paving                | Rollers                   | Diesel | Average | 1.00 | 7.00 | 36.0 | 0.38 |
| Paving                | Air Compressors           | Diesel | Average | 2.00 | 7.00 | 37.0 | 0.48 |
| Paving                | Generator Sets            | Diesel | Average | 2.00 | 7.00 | 14.0 | 0.74 |
| Paving                | Plate Compactors          | Diesel | Average | 1.00 | 7.00 | 8.00 | 0.43 |
| Paving                | Cement and Mortar Mixers  | Diesel | Average | 2.00 | 7.00 | 10.0 | 0.56 |
| Paving                | Excavators                | Diesel | Average | 1.00 | 7.00 | 36.0 | 0.38 |
| Paving                | Tractors/Loaders/Backhoes | Diesel | Average | 2.00 | 7.00 | 84.0 | 0.37 |
| Paving                | Graders                   | Diesel | Average | 1.00 | 6.00 | 148  | 0.41 |
| Paving                | Rough Terrain Forklifts   | Diesel | Average | 2.00 | 7.00 | 96.0 | 0.40 |
| Architectural Coating | Air Compressors           | Diesel | Average | 2.00 | 6.00 | 37.0 | 0.48 |
| Architectural Coating | Generator Sets            | Diesel | Average | 2.00 | 7.00 | 14.0 | 0.74 |
| Architectural Coating | Aerial Lifts              | Diesel | Average | 2.00 | 7.00 | 46.0 | 0.31 |

5.3. Construction Vehicles

5.3.1. Unmitigated

| Phase Name            | Trip Type    | One-Way Trips per Day | Miles per Trip | Vehicle Mix   |
|-----------------------|--------------|-----------------------|----------------|---------------|
| Demolition            | —            | —                     | —              | —             |
| Demolition            | Worker       | 80.0                  | 18.5           | LDA,LDT1,LDT2 |
| Demolition            | Vendor       | 16.0                  | 10.2           | HHDT,MHDT     |
| Demolition            | Hauling      | 32.0                  | 20.0           | HHDT          |
| Demolition            | Onsite truck | 2.00                  | 2.00           | HHDT          |
| Site Preparation      | —            | —                     | —              | —             |
| Site Preparation      | Worker       | 80.0                  | 18.5           | LDA,LDT1,LDT2 |
| Site Preparation      | Vendor       | 16.0                  | 10.2           | HHDT,MHDT     |
| Site Preparation      | Hauling      | 80.0                  | 20.0           | HHDT          |
| Site Preparation      | Onsite truck | 2.00                  | 2.00           | HHDT          |
| Grading               | —            | —                     | —              | —             |
| Grading               | Worker       | 80.0                  | 18.5           | LDA,LDT1,LDT2 |
| Grading               | Vendor       | 16.0                  | 10.2           | HHDT,MHDT     |
| Grading               | Hauling      | 120                   | 20.0           | HHDT          |
| Grading               | Onsite truck | 2.00                  | 2.00           | HHDT          |
| Building Construction | —            | —                     | —              | —             |
| Building Construction | Worker       | 160                   | 18.5           | LDA,LDT1,LDT2 |
| Building Construction | Vendor       | 64.0                  | 10.2           | HHDT,MHDT     |
| Building Construction | Hauling      | 0.00                  | 20.0           | HHDT          |
| Building Construction | Onsite truck | 0.00                  | 0.00           | HHDT          |
| Paving                | —            | —                     | —              | —             |
| Paving                | Worker       | 40.0                  | 18.5           | LDA,LDT1,LDT2 |
| Paving                | Vendor       | 16.0                  | 10.2           | HHDT,MHDT     |
| Paving                | Hauling      | 0.00                  | 20.0           | HHDT          |
| Paving                | Onsite truck | 0.00                  | 0.00           | HHDT          |

|                       |              |      |      |               |
|-----------------------|--------------|------|------|---------------|
| Architectural Coating | —            | —    | —    | —             |
| Architectural Coating | Worker       | 40.0 | 18.5 | LDA,LDT1,LDT2 |
| Architectural Coating | Vendor       | 16.0 | 10.2 | HHDT,MHDT     |
| Architectural Coating | Hauling      | 0.00 | 20.0 | HHDT          |
| Architectural Coating | Onsite truck | 0.00 | 0.00 | HHDT          |

5.3.2. Mitigated

| Phase Name            | Trip Type    | One-Way Trips per Day | Miles per Trip | Vehicle Mix   |
|-----------------------|--------------|-----------------------|----------------|---------------|
| Demolition            | —            | —                     | —              | —             |
| Demolition            | Worker       | 80.0                  | 18.5           | LDA,LDT1,LDT2 |
| Demolition            | Vendor       | 16.0                  | 10.2           | HHDT,MHDT     |
| Demolition            | Hauling      | 32.0                  | 20.0           | HHDT          |
| Demolition            | Onsite truck | 2.00                  | 2.00           | HHDT          |
| Site Preparation      | —            | —                     | —              | —             |
| Site Preparation      | Worker       | 80.0                  | 18.5           | LDA,LDT1,LDT2 |
| Site Preparation      | Vendor       | 16.0                  | 10.2           | HHDT,MHDT     |
| Site Preparation      | Hauling      | 80.0                  | 20.0           | HHDT          |
| Site Preparation      | Onsite truck | 2.00                  | 2.00           | HHDT          |
| Grading               | —            | —                     | —              | —             |
| Grading               | Worker       | 80.0                  | 18.5           | LDA,LDT1,LDT2 |
| Grading               | Vendor       | 16.0                  | 10.2           | HHDT,MHDT     |
| Grading               | Hauling      | 120                   | 20.0           | HHDT          |
| Grading               | Onsite truck | 2.00                  | 2.00           | HHDT          |
| Building Construction | —            | —                     | —              | —             |
| Building Construction | Worker       | 160                   | 18.5           | LDA,LDT1,LDT2 |
| Building Construction | Vendor       | 64.0                  | 10.2           | HHDT,MHDT     |
| Building Construction | Hauling      | 0.00                  | 20.0           | HHDT          |

|                       |              |      |      |               |
|-----------------------|--------------|------|------|---------------|
| Building Construction | Onsite truck | 0.00 | 0.00 | HHDT          |
| Paving                | —            | —    | —    | —             |
| Paving                | Worker       | 40.0 | 18.5 | LDA,LDT1,LDT2 |
| Paving                | Vendor       | 16.0 | 10.2 | HHDT,MHDT     |
| Paving                | Hauling      | 0.00 | 20.0 | HHDT          |
| Paving                | Onsite truck | 0.00 | 0.00 | HHDT          |
| Architectural Coating | —            | —    | —    | —             |
| Architectural Coating | Worker       | 40.0 | 18.5 | LDA,LDT1,LDT2 |
| Architectural Coating | Vendor       | 16.0 | 10.2 | HHDT,MHDT     |
| Architectural Coating | Hauling      | 0.00 | 20.0 | HHDT          |
| Architectural Coating | Onsite truck | 0.00 | 0.00 | 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 | 57%            | 57%             |

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                                     | 348,203                                      | 115,776                                      | 6,641                       |

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

| Phase Name       | Material Imported (Ton of Debris) | Material Exported (Ton of Debris) | Acres Graded (acres) | Material Demolished (Building Square Footage) | Acres Paved (acres) |
|------------------|-----------------------------------|-----------------------------------|----------------------|-----------------------------------------------|---------------------|
| Demolition       | 0.00                              | 0.00                              | 60.0                 | 123,000                                       | —                   |
| Site Preparation | 0.00                              | 2,840                             | 7.50                 | 2,840                                         | —                   |
| Grading          | 0.00                              | 69,000                            | 113                  | 0.00                                          | —                   |
| Paving           | 0.00                              | 0.00                              | 16.9                 | 0.00                                          | 2.54                |

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

| Land Use                            | Area Paved (acres) | % Asphalt |
|-------------------------------------|--------------------|-----------|
| Office Park                         | 0.00               | 0%        |
| Unenclosed Parking with Elevator    | 0.67               | 0%        |
| Strip Mall                          | 0.00               | 0%        |
| Arena                               | 0.00               | 0%        |
| General Office Building             | 0.00               | 0%        |
| High Turnover (Sit Down Restaurant) | 0.00               | 0%        |
| High Turnover (Sit Down Restaurant) | 0.00               | 0%        |
| Office Park                         | 0.00               | 0%        |
| Arena                               | 0.00               | 0%        |
| Manufacturing                       | 0.00               | 0%        |
| Office Park                         | 0.00               | 0%        |
| Strip Mall                          | 0.00               | 0%        |
| Office Park                         | 0.00               | 0%        |

|                            |      |     |
|----------------------------|------|-----|
| Other Non-Asphalt Surfaces | 1.87 | 50% |
|----------------------------|------|-----|

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         | 567 | 0.05 | 0.01 |
| 2026 | 0.00         | 567 | 0.05 | 0.01 |
| 2027 | 0.00         | 567 | 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  |
|---------------------|---------------|----------------|--------------|------------|-------------|--------------|------------|-----------|
| Total all Land Uses | 2,953         | 2,215          | 2,215        | 1,000,882  | 21,618      | 16,214       | 16,214     | 7,327,010 |

5.9.2. Mitigated

| Land Use Type       | Trips/Weekday | Trips/Saturday | Trips/Sunday | Trips/Year | VMT/Weekday | VMT/Saturday | VMT/Sunday | VMT/Year  |
|---------------------|---------------|----------------|--------------|------------|-------------|--------------|------------|-----------|
| Total all Land Uses | 2,953         | 2,215          | 2,215        | 1,000,882  | 21,618      | 16,214       | 16,214     | 7,327,010 |

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                                     | 348,203                                      | 115,776                                      | 6,641                       |

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) |
|-------------------------------------|----------------------|-----|--------|--------|-----------------------|
| Office Park                         | 707,236              | 567 | 0.0489 | 0.0069 | 892,079               |
| Unenclosed Parking with Elevator    | 344,360              | 567 | 0.0489 | 0.0069 | 0.00                  |
| Strip Mall                          | 4,978                | 567 | 0.0489 | 0.0069 | 2,462                 |
| Arena                               | 309,960              | 567 | 0.0489 | 0.0069 | 1,130,768             |
| General Office Building             | 1,434,543            | 567 | 0.0489 | 0.0069 | 1,809,473             |
| High Turnover (Sit Down Restaurant) | 309,416              | 567 | 0.0489 | 0.0069 | 899,932               |

|                                     |         |     |        |        |         |
|-------------------------------------|---------|-----|--------|--------|---------|
| High Turnover (Sit Down Restaurant) | 293,131 | 567 | 0.0489 | 0.0069 | 852,567 |
| Office Park                         | 4,779   | 567 | 0.0489 | 0.0069 | 6,028   |
| Arena                               | 185,976 | 567 | 0.0489 | 0.0069 | 678,461 |
| Manufacturing                       | 125,921 | 567 | 0.0489 | 0.0069 | 459,374 |
| Office Park                         | 121,058 | 567 | 0.0489 | 0.0069 | 152,698 |
| Strip Mall                          | 29,870  | 567 | 0.0489 | 0.0069 | 14,772  |
| Office Park                         | 43,008  | 567 | 0.0489 | 0.0069 | 54,248  |
| Other Non-Asphalt Surfaces          | 0.00    | 567 | 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) |
|-------------------------------------|----------------------|-----|--------|--------|-----------------------|
| Office Park                         | 688,167              | 567 | 0.0489 | 0.0069 | 864,867               |
| Unenclosed Parking with Elevator    | 344,360              | 567 | 0.0489 | 0.0069 | 0.00                  |
| Strip Mall                          | 4,827                | 567 | 0.0489 | 0.0069 | 2,455                 |
| Arena                               | 302,009              | 567 | 0.0489 | 0.0069 | 1,122,499             |
| General Office Building             | 1,395,862            | 567 | 0.0489 | 0.0069 | 1,754,278             |
| High Turnover (Sit Down Restaurant) | 270,734              | 567 | 0.0489 | 0.0069 | 898,412               |
| High Turnover (Sit Down Restaurant) | 256,485              | 567 | 0.0489 | 0.0069 | 851,127               |
| Office Park                         | 4,650                | 567 | 0.0489 | 0.0069 | 5,844                 |
| Arena                               | 181,205              | 567 | 0.0489 | 0.0069 | 673,499               |
| Manufacturing                       | 122,691              | 567 | 0.0489 | 0.0069 | 456,015               |
| Office Park                         | 117,794              | 567 | 0.0489 | 0.0069 | 148,040               |
| Strip Mall                          | 28,963               | 567 | 0.0489 | 0.0069 | 14,732                |
| Office Park                         | 41,848               | 567 | 0.0489 | 0.0069 | 52,593                |

|                            |      |     |        |        |      |
|----------------------------|------|-----|--------|--------|------|
| Other Non-Asphalt Surfaces | 0.00 | 567 | 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) |
|-------------------------------------|-------------------------|--------------------------|
| Office Park                         | 7,891,378               | 0.00                     |
| Unenclosed Parking with Elevator    | 0.00                    | 0.00                     |
| Strip Mall                          | 37,036                  | 0.00                     |
| Arena                               | 13,784,644              | 0.00                     |
| General Office Building             | 16,006,701              | 0.00                     |
| High Turnover (Sit Down Restaurant) | 2,883,570               | 0.00                     |
| High Turnover (Sit Down Restaurant) | 2,731,803               | 77,914                   |
| Office Park                         | 53,320                  | 0.00                     |
| Arena                               | 8,270,786               | 0.00                     |
| Manufacturing                       | 3,006,250               | 0.00                     |
| Office Park                         | 1,350,776               | 0.00                     |
| Strip Mall                          | 222,218                 | 0.00                     |
| Office Park                         | 479,881                 | 0.00                     |
| Other Non-Asphalt Surfaces          | 0.00                    | 732,395                  |

5.12.2. Mitigated

| Land Use                         | Indoor Water (gal/year) | Outdoor Water (gal/year) |
|----------------------------------|-------------------------|--------------------------|
| Office Park                      | 7,157,480               | 0.00                     |
| Unenclosed Parking with Elevator | 0.00                    | 0.00                     |
| Strip Mall                       | 33,607                  | 0.00                     |
| Arena                            | 12,508,186              | 0.00                     |

|                                     |            |          |
|-------------------------------------|------------|----------|
| General Office Building             | 14,582,105 | 0.00     |
| High Turnover (Sit Down Restaurant) | 2,616,552  | 0.00     |
| High Turnover (Sit Down Restaurant) | 2,478,838  | 77,914   |
| Office Park                         | 48,361     | 0.00     |
| Arena                               | 7,504,911  | 0.00     |
| Manufacturing                       | 3,006,250  | 0.00     |
| Office Park                         | 1,225,154  | 0.00     |
| Strip Mall                          | 201,640    | 0.00     |
| Office Park                         | 435,252    | 0.00     |
| Other Non-Asphalt Surfaces          | 0.00       | -172,771 |

5.13. Operational Waste Generation

5.13.1. Unmitigated

| Land Use                            | Waste (ton/year) | Cogeneration (kWh/year) |
|-------------------------------------|------------------|-------------------------|
| Office Park                         | 41.3             | —                       |
| Unenclosed Parking with Elevator    | 0.00             | —                       |
| Strip Mall                          | 0.53             | —                       |
| Arena                               | 0.88             | —                       |
| General Office Building             | 83.8             | —                       |
| High Turnover (Sit Down Restaurant) | 113              | —                       |
| High Turnover (Sit Down Restaurant) | 107              | —                       |
| Office Park                         | 0.28             | —                       |
| Arena                               | 0.53             | —                       |
| Manufacturing                       | 16.1             | —                       |
| Office Park                         | 7.07             | —                       |
| Strip Mall                          | 3.15             | —                       |

|                            |      |   |
|----------------------------|------|---|
| Office Park                | 2.51 | — |
| Other Non-Asphalt Surfaces | 0.00 | — |

5.13.2. Mitigated

| Land Use                            | Waste (ton/year) | Cogeneration (kWh/year) |
|-------------------------------------|------------------|-------------------------|
| Office Park                         | 41.3             | —                       |
| Unenclosed Parking with Elevator    | 0.00             | —                       |
| Strip Mall                          | 0.53             | —                       |
| Arena                               | 0.88             | —                       |
| General Office Building             | 83.8             | —                       |
| High Turnover (Sit Down Restaurant) | 113              | —                       |
| High Turnover (Sit Down Restaurant) | 107              | —                       |
| Office Park                         | 0.28             | —                       |
| Arena                               | 0.53             | —                       |
| Manufacturing                       | 16.1             | —                       |
| Office Park                         | 7.07             | —                       |
| Strip Mall                          | 3.15             | —                       |
| Office Park                         | 2.51             | —                       |
| Other Non-Asphalt Surfaces          | 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 |
|---------------|-----------------------------------------|-------------|-------|---------------|----------------------|-------------------|----------------|
| Office Park   | Household refrigerators and/or freezers | R-134a      | 1,430 | 0.02          | 0.60                 | 0.00              | 1.00           |
| Office Park   | Other commercial A/C and heat pumps     | R-410A      | 2,088 | < 0.005       | 4.00                 | 4.00              | 18.0           |

|                                     |                                               |        |       |         |      |      |      |
|-------------------------------------|-----------------------------------------------|--------|-------|---------|------|------|------|
| Strip Mall                          | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Strip Mall                          | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04    | 1.00 | 0.00 | 1.00 |
| Strip Mall                          | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| Arena                               | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Arena                               | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04    | 1.00 | 0.00 | 1.00 |
| Arena                               | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| General Office Building             | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.02    | 0.60 | 0.00 | 1.00 |
| General Office Building             | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| High Turnover (Sit Down Restaurant) | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.00    | 0.60 | 0.00 | 1.00 |
| High Turnover (Sit Down Restaurant) | Other commercial A/C and heat pumps           | R-410A | 2,088 | 1.80    | 4.00 | 4.00 | 18.0 |
| High Turnover (Sit Down Restaurant) | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| High Turnover (Sit Down Restaurant) | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.00    | 0.60 | 0.00 | 1.00 |
| High Turnover (Sit Down Restaurant) | Other commercial A/C and heat pumps           | R-410A | 2,088 | 1.80    | 4.00 | 4.00 | 18.0 |
| High Turnover (Sit Down Restaurant) | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| Office Park                         | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.02    | 0.60 | 0.00 | 1.00 |
| Office Park                         | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |

|               |                                               |        |       |         |      |      |      |
|---------------|-----------------------------------------------|--------|-------|---------|------|------|------|
| Arena         | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Arena         | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04    | 1.00 | 0.00 | 1.00 |
| Arena         | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| Manufacturing | Other commercial A/C and heat pumps           | R-410A | 2,088 | 0.30    | 4.00 | 4.00 | 18.0 |
| Office Park   | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.02    | 0.60 | 0.00 | 1.00 |
| Office Park   | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Strip Mall    | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Strip Mall    | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04    | 1.00 | 0.00 | 1.00 |
| Strip Mall    | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| Office Park   | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.02    | 0.60 | 0.00 | 1.00 |
| Office Park   | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |

5.14.2. Mitigated

| Land Use Type | Equipment Type                          | Refrigerant | GWP   | Quantity (kg) | Operations Leak Rate | Service Leak Rate | Times Serviced |
|---------------|-----------------------------------------|-------------|-------|---------------|----------------------|-------------------|----------------|
| Office Park   | Household refrigerators and/or freezers | R-134a      | 1,430 | 0.02          | 0.60                 | 0.00              | 1.00           |
| Office Park   | Other commercial A/C and heat pumps     | R-410A      | 2,088 | < 0.005       | 4.00                 | 4.00              | 18.0           |
| Strip Mall    | Other commercial A/C and heat pumps     | R-410A      | 2,088 | < 0.005       | 4.00                 | 4.00              | 18.0           |

|                                     |                                               |        |       |         |      |      |      |
|-------------------------------------|-----------------------------------------------|--------|-------|---------|------|------|------|
| Strip Mall                          | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04    | 1.00 | 0.00 | 1.00 |
| Strip Mall                          | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| Arena                               | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Arena                               | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04    | 1.00 | 0.00 | 1.00 |
| Arena                               | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| General Office Building             | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.02    | 0.60 | 0.00 | 1.00 |
| General Office Building             | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| High Turnover (Sit Down Restaurant) | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.00    | 0.60 | 0.00 | 1.00 |
| High Turnover (Sit Down Restaurant) | Other commercial A/C and heat pumps           | R-410A | 2,088 | 1.80    | 4.00 | 4.00 | 18.0 |
| High Turnover (Sit Down Restaurant) | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| High Turnover (Sit Down Restaurant) | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.00    | 0.60 | 0.00 | 1.00 |
| High Turnover (Sit Down Restaurant) | Other commercial A/C and heat pumps           | R-410A | 2,088 | 1.80    | 4.00 | 4.00 | 18.0 |
| High Turnover (Sit Down Restaurant) | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| Office Park                         | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.02    | 0.60 | 0.00 | 1.00 |
| Office Park                         | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Arena                               | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |

|               |                                               |        |       |         |      |      |      |
|---------------|-----------------------------------------------|--------|-------|---------|------|------|------|
| Arena         | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04    | 1.00 | 0.00 | 1.00 |
| Arena         | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| Manufacturing | Other commercial A/C and heat pumps           | R-410A | 2,088 | 0.30    | 4.00 | 4.00 | 18.0 |
| Office Park   | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.02    | 0.60 | 0.00 | 1.00 |
| Office Park   | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Strip Mall    | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| Strip Mall    | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04    | 1.00 | 0.00 | 1.00 |
| Strip Mall    | Walk-in refrigerators and freezers            | R-404A | 3,922 | < 0.005 | 7.50 | 7.50 | 20.0 |
| Office Park   | Household refrigerators and/or freezers       | R-134a | 1,430 | 0.02    | 0.60 | 0.00 | 1.00 |
| Office Park   | Other commercial A/C and heat pumps           | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

| Equipment Type          | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|-------------------------|-----------|-------------|----------------|---------------|------------|-------------|
| Forklifts               | Diesel    | Average     | 12.0           | 8.00          | 82.0       | 0.20        |
| Rough Terrain Forklifts | Diesel    | Average     | 4.00           | 6.00          | 96.0       | 0.40        |
| Aerial Lifts            | Diesel    | Average     | 4.00           | 8.00          | 46.0       | 0.31        |
| Generator Sets          | Diesel    | Average     | 4.00           | 6.00          | 14.0       | 0.74        |

5.15.2. Mitigated

| Equipment Type          | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|-------------------------|-----------|-------------|----------------|---------------|------------|-------------|
| Forklifts               | Diesel    | Average     | 12.0           | 8.00          | 82.0       | 0.20        |
| Rough Terrain Forklifts | Diesel    | Average     | 4.00           | 6.00          | 96.0       | 0.40        |
| Aerial Lifts            | Diesel    | Average     | 4.00           | 8.00          | 46.0       | 0.31        |
| Generator Sets          | Diesel    | Average     | 4.00           | 6.00          | 14.0       | 0.74        |

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 |
|----------------|-----------|----------------|---------------|----------------|------------|-------------|
|----------------|-----------|----------------|---------------|----------------|------------|-------------|

5.16.2. Process Boilers

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

5.17. User Defined

| Equipment Type | Fuel Type |
|----------------|-----------|
|----------------|-----------|

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

| Vegetation Land Use Type | Vegetation Soil Type | Initial Acres | Final Acres |
|--------------------------|----------------------|---------------|-------------|
|--------------------------|----------------------|---------------|-------------|

5.18.1.2. Mitigated

| Vegetation Land Use Type | Vegetation Soil Type | Initial Acres | Final Acres |
|--------------------------|----------------------|---------------|-------------|
|--------------------------|----------------------|---------------|-------------|

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

| Biomass Cover Type | Initial Acres | Final Acres |
|--------------------|---------------|-------------|
|--------------------|---------------|-------------|

5.18.1.2. Mitigated

| Biomass Cover Type | Initial Acres | Final Acres |
|--------------------|---------------|-------------|
|--------------------|---------------|-------------|

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

5.18.2.2. Mitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

| Climate Hazard               | Result for Project Location | Unit                                       |
|------------------------------|-----------------------------|--------------------------------------------|
| Temperature and Extreme Heat | 5.47                        | annual days of extreme heat                |
| Extreme Precipitation        | 5.55                        | annual days with precipitation above 20 mm |
| Sea Level Rise               | —                           | meters of inundation depth                 |

|          |      |                        |
|----------|------|------------------------|
| Wildfire | 0.00 | annual hectares burned |
|----------|------|------------------------|

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

| Climate Hazard               | Exposure Score | Sensitivity Score | Adaptive Capacity Score | Vulnerability Score |
|------------------------------|----------------|-------------------|-------------------------|---------------------|
| Temperature and Extreme Heat | 2              | 1                 | 3                       | 2                   |
| Extreme Precipitation        | N/A            | N/A               | N/A                     | N/A                 |
| Sea Level Rise               | 1              | 1                 | 2                       | 1                   |
| Wildfire                     | 2              | 2                 | 2                       | 2                   |
| Flooding                     | N/A            | N/A               | N/A                     | N/A                 |
| Drought                      | N/A            | N/A               | N/A                     | N/A                 |
| Snowpack Reduction           | N/A            | N/A               | N/A                     | N/A                 |
| Air Quality Degradation      | 0              | 1                 | 2                       | 1                   |

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

| Climate Hazard               | Exposure Score | Sensitivity Score | Adaptive Capacity Score | Vulnerability Score |
|------------------------------|----------------|-------------------|-------------------------|---------------------|
| Temperature and Extreme Heat | 1              | 1                 | 4                       | 1                   |

|                         |     |     |     |     |
|-------------------------|-----|-----|-----|-----|
| Extreme Precipitation   | N/A | N/A | N/A | N/A |
| Sea Level Rise          | 1   | 1   | 2   | 1   |
| Wildfire                | 2   | 2   | 2   | 2   |
| Flooding                | N/A | N/A | N/A | N/A |
| Drought                 | N/A | N/A | N/A | N/A |
| Snowpack Reduction      | N/A | N/A | N/A | N/A |
| Air Quality Degradation | 1   | 1   | 3   | 1   |

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

6.4.1. Temperature and Extreme Heat

| User Selected Measures                     | Co-Benefits Achieved                                                                 | Exposure Reduction | Sensitivity Reduction | Adaptive Capacity Increase |
|--------------------------------------------|--------------------------------------------------------------------------------------|--------------------|-----------------------|----------------------------|
| D-3: Install Drought Resistant Landscaping | Water Conservation                                                                   | —                  | 1.00                  | 1.00                       |
| EH-4: Enhance Building Envelope Efficiency | Energy and Fuel Savings, Improved Air Quality, Improved Public Health, Social Equity | —                  | —                     | 1.00                       |
| EH-9: Expand Urban Tree Canopy             | Energy and Fuel Savings, Improved Air Quality, Improved Public Health, Social Equity | 1.00               | 1.00                  | —                          |
| EH-10: Install Covered Parking             | Improved Air Quality, Improved Public Health                                         | —                  | —                     | 1.00                       |

6.4.2. Air Quality Degradation

| User Selected Measures | Co-Benefits Achieved | Exposure Reduction | Sensitivity Reduction | Adaptive Capacity Increase |
|------------------------|----------------------|--------------------|-----------------------|----------------------------|
|------------------------|----------------------|--------------------|-----------------------|----------------------------|

|                                            |                                                                                      |   |   |      |
|--------------------------------------------|--------------------------------------------------------------------------------------|---|---|------|
| EH-4: Enhance Building Envelope Efficiency | Energy and Fuel Savings, Improved Air Quality, Improved Public Health, Social Equity | — | — | 1.00 |
|--------------------------------------------|--------------------------------------------------------------------------------------|---|---|------|

## 7. Health and Equity Details

### 7.1. CalEnviroScreen 4.0 Scores

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

| Indicator                       | Result for Project Census Tract |
|---------------------------------|---------------------------------|
| Exposure Indicators             | —                               |
| AQ-Ozone                        | 40.0                            |
| AQ-PM                           | 73.9                            |
| AQ-DPM                          | 30.1                            |
| Drinking Water                  | 92.5                            |
| Lead Risk Housing               | 86.1                            |
| Pesticides                      | 38.3                            |
| Toxic Releases                  | 82.4                            |
| Traffic                         | 28.4                            |
| Effect Indicators               | —                               |
| CleanUp Sites                   | 20.5                            |
| Groundwater                     | 50.1                            |
| Haz Waste Facilities/Generators | 64.6                            |
| Impaired Water Bodies           | 0.00                            |
| Solid Waste                     | 9.67                            |
| Sensitive Population            | —                               |
| Asthma                          | 95.7                            |
| Cardio-vascular                 | 71.3                            |
| Low Birth Weights               | 98.3                            |

|                                 |      |
|---------------------------------|------|
| Socioeconomic Factor Indicators | —    |
| Education                       | 61.7 |
| Housing                         | 98.4 |
| Linguistic                      | 56.3 |
| Poverty                         | 82.4 |
| Unemployment                    | 94.3 |

7.2. Healthy Places Index Scores

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

| Indicator              | Result for Project Census Tract |
|------------------------|---------------------------------|
| Economic               | —                               |
| Above Poverty          | 22.98216348                     |
| Employed               | 17.64403952                     |
| Median HI              | 0.731425638                     |
| Education              | —                               |
| Bachelor's or higher   | 50.28872065                     |
| High school enrollment | 100                             |
| Preschool enrollment   | 17.78519184                     |
| Transportation         | —                               |
| Auto Access            | 1.924804312                     |
| Active commuting       | 80.85461311                     |
| Social                 | —                               |
| 2-parent households    | 3.926600796                     |
| Voting                 | 10.6249198                      |
| Neighborhood           | —                               |
| Alcohol availability   | 63.18490953                     |
| Park access            | 81.35506224                     |

|                                              |             |
|----------------------------------------------|-------------|
| Retail density                               | 78.8399846  |
| Supermarket access                           | 43.15411267 |
| Tree canopy                                  | 55.97330938 |
| Housing                                      | —           |
| Homeownership                                | 9.162068523 |
| Housing habitability                         | 22.0069293  |
| Low-inc homeowner severe housing cost burden | 85.34582317 |
| Low-inc renter severe housing cost burden    | 15.10329783 |
| Uncrowded housing                            | 69.47260362 |
| Health Outcomes                              | —           |
| Insured adults                               | 43.44924933 |
| Arthritis                                    | 3.0         |
| Asthma ER Admissions                         | 7.0         |
| High Blood Pressure                          | 1.0         |
| Cancer (excluding skin)                      | 25.9        |
| Asthma                                       | 3.8         |
| Coronary Heart Disease                       | 5.2         |
| Chronic Obstructive Pulmonary Disease        | 6.6         |
| Diagnosed Diabetes                           | 0.9         |
| Life Expectancy at Birth                     | 5.2         |
| Cognitively Disabled                         | 7.9         |
| Physically Disabled                          | 2.9         |
| Heart Attack ER Admissions                   | 51.9        |
| Mental Health Not Good                       | 24.7        |
| Chronic Kidney Disease                       | 1.7         |
| Obesity                                      | 5.4         |
| Pedestrian Injuries                          | 97.4        |

|                                       |      |
|---------------------------------------|------|
| Physical Health Not Good              | 14.8 |
| Stroke                                | 0.9  |
| Health Risk Behaviors                 | —    |
| Binge Drinking                        | 97.9 |
| Current Smoker                        | 26.1 |
| No Leisure Time for Physical Activity | 21.7 |
| Climate Change Exposures              | —    |
| Wildfire Risk                         | 0.0  |
| SLR Inundation Area                   | 0.0  |
| Children                              | 51.6 |
| Elderly                               | 12.6 |
| English Speaking                      | 23.3 |
| Foreign-born                          | 31.7 |
| Outdoor Workers                       | 87.4 |
| Climate Change Adaptive Capacity      | —    |
| Impervious Surface Cover              | 15.7 |
| Traffic Density                       | 65.8 |
| Traffic Access                        | 87.4 |
| Other Indices                         | —    |
| Hardship                              | 70.0 |
| Other Decision Support                | —    |
| 2016 Voting                           | 12.6 |

7.3. Overall Health & Equity Scores

| Metric                                              | Result for Project Census Tract |
|-----------------------------------------------------|---------------------------------|
| CalEnviroScreen 4.0 Score for Project Location (a)  | 90.0                            |
| Healthy Places Index Score for Project Location (b) | 8.00                            |

|                                                                                     |     |
|-------------------------------------------------------------------------------------|-----|
| Project Located in a Designated Disadvantaged Community (Senate Bill 535)           | Yes |
| Project Located in a Low-Income Community (Assembly Bill 1550)                      | Yes |
| Project Located in a Community Air Protection Program Community (Assembly Bill 617) | No  |

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

| Screen                                    | Justification                                                                                                 |
|-------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| Characteristics: Utility Information      | Source: LADWP 2022 Power Content Label                                                                        |
| Land Use                                  | Project elements obtained from Site Plan & Project Description.                                               |
| Construction: Construction Phases         | Schedule provided by Applicant.                                                                               |
| Construction: Off-Road Equipment          | Equipment inventories provided by Applicant.                                                                  |
| Construction: Dust From Material Movement | Demolition and Paving phases added due to ground-disturbing equipment.                                        |
| Construction: Trips and VMT               | Conservative estimates of construction trips.                                                                 |
| Construction: On-Road Fugitive Dust       | Vehicle speeds on unpaved surfaces limited to 15 mph per SCAQMD Rule 403 (57% reduction based on Table XI-A). |
| Construction: Paving                      | Parking structure will not be asphalt; Portions of service roads will be.                                     |
| Construction: Electricity                 | Source: LADWP 2022 Power Content Label                                                                        |
| Construction: Demolition                  | Existing hardscape (asphalt & concrete) to be removed during site preparation.                                |
| Operations: Off-Road Equipment            | On-site operational equipment supporting studio productions & mill shop.                                      |
| Construction: Architectural Coatings      | SCAQMD Rule 1113 requires a VOC content less than or equal to 50 g/L effective January 1, 2019.               |