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Date: October 28, 2025

To: Todd Jordan, Citrus Heights Water District

From: Sarah Henningsen, Ascent

Subject: Citrus Heights Water District Facilities Modernization and Expansion Project, Environmental Information Supporting a Categorical Exemption

1 INTRODUCTION

The Citrus Heights Water District (CHWD) is proposing to modernize its existing corporation yard at 6230 Sylvan Road in Citrus Heights and relocate some existing staff to its newly acquired office building at 7803B Madison Avenue in Citrus Heights. The Facilities Modernization and Expansion Project (project) would address existing facility deficiencies and projected office/maintenance needs through 2045. At the existing corporation yard, the project would include interior renovations of two office buildings, demolition of an existing maintenance shop, construction of a new maintenance shop, and site improvements involving earthmoving and construction of underground utilities. Additionally, CHWD recently purchased an office building at 7803B Madison Avenue (and filed a CEQA notice of exemption [NOE] for the purchase in February 2025). As part of the project, the interior of the office building would be renovated and some existing CHWD staff would be relocated to the new location. Finally, CHWD would acquire the parcel located at 7505 Greenback Lane, adjacent to the Sylvan Road site, which is called the “cabin property,” demolish two on-site buildings and install a well, associated piping, and a potential storage area.

As detailed in Section 3, “Exemptions under CEQA,” CHWD has determined that the project is exempt under State CEQA Guidelines Section 15301 (Class 1) for existing facilities and, on a separate and independent basis, Section 15301 (Class 2) for replacement or reconstruction projects.

2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

As noted above, the project site includes two sites located approximately 2 miles apart within the City of Citrus Heights, California: 6230 Sylvan Road (hereafter referred to as the Sylvan Road site) and 7803B Madison Avenue (hereafter referred to as the Madison Avenue site) (Figure 1). Additionally, CHWD would acquire the parcel located at 7505 Greenback Lane, adjacent to the Sylvan Road site, the “cabin property.”

Sylvan Road site

The Sylvan Road site encompasses approximately 3.2 acres, including the Greenback frontage (Figure 2). The Sylvan Road site includes several existing buildings, storage areas, vacuum basins, a fuel station, a well, and parking (Figure 3). The Sylvan Road site is located on Sylvan Road, just north of Greenback Lane. Several trees are located

throughout the site. Two undeveloped lots are located along Greenback Lane and these are referred to as the "Greenback frontage." The site includes three gated entrances, with one located along Greenback Lane and two located on Sylvan Road. Public access to the site's customer service department is provided via Sylvan Road, where two public parking spaces are available. There are 66 staff parking spaces on the site within the gated area. The cabin property is located adjacent to the Sylvan Road site (Figure 2) and contains two existing buildings. The buildings are single-story, residential buildings that are currently vacant.

The Sylvan Road site is surrounded by urban development, including various commercial development to the south and west, a self-storage business to the north, and San Juan High School to the east. Vehicular traffic occurs along Sylvan Road and Greenback Lane. Sacramento Regional Transit's (SacRT's) Greenback bus route (Route 1) is located along Greenback Lane and the closest bus stop is on Greenback Lane at its intersection with Sylvan Road, in front of the Greenback Tires and Wheels.

Madison Avenue Site

The Madison Avenue site includes an existing 14,436 square feet (sf) office building and 49 parking spaces (Figure 4). The office building is located in a business park with existing medical, dental, and office tenants. A private road (Village Way) is shared with neighboring properties. The Madison Avenue site is located on Madison Avenue, between Primrose Drive and Sunrise Boulevard.

The Madison Avenue site is also surrounded by urban development, including residential uses to the west, medical and office uses to the north and south, and commercial uses to the east. Vehicular traffic occurs along Madison Avenue and Village Way. SacRT's Sunrise bus route (Routes 21 and 124) is located along Sunrise Boulevard and the closest bus stop is on Sunrise Boulevard at its intersection with Madison Avenue, in front of the McDonald's.

2.2 GENERAL PLAN LAND USE AND ZONING DESIGNATIONS

The existing land use designations and zoning for the project site are shown in Table 1.

Table 1. Existing Land Use Designations and Zoning

Project Site	Address/Assessor's Parcel Number	General Plan Designation	Current Zoning [Proposed Zoning]
Sylvan Road site	6230 Sylvan Road / 243-0180-046	General Commercial	Limited Commercial (LC) [LC]
	6230 Sylvan Road / 243-0180-052	General Commercial	Medium Density Residential (RD 20) [LC]
	7515 Greenback Lane / 243-0180-004	General Commercial	Business and Professional Office (BP) [LC]
	7529 Greenback Lane / 243-0180-010	General Commercial	Business and Professional Office (BP) [LC]
	7505 Greenback Lane / 243-0180-002	General Commercial	Limited Commercial (LC) [LC]
Madison Avenue site	7830B Madison Avenue / 233-0440-031	Business Professional	Business and Professional Office (BP) [BP]

Source: Compiled by Ascent in 2025 from the City of Citrus Heights General Plan land use map (2020) and zoning.



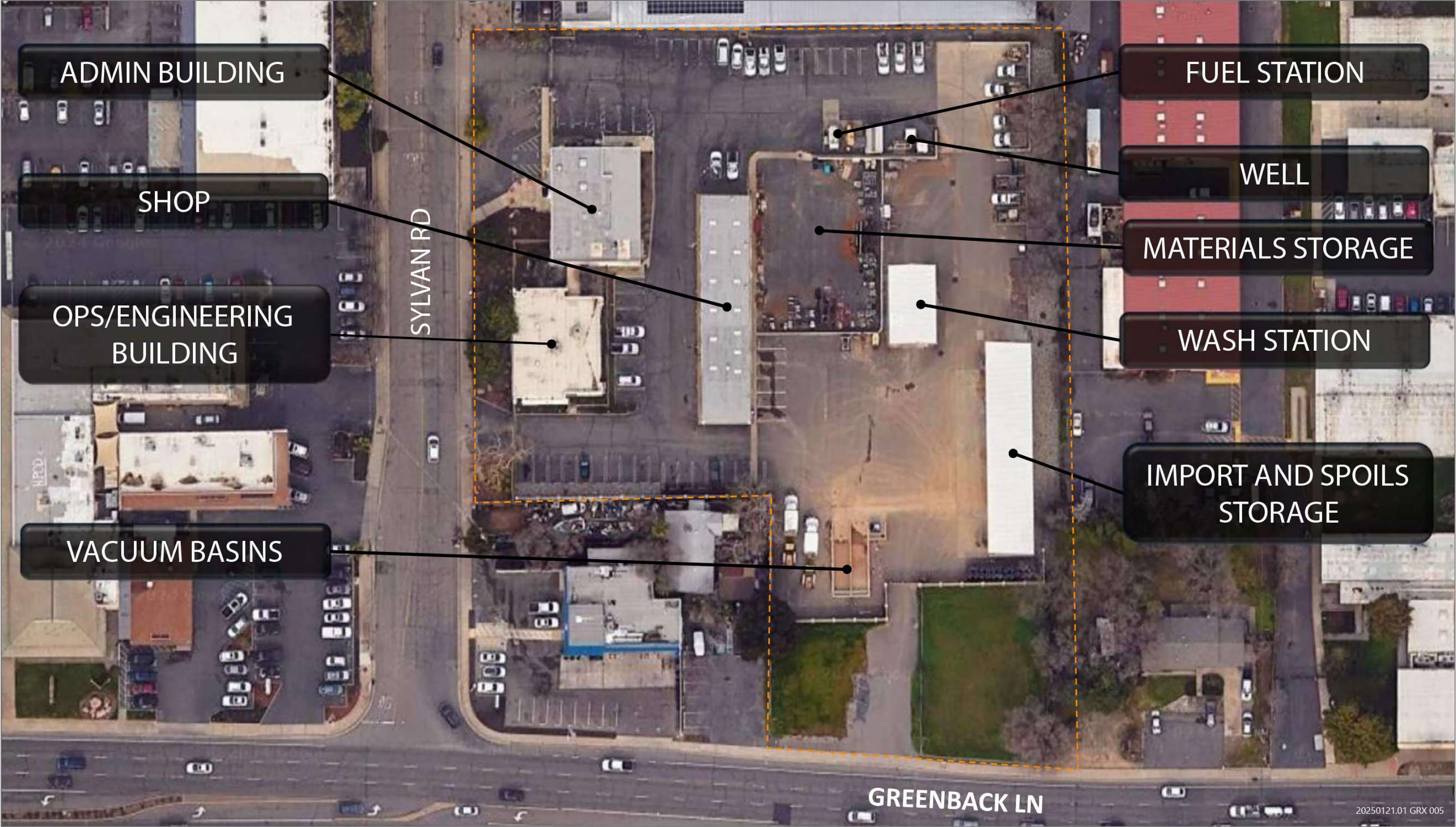
Source: Adapted by Ascent in 2025.

Figure 1 Project Location



Source: Provided by CHWD in 2025; adapted by Ascent in 2025.

Figure 2 Existing Sylvan Road Site



Source: Provided by CHWD in 2025; adapted by Ascent in 2025.

Figure 3 Existing Facilities at Sylvan Road Site



Source: Provided by CHWD in 2025; adapted by Ascent in 2025.

Figure 4 Existing Madison Avenue Site

Under the City's General Plan, the General Commercial land use designation provides for retail uses, services, restaurants, professional and administrative offices, hotels and motels, mixed-use projects, multi-family residences, public and quasi-public uses, and similar and compatible uses. The Business Professional land use designation provides for office uses, including uses supportive of offices, public and quasi-public uses, mixed-use projects, multi-family and similar and compatible uses.

As part of the project, CHWD would seek approval from the City of Citrus Heights Planning Commission to merge and rezone the parcels that comprise the Sylvan Road site to Limited Commercial (LC). To merge the lots into one lot, each lot must have the same zoning. The proposed zoning of Limited Commercial would align with the site's current and continuing use as a Corporation Yard. Existing land uses on the site would not change and the proposed rezone would not allow an increase in use intensity.

The Madsion Avenue site would not be rezoned because the current designation (Business Professional) and zoning (Business and Professional Office) is consistent with its proposed use.

2.3 EXISTING FACILITIES/NEED FOR PROJECT

CHWD's existing corporation yard is located at 6230 Sylvan Road in Citrus Heights, which occupies approximately 3.2 acres. Over the years, the site has evolved through incremental property acquisition, additions, and renovations without a unified master plan, resulting in several buildings that are functionally outdated and undersized for CHWD's current and future needs. In the past few years, CHWD conducted a comprehensive Space Needs Assessment to evaluate current facility limitations and forecast future space requirements through the year 2045. This assessment is the foundation for determining the scope, layout, and functionality of the proposed project.

The existing corporation yard includes the following buildings and associated limitations:

Administration Building (approximately 3,760 sf)

- ▶ Houses administrative staff, customer service functions, and CHWD's boardroom.
- ▶ Renovated in 2015 to improve lighting, insulation, and HVAC; however, the building is now at full capacity.
- ▶ Lacks flexibility due to previous retrofits and has limited potential for internal reconfiguration.
- ▶ Office space is insufficient for current staffing levels, with no available workstations for temporary or future staff.
- ▶ Meeting space is inadequate—the boardroom cannot accommodate large gatherings, community meetings, or staff-wide trainings.
- ▶ The IT server room is undersized, lacks workspace, and does not meet current standards for cooling, access, or security.
- ▶ Building systems, including mechanical, electrical, and plumbing, are outdated and underperforming.
- ▶ Life safety systems are inadequate and require upgrades to meet current codes and best practices.

Operations and Engineering Building (approximately 3,406 sf)

- ▶ Constructed in 1991, this building houses staff from Operations, Engineering, Water Quality, and Water Efficiency.
- ▶ Interior features include shared offices, a kitchenette, lockers, restrooms, and limited storage.
- ▶ The building suffers from significant space constraints, including insufficient locker room facilities and inadequate storage.
- ▶ The layout is inefficient, with poor separation between field and office functions, leading to noise, dust, and disruptions to office work.
- ▶ Multiple adjacency issues result in commingled workspaces and reduced operational efficiency.

- ▶ The building lacks adequate ventilation, privacy, and appropriate life safety systems.
- ▶ The structure is aging and will require substantial upgrades to continue supporting District operations.

Shop Building (approximately 4,200 sf)

- ▶ Constructed in 1987, the shop is currently used for vehicle storage, welding, materials and parts storage, and limited records storage.
- ▶ The building was not designed for occupancy and lacks basic infrastructure, including ventilation, plumbing, and sufficient lighting.
- ▶ Vehicle access is constrained by limited clearance and poor circulation, making it difficult to maneuver or service large equipment.
- ▶ The co-location of welding operations, material storage, and records creates safety and workflow concerns.

Greenback Frontage

- ▶ Two undeveloped properties, recently acquired by CHWD, that require grading, installation of a perimeter wall, and relocation of the existing driveway to provide better site access.

Yard Facilities and Infrastructure

- ▶ Field Operations Area: Includes a vehicle wash station, material storage shed, and vacuum excavation basins constructed in 2017.
- ▶ Oversized Material Storage: Used for pipe, hydrants, valves, and other large components.
- ▶ Well: Constructed in 1991. A production well located at the northeast corner of the yard. The well has potential water quality issues; therefore, a new location is being investigated.
- ▶ Standby Power: A backup generator and fuel storage tank located at the northeast corner of the yard.
- ▶ Parking: 67 on-site spaces for staff and fleet vehicles.
- ▶ Security: Perimeter fencing, cameras, and gated access in place, but security challenges persist due to nearby encampments. Perimeter fencing to be adjusted to enclose the Greenback frontage properties.

As described above, CHWD recently purchased an office building at 7803B Madison Avenue in Citrus Heights, which has the following characteristics:

- ▶ A 14,436 sf office building with 49 parking stalls.
- ▶ Structurally sound and suitable for adaptive reuse.
- ▶ Requires reconfiguration to serve as administrative and engineering headquarters.
- ▶ Lacks perimeter security and operational yard space but offers an opportunity to reduce construction-related disruptions at the corporation yard.

2.4 PROJECT OBJECTIVES

The following objectives have been established for the project:

- ▶ provide facilities to meet space and parking requirements through 2045;
- ▶ maximize utilization of the Sylvan site to provide adequate site access, operational efficiency, and site circulation;
- ▶ maximize existing building space by efficiently aligning staff adjacencies with workspace requirements; and

- ▶ develop building and site layouts that incorporate employee safety, energy, efficiency, information technology, and site security.

2.5 PROJECT COMPONENTS

The project consists of proposed improvements at the two sites: the existing corporation yard at the Sylvan Road site and the newly acquired office building at the Madison Avenue site.

Sylvan Road Site

At the Sylvan Road site, the existing office buildings located along Sylvan Road would be renovated, while the facilities further to the interior of the site would be improved to allow for greater operational efficiencies, as described in greater detail below. The proposed improvements at the Sylvan Road site are shown on Figures 5 and 6.

ADMINISTRATION BUILDING RENOVATION

The existing administration building would be renovated to include, upgraded restrooms, a large meeting room capable of accommodating all CHWD staff, new locker rooms with showers and secured lockers and flexible "hotel" offices for staff who occasionally work at the Sylvan site.

OPERATIONS AND ENGINEERING BUILDING RENOVATION

The existing operations and engineering building would be reconfigured to house operations staff and construction inspectors. Dedicated private offices would be provided for each staff member and satellite offices would be provided for temporary or shared use. A meeting room would also be included to support daily coordination and team meetings.

NEW SHOP CONSTRUCTION

The existing shop building would be demolished and replaced with a modern facility designed to meet operational and emergency response needs. The new shop would be 4,800 sf (which is 600 sf larger than the existing 4,200 sf building), with dedicated space for vehicle storage, welding, equipment maintenance, and parts storage. Access to the shop would be from the east.

GREENBACK FRONTAGE IMPROVEMENTS

As part of the project, access would be improved along Greenback Lane and frontage improvements would be made to enhance the site's visual appearance from the roadway (Figure 7). The Greenback frontage area would be graded to improve its usability. The existing driveway would be relocated. New retaining walls and fences would be constructed closer to Greenback Lane and along the Sylvan Road site's eastern boundary. The existing vacuum basins would be relocated to this area. Finally, frontage improvements are expected to consist of new sidewalks and a new streetlight.

OTHER SITE IMPROVEMENTS

Within the central portion of the Sylvan Road site, there is an area that is lower than the surrounding area. that would be filled and graded to match the surrounding area. Construction at the project site may require the removal of on-site vegetation, including several trees.

CABIN PROPERTY

As part of the project, CHWD would acquire the parcel located at 7505 Greenback Lane, adjacent to the Sylvan Road site (Figure 2). Both of the existing buildings would be demolished and the area would be prepared for a potential new well and associated piping. Additionally, CHWD would build a storage area on the property.

Madison Avenue Site

The interior of the existing building at 7803B Madison Avenue would be renovated to serve as CHWD's primary administrative and engineering headquarters. It would accommodate the General Manager, Administration, Public Affairs, IT, and most of the Engineering departments. Renovations would include new private offices, a customer service reception area, boardroom, cafeteria, meeting rooms, and upgraded restroom facilities (Figure 8). Additional/modern lighting and signage would be provided along the exterior of the building and parking lot. Additionally, exterior improvements would include a trash enclosure, fenced-in patio, landscape lighting, landscaping, and resurfacing and restriping of the parking lot.

Summary

Table 2 provides a summary of the existing facilities and the proposed improvements. About 40 staff are currently employed at the Sylvan Road site. With project implementation, about 6 new staff would be added over time and of the 46 total future staff, 21 staff would remain at the Sylvan Road site and 25 would be relocated to the Madison Avenue site. The primary source of vehicle trips to/from the Sylvan Road site is employee commute trips and mail deliveries (4 days per week due to the office being closed on Fridays). A similar level of vehicle trips would continue with implementation of the project, with daily mail deliveries to both sites, 21 staff continuing to commute to/from the Sylvan Road site, and 25 staff commuting to/from the Madison Avenue site.

Table 2. Summary of Existing Facilities and Proposed Improvements

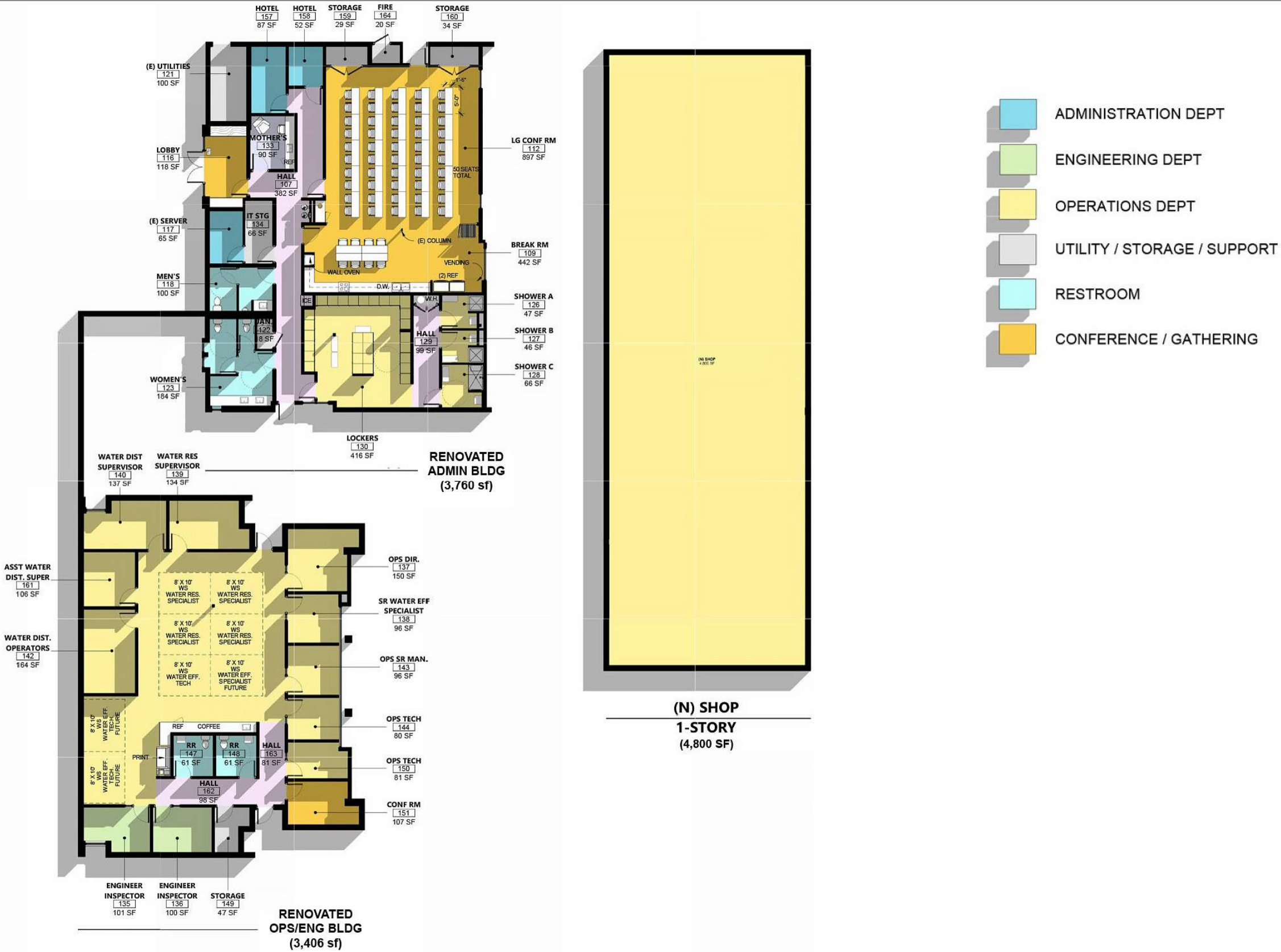
Project Site	Existing Facility/Area	Proposed Improvements
Sylvan Road site	Administration building (3,760 sf)	Renovate interior
	Operations and engineering building (3,406 sf)	Renovate interior
	Shop building (4,200 sf)	Demolish existing shop building and construct new shop building with 4,800 sf (which is 600 sf larger than the existing building)
	Greenback frontage	Grade area to improve its usability, relocate existing driveway, construct retaining walls and fences closer to Greenback Lane and along the Sylvan Road site's eastern boundary, relocate existing vacuum basins to this area, and install new sidewalks and a new streetlight
	Remainder of Sylvan Road site	Fill and grade one area to match the surrounding area; remove on-site vegetation, including several trees
	Two existing buildings on the cabin property	Demolish existing buildings, prepare area for a potential new well and associated piping, and potentially build a storage area
Madison Avenue site	Office building (14,436 sf)	Renovate interior and improve exterior, including a trash enclosure, fenced-in patio, landscape lighting, landscaping, and resurfacing and restriping of the parking lot

Notes: sf = square feet.

Source: Compiled by Ascent in 2025.



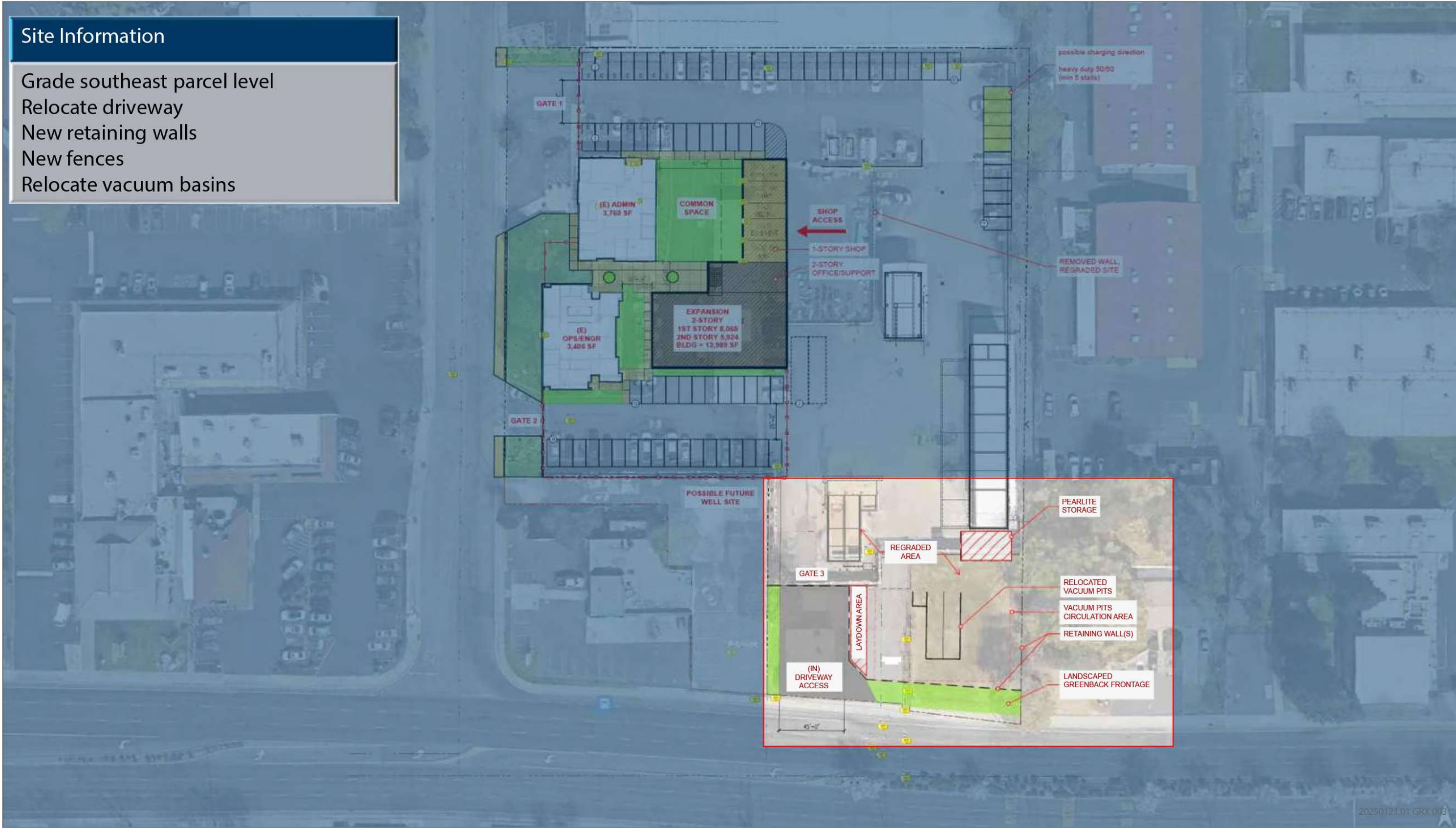
Source: Provided by CHWD in 2025; adapted by Ascent in 2025.
Figure 5 Overview of Proposed Improvements at Sylvan Road Site



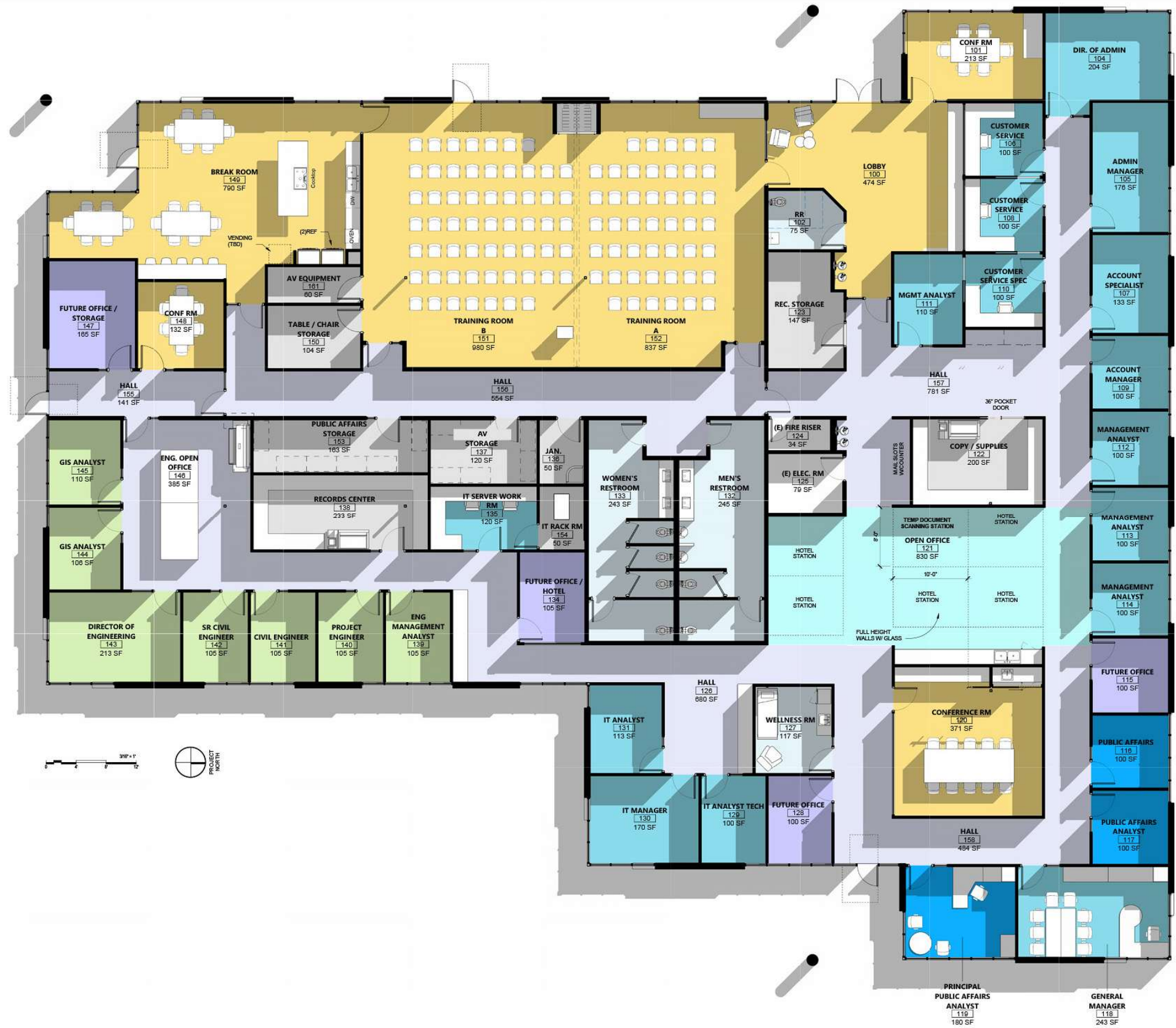
Source: Provided by CHWD in 2025; adapted by Ascent in 2025.
Figure 6 Proposed Interior Improvements at Sylvan Road Site

Site Information

Grade southeast parcel level
Relocate driveway
New retaining walls
New fences
Relocate vacuum basins



Source: Provided by CHWD in 2025; adapted by Ascent in 2025.
Figure 7 Proposed Greenback Frontage Improvements



Source: Provided by CHWD in 2025; adapted by Ascent in 2025.
Figure 8 Proposed Interior Improvements at Madison Avenue Site

2.6 PROJECT CONSTRUCTION

Construction at the Madison Avenue site would take up to 12 months, beginning in early 2026. Concurrently, construction at the Sylvan Road site would take up to 18 months, beginning in mid-2026.

During construction, an average of 15 workers would be present at either construction site. Construction activity would typically be limited to those hours consistent with the City of Citrus Heights' noise ordinance. Typical work hours would be Monday through Friday from 7:00 a.m. to 5:00 p.m. (construction noise is exempt from the noise ordinance between 6:00 a.m. and 8:00 p.m. Monday through Friday and between 8:00 a.m. and 8 p.m. Saturday and Sunday within the City of Citrus Heights).

The type and quantity of equipment would fluctuate throughout construction, but at the Sylvan Road site would generally include earthmoving equipment (scrapers, dozers, excavators); concrete mix trucks and concrete pumps; semi-trucks and other trucks for deliveries; and a variety of crew trucks, excavators, boom lifts, scissor lifts, trenchers, generators, and personal autos. Construction activities at the Madison Avenue site would largely be limited to boom lifts, scissor lifts, resurfacing equipment, and personal autos.

As part of the proposed grading of the central portion of the Sylvan Road site, approximately 1,000 cubic yards of soil material may be imported to the site.

During project construction, several trees may be removed from the Sylvan Road site. These trees (including native oaks) would be removed consistent with the City of Citrus Heights' Tree Preservation Ordinance, which requires a tree permit to be obtained from the City for removal of one or more protected trees.

2.7 ENVIRONMENTAL COMMITMENTS

Tree removal activities would occur outside of the nesting bird season, which is typically February 1 through August 31, and outside of the roosting bat season, which is typically April 1 through August 31.

2.8 POTENTIAL PERMITS AND APPROVALS REQUIRED

The following approvals and/or permits may be required to implement the project:

Permits and Approvals for Both Sites

- ▶ City of Citrus Heights: Building permit, demolition permit, engineering (civil) review, signage permit, pre-engineered metal building (PEMB) permit.
- ▶ City of Citrus Heights Planning Commission: Consideration of proposed rezoning.
- ▶ Sacramento Metropolitan Fire District: Fire (sprinkler/alarm) permit.

Additional Permits and Approvals for Sylvan Road Site

- ▶ City of Citrus Heights: Engineering (civil) review of off-site improvements, if deceleration lane is required; tree removal permit.
- ▶ City of Citrus Heights Planning Commission: Consideration of proposed lot merger.

3 EXEMPTIONS UNDER CEQA

3.1 CLASS 1 CATEGORICAL EXEMPTION: EXISTING FACILITIES

Section 15301 of the State CEQA Guidelines states that "Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use."

The project consists of proposed improvements at two sites: the existing corporation yard at Sylvan Road and the newly acquired office building at Madison Avenue.

At the existing corporation yard on Sylvan Road, the project would involve interior renovations of two office buildings, demolition of an existing maintenance shop, construction of a new maintenance shop, and site improvements that would require earthmoving and construction of underground utilities. The only increase in building area or square footage would result from construction of the new shop building, which would be 4,800 sf (which is 600 sf larger than the existing 4,200 sf building, or about 14 percent larger). No increase in capacity of the overall site is anticipated, and the proposed improvements would not constitute an increase in the intensity of development at the site. Therefore, the proposed improvements at the Sylvan Road site would qualify as a negligible or no expansion of an existing or former use, pursuant to CEQA Guidelines Section 15301.

Additionally, the project would involve the remodel of an existing office building at Madison Avenue to serve as CHWD's primary administrative and engineering headquarters. There would be no increase in building area or square footage. Renovations would include new private offices, a customer service reception area, boardroom/training room, cafeteria, outdoor patio, meeting rooms, and upgraded restroom facilities. Additional/modern lighting and signage would be provided along the exterior of the building and parking lot. Additionally, resurfacing and restriping of the parking lot would occur as part of the project. No increase in capacity of the building is anticipated, and the proposed renovation would not constitute an increase in the intensity of development at the site. Therefore, the proposed improvements at the Madison Avenue site would qualify as a negligible or no expansion of an existing or former use, pursuant to CEQA Guidelines Section 15301.

As noted above, CHWD would acquire a parcel adjacent to the Sylvan Road site, the "cabin property." Two existing buildings would be demolished and the area would be prepared for a potential new well and associated piping. This new well would replace an existing well on the same site. Additionally, CHWD would build a storage area on the property. The project would not increase the capacity of the existing buildings because they would be demolished, and the proposed addition of a new well, piping, and potential storage area would not constitute an increase in the intensity of development at the site. Therefore, the proposed improvements at the cabin property would qualify as a negligible or no expansion of an existing or former use.

3.2 CLASS 2 CATEGORICAL EXEMPTION: REPLACEMENT OR RECONSTRUCTION

A Class 2 CE is defined as a project that consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to (State CEQA Guidelines Section 15302):

- (a) Replacement or reconstruction of existing schools and hospitals to provide earthquake resistant structures which do not increase capacity more than 50 percent.
- (b) Replacement of a commercial structure with a new structure of substantially the same size, purpose, and capacity.

- (c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.
- (d) Conversion of overhead electric utility distribution system facilities to underground including connection to existing overhead electric utility distribution lines where the surface is restored to the condition existing prior to the undergrounding.

The project includes demolition and replacement of the existing shop building of substantially the same size, purpose, and capacity pursuant to State CEQA Guidelines Section 15302(b). The new shop building would be located on the same site as the existing shop building and would have substantially the same purpose as the existing shop building, with dedicated space for vehicle storage, welding, equipment maintenance, and parts storage. The new shop building would be 4,800 sf (which is 600 sf larger than the existing 4,200 sf building, or about 14 percent larger). Thus, the new shop building would be substantially the same size, purpose, and capacity of the existing shop building.

3.3 EXCEPTIONS TO RELIANCE ON CATEGORICAL EXEMPTIONS

A lead agency must also consider whether a project may fall under a list of exceptions to all classes of exemptions, as detailed under Section 15300.2 of the State CEQA Guidelines:

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The project is exempt under Classes 1 and 2. This exception does not apply.

- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

As detailed in Section 4, "Environmental Analysis," below, the project would not represent a cumulatively considerable contribution to cumulative impacts related to air quality, biological resources, cultural resources, greenhouse gas (GHG) emissions, hazards and hazardous materials, noise and vibration, and transportation. Therefore, no cumulative impacts would occur, and this exception does not apply.

- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There are no unusual circumstances related to the project or the project site. The project involves making improvements to CHWD's existing corporation yard and interior renovations to an existing office building to accommodate projected staff growth through 2045. No sensitive habitat or unique cultural or biological resource is located at the site. Further, there is no reasonable possibility that the project would have a significant effect on the environment, as evidenced by the analysis provided below in Section 4. Therefore, this exception does not apply.

- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The project site is not located within a highway officially designated as a state scenic highway (Caltrans 2025). This exception does not apply.

- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The project is not located on a site that is included on a list compiled pursuant to Section 65962.5 of the Government Code (DTSC 2025; SWRCB 2025). This exception does not apply.

- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The buildings on the Sylvan Road site were built in the 1980s and 1990s, the office building on the Madison Avenue site was built in 1987, and the buildings on the cabin property were built c1964 and c1998. Because they are not at least 50 years old, the buildings on the Sylvan Road site and Madison Avenue site are not historic age and do not require evaluation as historical resources. However, because the cabin property included a historic age building, the property was evaluated for historical significance and, as evidenced by the analysis provided below in Section 4, was recommended ineligible for both the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR). Therefore, the project would not cause a substantial adverse change in the significance of a historical resource, and this exception does not apply.

4 ENVIRONMENTAL ANALYSIS

The project would include modernization of CHWD's existing corporation yard at 6230 Sylvan Road and relocation of some existing staff to its newly acquired office building at 7803B Madison Avenue. At the existing corporation yard, the project would include interior renovations of two office buildings, demolition of an existing maintenance shop, construction of a new maintenance shop, and site improvements involving earthmoving and construction of underground utilities. Additionally, CHWD recently purchased an office building at 7803B Madison Ave (and filed a CEQA NOE for the purchase in February 2025). As part of the project, the interior of the office building would be renovated and some existing CHWD staff would be relocated to the new location.

Construction at the Madison Avenue site would take up to 12 months, beginning in early 2026. Concurrently, construction at the Sylvan Road site would take up to 18 months, beginning in mid-2026. The Sylvan Road site is currently being used as a corporation yard and the Madison Avenue site is currently being used as an office building; these land uses would remain the same after completion of the project (although a lot merger and rezone is proposed to merge the multiple lots that comprise the Sylvan Road site and rezone the lots to better reflect their existing use [Limited Commercial]). All federal, state, and local regulations would be followed during project-related activities.

The following analysis provides a more detailed evaluation of the potential impacts of the project on the environment and serves as evidence in support of the use of a categorical exemption for the project. Note that the discussion includes only the environmental issue areas where the project could conceivably result in physical effects.

4.1 AIR QUALITY

Would the project conflict with or obstruct implementation of the applicable air quality plan?

The project would involve interior renovations of existing office buildings, demolition of an existing maintenance shop, construction of a new maintenance shop, and site improvements involving earthmoving and construction of underground utilities. Project construction activities would generate criteria pollutant emissions via the use of heavy

construction equipment at the Sylvan Road site; however, construction would be temporary (occurring over a 12- to 18-month period) and much of the construction effort would consist of interior renovation of existing structures, which would not generate substantial criteria pollutant emissions that could conflict with air quality planning efforts. After construction is complete, no increase in capacity of the overall site is anticipated, and the proposed improvements would not constitute an increase in the intensity of development at the site. Long-term operation of the project would not generate population growth inconsistent with growth anticipated for the region. Therefore, the project would not conflict with or obstruct implementation of an applicable air quality plan. No significant impact would occur.

Would the project 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?

Short-Term Construction-Related Criteria Air Pollutant and Precursor Emissions

Construction activities such as excavation, trenching, and vehicle exhaust would generate fugitive dust (respirable particulate matter with aerodynamic diameter of 10 micrometers or less [PM₁₀] and fine particulate matter with aerodynamic diameter of 2.5 micrometers or less [PM_{2.5}]). The Sacramento Metropolitan Air Quality Management District (SMAQMD) requires that all construction projects (regardless of size) implement Basic Construction Emission Control Practices, as required by District Rule 403. Based on the anticipated site improvements, emissions modeling was conducted using SMAQMD-approved modeling software, California Emissions Estimator Model (CalEEMod). Results are compared to adopted SMAQMD thresholds, shown in Table 3.

Table 3 Maximum Emissions of Criteria Pollutants and Precursors Associated with Project Construction

Year	ROG (lb/day)	NO _x (lb/day)	CO (lb/day)	SO _x (lb/day)	PM ₁₀ (lb/day)	PM _{2.5} (lb/day)
Maximum Daily Emissions						
2027	3.3	13.5	12.5	<1	3.4	1.7
SMAQMD Threshold of Significance	N/A	65	N/A	N/A	80 ¹	82 ¹
Exceeds Thresholds?	N/A	No	N/A	N/A	No	No

Notes: lb/day = pounds per day; ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter; SMAQMD = Sacramento Metropolitan Air Quality Management District; N/A = not applicable.

¹ SMAQMD applies a threshold of 80 lbs/day for PM₁₀ and 82 lbs/day for PM_{2.5} when basic dust control practices are adhered to during construction activities. SMAQMD Rule 403 requires these measures; thus, this analysis assumes the project would comply with basic dust control measures and applies these thresholds.

Source: Modeling performed by Ascent in 2025.

Long-Term Operation-Related Regional Criteria Air Pollutant and Precursor Emissions

Operational activities would involve existing facilities and would not increase on or off-site activities. Therefore, SMAQMD's adopted thresholds of significance pertaining to criteria air pollutants and ozone precursors would not be exceeded.

Would the project expose sensitive receptors to substantial pollutant concentrations?

Criteria Air Pollutants and Precursors

As discussed above, project operations would not increase activity levels or introduce new sources of pollutants above what already occurs on the site; thus, from an operational standpoint, no increases in toxic air contaminants (TAC) or carbon monoxide is anticipated. Construction activities that could generate diesel particulate matter, the TAC of primary concern during construction, would be limited to demolition and minimal site preparation and grading activities. As shown in Table 1, construction-related emissions would not exceed applicable thresholds of

significance. Further, a majority of the activities would be associated with interior building improvements, which do not require the use of heavy-duty diesel operated equipment, further limiting the potential for diesel particulate matter to cause TAC concentrations. Due to the minimal construction activities over a short duration of time, the project would not result in exposure of sensitive receptors to substantial population concentrations. This impact would be less than significant.

Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Project construction would involve equipment, materials, and activities that may generate odors; however, these activities would be temporary and intermittent. After construction is complete, project operation would not generate substantial, objectionable odors compared to existing conditions because there would not be a change in use or an increase in capacity at the site. Further, the project would be required to comply with SMAQMD Rule 402 that prohibits the discharge of nuisance odors. Thus, the project would not result in the generation of odorous emissions that would adversely affect a substantial number of people, and there would be no impact.

4.2 BIOLOGICAL RESOURCES

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

The Sylvan Road site is developed as a corporation yard. Several trees are located throughout the site and there is minimal landscaping. Arcade Creek is located approximately 0.7 miles north of the Sylvan Road site. The Madison Avenue site is developed with an office building. Because there is no natural vegetation on the project site, the project site does not provide habitat suitable for special-status plants. A California Natural Diversity Database (CNDDDB) search was conducted (CNDDDB 2025a) and the California Department of Fish and Wildlife (CDFW) *Special Animals List* (CNDDDB 2025b) was consulted to generate a list of special-status wildlife species that have been documented within the USGS 7.5-minute quadrangles including and surrounding the project site, or that otherwise have geographic ranges that overlap the project site. Special-status wildlife species are not expected to occur on the project site based on habitat associations and the species geographic ranges. However, there is also potential for common native nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code to nest in the trees on the project site. As part of the project description, tree removal would occur outside of the nesting bird season, which is typically February 1 through August 31. Therefore, significant impacts on special-status species would not occur.

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

The Sylvan Road site is developed as a corporation yard. Arcade Creek is located approximately 0.7 miles north of the Sylvan Road site. The Madison Avenue site is developed with an office building. There are no areas of riparian habitat or other sensitive natural communities on or adjacent to the project site. As a result, no impacts on riparian habitat or other sensitive natural community would occur as a result of project implementation.

Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

As described previously, the project site is located in an urban setting, and no natural habitat, including wetlands, is located within at least 500 feet of the project site. Therefore, project implementation would not affect wetlands and other waters of the United States, or state jurisdictional wetlands or other waters. No impact would occur.

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project site does not serve as a significant wildlife corridor or linkage for special-status species. The site is located in an urban setting and there is no natural vegetation and no stream corridors on the project site; therefore, there are no wildlife corridors within or adjacent to the project site. The project would therefore not interfere with the movement of fish or wildlife species or migratory wildlife corridors. Habitat potentially suitable for native wildlife nursery sites, particularly bat species, may be present on the project site, within large trees. Nursery sites are considered in this analysis for native wildlife that are not defined and otherwise considered under CEQA as special-status species. As part of the project description, tree removal would occur outside of the roosting bat season, which is typically April 1 through August 31. Therefore, significant impacts on native wildlife nursery sites would not occur.

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

During project construction, several trees may be removed from the Sylvan Road site. These trees (including native oaks) would be removed consistent with the City of Citrus Heights' Tree Preservation Ordinance, which requires a tree permit to be obtained from the City for removal of one or more protected trees. No conflicts with applicable policies or ordinances are anticipated.

Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site is not located in an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

4.3 CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

The buildings on the Sylvan Road site were built in the 1980s and 1990s, the office building on the Madison Avenue site was built in 1987, and the buildings on the cabin property appear to have been built c1964 and c1998. On July 14, 2025, the North Central Information Center (NCIC) of the California Historical Resources Information System completed a records search request that covered the cabin property and Sylvan Road site. No previously recorded resources are on file at the NCIC for the cabin property or the Sylvan Road site. The cabin property appears to include at least one historic-age building; therefore, the property was evaluated using the CRHR and NRHP criteria to determine if a historical resource under CEQA was present. A records search was not conducted for the Madison Avenue site because no ground disturbance would occur at that location and the existing, on-site building is not over 50 years old.

A historical evaluation, consisting of records searches, online research, and an August 2025 site visit, was conducted by an architectural historian for the entire cabin property. As a result of this investigation, the property does not appear eligible for individual listing in either the CRHR or the NRHP. Because there are no historical resources on the project site, the project would not cause a substantial adverse change in the significance of a historical resource, and no impact would occur.

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

The project site is located in a heavily urbanized and developed area of Citrus Heights. The project would include interior renovations of existing office buildings, demolition of an existing maintenance shop, construction of a new maintenance shop, and site improvements involving earthmoving and construction of underground utilities. In the event of an unanticipated discovery of unknown cultural resources during the project implementation, the construction contractor would immediately notify CHWD. Any ground-disturbing activities within 50 feet of the discovery would be stopped until the find can be inspected by a qualified archaeologist, and avoidance or recovery measures could be developed in consultation, as outlined at 36 Code of Federal Regulations (CFR) Section 800.13. Work would not resume at that specific location until authorized. Because professionally accepted and legally compliant procedures for the discovery and protection of previously undocumented significant archaeological resources would be performed, significant impacts would not occur.

Disturb any human remains, including those interred outside of dedicated cemeteries?

The project site is located in a heavily urbanized and developed area of Citrus Heights. The project would include interior renovations of existing office buildings, demolition of an existing maintenance shop, construction of a new maintenance shop, and site improvements involving earthmoving and construction of underground utilities. California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Section 7050.5 and California Public Resources Code (PRC) Section 5097. These statutes require that, if human remains are discovered, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the appropriate County coroner shall be notified immediately. If the remains are determined by the coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the NAHC-designated Most Likely Descendant, and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments, if present, are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94. Compliance with California Health and Safety Code Section 7050.5 and California PRC Section 5097 would provide an opportunity to avoid or minimize the disturbance of human remains, and to appropriately treat any remains that are discovered. Thus, significant impacts would not occur.

4.4 GREENHOUSE GAS EMISSIONS

Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

As discussed above, the facility is an existing operation and the project would not substantially increase capacity. The project includes building improvements and upgrades, which would result in benefits regarding operational energy use and associated GHG emissions. Regarding project construction, short-term activities would generate minimal emissions, primarily in the form of vehicle and equipment exhaust. SMAQMD has adopted a 1,100 metric ton of carbon dioxide equivalent per year (MTCO₂e/year) threshold applicable to the construction phase of land use

development projects. Using the same emissions model conducted for air quality, as discussed above, maximum annual construction GHG emissions would be 193 MTCO₂e/year, which would not exceed the 1,100 MTCO₂e/year threshold. Therefore, this impact would be less than significant.

Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The project involves improvements and upgrades at an existing facility, which would benefit building energy efficiency and associated GHG emissions. Construction emissions would not exceed applicable SMAQMD thresholds designed specifically for short-term construction phases. Because the project would not result in any long-term increases in GHG emissions and construction emissions would not exceed adopted thresholds of significance, the project would not conflict with County or State-adopted GHG reduction strategies. This impact would be less than significant.

4.5 HAZARDS AND HAZARDOUS MATERIALS

Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

During construction and operation, limited quantities of fuels, oils, lubricants, solvents, and other materials that are classified as hazardous would be used. All materials would be stored, handled, and used in accordance with applicable laws. Some excavated materials would be hauled off site and disposed of as required by state and federal regulations, and waste would be classified and disposed of properly. Compliance with existing laws and regulations related to the transport, use, and disposal of hazardous materials would avoid creating a substantial hazard to the public.

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project is located within 0.25 miles of an existing school. San Juan High School is located approximately 200 feet east of the Sylvan Road site; however, minimal or no changes in the amount or type of potentially hazardous materials emitted by the project or handled onsite would occur and would primarily be associated with construction. The project would continue to comply with federal, State, and local requirements related to the generation, transportation, treatment, storage, and disposal of hazardous materials and waste.

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The project site is not listed as a hazardous materials site (DTSC 2025; SWRCB 2025). There are several closed sites located within 0.5 miles of both the Sylvan Road site and Madison Avenue site; these closed sites are identified as being leaking underground storage tank (LUST) cleanup sites and cleanup program sites that have been completed and the cases closed (DTSC 2025; SWRCB 2025). Construction and operation of the project would not exacerbate the existing conditions of these closed sites.

For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The nearest airports are Sacramento McClellan Airport, which is located 5.5 miles west of project site, and Sacramento Mather Airport, which is located 8 miles south of the project site. Because the project site is not within an airport land use plan area or within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip, the project would not result in an aviation-related safety hazard for people residing or working in the project area.

Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The project would not modify or otherwise impair implementation of existing emergency access, response, or evacuation with the project area.

Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project would be located in an urbanized area surrounded by other urban development that typically has a minimal wildfire risk. Given its location, the project would not exacerbate wildfire risk and, thus, would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

4.6 NOISE AND VIBRATION

Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

The project would not be anticipated to generate noise levels in excess of standards established in the local general plan or noise ordinance, or other applicable local, state, or federal standards. Project construction activity would be limited to those hours consistent with the City of Citrus Heights' noise ordinance. Typical work hours would be Monday through Friday from 7:00 a.m. to 5:00 p.m. (construction noise is exempt from the noise ordinance between 6:00 a.m. and 8:00 p.m. Monday through Friday and between 8:00 a.m. and 8 p.m. Saturday and Sunday within the City of Citrus Heights).

The type and quantity of equipment would fluctuate throughout construction, but at the Sylvan Road site would generally include earthmoving equipment (scrapers, dozers, excavators); concrete mix trucks and concrete pumps; semi-trucks and other trucks for deliveries; and a variety of crew trucks, excavators, boom lifts, scissor lifts, trenchers, generators, and personal autos. Construction activities at the Madison Avenue site would largely be limited to boom lifts, scissor lifts, pavers, and personal autos. Hand tools would be used to renovate the interior of the existing buildings at both sites.

Because heavy construction equipment would be limited (and used primarily at the Sylvan Road site), construction would only occur for 12—18 months, and construction hours would be consistent with the City of Citrus Heights' noise ordinance, substantial levels of noise and vibration in excess of City standards are not anticipated.

At the Sylvan Road site, the project would include interior renovations of two office buildings, demolition of an existing maintenance shop, construction of a new maintenance shop, and site improvements, which would not be

considered an intensification of an existing use. Additionally, interior renovations of the existing office building at the Madison Avenue site would not be considered an intensification of an existing use. As a result, operation-related noise in the vicinity of the project site is expected to be similar to current conditions.

For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The nearest airports are Sacramento McClellan Airport, which is located 5.5 miles west of project site, and Sacramento Mather Airport, which is located 8 miles south of the project site. Additionally, the project site is not within an airport land use plan area. Further, implementing the project would not substantially increase the number of employees on-site or otherwise modify airport-related noise in the project area. Therefore, implementing the project would not expose people residing or working in the project area to excessive noise levels related to airports.

4.7 TRANSPORTATION

Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The project site is located in an urbanized area, with existing roadways, transit services, and bicycle and pedestrian facilities. The Sylvan Road site is accessed via Sylvan Road and Greenback Lane. SacRT's Greenback bus route (Route 1) is located along Greenback Lane and the closest bus stop is on Greenback Lane at its intersection with Sylvan Road, in front of the Greenback Tires and Wheels. The Madison Avenue site is accessed via Madison Avenue and Village Way. SacRT's Sunrise bus route (Routes 21 and 124) is located along Sunrise Boulevard and the closest bus stop is on Sunrise Boulevard at its intersection with Madison Avenue, in front of the McDonald's. The project would not interfere with these existing services and facilities. Further, as part of the project, frontage improvements would be made along Greenback Lane and are expected to consist of new sidewalks and a new streetlight, in accordance with City standards. As a result, the project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No significant impact would occur.

Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

The State CEQA Guidelines were updated on December 28, 2018, and according to the new guidelines (Section 15064.3), vehicle miles traveled (VMT) replace congestion as the metric for determining transportation impacts. The guidelines state that "lead agencies may elect to be governed by these provisions of this section immediately. Beginning July 1, 2020, the provisions of this section shall apply statewide." In December 2018, the Governor's Office of Planning and Research (now known as the Office of Land Use and Climate Innovation) published the most recent version of the Technical Advisory on Evaluating Transportation Impacts (Technical Advisory), which provides guidance for VMT analysis. The guidance provided thus far relative to VMT significance criteria is focused on residential, office, and retail uses. The Technical Advisory also suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing. Further, State CEQA Guidelines Section 15064.3(b)(1) states that impacts related to VMT are presumed to be less than significant if a project is located proximate to public transportation options, including a high-quality transit (i.e., light rail and bus) corridor or major transit stop, as described below.

The project would result in additional vehicle trips both operationally and temporarily during construction. This may generate new VMT, or it may redistribute existing VMT given the relocation of existing staff from the Sylvan Road site to the Madison Avenue site. SacRT's Greenback bus route (Route 1) is located along Greenback Lane and the closest bus stop is on Greenback Lane at its intersection with Sylvan Road, in front of the Greenback Tires and Wheels. The Madison Avenue site is accessed via Madison Avenue and Village Way. SacRT's Sunrise bus route (Routes 21 and 124)

is located along Sunrise Boulevard and the closest bus stop is on Sunrise Boulevard at its intersection with Madison Avenue, in front of the McDonald's. Because alternative transportation is available, no increase in the capacity of the existing buildings is anticipated, and existing staff from the Sylvan Road site would be relocated to the Madison Avenue site, the project is not expected to substantially increase travel to the project site. As a result, it would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b). No significant impact would occur.

Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The project does not involve roadway improvements or other modifications to the existing roadway network; therefore, it would not increase hazards related to a geometric design feature or incompatible uses. No impact would occur.

Would the project result in inadequate emergency access?

The Sylvan Road site is accessed via Sylvan Road and Greenback Lane. The Madison Avenue site is accessed via Madison Avenue and Village Way. These and other surrounding roadways provide adequate circulation and access for emergency response and the project would not modify any roads or otherwise affect emergency response times. Therefore, the project would not result in inadequate emergency access. No significant impact would occur.

5 REFERENCES

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Attachment A

Air Quality Modeling

CHWD Custom Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	CHWD
Construction Start Date	1/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.50
Precipitation (days)	28.2
Location	38.67910974210656, -121.28997744711884
County	Sacramento
City	Citrus Heights
Air District	Sacramento Metropolitan AQMD
Air Basin	Sacramento Valley
TAZ	615
EDFZ	13
Electric Utility	Sacramento Municipal Utility District
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.30

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
Automobile Care Center	4.80	1000sqft	0.11	4,800	0.00	—	—	—

General Office Building	10.8	1000sqft	0.25	10,800	0.00	—	—	—
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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.	0.73	0.62	5.01	8.64	0.01	0.19	0.32	0.51	0.17	0.08	0.25	—	1,711	1,711	0.06	0.03	1.37	1,724
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.29	3.26	13.5	12.5	0.03	0.46	2.98	3.44	0.43	1.23	1.66	—	4,276	4,276	0.28	0.39	0.15	4,401
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.59	0.52	3.50	5.62	0.01	0.13	0.26	0.39	0.12	0.07	0.19	—	1,153	1,153	0.05	0.03	0.44	1,163
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.11	0.09	0.64	1.03	< 0.005	0.02	0.05	0.07	0.02	0.01	0.03	—	191	191	0.01	< 0.005	0.07	193

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.73	0.62	5.01	8.64	0.01	0.19	0.32	0.51	0.17	0.08	0.25	—	1,711	1,711	0.06	0.03	1.37	1,724

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.29	3.26	13.5	12.5	0.03	0.46	2.98	3.44	0.43	1.23	1.66	—	4,276	4,276	0.28	0.39	0.15	4,401
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.59	0.52	3.50	5.62	0.01	0.13	0.26	0.39	0.12	0.07	0.19	—	1,153	1,153	0.05	0.03	0.44	1,163
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.11	0.09	0.64	1.03	< 0.005	0.02	0.05	0.07	0.02	0.01	0.03	—	191	191	0.01	< 0.005	0.07	193

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.53	0.44	4.09	5.58	0.01	0.13	—	0.13	0.12	—	0.12	—	852	852	0.03	0.01	—	855
Demolition	—	—	—	—	—	—	0.13	0.13	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.03	0.03	0.24	0.32	< 0.005	0.01	—	0.01	0.01	—	0.01	—	49.0	49.0	< 0.005	< 0.005	—	49.2
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.11	8.11	< 0.005	< 0.005	—	8.14
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.11	0.10	1.24	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	297	297	0.01	0.01	0.03	300
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	< 0.005	0.32	0.12	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	169	169	0.02	0.03	0.01	178
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17.5	17.5	< 0.005	< 0.005	0.03	17.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.73	9.73	< 0.005	< 0.005	0.01	10.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.90	2.90	< 0.005	< 0.005	< 0.005	2.94
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.69
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3.3. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.52	0.44	3.74	5.54	0.01	0.19	—	0.19	0.17	—	0.17	—	858	858	0.03	0.01	—	861
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.70	4.70	< 0.005	< 0.005	—	4.72
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.78	0.78	< 0.005	< 0.005	—	0.78
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.11	0.10	1.24	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	297	297	0.01	0.01	0.03	300
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.67	1.67	< 0.005	< 0.005	< 0.005	1.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.28
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2026) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.22	1.02	9.19	9.69	0.02	0.42	—	0.42	0.39	—	0.39	—	1,714	1,714	0.07	0.01	—	1,720
Dust From Material Movement	—	—	—	—	—	—	2.08	2.08	—	1.00	1.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.10	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.8	18.8	< 0.005	< 0.005	—	18.9
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.11	3.11	< 0.005	< 0.005	—	3.12
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.11	0.10	1.24	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	297	297	0.01	0.01	0.03	300
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.27	0.06	4.26	1.58	0.01	0.04	0.59	0.64	0.04	0.16	0.20	—	2,266	2,266	0.21	0.37	0.12	2,380
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.33	3.33	< 0.005	< 0.005	0.01	3.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	24.8	24.8	< 0.005	< 0.005	0.02	26.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.55	0.55	< 0.005	< 0.005	< 0.005	0.56
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.11	4.11	< 0.005	< 0.005	< 0.005	4.32

3.7. 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 Equipm ent	0.59	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	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 Equipm ent	0.59	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	0.34	0.29	2.79	4.01	0.01	0.11	—	0.11	0.10	—	0.10	—	758	758	0.03	0.01	—	760
Onsite truck	0.00	0.00	0.00	0.00	0.00	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 Equipm ent	0.06	0.05	0.51	0.73	< 0.005	0.02	—	0.02	0.02	—	0.02	—	125	125	0.01	< 0.005	—	126
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.13	0.12	0.08	1.69	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	334	334	< 0.005	0.01	1.19	339
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	72.5	72.5	< 0.005	0.01	0.17	76.0

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	0.11	0.11	0.10	1.24	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	297	297	0.01	0.01	0.03	300
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	72.4	72.4	< 0.005	0.01	< 0.005	75.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.74	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	177	177	< 0.005	0.01	0.30	179
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.1	42.1	< 0.005	0.01	0.04	44.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.3	29.3	< 0.005	< 0.005	0.05	29.7
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.97	6.97	< 0.005	< 0.005	0.01	7.30
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.24	5.30	0.01	0.18	—	0.18	0.16	—	0.16	—	823	823	0.03	0.01	—	826
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	0.02	0.01	0.13	0.16	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	24.8	24.8	< 0.005	< 0.005	—	24.9
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	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 Equipm ent	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.11	4.11	< 0.005	< 0.005	—	4.12
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	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	0.11	0.11	0.10	1.24	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	297	297	0.01	0.01	0.03	300
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.17	9.17	< 0.005	< 0.005	0.02	9.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.52	1.52	< 0.005	< 0.005	< 0.005	1.54
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.03	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.02	4.02	< 0.005	< 0.005	—	4.04
Architectural Coatings	0.09	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipm ent	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.67	0.67	< 0.005	< 0.005	—	0.67
Architect ural Coating s	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.11	0.10	1.24	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	297	297	0.01	0.01	0.03	300
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.17	9.17	< 0.005	< 0.005	0.02	9.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.52	1.52	< 0.005	< 0.005	< 0.005	1.54
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

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	1/1/2026	1/29/2026	5.00	21.0	—
Site Preparation	Site Preparation	1/30/2026	2/2/2026	5.00	2.00	—
Grading	Grading	2/3/2026	2/6/2026	5.00	4.00	—
Building Construction	Building Construction	2/7/2026	12/1/2026	5.00	212	Construction and Modernization
Paving	Paving	12/2/2026	12/16/2026	5.00	11.0	—
Architectural Coating	Architectural Coating	12/17/2026	12/31/2026	5.00	11.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Tractors/Loaders/Back hoes	Diesel	Average	2.00	6.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29

Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	4.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	7.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.00	7.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	30.0	14.3	LDA,LDT1,LDT2
Demolition	Vendor	—	8.80	HHDT,MHDT
Demolition	Hauling	2.33	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	30.0	14.3	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.80	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	30.0	14.3	LDA,LDT1,LDT2
Grading	Vendor	—	8.80	HHDT,MHDT
Grading	Hauling	31.3	20.0	HHDT

Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	30.0	14.3	LDA,LDT1,LDT2
Building Construction	Vendor	2.56	8.80	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	30.0	14.3	LDA,LDT1,LDT2
Paving	Vendor	—	8.80	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	30.0	14.3	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.80	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	7,200	2,400	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	4,200	—
Site Preparation	—	—	0.50	0.00	—
Grading	1,000	—	1.50	0.00	—
Paving	0.00	0.00	0.00	0.00	0.00

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Automobile Care Center	0.00	0%
General Office Building	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	375	0.01	< 0.005

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Begins early 2026, lasts 12 months

Construction: Dust From Material Movement	Half of 3 acre site graded
Construction: Trips and VMT	15 onsite workers for 30 daily trips
Construction: Architectural Coatings	Only new building to be Arch Coated