

APPENDIX A

AIR QUALITY, ENERGY, AND GREENHOUSE GAS TECHNICAL MEMORANDUM

MEMORANDUM

DATE: March 31, 2025

To: Joe Dykstra, President, SCLP

FROM: Cara Cunningham, Associate

SUBJECT: Air Quality, Energy, and Greenhouse Gas Technical Memorandum for the 43800 Osgood Road Project, Fremont, California

This Air Quality, Energy, and Greenhouse Gas Emissions Analysis for the proposed 43800 Osgood Road Project (project) in Fremont, Alameda County, has been prepared using methods and assumptions recommended by the Bay Area Air District (Air District). This analysis includes a description of existing regulatory framework, an assessment of project construction and operation-period air quality and greenhouse gas (GHG) emissions, and an evaluation of the project’s compliance with adopted plans related to the reduction of clean air and GHG emissions.

PROJECT DESCRIPTION

The 11.21-acre project site is located at 43800 Osgood Road in Fremont, California. The project site is currently developed with an existing 143,795-square-foot building that operates as a retail center. The proposed project would rezone the existing site from Commercial (C-R) to Industrial (I-T) to allow operation of the existing building with a future end use that may include Industrial or Research and Development (R&D) land uses.

The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility, which would include substantial improvements and updates to the structure, including the addition of a mezzanine level of approximately 6,000 square feet, a full interior renovation, and façade design improvements. Additionally, the proposed project would include minor changes to the parking layout on the site to provide separated trailer and auto parking stalls. The proposed project would provide up to 18 dock doors and 3 drive-in doors. The proposed project would have 195,785 square feet of asphalt surfaces, 42,385 square feet of concrete surfaces, and 97,390 square feet of landscaping. In addition, the project would provide 56 electric vehicle (EV) capable parking stalls and 19 EV installed spaces. The proposed project’s energy supply would be all-electric and would not include natural gas usage. Once operational, the proposed project would generate approximately 964 average daily trips, including 936 vehicle trips and 28 truck trips.¹

¹ Hexagon Transportation Consultants, Inc. 2025a. *Trip Generation Estimates for High Cube Fulfillment Center – Sort*.

The proposed project would include site improvements such as internal demolition and construction, grading, paving and landscaping. Construction activities would begin in 2026, occurring for 6 months, and would require 124,000 square feet of asphalt demolition, 10,460 square feet of concrete demolition, and 7,500 cubic yards of soil export. Construction of the proposed project would utilize Tier 4 equipment.

EXISTING SENSITIVE RECEPTORS IN THE PROJECT AREA

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise.

For the purposes of this analysis, sensitive receptors are areas of population that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include residences, schools, daycare centers, hospitals, parks, and similar uses which are sensitive to air quality. Impacts on sensitive receptors are of particular concern because they are the population most vulnerable to the effects of air pollution. The closest receptors to the project site include multi-family residences located approximately 700 feet southeast of the project site.

ENVIRONMENTAL SETTING

Air Quality Background

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

A region's topographic features have a direct correlation with air pollution flow and, therefore, are used to determine the boundary of air basins. Fremont is located within the San Francisco Bay Area Air Basin (Air Basin), a large shallow air basin ringed by hills that taper into a number of sheltered valleys around the perimeter. Two primary atmospheric outlets exist. One is through the strait known as the Golden Gate, a direct outlet to the Pacific Ocean. The second extends to the northeast, along the west delta region of the Sacramento and San Joaquin Rivers.

Fremont is within the jurisdiction of the Air District, which regulates air quality in the Bay Area. Air quality conditions in the Bay Area have improved significantly since the Air District was created in 1955. Ambient concentrations of air pollutants and the number of days during which the region exceeds air quality standards have fallen dramatically. Neither State nor national ambient air quality standards of the following chemicals have been violated in recent decades: nitrogen dioxide, sulfur

dioxide, sulfates, lead, hydrogen sulfide, and vinyl chloride. Those exceedances of air quality standards that do occur primarily happen during meteorological conditions conducive to high pollution levels, such as cold, windless nights or hot, sunny summer afternoons.

Both State and federal governments have established health-based Ambient Air Quality Standards (AAQS) for six criteria air pollutants: carbon monoxide (CO), ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O₃ and NO₂, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO₂, and Pb are considered local pollutants that tend to accumulate in the air locally. The Air District is under State nonattainment status for ozone and particulate matter standards. The Air District is classified as nonattainment for the federal ozone 8-hour standard and nonattainment for the federal particulate matter less than 2.5 microns in size (PM_{2.5}) 24-hour standard. As such, the primary pollutants of concern in the project area are O₃, CO, and PM_{2.5}.

Because of the conservative nature of the significance thresholds, and the basin-wide context of individual development project emissions, there is no direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NO_x) and reactive organic gases (ROG).

Further, by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to by itself result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, the air districts have considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise. These populations are referred to as sensitive receptors.

Energy

Electricity

Electricity is a manmade resource. The production of electricity requires the consumption or conversion of energy resources (including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into energy. Electricity is used for a variety of purposes (e.g., lighting, heating, cooling, and refrigeration, and for operating appliances, computers, electronics, machinery, and public transportation systems).

The project site is within the service territory of Pacific Gas and Electric Company (PG&E). According to the California Energy Commission (CEC), total electricity consumption in the PG&E service area in 2022 was 77,887 gigawatt-hours (GWh) or 77,886,999,998 kilowatt-hours (kWh).² Of this total, Alameda County consumed 10,395 GWh or 10,395,384,395 kWh.³

Natural Gas

Natural gas is a non-renewable fossil fuel. Fossil fuels are formed when layers of decomposing plant and animal matter are exposed to intense heat and pressure under the surface of the Earth over millions of years. Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas is found in naturally occurring reservoirs in deep underground rock formations. Natural gas is used for a variety of uses (e.g., heating buildings, generating electricity, and powering appliances such as stoves, washing machines and dryers, gas fireplaces, and gas grills).

PG&E is the natural gas service provider for the proposed project site. According to the CEC, total natural gas consumption in the PG&E service area in 2022 was 4,422 million therms (4,422,630,060 therms).⁴ Of this total, Alameda County consumed 377 million therms or 377,309,788 therms.⁵

Fuel

Petroleum is also a non-renewable fossil fuel. Petroleum is a thick, flammable, yellow-to-black mixture of gaseous, liquid, and solid hydrocarbons that occurs naturally beneath the earth's surface. Petroleum is primarily recovered by oil drilling. It is refined into a large number of consumer products, primarily fuel oil, gasoline, and diesel.

The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles [SUVs]) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to

² California Energy Commission (CEC). 2023a. Electricity Consumption by County and Entity. Website: <http://www.ecdms.energy.ca.gov/elecbycounty.aspx> and <http://www.ecdms.energy.ca.gov/elecbyutil.aspx> (accessed March 2025).

³ Ibid.

⁴ CEC. 2023b. Gas Consumption by County and Entity. Website: <http://www.ecdms.energy.ca.gov/gasbycounty.aspx> and <http://www.ecdms.energy.ca.gov/gasbyutil.aspx> (accessed March 2025).

⁵ Ibid.

22.8 mpg in 2022.⁶ The average fuel economy for heavy-duty trucks in the United States has also steadily increased, from 5.7 mpg in 2013 to a projected 8.0 mpg in 2021.⁷ Based on fuel consumption obtained from the California Air Resources Board's (CARB) California Emissions Factor Model, Version 2021 (EMFAC2021), approximately 536.1 million gallons of gasoline and approximately 155.8 million gallons of diesel will be consumed from vehicle trips in Alameda County in 2025.

Greenhouse Gas Background

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO₂);
- Methane (CH₄);
- Nitrous oxide (N₂O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur hexafluoride (SF₆).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. Although manmade GHGs include naturally occurring GHGs (e.g., CO₂, CH₄, and N₂O), some gases (e.g., HFCs, PFCs, and SF₆) are completely new to the atmosphere.

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

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere (i.e., atmospheric lifetime). The GWP of each gas is measured relative to CO₂, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of

⁶ United States Department of Transportation (USDOT). 2023. "Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles." Website: <https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles> (accessed March 2025).

⁷ CEC. 2015. Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026. Website: efiling.energy.ca.gov/getdocument.aspx?tn=206180 (accessed March 2025).

heat trapped by one unit mass of CO₂ over a specified time period. GHG emissions are typically measured in terms of pounds or tons of CO₂ equivalents (CO₂e).

REGULATORY FRAMEWORK

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

Air Quality

Federal Regulations

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

State Regulations

In 1988, the California Clean Air Act (CCAA) required that all air districts in the State endeavor to achieve and maintain California Ambient Air Quality Standards (CAAQS) for CO, O₃, sulfur dioxide (SO₂), and nitrogen dioxide (NO₂) by the earliest practical date. The CCAA provides districts with authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each nonattainment district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

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

Regional Regulations

The Air District seeks to attain and maintain air quality conditions in the Air Basin through a comprehensive program of planning, regulation, enforcement, technical innovation, and education. The clean air strategy includes the preparation of plans for the attainment of ambient air quality standards, adoption and enforcement of rules and regulations, and issuance of permits for stationary sources. The Air District also inspects stationary sources and responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements programs and regulations required by law.

Clean Air Plan. The Clean Air Plan guides the region’s air quality planning efforts to attain the CAAQS.⁸ The Air District 2017 Clean Air Plan (Clean Air Plan), which was adopted on April 19, 2017, by the Air District Board of Directors, is the current Clean Air Plan, which contains district-wide control measures to reduce ozone precursor emissions (e.g., ROG and NO_x), particulate matter and GHG emissions.

The Air District 2017 Clean Air Plan:

- Describes the Air District plan towards attaining all State and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities;
- Defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious GHG reduction targets for 2030 and 2050;
- Provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve GHG reduction targets; and
- Includes a wide range of control measures designed to decrease emissions of air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants; to reduce emissions of methane and other “Super-GHGs” that are potent climate pollutants in the near term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CEQA Air Quality Guidelines. The Air District’s CEQA Air Quality Guidelines were prepared to assist in the evaluation of air quality impacts of projects and plans proposed within the Bay Area. The guidelines provide recommended procedures for evaluating potential air impacts during the environmental review process, consistent with CEQA requirements, and include recommended thresholds of significance, mitigation measures, and background air quality information. They also include recommended assessment methodologies for air toxics, odors, and GHG emissions.

In 2023, the Air District published an updated version of the CEQA Guidelines. The Air District’s CEQA Guidelines include thresholds to evaluate project impacts to protectively evaluate the potential effects of the project on air quality. These protective thresholds are appropriate in the context of the size, scale, and location of the proposed project.

Local Regulations

The Conservation Element of the City of Fremont’s (City) *City of Fremont General Plan*⁹ includes air quality policies and implementation measures intended to improve air quality over current

⁸ Bay Area Air Quality Management District. 2017. *Final 2017 Clean Air Plan*. April 19. Website: www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en (accessed March 2025).

⁹ City of Fremont. 2011. *City of Fremont General Plan Conservation Element*. December. Website: <https://www.fremont.gov/home/showpublisheddocument/791/637750630830170000> (accessed March 2025).

conditions to meet or exceed State and regional standards. The following policies and implementation measures are applicable to the project:

- **Policy 7-7.2: Reduce Air Pollution Levels.** Reduce City of Fremont air contaminant levels and particulate emissions below Air District attainment levels, in particular, ozone and particulate matter levels.
 - **Implementation 7-7.2.A: Construction Practices.** Require construction practices that reduce dust and other particulate emissions and require watering of exposed areas at construction sites.
- **Policy 7-7.3: Land Use Planning to Minimize Health Impacts from Toxic Air Contaminants.** Coordinate land use planning with air quality data and local transportation planning to reduce the potential for long-term exposure to toxic air contaminants (TAC) from permanent sources that affect the community.
 - **Implementation 7-7.3.A: Limit New TAC Sources.** Evaluate new sources of TAC emissions pursuant to Air District guidelines and thresholds for an increased health risk of no more than 10 additional incidents of cancer per million exposures or contribute to a cumulative risk in excess of 100 additional incidents of cancer per million exposures.
 - **Implementation 7-7.3.C: Incorporate TAC Controls with New Development.** New development projects with sensitive receptors within 1,000 feet of a freeway or major TAC source shall assess the TAC health risk for the site and incorporate, to the maximum extent feasible, risk reduction measures to reduce exposure to TAC. Risk reduction measures may include, but not be limited to, project phasing, site orientation, distance separations, landscape buffering, building air filtration systems, modified building design or building type, or off site improvements at a TAC source.

In addition, the City of Fremont Municipal Code (FMC) identifies standard development requirements for construction-related emissions in Section 18.218.050(a). FMC Section 18.218.050(a) requires the implementation of the Air District's Basic Construction Mitigation Measures for all proposed development projects and the implementation of the Air District's Additional Construction Mitigation Measures that are recommended for proposed development projects that would generate construction emissions above the Air District's thresholds. FMC Section 18.218.050(a) Standard Development Requirements for air quality are as follows:

(a) Air Quality.

- (1) Construction Related Emissions. The following construction measures, as periodically amended by Air District, are required for all proposed development projects to reduce construction-related fugitive dust and exhaust emissions:

- (A) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times daily.

- (B) All haul trucks transporting soil, sand, or other loose material off site shall be covered.
 - (C) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
 - (D) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
 - (E) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
 - (F) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations (CCR)). Clear signage shall be provided for construction workers at all access points.
 - (G) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
 - (H) A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. Air District's phone number shall also be visible to ensure compliance with applicable regulations.
- (2) Construction Related Emissions – Supplemental Measures. The following supplemental construction measures, as periodically amended by Air District, are required for all proposed development projects that would exceed the thresholds of significance for construction criteria air pollutant and precursors provided in the most recent Air District CEQA Guidelines:
- (A) All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
 - (B) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
 - (C) Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.

- (D) Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- (E) The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the total area of surfaces disturbed at any one time.
- (F) All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- (G) Site accesses to a distance of 100 feet from the paved road shall be treated with a six- to 12-inch compacted layer of wood chips, mulch, or gravel.
- (H) Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- (I) Idling time of diesel-powered construction equipment shall be limited to two minutes.
- (J) The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project-wide fleet-average 20 percent nitrogen oxide (NO_x) reduction and 45 percent particulate matter (PM) reduction compared to the most recent Air Resources Board fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.
- (K) Low volatile organic compound (i.e., reactive organic gas) coatings beyond the local requirements (i.e., Air District Regulation 8, Rule 3: Architectural Coatings) shall be used.
- (L) All construction equipment, diesel trucks, and generators shall be equipped with best available control technology for emission reductions of NO_x and PM.
- (M) All contractors shall use equipment that meets the Air Resources Board's most recent certification standard for off-road heavy-duty diesel engines.

In addition, the following mitigation measures from the City of Fremont General Plan Final Environmental Impact Report (FEIR) are applicable to the proposed project:

Mitigation Measure AIR-2

Modify Draft General Plan Update Policy 7-7.3 and Related Implementation Measures to Minimize Potential Exposures of Sensitive Receptors to TACs. Policy 7-7.3 and related implementation measures shall be modified as follows:

- **Policy 7-7.3: Land Use Planning to Minimize Health Impacts from Toxic Air Contaminants.** Coordinate land use planning with air quality data and local transportation planning to reduce the potential for long-term exposure to toxic air contaminants (TAC) from permanent sources that affect the community.
 - **Implementation 7-7.3.A: Limit New TAC Sources.** Evaluate new sources of TAC emissions pursuant to Air District guidelines and thresholds for an increased health risk of no more than 10 additional incidents of cancer per million exposures or contribute to a cumulative risk in excess of 100 additional incidents of cancer per million exposures.

Mitigation Measure AIR-3

Implement Air District-Recommended Measures to Control Particulate Matter Emissions during Construction. Measures to reduce diesel particulate matter and PM₁₀ from construction are recommended to ensure that short-term health impacts to nearby sensitive receptors are avoided. Reduce City of Fremont air contaminant levels and particulate emissions below Air District attainment levels, in particular, ozone and particulate matter levels.

Dust (PM₁₀) Control Measures:

- Water all active construction areas at least twice daily and more often during windy periods. Active areas adjacent to residences should be kept damp at all times.
- Cover all hauling trucks or maintain at least two feet of freeboard.
- Pave, apply water at least twice daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas and sweep streets daily (with water sweepers) if visible soil material is deposited onto the adjacent roads.

- Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (i.e., previously-graded areas that are inactive for 10 days or more).
- Enclose, cover, water twice daily, or apply (non-toxic) soil binders to exposed stockpiles.
- Limit traffic speeds on any unpaved roads to 15 mph.
- Replant vegetation in disturbed areas as quickly as possible.
- Suspend construction activities that cause visible dust plumes to extend beyond the construction site.
- Post a publicly-visible sign(s) with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Additional Measures to Reduce Diesel Particulate Matter and PM_{2.5} and other construction emissions:

- The developer or contractor shall provide a plan for approval by the City or Air District demonstrating that the heavy-duty (>50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NO_x reduction and 45 percent particulate reduction compared to the most recent CARB fleet average for the year 2011.
- Clear signage at all construction sites will be posted indicating that diesel equipment standing idle for more than five minutes shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate, or other bulk materials. Rotating drum concrete trucks could keep their engines running continuously as long as they were onsite or adjacent to the construction site.
- The contractor shall install temporary electrical service whenever possible to avoid the need for independently powered equipment (e.g. compressors).
- Properly tune and maintain equipment for low emissions.

Energy

Federal and State agencies regulate energy use and consumption through various means and programs. On the federal level, the United States Department of Transportation (USDOT), the United States Department of Energy, and the United States Environmental Protection Agency (USEPA) are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. On the State level, the California Public Utilities Commission (CPUC) and the CEC are two agencies with authority over different aspects of energy.

The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies and serves the public interest by protecting consumers and ensuring the provision of safe, reliable utility service and infrastructure at reasonable rates, with a commitment to environmental enhancement and a healthy California economy.

The CEC is the State's primary energy policy and planning agency. The CEC forecasts future energy needs, promotes energy efficiency, supports energy research, develops renewable energy resources, and plans for/directs state response to energy emergencies. The applicable federal, State, regional, and local regulatory framework is discussed below.

Federal Regulations

On March 31, 2022, the National Highway Traffic Safety Administration (NHTSA) finalized the Corporate Average Fuel Economy (CAFE) standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

State Regulations

Assembly Bill 1575, Warren-Alquist Act. In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575 (also known as the Warren-Alquist Act), which created the CEC. The statutory mission of the CEC is to forecast future energy needs; license power plants of 50 megawatts (MW) or larger; develop energy technologies and renewable energy resources; plan for and direct State responses to energy emergencies; and, perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code (PRC) Section 21100(b)(3) and *State CEQA Guidelines* Section 15126.4 to require Environmental Impact Reports (EIRs) to include, where relevant, mitigation measures proposed to minimize the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the *State CEQA Guidelines*. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the *State CEQA Guidelines* also states that the goal of

conserving energy implies the wise and efficient use of energy and the means of achieving this goal, including (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on renewable energy sources.

Senate Bill 1389, Energy: Planning and Forecasting. In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles (ZEVs) and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In compliance with the requirements of SB 1389, the CEC adopts an Integrated Energy Policy Report every 2 years and an update every other year. The most recently adopted report includes the *2025 Integrated Energy Policy Report*.¹⁰ The *Integrated Energy Policy Report* covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast. The *Integrated Energy Policy Report* provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs.

Renewable Portfolio Standard. SB 1078 established the California Renewable Portfolio Standards program in 2002. SB 1078 initially required that 20 percent of electricity retail sales be served by renewable resources by 2017; however, this standard has become more stringent over time. In 2006, SB 107 accelerated the standard by requiring that the 20 percent mandate be met by 2010. In April 2011, SB 2 required that 33 percent of electricity retail sales be served by renewable resources by 2020. In 2015, SB 350 established tiered increases to the Renewable Portfolio Standards of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. In 2018, SB 100 increased the requirement to 60 percent by 2030 and required that all the State's electricity come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019.¹¹

Title 24, California Building Code. Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations (CCR), known as the California Building Code (CBC). The CEC first adopted the Building Energy Efficiency Standards for Residential and Non-residential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. In 2010, the California Building Standards

¹⁰ CEC. 2025. *2025 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 25-IEPR-01.

¹¹ California Public Utilities Commission (CPUC). 2019. Renewables Portfolio Standard Program. Website: cpuc.ca.gov/rps (accessed March 2025).

Commission (CBSC) adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards Code (CALGreen Code). The CALGreen Code took effect on January 1, 2011. The CALGreen Code is updated on a regular basis, with the most recent update consisting of the 2022 CALGreen Code standards that became effective January 1, 2023. The CALGreen Code established mandatory measures for residential and non-residential building construction and encouraged sustainable construction practices in the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality.

California Energy Efficiency Strategic Plan. On September 18, 2008, the CPUC adopted California’s first Long-Term Energy Efficiency Strategic Plan, presenting a roadmap for energy efficiency in California. The Plan articulates a long-term vision and goals for each economic sector and identifies specific near-term, mid-term, and long-term strategies to assist in achieving those goals. The plan also reiterates the following four specific programmatic goals known as the “Big Bold Energy Efficiency Strategies” that were established by the CPUC in Decisions D.07-10-032 and D.07-12-051:

- All new residential construction will be zero net energy (ZNE) by 2020;
- All new commercial construction will be ZNE by 2030;
- 50 percent of commercial buildings will be retrofitted to ZNE by 2030; and
- 50 percent of new major renovations of State buildings will be ZNE by 2025.

Regional Regulations

There are no regional energy regulations that apply to the proposed project.

Local Regulations

The Conservation Element of the *City of Fremont General Plan*¹² includes energy conservation policies and implementation measures that identify highly efficient building and site design standards that provide cost-effective methods to conserve energy, reduce the City’s carbon footprint, and promote the use of renewable energy source. The following policies and implementation measures are applicable to the project:

- **Policy 7-9.1: Implement Green Building Standards.** Continue to implement and strengthen green building standards.
- **Policy 7-9.2: Energy Efficiency in Building/Site Design.** Encourage/require maximum feasible energy efficiency in site design, building orientation, landscaping, and utilities/infrastructure for all development and redevelopment projects.
 - **Implementation 7-9.2.A: Title 24.** Continue to enforce the Title 24 regulations of the California Building Code to promote energy efficient design and development. Consider local

¹² City of Fremont. 2011. *City of Fremont General Plan Conservation Element*. December. Website: <https://www.fremont.gov/home/showpublisheddocument/791/637750630830170000> (accessed March 2025).

amendment to the California Code to further goals. Support efforts to strengthen Title 24 to achieve greater energy conservation.

- **Policy 7-9.3: Renewable Energy Sources.** Encourage renewable energy sources for new and existing buildings and infrastructure.
 - **Implementation 7-9.3.A: Solar Energy.** Promote the integration of solar energy sources into all types of development.
 - **Implementation 7-9.3.D: Solar Shade Structures.** Consider standards for allowing solar shade structures to supplement tree planting requirements in parking lots.
 - **Implementation 7-9.3.E: Pre-Wiring for Future Solar Energy.** Consider requirements to provide pre-wiring for future solar photovoltaics in new home construction in order to reduce the cost and inconvenience to those homeowners wanting to install solar in the future.

Greenhouse Gas Emissions

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

Federal Regulations

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

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

State Regulations

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

Assembly Bill 32 (2006), California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is AB 32, passed by the State legislature on August 31, 2006. This effort set a GHG emission reduction target to reduce GHG emissions to 1990 levels by 2020. The CARB has established the level of GHG emissions in 1990 at 427 million metric tons (MMT) of CO₂e. The emissions target of 427 MMT CO₂e requires the reduction of 169 MMT CO₂e from the State's

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

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

The CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defines CARB climate change priorities until 2020 and sets the groundwork to reach long-term goals set forth in Executive Orders (EOs) S-3-05 and B-16-2012. The Update highlights California’s progress toward meeting the “near-term” 2020 GHG emission reduction goals as defined in the initial Scoping Plan. It also evaluates how to align the State’s “longer-term” GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. The CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,¹³ to reflect the 2030 target set by EO B-30-15 and codified by SB 32.

The 2022 Scoping Plan¹⁴ was approved in December 2022 and assesses progress towards achieving the SB 32 2030 target and lay out a path to achieve carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State’s long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

Senate Bill 375 (2008). Signed into law on October 1, 2008, SB 375 supplements GHG reductions from new vehicle technology and fuel standards with reductions from more efficient land use

¹³ California Air Resources Board (CARB). 2017. *California’s 2017 Climate Change Scoping Plan*. November. Website: ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf (accessed March 2025).

¹⁴ CARB. 2021. *2022 Scoping Plan Update*. May 10. Website: <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf> (accessed March 2025).

patterns and improved transportation. Under the law, the CARB approved GHG reduction targets in February 2011 for California's 18 federally designated regional planning bodies, known as Metropolitan Planning Organizations (MPOs). The CARB may update the targets every four years and must update them every eight years. MPOs, in turn, must demonstrate how their plans, policies and transportation investments meet the targets set by the CARB through Sustainable Community Strategies (SCS). The SCSs are included with the Regional Transportation Plan, a report required by State law. However, if an MPO finds that its SCS will not meet the GHG reduction target, it may prepare an Alternative Planning Strategy (APS). The APS identifies the impediments to achieving the targets.

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

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

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

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

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

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

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

atmospheric GHG concentrations at 450 parts per million CO₂e and reduce the likelihood of catastrophic impacts from climate change.

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

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

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

California Building Efficiency Standards (Title 24, Part 6). The California Building Standards Code, or Title 24 of the California Code of Regulations (CCR) contains the regulations that govern the construction of buildings in California. Within the Building Standards Code, two parts pertain to the incorporation of both energy efficient and green building elements into land use development. Part 6 is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption and are updated on an approximately 3-year cycle to allow consideration and possible incorporation of new energy efficient technologies and methods. In November 2008, the California Building Standards Commission established the California Green Building Standards Code (CALGreen Code), which sets performance standards for residential and non-residential development to reduce environmental impacts and encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The current set of standards were adopted in 2022 and will apply to projects seeking building permits on or after January 1, 2023. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

Assembly Bill 1279. AB 1279 was signed in September of 2022, and codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. This bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels by 2045 and directs CARB to work with relevant state agencies to achieve these goals.

Regional Regulations

The Air District is the regional government agency that regulates sources of air pollution within the nine Bay Area counties.

CEQA Guidelines. The Air District’s CEQA Guidelines¹⁵ identify applicable GHG significance thresholds. The Air District recommends these thresholds of significance for use in determining whether a proposed project will have a significant impact related to climate change. These thresholds evaluate a project based on its effect on California’s efforts to meet the State’s long-term climate goals. Applying this approach, the Air District identifies and provides supporting documentation outlining the requirements that new land use development projects must comply with to achieve California’s long-term climate goal of carbon neutrality by 2045. Based on this research, the Air District has determined that new land use development projects need to incorporate design elements to contribute the “fair share” towards implementation of the goal of carbon neutrality by 2045. If a project is designed and built to incorporate the identified design elements, then it will contribute its portion of what is necessary to achieve California’s long-term climate goals—its “fair share”—and an agency reviewing the project under CEQA can conclude that the project will not make a cumulatively considerable contribution to global climate change.

Local Regulations

The Conservation Element of the *City of Fremont General Plan*¹⁶ includes GHG policies and implementation measures intended to reduce GHG emissions 25 percent from 2005 levels by 2020. The following policy is applicable to the project:

- **Policy 7-8.2: Development Trends.** Review development trends for consistency with targets of AB 32: Global Warming Solutions Act of 2006.

The City passed its first Climate Action Plan (CAP) in 2012 with the goal of reducing municipal and community-wide GHG emissions 25 percent by 2020 from a 2005 baseline level. Some implementation successes include improving bike and pedestrian infrastructure, upgrading City streetlights with high-efficiency light emitting diode (LED) lighting, requiring all businesses to recycle, and establishing mandatory solar requirements for new residential construction.

In addition, the City adopted its updated CAP, *Climate Ready Fremont*,¹⁷ on October 10, 2023. *Climate Ready Fremont* provides a series of local GHG reduction and climate adaptation measures to be undertaken through 2023, including transportation, energy, and waste. Some of the key community-level measures include promoting clean power for residents and businesses, investing in

¹⁵ Bay Area Air Quality Management District. *2022 CEQA Guidelines*. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines> (accessed March 2025)

¹⁶ City of Fremont. 2011. *City of Fremont General Plan Conservation Element*. December. Website: <https://www.fremont.gov/home/showpublisheddocument/791/637750630830170000> (accessed March 2025).

¹⁷ City of Fremont. 2023. *Climate Ready Fremont*. October 10. Website: <https://www.fremont.gov/home/showpublisheddocument/14218/638333186754130000> (accessed March 2025)

EV charging infrastructure and encouraging the use of EVs, requiring green building for new construction, reducing plastic waste, and promoting active transportation options like biking and walking.

In addition, as discussed in *Climate Ready Fremont*, new development projects that are consistent with the growth projections and applicable GHG reduction measures in *Climate Ready Fremont* are eligible for CEQA streamlining, per the provisions of *State CEQA Guidelines* Section 15183.5. Under these provisions, a project that is subject to discretionary review and is consistent with the City's General Plan growth projections can show consistency with applicable GHG reduction measures in *Climate Ready Fremont*, and the level of analysis for the project required under CEQA can be streamlined. Furthermore, a project's incremental contribution to cumulative GHG emissions may be determined not to be cumulatively considerable in such cases.

METHODOLOGY

Construction Emissions

Construction activities can generate a substantial amount of air pollution. Construction activities are considered temporary; however, short-term impacts can contribute to exceedances of air quality standards. Construction activities include site preparation, earthmoving, and general construction. The emissions generated from these common construction activities include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips. The California Emissions Estimator Model (CalEEMod) Version 2022.1 computer program was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site.

As identified in the Project Description, the proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility. The proposed project would include site improvements such as internal demolition and construction, grading, paving and landscaping. The construction analysis evaluates the addition of the 6,000-square-foot mezzanine, 195,785 square feet of asphalt surfaces, 42,385 square feet of concrete surfaces, and 97,390 square feet of landscaping. Construction activities would begin in 2026, occurring for 6 months, and would require 124,000 square feet of asphalt demolition, 10,460 square feet of concrete demolition, and 7,500 cubic yards of soil export, which was included in CalEEMod. In addition, this analysis assumes the use of Tier 4 construction equipment as proposed by the project. Other detailed construction information is currently unavailable; therefore, this analysis utilizes CalEEMod default assumptions.

Operational Emissions

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

Consistent with the Air District's guidance for estimating emissions, CalEEMod was used to calculate the long-term operational emissions associated with the project. As described in the Project

Description, the project site is currently developed with an existing 143,795-square-foot building that operates as a retail center. The proposed project would rezone the existing site from Commercial (C-R) to Industrial (I-T) to allow operation of the existing building with a future end use that may include Industrial or Research and Development (R&D) land uses. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility, which would include substantial improvements and updates to the structure, including a 6,000-square-foot addition.

As such, this analysis evaluates operational emissions associated with a 149,795-square-foot warehouse building, which includes the existing 143,795-square-foot building plus 6,000-square-foot addition. The analysis was conducted using land use codes *Unrefrigerated Warehouse-No Rail, Other Asphalt Surfaces*, and *Other Non-Asphalt Surfaces*. The proposed project's energy supply would be all-electric and would not include natural gas usage, which was included in CalEEMod. Once operational, the proposed project would generate approximately 964 average daily trips, including 936 vehicle trips and 28 truck trips, which was also included in CalEEMod.¹⁸ Where project-specific data were not available, default assumptions (e.g., energy usage, water usage, and solid waste generation) from CalEEMod were used to estimate project emissions. CalEEMod output sheets are attached.

Energy Use

The analysis focuses on the sources of energy that are relevant to the proposed project: electricity and vehicle fuel necessary for project operations. For the purposes of this analysis, the amount of electricity and fuel use from operations are quantified and compared to that consumed in Alameda County. The electricity use of the proposed project is analyzed as a whole on an annual basis. Electricity use was estimated for the project using default energy intensities by land use type in CalEEMod. Fuel consumption (diesel fuel and gasoline) from vehicle trips during operation was estimated for the proposed project based on trip estimates from the CalEEMod model and fuel efficiencies using USEPA fuel economy estimates.

Greenhouse Gas Emissions

GHG emissions associated with the project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term GHG emissions associated with project-related area sources, energy consumption, water conveyance and treatment, and waste generation.

THRESHOLDS OF SIGNIFICANCE

Air Quality

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

¹⁸ Hexagon Transportation Consultants, Inc., 2025a. *Trip Generation Estimates for High Cube Fulfillment Center – Sort*.

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project is nonattainment under 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) adversely affecting a substantial number of people.

According to the Air District's CEQA Guidelines, to meet air quality standards for criteria air pollutant and air precursor impacts, the proposed project must not:

- Contribute to CO concentrations exceeding the State ambient air quality standards;
- Generate average daily construction emissions of ROG, NO_x or PM_{2.5} (exhaust) greater than 54 pounds per day or particulate matter less than 10 microns in size (PM₁₀) exhaust emissions greater than 82 pounds per day;
- Generate operational emissions of ROG, NO_x or PM_{2.5} of greater than 10 tons per year or 54 pounds per day or PM₁₀ emissions greater than 15 tons per year or 82 pounds per day; or
- Exceed a cancer risk level of more than 10 in one million, a non-cancer risk (i.e., chronic or acute) hazard index greater than 1.0, or result in incremental increase of greater than 0.3 micrograms per cubic meter annual average PM_{2.5}.

Energy

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

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Greenhouse Gas Emissions

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

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

According to the Air District, a project would have a less than significant impact related to GHG emissions if it would:

- a. Include, at a minimum, the following project design elements:
 1. Buildings
 - a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
 2. Transportation
 - a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
 2. Residential projects: 15 percent below the existing VMT per capita
 3. Office projects: 15 percent below the existing VMT per employee
 4. Retail projects: no net increase in existing VMT
 - b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
- b. Or be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

As discussed above, the City's CAP, *Climate Ready Fremont*, meets the requirements for a Qualified Greenhouse Gas Reduction Strategy and is designed to streamline environmental review of future development projects in the City, consistent with *State CEQA Guidelines* Section 15183.5(b). Therefore, the proposed project is evaluated for consistency with *Climate Ready Fremont*.

PROJECT IMPACTS

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

Air Quality

Air pollutant emissions associated with the project would occur over the short term from construction activities and over the long term from operational activities associated with the proposed land uses.

Consistency with Applicable Air Quality Plans

The applicable air quality plan is the Air District's 2017 Clean Air Plan, which defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduce GHG emissions to protect the climate. Consistency with the Clean Air Plan can be determined if the project: (1) supports the goals of the Clean Air Plan; (2) includes applicable control measures from the Clean Air Plan; and (3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan.

Clean Air Plan Goals. The primary goals of the Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health in the Bay Area, and reduce GHG emissions and protect climate.

The Air District has established significance thresholds for project construction and operational impacts at a level at which the cumulative impact of exceeding these thresholds would have an adverse impact on the region's attainment of air quality standards. The health and hazards thresholds were established to help protect public health. As discussed below, construction and operation of the proposed project would not result in the generation of criteria air pollutants that would exceed the Air District's thresholds of significance. Therefore, the proposed project would not conflict with the Clean Air Plan goals.

Clean Air Plan Control Measures. The control strategies of the Clean Air Plan include measures in the following categories: Stationary Source Measures, Transportation Measures, Energy Measures, Building Measures, Agriculture Measures, Natural and Working Lands Measures, Waste Management Measures, Water Measures, and Super-GHG Pollutants Measures. The proposed project's compliance with each of these control measures is discussed below.

Stationary Source Control Measures. The Stationary Source Control Measures, which are designed to reduce emissions from stationary sources such as metal melting facilities, cement kilns, refineries, and glass furnaces, are incorporated into the rules adopted by the Air District and then enforced by the Air District's Permit and Inspection programs. Because the proposed project would not include any of these stationary sources, the Stationary Source Control Measures of the Clean Air Plan are not applicable to the proposed project.

Transportation Control Measures. The Air District identifies Transportation Control Measures as part of the Clean Air Plan to decrease emissions of criteria pollutants, TACs, and GHGs by reducing demand for motor vehicle travel, promoting efficient vehicles and transit service, decarbonizing transportation fuels, and electrifying motor vehicles and equipment. The project site is currently developed with an existing building that operates as a retail center. The

proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility, which would locate employees near existing commercial, industrial, and residential uses, reducing the demand for travel by single occupancy vehicles. The proposed project would also provide EV charging, and the Alameda-Contra Costa Transit District (AC Transit) Bus Route Line 215 has a stop adjacent to the project site. Additionally, as discussed in the VMT Analysis¹⁹ prepared for the proposed project, a detailed assessment of VMT reduction strategies that are applicable to the project were considered and applied using the Alameda County Transportation Commission VMT Reduction Calculator Tool. Given that the eventual project tenant is unknown, the VMT Analysis presented several trip reduction strategies that may be utilized to mitigate the VMT impact, including priced workplace parking, mandatory employer commute program, or a combination of multiple strategies such as carpool and/or vanpool programs. The proposed project would be required to implement one of these options to ensure VMT impacts would be less than significant.

Therefore, the proposed project would support the ability to use alternative and cleaner modes of transportation, would promote initiatives to reduce vehicle trips and VMT, and would increase the use of alternate means of transportation. Therefore, the proposed project would not conflict with the identified Transportation Control Measures of the Clean Air Plan.

Energy Control Measures. The Clean Air Plan also includes Energy Control Measures, which are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG-intensive fuel sources for electricity generation. Because these measures apply to electrical utility providers and local government agencies (and not individual projects), the Energy Control Measures of the Clean Air Plan are not applicable to the proposed project.

Building Control Measures. The Air District has authority to regulate emissions from certain sources in buildings (e.g., boilers and water heaters) but has limited authority to regulate buildings themselves. Therefore, the strategies in the control measures for this sector focus on working with local governments that do have authority over local building codes, to facilitate adoption of best GHG control practices and policies. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility. The proposed project would be all-electric. As identified in the Air District's CEQA Guidelines, the elimination of natural gas in new developments would help projects implement their "fair share" of GHG emission reductions necessary to achieve carbon neutrality by 2045, consistent with State goals. As such, if a project does utilize natural gas, a lead agency can conclude that it would not be consistent with achieving the 2045 neutrality goal and will have a cumulative considerable impact on climate change. The proposed project would not include natural gas appliances or plumbing. Therefore, the proposed project would contribute to its "fair share" of GHG emission reductions necessary to support achieving the State goals of long-term

¹⁹ Hexagon Transportation Consultants, Inc. 2025b. *VMT Analysis for proposed Industrial Development at 43800 Osgood Road in Fremont, California*. March 7.

GHG emission reductions and carbon neutrality by 2045. Therefore, the proposed project would not conflict with any of the Building Control Measures.

Agriculture Control Measures. The Agriculture Control Measures are designed to primarily reduce emissions of methane. Because the project does not include any agricultural activities, the Agriculture Control Measures of the Clean Air Plan are not applicable to the proposed project.

Natural and Working Lands Control Measures. The Natural and Working Lands Control Measures focus on increasing carbon sequestration on rangelands and wetlands, as well as encouraging local governments to adopt ordinances that promote urban-tree plantings. Because the proposed project does not include the disturbance of any rangelands or wetlands, the Natural and Working Lands Control Measures of the Clean Air Plan are not applicable to the proposed project.

Waste Management Control Measures. The Waste Management Control Measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle. The proposed project would comply with local requirements for waste management (e.g., recycling and composting services). Therefore, the proposed project would be consistent with the Waste Management Control Measures of the Clean Air Plan.

Water Control Measures. The Water Control Measures focus on reducing emissions of criteria pollutants, TACs, and GHGs by encouraging water conservation, limiting GHG emissions from publicly owned treatment works (POTWs), and promoting the use of biogas recovery systems. Because these measures apply to POTWs and local government agencies (and not individual projects), the Water Control Measures are not applicable to the proposed project.

Super GHG Control Measures. The Super-GHG Control Measures are designed to facilitate the adoption of best GHG control practices and policies through the Air District and local government agencies. Because these measures do not apply to individual projects, the Super-GHG Control Measures are not applicable to the proposed project.

Clean Air Plan Implementation. As discussed above, the proposed project would generally implement the applicable measures outlined in the Clean Air Plan, including Transportation Control Measures. Therefore, the project would not disrupt or hinder implementation of a control measure from the Clean Air Plan.

Criteria Pollutant Analysis

The Air District is currently designated as a nonattainment area for State and national ozone standards and national particulate matter AAQS. The Air District's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant

adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary. The following analysis assesses the potential project-level construction- and operation-related air quality impacts.

Short-Term Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by demolition, grading, paving, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, ROG, directly emitted particulate matter (PM_{2.5} and PM₁₀), and TACs such as diesel exhaust particulate matter.

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

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The Air District has established standard measures for reducing fugitive dust emissions (PM₁₀). With the implementation of these Basic Best Management Practices (BMPs), fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM₁₀ emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO₂, NO_x, ROG, and some soot particulate (PM_{2.5} and PM₁₀) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

CalEEMod was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site. Construction-related emissions are presented in Table A.

Table A: Project Construction Emissions (in Pounds Per Day)

Project Construction	ROG	NO _x	Exhaust PM ₁₀	Fugitive Dust PM ₁₀	Exhaust PM _{2.5}	Fugitive Dust PM _{2.5}
Project Construction Emissions	0.5	3.1	<0.1	0.5	<0.1	0.2
Air District Thresholds	54.0	54.0	82.0	BMP	54.0	BMP
Exceed Threshold?	No	No	No	No	No	No

Source: LSA (March 2025).

Note: Average Daily Emissions

Air District = Bay Area Air District

BMP = Best Management Practices

NO_x = nitrogen oxides

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

PM₁₀ = particulate matter less than 10 microns in size

ROG = reactive organic gases

As shown in Table A, construction emissions associated with the project would not exceed the Air District’s thresholds for ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5} emissions. FMC Section 18.218.050(a) and City of Fremont General Plan FEIR Mitigation Measure AIR-3 would require the implementation of the Air District’s Basic BMPs to reduce construction fugitive dust impacts to a less than significant level. As such, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS.

Long-Term Operational Emissions. Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment) related to the proposed project.

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

Energy source emissions result from activities in buildings for which natural gas is used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. As identified above, the proposed project would be all-electric; therefore, the proposed project would not generate energy source emissions.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings, consumer products, and the use of landscape maintenance equipment.

Emission estimates for operation of the project were calculated using CalEEMod. The primary emissions associated with the project are regional in nature, meaning that air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the project, emissions are released in other areas of the Air Basin. The daily and annual emissions associated with project

operational trip generation, energy, and area sources are identified in Table B for ROG, NO_x, PM₁₀, and PM_{2.5}.

Table B: Project Operational Emissions

	ROG	NO _x	PM ₁₀	PM _{2.5}
Pounds Per Day				
Mobile Source Emissions	2.3	3.2	7.1	1.8
Area Source Emissions	4.2	<0.1	<0.1	<0.1
Energy Source Emissions	0.0	0.0	0.0	0.0
Total Emissions	6.5	3.2	7.1	1.8
Air District Thresholds	54.0	54.0	82.0	54.0
Exceed Threshold?	No	No	No	No
Tons Per Year				
Mobile Source Emissions	0.4	0.6	1.3	0.3
Area Source Emissions	0.8	<0.1	<0.1	<0.1
Energy Source Emissions	0.0	0.0	0.0	0.0
Total Emissions	1.2	0.6	1.3	0.3
Air District Thresholds	10.0	10.0	15.0	10.0
Exceed Threshold?	No	No	No	No

Source: LSA (March 2025).

Air District = Bay Area Air District

NO_x = nitrogen oxides

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

PM₁₀ = particulate matter less than 10 microns in size

ROG = reactive organic gases

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

Localized CO Impacts. Emissions and ambient concentrations of CO have decreased dramatically in the Bay Area with the introduction of the catalytic converter in 1975. No exceedances of the State or federal CO standards have been recorded at Bay Area monitoring stations since 1991. The Air District’s CEQA Guidelines include recommended methodologies for quantifying concentrations of localized CO levels for proposed transportation projects. A screening level analysis using guidance from the Air District’s CEQA Guidelines was performed to determine the impacts of the project. The screening methodology provides a conservative indication of whether the implementation of a proposed project would result in significant CO emissions. According to the Air District’s CEQA Guidelines, a proposed project would result in a less-than-significant impact to localized CO concentrations if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, and the regional transportation plan and local congestion management agency plans.

- Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- The project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, or below-grade roadway).

Implementation of the proposed project would not conflict with the policies or programs of the Alameda County Transportation Commission. The proposed project would generate approximately 131 a.m. peak hour trips and 180 p.m. peak hour trips; therefore, the project's contribution to peak hour traffic volumes at intersections in the vicinity of the project site would be well below 44,000 vehicles per hour. As such, the proposed project would not result in localized CO concentrations that exceed State or federal standards.

Sensitive Receptors

Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. Exposure from diesel exhaust associated with construction activity contributes to both cancer and chronic non-cancer health risks.

Construction of the proposed project may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, the closest receptors to the project site include multi-family residences located approximately 700 feet southeast of the project site. Additionally, construction contractors would be required to implement the Air District's Basic BMPs to reduce construction fugitive dust impacts to a less than significant level, as required by FMC Section 18.218.050(a) and General Plan FEIR Mitigation Measure AIR-3. With implementation of the Air District's Basic BMPs, project construction pollutant emissions would be below significance thresholds. Therefore, given the distance to the nearest sensitive receptors, the temporary nature of short-term construction impacts, and the absence of any exceeded threshold of significance related to construction impacts, construction of the proposed project would not expose nearby sensitive receptors to substantial pollutant concentrations.

Once operational, the proposed project would generate approximately 964 average daily trips, including 936 vehicle trips and 28 truck trips.²⁰ While the TAC emissions from gasoline-powered vehicles have a small health effect, truck trips would generate diesel exhaust emissions that could expose nearby sensitive receptors to TACs. Project trucks would operate in two modes: stationary idling and moving on and off the site. The emissions from trucks while idling result in a much higher concentration of TACs at nearby sensitive receptors compared to the emissions from moving trucks. This is due to the dispersion of emissions that occurs with distance and with travel of the vehicle.

²⁰ Hexagon Transportation Consultants, Inc., 2025a. *Trip Generation Estimates for High Cube Fulfillment Center – Sort*.

As identified in the Project Description, the proposed project would provide up to 18 dock doors and 3 drive-in doors. As the project would contain multiple loading docks, offsite queuing of trucks is not anticipated. As identified above, the closest receptors to the project site include multi-family residences located approximately 700 feet southeast of the project site. These residences would be located approximately 1,000 feet from the loading docks. At this distance, project trucks would not be a source of substantial emissions at the nearest residences. In addition, idling of trucks would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. As such, sensitive receptors are not expected to be exposed to substantial pollutant concentrations during project construction or operation.

Objectionable Odors

During construction, the various diesel-powered vehicles and equipment in use on site would create localized odors. These odors would be temporary and are not likely to be noticeable for extended periods of time beyond the project site. Additionally, the proposed uses that would be developed within the project site are not expected to produce any offensive odors that would result in frequent odor complaints. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Energy

This section discusses energy use resulting from implementation of the proposed project and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with any applicable plans for renewable energy and energy efficiency.

Consumption of Energy Resources

The proposed project would increase the demand for energy through day-to-day operations and fuel consumption associated with project construction.

Construction. As identified in the Project Description, the proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility. The proposed project would include site improvements such as internal demolition and construction, grading, paving and landscaping. Construction activities would begin in 2026 and would occur for 6 months.

Construction would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and construction activities. All or most of this energy would be derived from nonrenewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. However, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy (i.e., fuel) usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources.

Operation. Operational energy usage is typically associated with natural gas use, electricity consumption, and fuel used for vehicle trips. Energy consumption was estimated for the project using default energy intensities by land use type in CalEEMod. Electricity usage estimates associated with the proposed project are shown in Table C.

In addition, the proposed project would result in energy usage associated with gasoline to fuel project-related trips. Based on the CalEEMod analysis, the proposed project would result in approximately 3,722,681 VMT per year. The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 14.9 mpg in 1980 to 22.8 mpg in 2022.²¹ The average fuel economy for heavy-duty trucks in the United States has also steadily increased, from 5.7 mpg in 2013 to a projected 8.0 mpg in 2021.²² Therefore, based on the default vehicle fleet mix assumed in CalEEMod and using the USEPA fuel economy estimates, the proposed project would result in the consumption of approximately 144,660 gallons of gasoline per year and 51,245 gallons of diesel fuel per year.

Table C: Estimated Annual Energy Use of Proposed Project

Electricity Use (kWh per year)	Natural Gas Use (therms per year)	Gasoline (gallons per year)	Diesel (gallons per year)
1,500,669	0	144,660	51,245

Source: LSA (March 2025).
kWh = kilowatt-hours

As shown in Table C, the estimated potential increased electricity demand associated with the proposed project is 1,500,669 kWh per year. In 2022, Alameda County consumed 10,395 GWh or 10,395,384,395 kWh.²³ Therefore, electricity demand associated with the proposed project would be less than 0.1 percent of Alameda County’s total electricity demand.

In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. As shown above in Table C, vehicle trips associated with the proposed project would consume approximately 144,660 gallons of gasoline per year and 51,245 gallons of diesel fuel per year. Based on fuel consumption obtained from EMFAC2021, approximately 536.1 million gallons of gasoline and approximately 155.8 million gallons of diesel will be consumed from vehicle trips in Alameda County in 2025. Therefore, gasoline and diesel fuel demand generated by vehicle trips associated with the proposed project would be a minimal fraction of gasoline and diesel fuel consumption in Alameda County. Fuel consumption associated with vehicle trips generated by

²¹ USDOT. 2023. “Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles.” Website: <https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles> (accessed March 2025).
²² CEC. 2015. Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026. Website: efiling.energy.ca.gov/getdocument.aspx?tn=206180 (accessed March 2025).
²³ California Energy Commission (CEC). 2023a. Electricity Consumption by County and Entity. Website: <http://www.ecdms.energy.ca.gov/elecbycounty.aspx> and <http://www.ecdms.energy.ca.gov/elecbyutil.aspx> (accessed March 2025).

project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

As identified above, the proposed project would be all-electric and would include EV parking. In addition, the expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for industrial uses.

PG&E is the private utility that would supply the proposed project's electricity services. In 2022, approximately 40 percent of PG&E's delivered electricity came from renewable sources, including solar, wind, geothermal, small hydroelectric, and various forms of bioenergy.²⁴ PG&E reached California's 2020 renewable energy goal in 2017 and is positioned to meet the State's 60 percent by 2030 renewable energy mandate set forth in SB 100. In addition, PG&E plans to continue to provide reliable service to its customers and upgrade its distribution systems as necessary to meet future demand.

Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment use, and transportation.

Conflict with Renewable Energy or Energy Efficiency Plans

In 2002, the Legislature passed SB 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the Integrated Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for ZEVs and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC's *2025 Integrated Energy Policy Report* provides the results of the CEC's assessments of a variety of energy issues facing California. As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in Alameda County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Alameda County, and the State's available energy resources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the

²⁴ Pacific Gas & Electric (PG&E). 2025. *Clean Energy Solutions*. Website: <https://www.pge.com/en/about/corporate-responsibility-and-sustainability/taking-responsibility/clean-energy-solutions.html>. (accessed March 2025).

proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy.

Greenhouse Gas Emissions

This section describes the potential GHG impacts associated with implementation of the proposed project.

Generate Greenhouse Gas Emissions

The proposed project would generate construction- and operational-related GHG emissions and contribute to global climate change. The Air District has not addressed emissions thresholds for construction in their CEQA Guidelines; however, construction emissions are discussed in this section for disclosure purposes.

Construction GHG Emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The Air District does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that construction of the proposed project would generate approximately 183.4 MT CO₂e.

Operational GHG Emissions. Long-term GHG emissions associated with the proposed project would typically be generated from mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle trips to and from the project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the project. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

As discussed above, a project would have a less than significant impact related to GHG emissions if it would include the project design elements related to natural gas, energy, VMT, and electric vehicles, required by the Air District *or* if it would be consistent with a local GHG reduction strategy that meets the criteria under *State CEQA Guidelines* Section 15183.5(b). As discussed above, the City's CAP, *Climate Ready Fremont*, meets the requirements for a Qualified Greenhouse Gas Reduction Strategy and is designed to streamline environmental review of future development projects in the

City, consistent with *State CEQA Guidelines* Section 15183.5(b). Therefore, the proposed project is evaluated for consistency with applicable GHG reduction measures in *Climate Ready Fremont* as demonstrated in Table D below.

Table D: Project Compliance with the *Climate Ready Fremont* GHG Reduction Measures

GHG Reduction Measure	Project Compliance
Measure BU-1: Transition to 100 percent clean electricity consumption.	Consistent. The proposed project would include solar, which would help generate a portion of the electricity on site. In addition, PG&E is the private utility that would supply the proposed project’s electricity services. In 2022, approximately 40 percent of PG&E’s delivered electricity came from renewable sources, including solar, wind, geothermal, small hydroelectric, and various forms of bioenergy. PG&E reached California’s 2020 renewable energy goal in 2017 and is positioned to meet the State’s 60 percent by 2030 renewable energy mandate set forth in Senate Bill (SB) 100.
Measure BU-3: Require new nonresidential construction to be zero net energy and low carbon.	Consistent. The proposed project would be all-electric, and no natural gas demand is anticipated during construction or operation of the proposed project. The elimination of natural gas in new development would help projects implement their “fair share” of achieving long-term 2045 carbon neutrality consistent State goals.
Measure BU-8: Reduce energy consumption in buildings and operations.	Consistent. As identified above, the proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility. The proposed project would be all-electric and would comply with reach codes established by the City, which go beyond the State regulatory requirements.
Measure BU-10: Reduce overall demand on the electrical grid.	Consistent. As identified above, the proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility. The proposed project would be all-electric. As identified in the Air District’s CEQA Guidelines, the elimination of natural gas in new developments would help projects implement their “fair share” of GHG emission reductions necessary to achieve carbon neutrality by 2045, consistent with State goals. As such, if a project does utilize natural gas, a lead agency can conclude that it would not be consistent with achieving the 2045 neutrality goal and will have a cumulative considerable impact on climate change. The proposed project would not include natural gas appliances or plumbing. Therefore, the proposed project would contribute to its “fair share” of GHG emission reductions necessary to support achieving the State goals of long-term GHG emission reductions and carbon neutrality by 2045. In addition, PG&E plans to continue to provide reliable service to its customers and upgrade its distribution systems as necessary to meet future demand. Therefore, the proposed project would not conflict with measures related to reducing overall demand on the electrical grid.
Measure BU-13: Reduce water consumption in buildings.	Consistent. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility. Because the proposed project would reuse an existing building, it isn’t expected that the proposed project would substantially increase water consumption, consistent with the intent of this measure.

Table D: Project Compliance with the *Climate Ready Fremont* GHG Reduction Measures

GHG Reduction Measure	Project Compliance
<p>Measure BU-14: Increase the capture of rainwater and use of greywater.</p>	<p>Consistent. As discussed above, the proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility. Because the proposed project would reuse an existing building, it isn't expected that the proposed project would substantially increase water consumption. The proposed project would also be required to comply with the California Model Water Efficient Landscape Ordinance. As such, the proposed project is consistent with the intent of this measure.</p>
<p>Measure BU-15: Increase sustainable materials use and recovery in construction and demolition (C&D).</p>	<p>Consistent. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility. As such, the proposed project would increase sustainable materials use and recovery in construction and demolition (C&D).</p>
<p>Measure IN-3: Install infrastructure to support electric vehicle (EV) charging and other zero-emission vehicle (ZEV) fueling needs.</p>	<p>Consistent. As identified in the Project Description, the proposed project would provide 56 EV capable parking stalls and 19 EV installed spaces.</p>
<p>Measure IN-5: Improve pedestrian and bicycle infrastructure as identified in previous City plans and in the new Active Transportation Plan.</p>	<p>Consistent. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility, which would locate employees near existing commercial, industrial, and residential uses, reducing the demand for travel by single occupancy vehicles. The proposed project would also provide EV charging and Alameda-Contra Costa Transit District (AC Transit) Bus Route Line 215 has a stop adjacent to the project site. Therefore, the proposed project would support the ability to use alternative and cleaner modes of transportation, would promote initiatives to reduce vehicle trips and VMT, and would increase the use of alternate means of transportation.</p>
<p>Measure IN-12: Reduce emissions and air pollution associated with diesel fuel use in off-road equipment and stationary sources.</p>	<p>Consistent. Once operational, the proposed project would not include off-road equipment or stationary sources. In addition, with implementation of the Air District's Basic Best Management Practices, as required by Fremont Municipal Code Section 18.218.050(a) and General Plan Final Environmental Impact Report Mitigation Measure AIR-3, would reduce the amount of construction vehicle idling consistent with this measure.</p>
<p>Measure LU-1: Promote and enhance active transportation options as identified in the City's Active Transportation Plan and Mobility Action Plan.</p>	<p>Consistent. The project site is currently developed with an existing building that operates as a retail center. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility, which would locate employees near existing commercial, industrial, and residential uses, reducing the demand for travel by single occupancy vehicles. The proposed project would also provide EV charging and AC Transit Bus Route Line 215 has a stop adjacent to the project site. Therefore, the proposed project would support the ability to use alternative and cleaner modes of transportation, would promote initiatives to reduce vehicle trips and VMT, and would increase the use of alternate means of transportation.</p>

Table D: Project Compliance with the *Climate Ready Fremont* GHG Reduction Measures

GHG Reduction Measure	Project Compliance
<p>Measure LU-2: Reduce vehicle miles traveled (VMT) and single-occupancy vehicle trips, as identified in the General Plan.</p>	<p>Consistent. As discussed above, the project site is currently developed with an existing building that operates as a retail center. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility, which would locate employees near existing commercial, industrial, and residential uses, reducing the demand for travel by single occupancy vehicles. The proposed project would also provide EV charging and AC Transit Bus Route Line 215 has a stop adjacent to the project site. Therefore, the proposed project would support the ability to use alternative and cleaner modes of transportation, would promote initiatives to reduce vehicle trips and VMT, and would increase the use of alternate means of transportation.</p>
<p>Measure LU-3: Encourage the adoption of zero-emission passenger vehicles.</p>	<p>Consistent. As identified in the Project Description, the proposed project would provide 56 EV capable parking stalls and 19 EV installed spaces. Therefore, the proposed project is consistent with measures encouraging the use of EVs.</p>
<p>Measure LU-4: Increase transit ridership and promote transition to zero-emissions transit.</p>	<p>Consistent. As discussed above, AC Transit Bus Route Line 215 has a stop adjacent to the project site. Therefore, the proposed project would support the ability to use alternative modes of transportation.</p>
<p>Measure LU-5: Increase implementation of Transportation Demand Management (TDM) strategies as identified in the General Plan.</p>	<p>Consistent. As discussed in the VMT Analysis prepared for the proposed project, a detailed assessment of VMT reduction strategies that are applicable to the project were considered and applied using the Alameda County Transportation Commission VMT Reduction Calculator Tool. Given that the eventual project tenant is unknown, the VMT Analysis presented several trip reduction strategies that may be utilized to mitigate the VMT impact, including price workplace parking, mandatory employer commute program, or a combination of multiple strategies such as carpool and/or vanpool programs. The proposed project would be required to implement one of these options to ensure VMT impacts would be less than significant. Therefore, the proposed project would support the ability to use alternative modes of transportation, would promote initiatives to reduce vehicle trips and VMT, and would increase the use of alternate means of transportation. Therefore, the proposed project is consistent with this measure.</p>
<p>Measure LU-6: Reduce the amount of parking to encourage transit-oriented development (TOD) as identified in the General Plan.</p>	<p>Consistent. As discussed above, the project site is currently developed with an existing building that operates as a retail center. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility, which would locate employees near existing commercial, industrial, and residential uses, reducing the demand for travel by single occupancy vehicles. The proposed project would also provide EV charging and AC Transit Bus Route Line 215 has a stop adjacent to the project site. Therefore, the proposed project would support the ability to use alternative and cleaner modes of transportation, would promote initiatives to reduce vehicle trips and VMT, and would increase the use of alternate means of transportation.</p>
<p>Measure LU-7: Apply smart growth and low-carbon land use development principles.</p>	<p>Consistent. As discussed above, the project site is currently developed with an existing building that operates as a retail center. The proposed project would include improvements to reuse the existing structure and surrounding site to convert it to an industrial facility, which would locate employees near existing commercial, industrial, and residential uses, consistent with this measure.</p>

Source: LSA (March 2025).

As demonstrated in Table D above, the proposed project would be consistent with the applicable strategies from *Climate Ready Fremont*. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.

Consistency with Greenhouse Gas Reduction Plans

As discussed above, the proposed project is consistent with the City's CAP, *Climate Ready Fremont*. Absent any other local or regional Climate Action Plan, the proposed project was analyzed for consistency with the goals of the 2022 Scoping Plan,²⁵ EO B-30-15, SB 32, and AB 197.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,²⁶ to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps California on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016. AB 1279 codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter.

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

The Air District's Justification Report established guidance on how individual projects would be consistent with California's long-term climate goals and provides substantial evidence in supporting the use of their thresholds for projects throughout California because the thresholds are designed to meet the State's established GHG reduction goals, including the 2022 Scoping Plan goals. If a project is designed and built to incorporate these design elements related to VMT, natural gas, energy, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals, and an agency reviewing the project under CEQA can conclude that the project would be consistent with the State's 2022 Scoping Plan. As discussed above, the City's CAP, *Climate Ready Fremont*, meets the Air District's requirements for a Qualified Greenhouse Gas Reduction Strategy and is designed to streamline environmental review of future development projects in the City, consistent with *State CEQA Guidelines* Section 15183.5(b) and the Air District's Justification Report. As demonstrated above, the proposed project would be consistent with *Climate Ready Fremont* and would have a less than significant GHG impact. As analyzed against the thresholds of significance,

²⁵ CARB. 2021. *2022 Scoping Plan Update*. May 10. Website: <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf> (accessed March 2025).

²⁶ CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November.

the proposed project would be contributing its “fair share” of emission reductions to support long-term State goals of GHG emission reductions and carbon neutrality, and would therefore be found to be consistent with regional and State goals and applicable plans for GHG emissions reductions.

Therefore, the proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in EO B-30-15, SB 32, AB 197, and AB 1279, and would be consistent with applicable plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG emissions.

CONCLUSION

Based on the analysis presented above, construction and operation of the proposed project would not result in the generation of criteria air pollutants that would exceed the Air District’s thresholds of significance. In addition, with the incorporation of regulatory requirements, the proposed project is not expected to produce significant emissions that would affect nearby sensitive receptors or proposed future residential receptors. The proposed project would also not result in objectionable odors affecting a substantial number of people. Additionally, the project would not conflict with the State’s GHG emissions reductions objectives embodied in EO B-30-15, SB 32, AB 197, or AB 1279.

Attachment: CalEEMod Output Sheets

43800 Osgood Road Project - Construction Analysis Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	43800 Osgood Road Project - Construction Analysis
Construction Start Date	1/5/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	25.8
Location	43800 Osgood Rd, Fremont, CA 94539, USA
County	Alameda
City	Fremont
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1627
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	6.00	1000sqft	0.14	6,000	97,390	—	—	—

Other Asphalt Surfaces	196	1000sqft	4.49	0.00	0.00	—	—	—
Other Non-Asphalt Surfaces	42.4	1000sqft	0.97	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	12.9	12.9	19.3	0.04	0.13	3.47	3.60	0.11	1.52	1.63	—	5,239	5,239	0.24	0.37	5,359
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.69	14.8	28.9	0.05	0.22	7.81	7.91	0.20	3.97	4.07	—	5,436	5,436	0.24	0.37	5,456
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.50	3.08	4.77	0.01	0.04	0.51	0.54	0.03	0.20	0.24	—	1,092	1,092	0.05	0.05	1,108
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.09	0.56	0.87	< 0.005	0.01	0.09	0.10	0.01	0.04	0.04	—	181	181	0.01	0.01	183

2.2. Construction Emissions by Year, Unmitigated

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

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

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	12.9	12.9	19.3	0.04	0.13	3.47	3.60	0.11	1.52	1.63	—	5,239	5,239	0.24	0.37	5,359
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.69	14.8	28.9	0.05	0.22	7.81	7.91	0.20	3.97	4.07	—	5,436	5,436	0.24	0.37	5,456
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.50	3.08	4.77	0.01	0.04	0.51	0.54	0.03	0.20	0.24	—	1,092	1,092	0.05	0.05	1,108
2027	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.09	0.56	0.87	< 0.005	0.01	0.09	0.10	0.01	0.04	0.04	—	181	181	0.01	0.01	183
2027	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.41	11.9	18.2	0.03	0.20	—	0.20	0.19	—	0.19	—	3,427	3,427	0.14	0.03	3,438
Demolition	—	—	—	—	—	0.84	0.84	—	0.13	0.13	—	—	—	—	—	—

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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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.98	1.49	< 0.005	0.02	—	0.02	0.02	—	0.02	—	282	282	0.01	< 0.005	283
Demolition	—	—	—	—	—	0.07	0.07	—	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.18	0.27	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	46.6	46.6	< 0.005	< 0.005	46.8
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.48	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	118	118	< 0.005	0.01	120
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
Hauling	0.02	1.31	0.50	0.01	0.02	0.28	0.30	0.01	0.08	0.09	—	1,035	1,035	0.06	0.16	1,085
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.78	9.78	< 0.005	< 0.005	9.92
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
Hauling	< 0.005	0.11	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	85.1	85.1	< 0.005	0.01	89.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.62	1.62	< 0.005	< 0.005	1.64
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	14.1	14.1	< 0.005	< 0.005	14.8

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.64	14.7	28.3	0.05	0.10	—	0.10	0.10	—	0.10	—	5,298	5,298	0.21	0.04	5,316
Dust From Material Movement	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.20	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	72.6	72.6	< 0.005	< 0.005	72.8
Dust From Material Movement	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	0.04	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	12.1
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.56	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	138	138	< 0.005	0.01	140
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.90	1.90	< 0.005	< 0.005	1.93
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	0.32
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.39	10.3	17.8	0.03	0.08	—	0.08	0.08	—	0.08	—	2,960	2,960	0.12	0.02	2,970
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.39	10.3	17.8	0.03	0.08	—	0.08	0.08	—	0.08	—	2,960	2,960	0.12	0.02	2,970
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.84	1.46	< 0.005	0.01	—	0.01	0.01	—	0.01	—	243	243	0.01	< 0.005	244
Dust From Material Movement	—	—	—	—	—	0.23	0.23	—	0.11	0.11	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.15	0.27	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	40.3	40.3	< 0.005	< 0.005	40.4

Dust From Material Movement	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.54	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	127	127	< 0.005	< 0.005	129
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
Hauling	0.05	2.57	1.03	0.01	0.04	0.58	0.62	0.03	0.16	0.19	—	2,152	2,152	0.12	0.34	2,260
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.48	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	118	118	< 0.005	0.01	120
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
Hauling	0.05	2.72	1.04	0.01	0.04	0.58	0.62	0.03	0.16	0.19	—	2,153	2,153	0.12	0.34	2,257
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.78	9.78	< 0.005	< 0.005	9.92
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
Hauling	< 0.005	0.22	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	177	177	0.01	0.03	186
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.62	1.62	< 0.005	< 0.005	1.64
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	29.3	29.3	< 0.005	< 0.005	30.7

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.32	8.74	14.3	0.02	0.09	—	0.09	0.08	—	0.08	—	2,397	2,397	0.10	0.02	2,405
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.72	1.18	< 0.005	0.01	—	0.01	0.01	—	0.01	—	197	197	0.01	< 0.005	198
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.13	0.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	32.6	32.6	< 0.005	< 0.005	32.7
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	21.4	21.4	< 0.005	< 0.005	21.7
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	25.7	25.7	< 0.005	< 0.005	27.0
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.64	1.64	< 0.005	< 0.005	1.67
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.12	2.12	< 0.005	< 0.005	2.22
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.27	0.27	< 0.005	< 0.005	0.28
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.35	0.35	< 0.005	< 0.005	0.37
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

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Paving	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Paving	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.54	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	127	127	< 0.005	< 0.005	129
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.78	9.78	< 0.005	< 0.005	9.92
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.62	1.62	< 0.005	< 0.005	1.64
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coatings	12.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.35	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.28	4.28	< 0.005	< 0.005	4.35
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.11	0.11	< 0.005	< 0.005	0.11
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	0.02
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
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

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/5/2026	2/13/2026	5.00	30.0	—
Site Preparation	Site Preparation	2/16/2026	2/20/2026	5.00	5.00	—
Grading	Grading	2/23/2026	4/3/2026	5.00	30.0	—
Building Construction	Building Construction	4/6/2026	5/15/2026	5.00	30.0	—
Paving	Paving	5/18/2026	6/26/2026	5.00	30.0	—
Architectural Coating	Architectural Coating	6/29/2026	7/10/2026	5.00	10.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Interim	2.00	8.00	367	0.40
Demolition	Excavators	Diesel	Tier 4 Interim	3.00	8.00	36.0	0.38

Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Interim	1.00	8.00	33.0	0.73
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Interim	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Tier 4 Interim	4.00	8.00	84.0	0.37
Grading	Graders	Diesel	Tier 4 Interim	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Tier 4 Interim	1.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Back hoes	Diesel	Tier 4 Interim	3.00	8.00	84.0	0.37
Grading	Rubber Tired Dozers	Diesel	Tier 4 Interim	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Tier 4 Interim	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Tier 4 Interim	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Tier 4 Interim	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Tier 4 Interim	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Back hoes	Diesel	Tier 4 Interim	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Tier 4 Interim	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 4 Interim	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 4 Interim	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 4 Interim	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	15.0	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	15.0	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT

Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	31.3	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	2.52	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	0.98	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.50	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

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

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	9,000	3,000	14,290

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	1,802	—
Site Preparation	—	—	7.50	0.00	—
Grading	—	7,500	30.0	0.00	—
Paving	0.00	0.00	0.00	0.00	5.47

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
Unrefrigerated Warehouse-No Rail	0.00	0%
Other Asphalt Surfaces	4.49	100%
Other Non-Asphalt Surfaces	0.97	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	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

Screen	Justification
Construction: Construction Phases	Construction activities would begin in 2026 and would occur for 6 months. The proposed project would include site improvements such as internal demolition and construction, grading, paving and landscaping.
Construction: Off-Road Equipment	Construction of the proposed project would utilize Tier 4 equipment.

43800 Osgood Road Project - Operational Analysis Custom Report

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5.18.2.1. Unmitigated

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	43800 Osgood Road Project - Operational Analysis
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	25.8
Location	43800 Osgood Rd, Fremont, CA 94539, USA
County	Alameda
City	Fremont
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1627
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	150	1000sqft	5.71	149,795	97,930	—	—	—

Other Asphalt Surfaces	196	1000sqft	4.50	0.00	0.00	—	—	—
Other Non-Asphalt Surfaces	42.4	1000sqft	1.00	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.12	1.54	33.0	0.07	0.04	6.90	6.94	0.04	1.74	1.78	142	7,730	7,872	14.7	0.34	8,367
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.96	1.91	23.7	0.06	0.03	6.90	6.93	0.03	1.74	1.77	142	7,205	7,347	14.8	0.37	7,828
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.48	3.22	26.7	0.07	0.06	7.05	7.10	0.05	1.78	1.83	142	8,303	8,446	14.8	0.53	8,985
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.18	0.59	4.88	0.01	0.01	1.29	1.30	0.01	0.33	0.33	23.6	1,375	1,398	2.45	0.09	1,487

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.38	1.48	26.5	0.07	0.03	6.90	6.93	0.03	1.74	1.77	—	6,736	6,736	0.19	0.16	6,813
Area	4.74	0.05	6.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	26.9
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	839	839	0.14	0.02	847
Water	—	—	—	—	—	—	—	—	—	—	66.4	128	195	6.83	0.16	414
Waste	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.58	0.00	266
Total	7.12	1.54	33.0	0.07	0.04	6.90	6.94	0.04	1.74	1.78	142	7,730	7,872	14.7	0.34	8,367
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.29	1.91	23.7	0.06	0.03	6.90	6.93	0.03	1.74	1.77	—	6,238	6,238	0.22	0.19	6,301
Area	3.67	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	839	839	0.14	0.02	847
Water	—	—	—	—	—	—	—	—	—	—	66.4	128	195	6.83	0.16	414
Waste	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.58	0.00	266
Total	5.96	1.91	23.7	0.06	0.03	6.90	6.93	0.03	1.74	1.77	142	7,205	7,347	14.8	0.37	7,828
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.29	3.19	23.5	0.07	0.05	7.05	7.10	0.05	1.78	1.83	—	7,323	7,323	0.27	0.35	7,444
Area	4.20	0.03	3.21	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13.2	13.2	< 0.005	< 0.005	13.3
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	839	839	0.14	0.02	847
Water	—	—	—	—	—	—	—	—	—	—	66.4	128	195	6.83	0.16	414
Waste	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.58	0.00	266
Total	6.48	3.22	26.7	0.07	0.06	7.05	7.10	0.05	1.78	1.83	142	8,303	8,446	14.8	0.53	8,985
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.42	0.58	4.29	0.01	0.01	1.29	1.30	0.01	0.33	0.33	—	1,212	1,212	0.04	0.06	1,233
Area	0.77	< 0.005	0.59	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.19	2.19	< 0.005	< 0.005	2.20
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	139	139	0.02	< 0.005	140

Water	—	—	—	—	—	—	—	—	—	—	11.0	21.3	32.3	1.13	0.03	68.6
Waste	—	—	—	—	—	—	—	—	—	—	12.6	0.00	12.6	1.26	0.00	44.0
Total	1.18	0.59	4.88	0.01	0.01	1.29	1.30	0.01	0.33	0.33	23.6	1,375	1,398	2.45	0.09	1,487

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	2.38	1.48	26.5	0.07	0.03	6.90	6.93	0.03	1.74	1.77	—	6,736	6,736	0.19	0.16	6,813
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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	0.00
Total	2.38	1.48	26.5	0.07	0.03	6.90	6.93	0.03	1.74	1.77	—	6,736	6,736	0.19	0.16	6,813
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	2.29	1.91	23.7	0.06	0.03	6.90	6.93	0.03	1.74	1.77	—	6,238	6,238	0.22	0.19	6,301

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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	0.00
Total	2.29	1.91	23.7	0.06	0.03	6.90	6.93	0.03	1.74	1.77	—	6,238	6,238	0.22	0.19	6,301
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.42	0.58	4.29	0.01	0.01	1.29	1.30	0.01	0.33	0.33	—	1,212	1,212	0.04	0.06	1,233
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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	0.00
Total	0.42	0.58	4.29	0.01	0.01	1.29	1.30	0.01	0.33	0.33	—	1,212	1,212	0.04	0.06	1,233

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	839	839	0.14	0.02	847

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	839	839	0.14	0.02	847
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	839	839	0.14	0.02	847
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	839	839	0.14	0.02	847
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	139	139	0.02	< 0.005	140
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	139	139	0.02	< 0.005	140

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.45	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.07	0.05	6.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	26.9
Total	4.74	0.05	6.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	26.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer	3.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.45	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	3.67	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscaping Equipment	0.10	< 0.005	0.59	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.19	2.19	< 0.005	< 0.005	2.20
Total	0.77	< 0.005	0.59	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.19	2.19	< 0.005	< 0.005	2.20

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	66.4	128	195	6.83	0.16	414
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00

Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	66.4	128	195	6.83	0.16	414
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	66.4	128	195	6.83	0.16	414
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	66.4	128	195	6.83	0.16	414
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	11.0	21.3	32.3	1.13	0.03	68.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	11.0	21.3	32.3	1.13	0.03	68.6

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.58	0.00	266
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.58	0.00	266
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.58	0.00	266
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.58	0.00	266
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	12.6	0.00	12.6	1.26	0.00	44.0
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	12.6	0.00	12.6	1.26	0.00	44.0

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-No Rail	965	965	965	352,108	10,199	10,199	10,199	3,722,681
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. 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	224,693	74,898	14,375

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	1,500,669	204	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00
Other Non-Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	34,640,094	1,112,613
Other Asphalt Surfaces	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	141	—
Other Asphalt Surfaces	0.00	—
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
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5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.16.1. Emergency Generators and Fire Pumps

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

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

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

Screen	Justification
Land Use	Total project site is 11.21 acres.
Operations: Vehicle Data	The proposed project would generate approximately 964 average daily trips.

Operations: Fleet Mix	The proposed project would generate approximately 964 average daily trips, including 936 vehicle trips and 28 truck trips.
Operations: Energy Use	The proposed project's energy supply would be all-electric and would not include natural gas usage.