RECON

An Employee-Owned Company

February 9, 2026

Mr. John Ly
U-Stor-It
501 West Broadway, Suite 2020
San Diego, CA 92101

Reference: Air Quality Analysis for the Winchester Road U-Stor-It Project, County of Riverside, California (RECON Number 10398)

Dear Mr. Ly:

The purpose of this report is to assess potential short-term local and regional air quality impacts resulting from development of the Winchester Road U-Stor-It Project (project). The analysis of impacts is based on state and federal Ambient Air Quality Standards (AAQS) and assessed in accordance with the regional guidelines, policies, and standards established by County of Riverside (County) and the South Coast Air Quality Management District (SCAQMD).

1.0 Project Description

The project site is located at 33890 Winchester Road in the unincorporated community of Winchester in Riverside County, California. The 11.12-acre project site is currently undeveloped. The project is situated immediately southeast of Winchester Road/State Route 79 (SR-79) and south of Elmhurst Lane and Coventry Lane. Land uses surrounding the project site include Commercial Retail (CR) to the west, Open-Space Conservation (OS-C) to the northwest and Rural Residential (RR) to the north, east, and south. Figure 1 shows the regional location. Figure 2 shows an aerial photograph of the project site and vicinity.

The project would construct seven one-story self-storage buildings totaling 113,915 square feet and 130 recreational vehicle storage spaces. The project would also consist of off-site roadway improvements to Coventry Lane and drainage improvements at the Coventry Lane and Keller Road intersection. Further, in accordance with California Department of Transportation (Caltrans) standards and requirements, the project would install an off-site barricade with reflective signage to close access to Elmhurst Lane and Coventry Lane from Winchester Road/SR-79. Construction staging would take place on the project site. Figure 3 shows the proposed site plan.

2.0 Environmental Setting

2.1 Regulatory Setting

2.1.1 Federal Regulations

AAQS represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The federal Clean Air Act (CAA) was enacted in 1970 and amended in 1977 and 1990 [42 United States Code (USC) 7401] for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, in order to achieve the purposes of Section 109 of the CAA [42 USC 7409], the U.S. Environmental Protection Agency (U.S. EPA) developed primary and secondary National Ambient Air Quality Standards (NAAQS).

Six criteria pollutants of primary concern have been designated: ozone, carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), lead (Pb), and respirable particulate matter (PM_{10} and $PM_{2.5}$). The primary NAAQS ". . . in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health . . . " and the secondary standards ". . . protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" [42 USC 7409(b)(2)]. The primary NAAQS were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties). The NAAQS are presented in Table 1 (California Air Resources Board [CARB] 2024).

An air basin is designated as either attainment or non-attainment for a particular pollutant. Once a non-attainment area has achieved the AAQS for a particular pollutant, it is redesignated as an attainment area for that pollutant. To be redesignated, the area must meet air quality standards for three consecutive years. After redesignation to attainment, the area is known as a maintenance area and must develop a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. The project is located in the South Coast Air Basin (SoCAB). The SoCAB is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except for the 8-hour ozone and $PM_{2.5}$ standards.

2.1.2 State Regulations

Criteria Pollutants

The CARB has developed the California AAQS (CAAQS) and generally has set more stringent limits on the criteria pollutants than the NAAQS (see Table 1). In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Similar to the federal CAA, the state classifies as either "attainment" or "non-attainment" areas for each pollutant based on the comparison of measured data with the CAAQS. The portion of the SoCAB covering the project site is a non-attainment area for the state 8-hour ozone, PM_{10}, and $PM_{2.5}$ standards.

Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. Diesel particulate matter (DPM) emissions have been identified as TACs. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: Health and Safety Code Sections 39650–39674). The California Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air.

Table 1
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM_{10})[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		–		
Fine Particulate Matter ($PM_{2.5}$)[9]	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	9 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-dispersive Infrared Photometry	35 ppm (40 mg/m^3)	–	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	–	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m^3)	–	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3 Hour	–		–	0.5 ppm (1,300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[11]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[11]	–	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chroma-tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chroma-tography			

Table 1
Ambient Air Quality Standards

NOTES:

ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; – = not applicable.

[1] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

[3] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4] Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

[5] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7] Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.

[8] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[9] On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 µg/m^3 to 9.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standards of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[10] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[11] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[12] The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[13] The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[14] In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: CARB 2024.

The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels.

The Children's Environmental Health Protection Act, California Senate Bill 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air monitoring network, and develop any additional air toxic control measures needed to protect children's health. Locally, toxic air pollutants are regulated through the SDAPCD's Regulation XII. Of particular concern statewide are DPM emissions. DPM was established as a TAC in 1998 and is estimated to represent a majority of the cancer risk from TACs statewide (based on the statewide average). Diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB and are listed as carcinogens either under the state's Proposition 65 or under the federal Hazardous Air Pollutants program.

Following the identification of DPM as a TAC in 1998, CARB has worked on developing strategies and regulations aimed at reducing the risk from DPM. The overall strategy for achieving these reductions is found in the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* (CARB 2000). A stated goal of the plan is to reduce the statewide cancer risk arising from exposure to DPM by 85 percent by 2020.

In April 2005, CARB published the *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005). The handbook makes recommendations directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics). Sensitive land uses include but are not limited to, schools, hospitals, residences, resident care facilities, and day-care centers. The handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. Of pertinence to this study, the CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles/day should be avoided when possible.

As an ongoing process, CARB will continue to establish new programs and regulations for the control of DPM and other air-toxics emissions as appropriate. The continued development and implementation of these programs and policies will ensure that the public's exposure to DPM and other TACs will continue to decline.

State Implementation Plan

The State Implementation Plan (SIP) is a collection of documents that set forth the state's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as air quality management plans, monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. The CARB is the lead agency for all purposes related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. The CARB then forwards SIP revisions to the U.S. EPA for approval and publication in the Federal Register. All of the items included in the California SIP are listed in the Code of Federal Regulations (CFR) at 40 CFR 52.220.

California Environmental Quality Act

Section 15125(d) of the California Environmental Quality Act (CEQA) Guidelines requires discussion of any inconsistencies between the project and applicable general plans and regional plans, including the applicable air quality attainment or maintenance plan (or SIP).

2.1.3 Local Regulations

South Coast Air Quality Management District

The SCAQMD is the air pollution control agency in the SoCAB. The role of the local SCAQMD is to protect the people and the environment of the SoCAB from the effects of air pollution. As the SCAQMD is designated as a nonattainment area for state air quality standards for 8-hour ozone, PM_{10}, and $PM_{2.5}$, SCAQMD periodically prepares air quality management plans outlining measures to reduce these pollutants. The most recent AQMP is the 2022 Air Quality Management Plan (2022 AQMP).

Emissions that would result from mobile, area, and stationary sources during construction and operation of the project are subject to the rules and regulations of SCAQMD. The SCAQMD rules applicable to the project may include the following:

- **Rule 401, Visible Emissions.** This rule establishes the limit for visible emissions from stationary sources.
- **Rule 402, Nuisance.** This rule prohibits the discharge of air pollutants from a facility that cause injury, detriment, nuisance, or annoyance to the public or damage to business or property.
- **Rule 403, Fugitive Dust.** This rule requires fugitive dust sources to implement best available control measures for all sources and prohibits all forms of visible particulate matter from crossing any property line. SCAQMD Rule 403 is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust.
- **Rule 431.2, Sulfur Content of Liquid Fuels.** The purpose of this rule is to limit the sulfur content in diesel and other liquid fuels for the purpose of reducing the formation of oxides of sulfur (SO_X) and particulates during combustion and of enabling the use of add-on control devices for diesel-fueled internal combustion engines. The rule applies to all refiners, importers, and other fuel suppliers such as distributors, marketers, and retailers, as well as to users of diesel, low-sulfur diesel, and other liquid fuels for stationary-source applications in the SCAQMD. The rule also affects diesel fuel supplied for mobile sources.
- **Rule 1110.2, Emissions from Gaseous- and Liquid-Fueled Engines.** This rule applies to stationary and portable engines rated at greater than 50 horsepower. The purpose of Rule 1110.2 is to reduce oxides of nitrogen (NO_X), volatile organic compounds (VOC), and CO emissions from engines. Emergency engines, including those powering standby generators, are generally exempt from the emissions and monitoring requirements of this rule because they have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter.
- **Rule 1113, Architectural Coatings.** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Southern California Association of Governments

In September 2020, SCAG adopted Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. The Connect SoCal plan identifies that land use strategies that focus on new housing and job growth in areas with a variety of destinations and mobility options would support and complement the proposed transportation network. The overarching strategy in Connect SoCal is to provide for a plan that allows the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and

pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2020). The Connect SoCal plan contains transportation projects to help more efficiently distribute population, housing, and employment growth as well as projected development that promotes active transport and reduces GHG emissions.

County of Riverside

The Air Quality Element of the County's General Plan (County of Riverside 2015). contains the following policies related to air quality:

> Pollution Control Policies:
>
> *Multi-jurisdictional Cooperation*
>
> AQ 1.1 Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.
>
> AQ 1.2 Support Southern California Association of Government's (SCAG) Regional Growth Management Plan by developing intergovernmental agreements with appropriate governmental entities such as the Western Riverside Council of Governments (WRCOG), the Coachella Valley Association of Governments (CVAG), sanitation districts, water districts, and those subregional entities identified in the Regional Growth Management Plan.
>
> AQ 1.3 Participate in the development and update of those regional air quality management plans required under federal and state law, and meet all standards established for clean air in these plans.
>
> AQ 1.4 Coordinate with the SCAQMD and MDAQMD to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.
>
> AQ 1.5 Establish and implement air quality, land use and circulation measures that improve not only the County's environment but the entire region.
>
> AQ 1.6 Establish a level playing field by working with local jurisdictions to simultaneously adopt policies similar to those in this Air Quality Element.
>
> AQ 1.7 Support legislation which promotes cleaner industry, clean fuel vehicles and more efficient burning engines and fuels.
>
> AQ 1.8 Support the introduction of federal, state or regional enabling legislation to permit the County to promote inventive air quality programs, which otherwise could not be implemented.
>
> AQ 1.9 Encourage, publicly recognize and reward innovative approaches that improve air quality.
>
> AQ 1.10 Work with regional and local agencies to evaluate the feasibility of implementing a system of charges (e.g., pollution charges, user fees, congestion pricing and toll roads) that requires individuals who undertake polluting activities to bear the economic cost of their actions where possible.
>
> AQ 1.11 Involve environmental groups, the business community, special interests, and the general public in the formulation and implementation of programs that effectively reduce airborne pollutants.

Sensitive Receptors

AQ 2.1 The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.

AQ 2.2 Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible.

AQ 2.3 Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.

AQ 2.4 Consider creating a program to plant urban trees on an Area Plan basis that removes pollutants from the air, provides shade and decreases the negative impacts of heat on the air.

Mobile Pollution Sources

AQ 3.1 Allow the market place, as much as possible, to determine the most economical approach to relieve congestion and cut emissions.

AQ 3.2 Seek new cooperative relationships between employers and employees to reduce vehicle miles traveled.

AQ 3.3 Encourage large employers and commercial/industrial complexes to create Transportation Management Associations.

AQ 3.4 Encourage employee rideshares and transit incentives for employers with more than 25 employees at a single location.

Stationary Pollution Sources

AQ 4.1 Require the use of all feasible building materials/methods which reduce emissions.

AQ 4.2 Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.

AQ 4.3 Require centrally heated facilities to utilize automated time clocks or occupant sensors to control heating where feasible.

AQ 4.4 Require residential building construction to comply with energy use guidelines detailed in Part 6 (California Energy Code) and/or Part 11 (California Green Building Standards Code) of Title 24 of the California Code of Regulations.

AQ 4.5 Require stationary pollution sources to minimize the release of toxic pollutants through:

- Design features;
- Operating procedures;
- Preventive maintenance;
- Operator training; and
- Emergency response planning

AQ 4.6 Require stationary air pollution sources to comply with applicable air district rules and control measures.

AQ 4.7 To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency and the California Air Resources Board.

AQ 4.8 Expand, as appropriate, measures contained in the County's Fugitive Dust Reduction Program for the Coachella Valley to the entire County.

AQ 4.9 Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.

AQ 4.10 Coordinate with the SCAQMD and MDAQMD to create a communications plan to alert those conducting grading operations in the County of first, second, and third stage smog alerts, and when wind speeds exceed 25 miles per hour. During these instances all grading operations should be suspended.

Energy Efficiency and Conservation

AQ 5.1 Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.

AQ 5.2 Adopt incentives and/or regulations to enact energy conservation requirements for private and public developments.

AQ 5.3 Update, when necessary, the County's Policy Manual for Energy Conservation to reflect revisions to the County Energy Conservation Program.

AQ 5.4 Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.

2.2 Existing Air Quality

2.2.1 Climate and Meteorology

The project is located approximately 32 miles east of the Pacific Ocean, within Riverside County, between the Santa Ana Mountains and the San Jacinto Mountains. Air quality in the county is influenced by both topographical and meteorological conditions.

The project area, like other inland valley areas in southern California, has a Mediterranean climate characterized by warm, dry summers and mild, wet winters. Based on measurements taken at the Perris climate monitoring station (ID 047473), the average annual precipitation is 9.86 inches, falling primarily from November to April (Western Regional Climate Center 2023). Overall annual temperatures in the project area average about 65 degrees Fahrenheit (°F), winter low temperatures average about 42°F, and summer high temperatures average about 92°F.

The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. These winds tend to blow pollutants away from the coast toward the inland areas. Consequently, air quality near the coast is generally better than that which occurs at the base of the coastal mountain range.

The prevailing westerly wind pattern is sometimes interrupted by regional "Santa Ana" conditions. A Santa Ana occurs when a strong high pressure develops over the Nevada–Utah area and overcomes the prevailing westerly coastal winds, sending strong, steady, hot, dry northeasterly winds over the mountains and out to sea.

2.2.2 Background Air Quality

The State of California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. The project is located in the SoCAB, which includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except 8-hour ozone and $PM_{2.5}$ standards. The SoCAB is designated as in nonattainment for state air quality standards for 8-hour ozone, PM_{10}, and $PM_{2.5}$.

Air quality is commonly expressed as the number of days in which air pollution levels exceed state standards set by CARB or federal standards set by the U.S. EPA. SCAQMD has divided its jurisdictional territory of the SoCAB into 38 Source Receptor Areas (SRAs), most of which have monitoring stations that collect air quality data. These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area. These geographical areas include urbanized regions, interior valleys, coastal areas, and mountains. The SCAQMD maintains 41 active air quality monitoring sites located throughout the SoCAB. Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels.

The monitoring station closest to the project site is the Winchester monitoring station located approximately four miles south of the project site at 33700 Borel Road. The Winchester monitoring station measures ozone. The nearest monitoring station that includes measurements of all non-attainment pollutants is the Lake Elsinore monitoring station located approximately 14 miles northwest of the project site at 506 West Flint Street. Table 2 provides a summary of measurements collected at the Winchester and Lake Elsinore monitoring stations for the years 2022 through 2024.

Table 2
Summary of Air Quality Measurements Recorded at the
Winchester and Lake Elsinore Air Quality Monitoring Stations

Pollutant/Standard	2022	2023	2024
Winchester Monitoring Station			
Ozone			
Federal Max 8-hr (ppm)	0.079	0.082	0.077
Days 2015 Federal 8-hour Standard Exceeded (0.07 ppm)	3	3	5
Days 2008 Federal 8-hour Standard Exceeded (0.075 ppm)	2	1	2
State Max 8-hr (ppm)	0.079	0.082	0.078
Days State 8-hour Standard Exceeded (0.07 ppm)	4	3	6
Max. 1-hour (ppm)	0.087	0.088	0.100
Days State 1-hour Standard Exceeded (0.09 ppm)	0	0	1
Lake Elsinore Monitoring Station			
Ozone			
Federal Max 8-hr (ppm)	0.091	0.103	0.099
Days 2015 Federal 8-hour Standard Exceeded (0.07 ppm)	37	31	49
Days 2008 Federal 8-hour Standard Exceeded (0.075 ppm)	27	21	34
State Max 8-hr (ppm)	0.092	0.103	0.100
Days State 8-hour Standard Exceeded (0.07 ppm)	37	35	51
Max. 1-hour (ppm)	0.121	0.120	0.117
Days State 1-hour Standard Exceeded (0.09 ppm)	17	10	21

Table 2 Summary of Air Quality Measurements Recorded at the Winchester and Lake Elsinore Air Quality Monitoring Stations			
Pollutant/Standard	2022	2023	2024
Nitrogen Dioxide			
Max 1-hour (ppm)	0.0372	0.0417	0.0448
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0
Days Federal 1-hour Standard Exceeded (0.100 ppm)	0	0	0
Annual Average (ppm)	0.007	0.006	0.007
PM_{10}*			
Federal Max. Daily ($\mu g/m^3$)	91.8	187.0	81.6
Measured Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	0	1	0
Calculated Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	0.0	1.0	0.0
Federal Annual Average ($\mu g/m^3$)	20.3	21.8	26.7
State Max. Daily ($\mu g/m^3$)	--	--	--
Measured Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	--	--	--
Calculated Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	--	--	--
State Annual Average ($\mu g/m^3$)	--	--	--
$PM_{2.5}$*			
Federal Max. Daily ($\mu g/m^3$)	--	--	--
Measured Days Federal 24-hour Standard Exceeded (35 $\mu g/m^3$)	--	--	--
Calculated Days Federal 24-hour Standard Exceeded (35 $\mu g/m^3$)	--	--	--
Federal Annual Average ($\mu g/m^3$)	--	--	--
State Max. Daily ($\mu g/m^3$)	16.2	19.9	36.5
State Annual Average ($\mu g/m^3$)	5.8	5.9	7.5

SOURCE: CARB 2026.
ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter; -- = Not available.
* Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.

3.0 Thresholds of Significance

The significance thresholds used in this analysis were based on Appendix G of the CEQA Guidelines as well as guidance from the SCAQMD for assessing air quality impacts. The following thresholds were used to determine the significance of air quality impacts associated with the project. Adverse air quality impacts would occur if implementation of the project would:

- Obstruct or conflict with the implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standards (including the release of emissions which exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentration including air toxics.
- Create objectionable odors affecting a substantial number of people.

3.1 Regional Significance Thresholds

The SCAQMD has established significance thresholds to assess the regional and localized impacts of project-related air pollutant emissions. These significance thresholds are updated as needed to appropriately represent the most current technical information and attainment status in the SoCAB. The County uses the current SCAQMD thresholds to determine whether a project would have a significant impact. SCAQMD's significance thresholds for impacts to regional air quality are shown in Table 3.

Table 3
SCAQMD Air Quality Significance Thresholds – Mass Daily Thresholds

Pollutant	Emissions (pounds)	
	Construction	Operational
Oxides of Nitrogen (NO_X)	100	55
Volatile Organic Compounds (VOC)	75	55
Coarse Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55
Oxides of Sulfur (SO_X)	150	150
Carbon Monoxide (CO)	550	550
Lead (Pb)	3	3
SOURCE: SCAQMD CEQA Air Quality Handbook (SCAQMD 1993); SCAQMD Air Quality Significance Thresholds (SCAQMD 2015)		

3.2 Localized Significance Thresholds

The SCAQMD's Final Localized Significance Threshold (LST) Methodology was developed as a tool to assist lead agencies to analyze localized air quality impacts to sensitive receptors in the vicinity of the project (SCAQMD 2008). The LST Methodology outlines how to analyze localized impacts from common pollutants of concern including NO_2, CO, PM_{10}, and $PM_{2.5}$. Localized air quality impacts would occur if pollutant concentrations at sensitive receptors exceeded applicable NAAQS or CAAQS.

LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses. The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards. In the case of CO and NO_2, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$, both of which are non-attainment pollutants.

4.0 Air Quality Calculations

Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts can occur on two levels: regional or local. In the case of this project, operational impacts are primarily due to emissions from project-related mobile sources associated with vehicular travel along the roadways. Operational emissions also consist of area sources that are direct sources of emissions located at the project site.

Construction and operation air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2022.1 (California Air Pollution Control Officers Association 2022). The CalEEMod program is a tool used to estimate air emissions resulting from land development projects based on California-specific emission factors. The model estimates mass emissions from two basics sources: construction sources and operational sources (i.e., area and mobile sources).

Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, vehicle fleet mix (percentage of autos, medium truck, etc.), trip destination (i.e., percent of trips from home to work, etc.), duration of construction phases, construction equipment usage, grading areas, season, and ambient temperature, as well as other parameters. The CalEEMod output files presented in Attachment 1 indicate the specific outputs for each model run. Emissions of NO_X, CO, SO_X, PM_{10}, $PM_{2.5}$, and reactive organic gases (ROG) are calculated. Emission factors are not available for lead and consequently lead emissions are not calculated. The SoCAB is currently in attainment of the federal and state lead standards. Furthermore, fuel used in construction equipment and most other vehicles is not leaded.

4.1 Construction Regional Emissions

Construction-related activities are temporary, short-term sources of emissions. Sources of construction-related emissions include the following:

- Fugitive dust from grading activities;
- Construction equipment exhaust; and
- Construction-related trips by workers, delivery trucks, and material-hauling trucks.

Construction-related emissions include emissions from dust raised during grading, exhaust from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established by the SCAQMD including Rule 403, Fugitive Dust. Rule 403 requires the use of best available control measures for fugitive dust. This analysis assumes that standard dust and emission control during grading operations would be implemented to reduce potential nuisance impacts and to ensure compliance with SCAQMD Rule 403, which is estimated to result in a 61 percent reduction in fugitive dust from watering three times per day. The project would also be required to comply with SCAQMD Rule 1113, which places VOC content limits on architectural coatings. Criteria pollutant emissions were calculated using the default VOC content values of 50 and 100 grams per liter which was provided by the SCAQMD.

Heavy-duty construction equipment is usually diesel-powered. Standard construction equipment includes dozers, rollers, scrapers, dewatering pumps, backhoes, loaders, paving equipment, delivery/haul trucks, jacking equipment, welding machines, pile drivers, and so on. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys, performed by the SCAQMD and the Sacramento Metropolitan Air Quality Management District, of typical construction projects that provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. The construction schedule is based on the default construction phases, which include site preparation, grading, building construction, paving, and architectural coatings. Project grading would consist of approximately 17,250 cubic yards of cut, 18,587 cubic yards of fill, resulting in a net import of 1,338 cubic yards. In addition, off-site grading would consist of approximately 3,425 cubic yards of cut and 1,425 cubic yards of fill, resulting in a new export

of 2,000 cubic yards. In total, the project would consist of a net export of 662 cubic yards. As a conservative assessment, 2,000 cubic yards of import and 2,000 cubic yards of export were modeled.

Table 4 summarizes the default construction phases, duration, and equipment for total project construction. Table 5 shows the total projected construction maximum daily emission levels for each criteria pollutant and compares emissions to the SCAQMD regional significance thresholds. The CalEEMod output files for construction emissions are presented in Attachment 1.

Table 4
Construction Phases and Equipment

Equipment	Quantity (Number/Day)	Daily Operation Time (Hours)
Site Preparation (10 days)		
Rubber Tired Dozers	3	8
Tractors/Loaders/Backhoes	4	8
Grading (30 days)		
Excavators	2	8
Graders	1	8
Rubber Tired Dozers	1	8
Scrapers	2	8
Tractors/Loaders/Backhoes	2	8
Building Construction (300 days)		
Cranes	1	7
Forklifts	3	8
Generator Sets	1	8
Tractors/Loaders/Backhoes	3	7
Welders	1	8
Paving (20 days)		
Pavers	2	8
Paving Equipment	2	8
Rollers	2	8
Architectural Coatings (20 days)		
Air Compressor	1	6
NOTE: Each phase would also include vehicles associated with work commutes, dump trucks for hauling, and trucks for deliveries.		

Table 5
Maximum Daily Construction Emissions

Year	Emissions (pounds per day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
2026	3	29	30	<1	9	5
2027	55	10	16	<1	1	1
Maximum Daily Emissions	**55**	**29**	**30**	**<1**	**9**	**5**
SCAQMD Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceeds Threshold?	*No*	*No*	*No*	*No*	*No*	*No*
[1]Emissions were rounded to the nearest whole number. Emissions reported as <1 indicate that emissions were calculated to be less than 0.5 pound per day.						

As shown in Table 5, maximum daily construction emissions would be less than the daily SCAQMD regional thresholds for all criteria pollutants.

4.2 Operational Regional Emissions

Mobile source emissions would originate from traffic generated by the project. Area source emissions would result from the use of consumer products, architectural coatings, and landscaping activities. Energy source emissions would result from the use of natural gas.

4.2.1 Mobile Sources

Mobile source operational emissions are based on the trip rate, trip length, and vehicle mix. The trip generation potential of the project was estimated using the Institute of Transportation Engineers Land Use 151: Mini Warehouse trip rate of 1.45 trips per 1,000 square feet of self-storage and 0.1796 trip per RV parking spaces. The proposed self-storage project is forecast to generate 183 daily trips, with 12 trips (7 inbound, 5 outbound) produced in the AM peak hour and 18 trips (9 inbound, 9 outbound) produced in the PM peak hour on a "typical" weekday (Linscott, Law & Greenspan, Engineers 2024). CalEEMod default trip lengths and emission factors for year 2027 were modeled.

4.2.2 Area Sources

Area sources are defined as direct sources of operational emissions located at the project site. Area source emissions associated with the project include consumer products, architectural coatings, and landscaping equipment. Hearths (fireplaces) and woodstoves are also a source of area emissions; however, the project would not include hearths or woodstoves. Consumer products are chemically formulated products used by household and institutional consumers, including, but not limited to, detergents, cleaning compounds, polishes, floor finishes, disinfectants, sanitizers, and aerosol paints but not including other paint products, furniture coatings, or architectural coatings. Emissions due to consumer products are calculated using total building area and product emission factors.

For architectural coatings, emissions result from evaporation of solvents contained in surface coatings such as in paints and primers. Emissions are based on the building surface area, architectural coating emission factors, and a reapplication rate of 10 percent of area per year. Landscaping maintenance includes fuel combustion emission from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers as well as air compressors, generators, and pumps. Emission calculations take into account building area, equipment emission factors, and the number of operational days (summer days).

4.2.3 Energy Sources

Energy source emissions associated with the project include natural gas used in space and water heating. Emissions are generated from the combustion of natural gas used in space and water heating. Emissions are based on the Residential Appliance Saturation Survey which is a comprehensive energy use assessment that includes the end use for various climate zones in California.

4.2.4 Total Operational Emissions

Table 6 presents the total operational emissions that would be generated by the project. CalEEMod output files are presented in Attachment 1. As shown in Table 6, project-generated emissions are projected to be less than the SCAQMD's significance thresholds for all criteria pollutants.

Table 6 Summary of Project Operational Emissions (pounds per day)						
Source	Emissions					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile Sources	1	1	6	<1	1	<1
Area Sources	4	<1	5	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Total	**4**	**1**	**12**	**<1**	**2**	**<1**
SCAQMD Significance Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	*No*	*No*	*No*	*No*	*No*	*No*
NOTE: Totals may vary due to independent rounding.						

4.3 Localized Significance Thresholds

4.3.1 Construction Localized Significance Thresholds Calculations

The project site is located within Perris Valley SRA 24. LSTs apply to on-site air emissions of CO, NO_2, PM_{10}, and $PM_{2.5}$. Based on the SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds (Fact Sheet), the appropriate methodology for determining localized impacts that could occur as a result of project-related construction, should follow these steps:

- Use CalEEMod to determine the maximum daily on-site emissions that will occur during construction activity.
- The SCAQMD's Fact Sheet is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod.
- If the total calculated acreage is less than or equal to five acres, then the SCAQMD's screening look-up tables may be utilized to determine the potential for significant impacts. The look-up tables establish a maximum daily emissions threshold in pounds per day to be directly compared to CalEEMod emission results.
- If the total acreage disturbed is greater than five acres per day, then the SCAQMD recommends dispersion modeling to be conducted to determine the actual pollutant concentrations for applicable LSTs.

Additionally, the LST Methodology (SCAQMD 2008) states that only on-site emissions should be compared to LSTs. Therefore, off-site emissions associated with worker travel, materials deliveries, and other mobiles sources are not evaluated against LSTs.

The maximum on-site daily construction emissions for CO, NO_X, PM_{10}, and $PM_{2.5}$ are compared to the applicable screening thresholds based on construction site acreage and the distance to the closest sensitive receptor. Rural residential uses are located in the vicinity of the project site. Currently, the closest residential structure is located 95 feet south of the project site and 290 feet from the off-site improvement area. Other structures near the project site are currently occupied by commercial or agricultural uses. To determine the maximum daily disturbed acreage for use in the SCAQMD's LST look-up tables, the maximum acres per day were developed from the CalEEMod Users Guide. Based on the CalEEMod Users Guide, the project is anticipated to disturb approximately 3.5 acres per day during the site preparation phase and 4.5 acres per day during the grading phase (Table 7). The SCAQMD's LST look-up tables provide LSTs for one-, two-, and five-acre sites. Using the guidance provided in the LST Methodology, LSTs for 3.5 and 4.5 acres were developed using ratios of the known acreages and corresponding LSTs using the

methodology provided in Appendix K of the SCAQMD's *Sample Construction Scenarios for Projects Less than Five Acres in Size* (SCAQMD 2005). The closest receptor distance in LST look-up tables is 25 meters. As a conservative analysis, the LSTs for receptors located at 25 meters were used.

Table 7
Maximum Disturbed Acres

Phase	Equipment	Pieces	Acres/Piece	Total Daily Acres
Site Preparation	Rubber Tired Dozers	3	0.5	1.5
	Tractors/Loaders/Backhoes	4	0.5	2.0
	Total Acres			3.5
Grading	Graders	2	0.5	1.0
	Rubber Tired Dozers	1	0.5	0.5
	Scrapers	2	1	2.0
	Tractors/Loaders/Backhoes	2	0.5	1.0
	Total Acres			4.5
SOURCE: Attachment 1				

The maximum daily localized emissions from project construction and LSTs are presented in Table 8. As shown in Table 8, the maximum localized construction emissions would not exceed any of the SCAQMD recommended localized screening thresholds.

Table 8
Localized Construction Emissions

	NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation (3.5 acres per day)				
Maximum On-Site Daily Emission	29.16	28.81	8.91	5.08
LST Threshold	216.77	1,221.40	9.83	6.06
Exceeds Threshold?	No	No	No	No
Grading (4.5 acres per day)				
Maximum On-Site Daily Emission	27.23	27.57	4.71	2.46
LST Threshold	*253.69*	*1,462.29*	*12.02*	*7.33*
Exceeds Threshold?	No	No	No	No

4.3.2 Operational Localized Significance Thresholds Calculations

Project operations impacts were also assessed using SCAQMD LSTs. Table 9 presents the maximum on-site emissions and applicable LSTs. On-site emissions were evaluated against the most restrictive LSTs for a 1-acre project site with a sensitive receptor located 25 meters from the project boundary. As shown in Table 9, the maximum localized operational emissions would not exceed any of the SCAQMD recommended localized screening thresholds.

Table 9 Localized Operations Emissions				
Operations	Pollutant (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Area Sources	0.04	4.95	0.01	0.01
Energy Sources	0.58	0.49	0.04	0.04
Maximum On-Site Emissions	0.62	5.44	0.05	0.05
Operations LST Threshold[1]	*118*	*602*	*1*	*1*
Exceeds Threshold?	No	No	No	No

NOTE: Totals may vary due to independent rounding.
[1] Emissions are assessed against the threshold for 1-acre project sites with sensitive receptors within 25 meters of the project site boundary.

5.0 Impact Analysis

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

The SoCAB is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except for the 8-hour ozone and $PM_{2.5}$ standards. The SoCAB is also designated as in nonattainment for state air quality standards for 8-hour ozone and $PM_{2.5}$, and additionally is in nonattainment of state PM_{10} standards. The regional air quality plan, the 2022 AQMP, outlines measures to reduce emissions of ozone and $PM_{2.5}$. Whereas reducing PM concentrations is achieved by reducing emissions of $PM_{2.5}$ to the atmosphere, reducing ozone concentrations is achieved by reducing the precursors of photochemical formation of ozone, VOC, and NO_X.

The growth forecast for the 2022 AQMP is based in part on the land uses established by local general plans. Thus, if a project is consistent with land use as designated in the local general plan, it can normally be considered consistent with the 2022 AQMP. Projects that propose a different land use than is identified in the local general plan may also be considered consistent with the 2022 AQMP if the proposed land use is less intensive than buildout under the current designation. For projects that propose a land use that is more intensive than the current designation, analysis that is more detailed is required to assess conformance with the 2022 AQMP.

The project site is designated as Rural Residential (RUR-RR) in the County's General Plan and is zoned Rural Residential (RR). The project would require a General Plan land use change from Rural Residential (RR) to Community Development: Commercial Retail (CD:CR) and a zone change from Rural Residential (RR) to General Commercial (C-1/C-P). However, the project would not be growth inducing because it does not propose a residential use that would attract new residents and would require minimal employees. The project would therefore be consistent with the growth forecasting assumed in the 2022 AQMP.

Another factor used to determine if a project would conflict with implementation of the 2022 AQMP is determining if the project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards (NAAQS and CAAQS) or interim emissions reductions specified in the 2022 AQMP. NAAQS and CAAQS violations could occur if project emissions exceed regional significance thresholds or LSTs. As shown in Tables 5 and 6 above, construction and operational emissions would not exceed the regional significance thresholds. Additionally, as shown in Tables 8 and 9 above, construction and operational emissions would not exceed the SCAQMD LSTs. Therefore, the project would not conflict with or obstruct the implementation of the 2022 AQMP or applicable portions of the SIP, and impacts would be less than significant.

2. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

As discussed in Section 3.0 above, the SoCAB is classified as in attainment for all criterion pollutants except for ozone, PM_{10}, and $PM_{2.5}$. The SoCAB is designated as a nonattainment area for federal AAQS for the 8-hour ozone and $PM_{2.5}$ standards, and is in nonattainment area under state PM_{10} standards. Ozone is not emitted directly but is a result of atmospheric activity on precursors. NO_X and ROG are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone.

Based on SCAQMD cumulative significance methodologies, the emissions-based thresholds shown in Table 3 are used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. These thresholds were used to assess the significance of the project-specific and cumulative air quality impacts. Air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the SoCAB. As the individual project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the project's contribution to cumulative impacts.

As shown in Tables 5 and 6 above, emissions of ozone precursors (ROG and NO_X), PM_{10}, and $PM_{2.5}$ during construction and operation of the project would not exceed the SCAQMD's thresholds of significance. These thresholds are designed to provide limits below which project emissions from an individual project would not significantly affect regional air quality or the timely attainment of the NAAQS and CAAQS. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM_{10}, or $PM_{2.5}$, and impacts would be less than significant.

3. *Would the project expose sensitive receptors to substantial pollutant concentration including air toxics such as diesel particulates?*

A sensitive receptor is a person in the population who is more susceptible to health effects due to exposure to an air contaminant than is the population at large. Examples of sensitive receptor locations in the community include residences, schools, playgrounds, childcare centers, churches, athletic facilities, retirement homes, and long-term health care facilities. Rural residential uses are located in the vicinity of the project site. The closest residential structure is located 95 feet south of the project site and 290 feet from the off-site improvement area. Other structures that are near the project site are currently occupied by commercial or agricultural uses.

The two primary emissions of concern regarding health effects for land development projects are DPM and CO. Projects that would site sensitive receptors near potential CO hotspots or would contribute vehicle traffic to local intersections where a CO hotspot could occur would be considered as having a potentially significant impact.

<u>Diesel Particulate Matter – Construction</u>

Projects that would result in exposure to TACs resulting in a maximum incremental cancer risk greater than one in one million without application of best available control technology for toxics or a threshold of 10 in one million for projects implementing best available control technology for air toxics or a health hazard index greater than one would be considered as having a potentially significant impact. Construction of the project would result in the generation of DPM emissions from the use of off-road diesel construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the project would occur over a 15-month period. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose

is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were 18 months, the exposure would be five percent (18 months divided by 30 years) of the total exposure period used for health risk calculation. Further, the project would implement construction best management practices and would be conducted in accordance with CARB regulations. Specifically, the project would implement the following Best Available Control Technology for Toxics measures during construction:

- The construction fleet shall use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or utilize CARB/U.S. EPA Engine Certification Tier 3 or better, or other equivalent methods approved by the CARB.
- The engine size of construction equipment shall be the minimum size suitable for the required job.
- Construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.
- Per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

Due to the limited time of exposure and implementation of Best Available Control Technology for Toxics measures, project construction is not anticipated to create conditions where the probability is greater than 10 in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of noncarcinogenic TACs that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of U.S. EPA and CARB requirements for cleaner fuels, off-road diesel engine retrofits, and new low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced. Thus, DPM generated during construction would not result in the exposure of sensitive receptors to substantial pollutant concentration, and impacts would be less than significant.

Diesel Particulate Matter – Freeway

As discussed in Section 2.1.2 above, the CARB handbook indicates that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles per day should be avoided when possible. The project does not include a sensitive land use and is located more than 500 feet from any roadway that carries 100,000 or more vehicles per day. Based on Caltrans traffic counts, the daily traffic volume on SR-79 in the vicinity of the project site is 26,000 average daily trips (California Department of Transportation 2021). Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with diesel particulate matter during operation, and impacts would be less than significant.

Carbon Monoxide Hot Spots

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near congested intersections where idling and queuing occurs. Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have

been developed. The Sacramento Metropolitan Air Quality Management District developed a screening threshold in 2011, which states that any project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In addition, the Bay Area Air Quality Management District developed a screening threshold in 2010 which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis. This analysis conservatively assesses potential CO hot spots using the Sacramento Metropolitan Air Quality Management District screening threshold of 31,600 vehicles per hour.

The project would generate 183 daily trips, with 12 trips (7 inbound, 5 outbound) produced in the AM peak hour and 18 trips (9 inbound, 9 outbound) produced in the PM peak hour on a "typical" weekday (Linscott, Law & Greenspan, Engineers 2024). The daily traffic volume on SR-79 is 26,000 and volumes on other area roadways that intersect with SR-79 near the project site would be less than this. Peak hour volumes are typically 10 percent of the average daily traffic. Based on this, the hourly turning volumes at nearby intersections are projected to be well less than 31,600 vehicles per hour. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with a CO hot spot, and impacts would be less than significant.

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

The potential for an odor impact is dependent on a number of variables, including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During construction, construction equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses; however, exposure to odors associated with project construction would be short term and temporary in nature. Further, per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons. Therefore, project construction would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

The following list provides some common types of facilities that are known producers of objectionable odors (Bay Area Air Quality Management District 2017). This list of facilities is not meant to be all-inclusive.

- Wastewater Treatment Plant
- Wastewater Pumping Facilities
- Sanitary Landfill
- Transfer Station
- Composting Facility
- Petroleum Refinery
- Asphalt Batch Plant
- Chemical Manufacturing
- Fiberglass Manufacturing
- Painting/Coating Operations
- Rendering Plant
- Coffee Roaster
- Food Processing Facility
- Confined Animal Facility/Feed Lot/Dairy
- Green Waste and Recycling Operations
- Metal Smelting Plants

The project does not include any of these uses that are typically associated with odor complaints. The project does not propose any uses or activities that would result in potentially significant operational-source odor impacts.

Additionally, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances. Therefore, project operation would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

6.0 Conclusions

The project's potential to result in impacts to air quality was assessed in accordance with the guidelines, policies, and standards established by the County and the SCAQMD. The SCAQMD prepared the 2022 AQMP, which represents its contribution to the SIP, to outline the district's strategy for achieving attainment of federal and state AAQS. The 2022 AQMP provides an overview of air quality and sources of air pollution and identifies the pollution-control measures needed to meet clean air standards. As discussed in this analysis, The project site is designated as Rural Residential (RUR-RR) in the County's General Plan and is zoned Rural Residential (RR). The project would require a General Plan land use change from Rural Residential (RR) to Community Development: Commercial Retail (CD:CR) and a zone change from Rural Residential (RR) to General Commercial (C 1/C-P). However, the project would not be growth inducing because it does not propose a residential use that would attract new residents and would require minimal employees. Therefore, the project would not result in an exceedance of the growth forecasting used to develop the 2022 AQMP. Additionally, the project would not result in an air quality violation. Therefore, the project would not conflict with or obstruct the implementation of the 2022 AQMP or applicable portions of the SIP, and impacts would be less than significant.

As shown in Tables 5 and 6 above, project construction and operation would not exceed the SCAQMD's thresholds of significance. Therefore, the project would not result in regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations, and impacts would be less than significant.

On-site emissions during construction and operation would be less than the SCAQMD LSTs. Project construction would not result in the exposure of sensitive receptors to significant levels of DPM that could result in excess cancer risks. The project would not introduce site sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles per day and would not result in the creation of a CO hot spot. Therefore, construction and operation of the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

During construction, potential odor sources would be associated with construction equipment; however, exposure to odors associated with project construction would be short term and temporary in nature. Operation of the project would not include any uses that would generate substantial odors. Therefore, the project would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

If you have any questions about the results of this analysis, please contact me at jfleming@reconenvironmental.com or (619) 308-9333 extension 177.

Sincerely,

Jessica Fleming
Senior Air Quality Specialist

JLF:jg:sjg

cc: Mr. Peter Nora, U-Stor-It

7.0 Certification

The following is a list of preparers, persons, and organizations involved with the air quality analysis.

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- Morgan Weintraub, Associate Project Manager
- Jennifer Gutierrez, Production Specialist
- Steven Gaughran, Production Specialist
- Frank McDermott, GIS Manager

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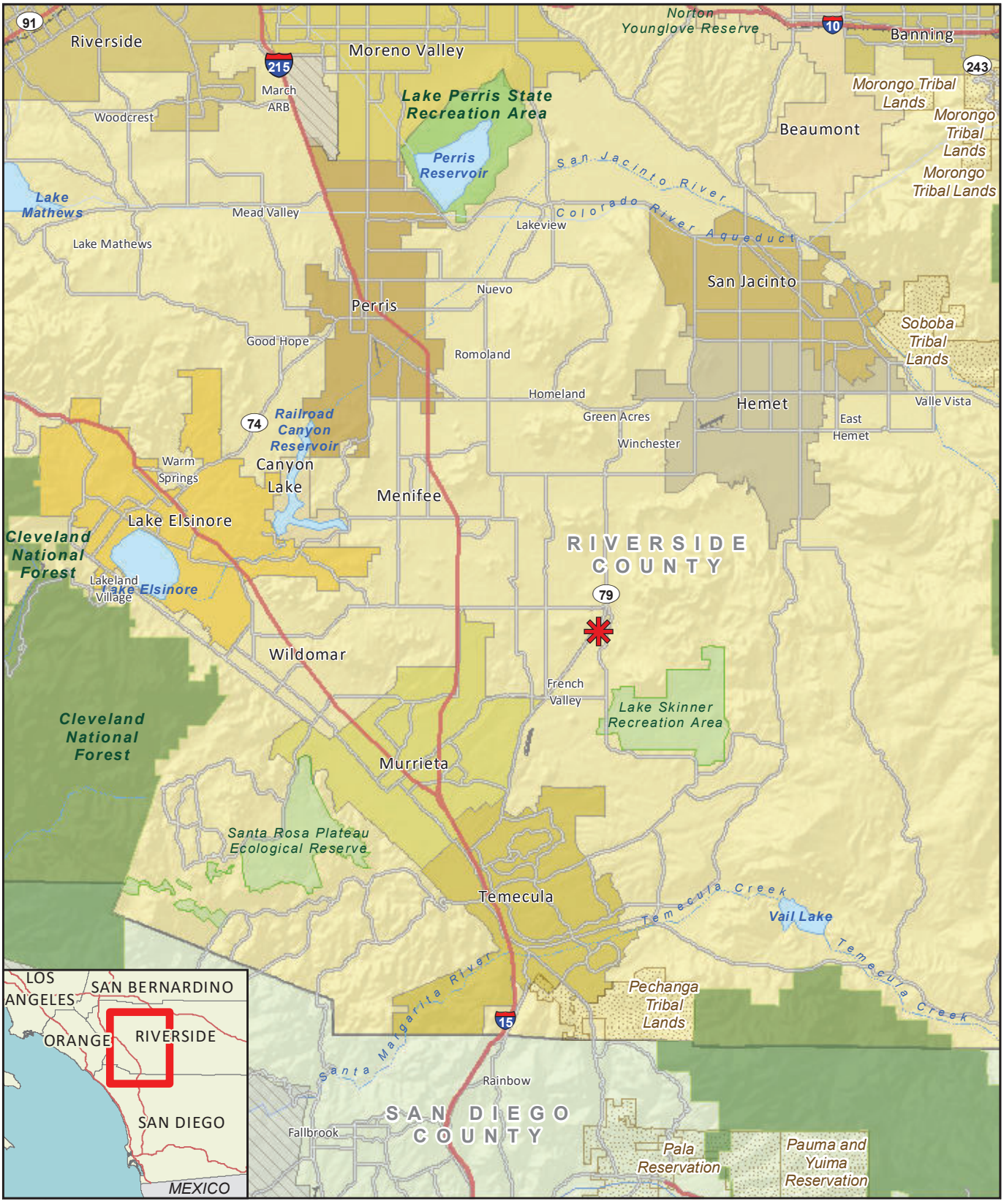

Project Location

RECON

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FIGURE 1
Regional Location

Image Source: NearMap (flown January 2025)

RECON

FIGURE 2

Project Location on Aerial Photograph

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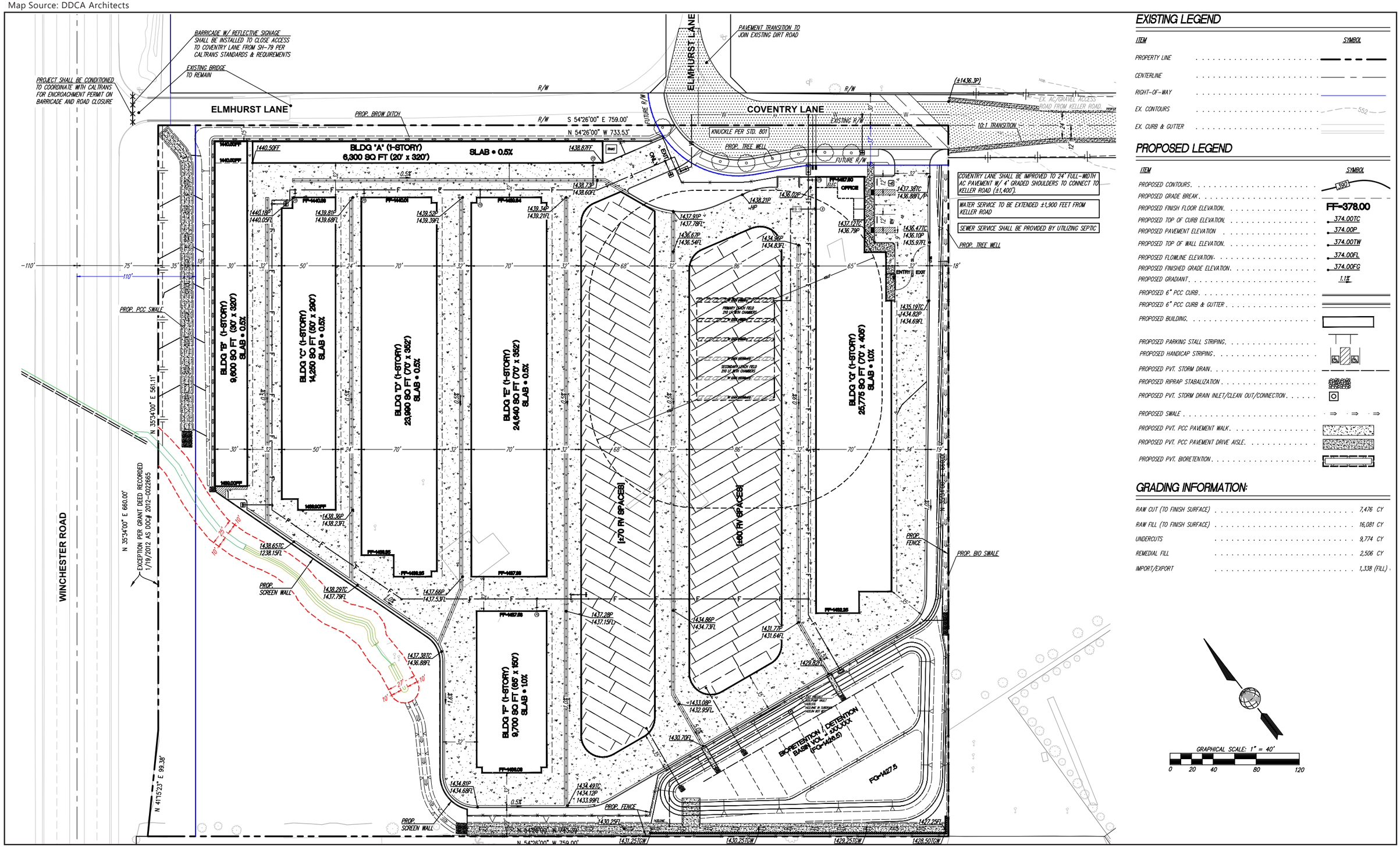
Map Source: DDCA Architects



EXISTING LEGEND

ITEM	SYMBOL
PROPERTY LINE	
CENTERLINE	
RIGHT-OF-WAY	
EX. CONTOURS	552
EX. CURB & GUTTER	

PROPOSED LEGEND

ITEM	SYMBOL
PROPOSED CONTOURS	590
PROPOSED GRADE BREAK	
PROPOSED FINISH FLOOR ELEVATION	FF=378.00
PROPOSED TOP OF CURB ELEVATION	374.00TC
PROPOSED PAVEMENT ELEVATION	374.00P
PROPOSED TOP OF WALL ELEVATION	374.00TW
PROPOSED FLOWLINE ELEVATION	374.00FL
PROPOSED FINISHED GRADE ELEVATION	374.00FG
PROPOSED GRADIANT	1.1%
PROPOSED 6" PCC CURB	
PROPOSED 6" PCC CURB & GUTTER	
PROPOSED BUILDING	
PROPOSED PARKING STALL STRIPING	
PROPOSED HANDICAP STRIPING	
PROPOSED PVT. STORM DRAIN	
PROPOSED RIPRAP STABALIZATION	
PROPOSED PVT. STORM DRAIN INLET/CLEAN OUT/CONNECTION	
PROPOSED SWALE	
PROPOSED PVT. PCC PAVEMENT WALK	
PROPOSED PVT. PCC PAVEMENT DRIVE AISLE	
PROPOSED PVT. BIORETENTION	

GRADING INFORMATION:

RAW CUT (TO FINISH SURFACE)	7,476 CY
RAW FILL (TO FINISH SURFACE)	16,081 CY
UNDERCUTS	9,774 CY
REMEDIAL FILL	2,506 CY
IMPORT/EXPORT	1,338 (FILL)

GRAPHICAL SCALE: 1" = 40'
0 20 40 80 120

RECON

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FIGURE 3
Site Plan

ATTACHMENT 1

CalEEMod Output

Winchester U-Stor-It Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Winchester U-Stor-It
Construction Start Date	1/1/2026
Operational Year	2027
Lead Agency	County of Riverside
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	14.0
Location	33.6303264817446, -117.08919666177553
County	Riverside-South Coast
City	Unincorporated
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5685
EDFZ	11
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	114	1000sqft	9.02	113,915	113,764	0.00	—	—

Parking Lot	130	Space	2.10	0.00	0.00	0.00	—	—
Other Asphalt Surfaces	1.74	Acre	1.74	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.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	55.3	55.3	10.6	16.6	0.03	0.39	0.79	1.17	0.36	0.19	0.55	—	3,619	3,619	0.14	0.13	3.77	3,665
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.82	3.21	29.2	29.8	0.07	1.24	7.89	9.14	1.14	3.99	5.14	—	7,981	7,981	0.29	0.24	0.10	8,062
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.43	3.37	9.63	12.8	0.02	0.36	1.03	1.39	0.33	0.35	0.69	—	2,969	2,969	0.10	0.10	1.11	3,002
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.63	0.61	1.76	2.34	< 0.005	0.07	0.19	0.25	0.06	0.06	0.13	—	491	491	0.02	0.02	0.18	497
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

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

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.53	1.29	10.6	16.6	0.03	0.39	0.79	1.17	0.36	0.19	0.55	—	3,619	3,619	0.14	0.13	3.77	3,665
2027	55.3	55.3	10.1	16.3	0.03	0.34	0.79	1.13	0.32	0.19	0.51	—	3,596	3,596	0.12	0.12	3.42	3,640
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.82	3.21	29.2	29.8	0.07	1.24	7.89	9.14	1.14	3.99	5.14	—	7,981	7,981	0.29	0.24	0.10	8,062
2027	1.46	1.22	10.2	15.5	0.03	0.34	0.79	1.13	0.32	0.19	0.51	—	3,545	3,545	0.12	0.12	0.09	3,585
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.33	1.12	9.63	12.8	0.02	0.36	1.03	1.39	0.33	0.35	0.69	—	2,969	2,969	0.10	0.10	1.11	3,002
2027	3.43	3.37	2.65	4.08	0.01	0.09	0.19	0.28	0.09	0.05	0.13	—	879	879	0.03	0.03	0.34	888
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.24	0.20	1.76	2.34	< 0.005	0.07	0.19	0.25	0.06	0.06	0.13	—	491	491	0.02	0.02	0.18	497
2027	0.63	0.61	0.48	0.74	< 0.005	0.02	0.03	0.05	0.02	0.01	0.02	—	145	145	< 0.005	< 0.005	0.06	147

2.4. Operations Emissions Compared Against Thresholds

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.50	4.34	1.30	11.8	0.02	0.06	1.46	1.53	0.06	0.37	0.43	108	3,153	3,261	11.1	0.21	5.32	3,606
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.58	3.48	1.31	5.84	0.02	0.06	1.46	1.52	0.06	0.37	0.43	108	3,031	3,139	11.1	0.21	0.14	3,480
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.17	4.03	1.35	9.43	0.02	0.06	1.45	1.51	0.06	0.37	0.43	108	3,059	3,167	11.1	0.21	2.30	3,511
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.76	0.74	0.25	1.72	< 0.005	0.01	0.26	0.28	0.01	0.07	0.08	17.9	507	524	1.85	0.03	0.38	581
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	3,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	Yes
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	3,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	Yes

2.5. Operations Emissions by Sector, Unmitigated

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

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

Mobile	0.80	0.74	0.68	6.37	0.02	0.01	1.46	1.47	0.01	0.37	0.38	—	1,683	1,683	0.06	0.07	5.32	1,712
Area	3.63	3.57	0.04	4.95	< 0.005	0.01	—	0.01	0.01	—	0.01	—	20.4	20.4	< 0.005	< 0.005	—	20.4
Energy	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,270	1,270	0.12	0.01	—	1,276
Water	—	—	—	—	—	—	—	—	—	—	—	50.5	179	230	5.19	0.13	—	397
Waste	—	—	—	—	—	—	—	—	—	—	—	57.7	0.00	57.7	5.77	0.00	—	202
Total	4.50	4.34	1.30	11.8	0.02	0.06	1.46	1.53	0.06	0.37	0.43	108	3,153	3,261	11.1	0.21	5.32	3,606
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.76	0.69	0.72	5.35	0.02	0.01	1.46	1.47	0.01	0.37	0.38	—	1,581	1,581	0.07	0.08	0.14	1,605
Area	2.75	2.75	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,270	1,270	0.12	0.01	—	1,276
Water	—	—	—	—	—	—	—	—	—	—	—	50.5	179	230	5.19	0.13	—	397
Waste	—	—	—	—	—	—	—	—	—	—	—	57.7	0.00	57.7	5.77	0.00	—	202
Total	3.58	3.48	1.31	5.84	0.02	0.06	1.46	1.52	0.06	0.37	0.43	108	3,031	3,139	11.1	0.21	0.14	3,480
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.75	0.69	0.74	5.54	0.02	0.01	1.45	1.46	0.01	0.37	0.38	—	1,596	1,596	0.07	0.08	2.30	1,623
Area	3.36	3.31	0.03	3.39	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	14.0	14.0	< 0.005	< 0.005	—	14.0
Energy	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,270	1,270	0.12	0.01	—	1,276
Water	—	—	—	—	—	—	—	—	—	—	—	50.5	179	230	5.19	0.13	—	397
Waste	—	—	—	—	—	—	—	—	—	—	—	57.7	0.00	57.7	5.77	0.00	—	202
Total	4.17	4.03	1.35	9.43	0.02	0.06	1.45	1.51	0.06	0.37	0.43	108	3,059	3,167	11.1	0.21	2.30	3,511
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.14	0.13	0.13	1.01	< 0.005	< 0.005	0.26	0.27	< 0.005	0.07	0.07	—	264	264	0.01	0.01	0.38	269
Area	0.61	0.60	0.01	0.62	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.31	2.31	< 0.005	< 0.005	—	2.32
Energy	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	210	210	0.02	< 0.005	—	211
Water	—	—	—	—	—	—	—	—	—	—	—	8.36	29.7	38.0	0.86	0.02	—	65.7
Waste	—	—	—	—	—	—	—	—	—	—	—	9.55	0.00	9.55	0.95	0.00	—	33.4

Total	0.76	0.74	0.25	1.72	< 0.005	0.01	0.26	0.28	0.01	0.07	0.08	17.9	507	524	1.85	0.03	0.38	581

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	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	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.80	0.79	< 0.005	0.03	—	0.03	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	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	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.08	0.95	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	222	222	< 0.005	0.01	0.02	225
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.16	6.16	< 0.005	< 0.005	0.01	6.24
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.02	1.02	< 0.005	< 0.005	< 0.005	1.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.30	0.25	2.24	2.27	0.01	0.09	—	0.09	0.08	—	0.08	—	542	542	0.02	< 0.005	—	544
Dust From Material Movement	—	—	—	—	—	—	0.30	0.30	—	0.12	0.12	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.05	0.05	0.41	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	89.8	89.8	< 0.005	< 0.005	—	90.1
Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.09	1.09	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	254	254	< 0.005	0.01	0.02	257
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	0.02	1.29	0.31	0.01	0.02	0.30	0.32	0.02	0.08	0.11	—	1,129	1,129	0.02	0.18	0.06	1,184
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	21.1	21.1	< 0.005	< 0.005	0.03	21.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.11	0.03	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	92.8	92.8	< 0.005	0.01	0.08	97.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.50	3.50	< 0.005	< 0.005	0.01	3.54
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.4	15.4	< 0.005	< 0.005	0.01	16.1

3.5. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	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	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	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	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.77	0.65	5.96	7.84	0.01	0.23	—	0.23	0.21	—	0.21	—	1,450	1,450	0.06	0.01	—	1,455
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.09	1.43	< 0.005	0.04	—	0.04	0.04	—	0.04	—	240	240	0.01	< 0.005	—	241
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.23	0.20	0.19	3.44	0.00	0.00	0.63	0.63	0.00	0.15	0.15	—	660	660	0.03	0.02	2.24	670
Vendor	0.03	0.01	0.60	0.19	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	562	562	0.01	0.09	1.54	590
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.19	0.21	2.61	0.00	0.00	0.63	0.63	0.00	0.15	0.15	—	607	607	0.01	0.02	0.06	614
Vendor	0.02	0.01	0.63	0.19	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	562	562	0.01	0.09	0.04	589
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.11	0.14	1.65	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	372	372	0.01	0.01	0.58	377
Vendor	0.02	0.01	0.38	0.11	< 0.005	0.01	0.10	0.10	0.01	0.03	0.03	—	340	340	0.01	0.05	0.40	356
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.03	0.30	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	61.5	61.5	< 0.005	< 0.005	0.10	62.3
Vendor	< 0.005	< 0.005	0.07	0.02	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	56.3	56.3	< 0.005	0.01	0.07	59.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2027) - Unmitigated

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

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

Off-Road Equipm	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	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	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	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	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.22	2.04	2.81	0.01	0.07	—	0.07	0.07	—	0.07	—	521	521	0.02	< 0.005	—	522
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.37	0.51	< 0.005	0.01	—	0.01	0.01	—	0.01	—	86.2	86.2	< 0.005	< 0.005	—	86.5
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.19	0.17	3.18	0.00	0.00	0.63	0.63	0.00	0.15	0.15	—	648	648	0.01	0.02	2.01	657
Vendor	0.02	0.01	0.58	0.18	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	552	552	0.01	0.08	1.40	578
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.18	0.19	2.40	0.00	0.00	0.63	0.63	0.00	0.15	0.15	—	596	596	0.01	0.02	0.05	603
Vendor	0.02	0.01	0.60	0.19	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	552	552	0.01	0.08	0.04	577
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.05	0.55	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	131	131	< 0.005	< 0.005	0.19	133
Vendor	0.01	< 0.005	0.13	0.04	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	120	120	< 0.005	0.02	0.13	125
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.7	21.7	< 0.005	< 0.005	0.03	22.0
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	19.8	19.8	< 0.005	< 0.005	0.02	20.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.50	0.50	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	1.00	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	203	203	< 0.005	0.01	0.63	206
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.4	10.4	< 0.005	< 0.005	0.01	10.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.72	1.72	< 0.005	< 0.005	< 0.005	1.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	55.1	55.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34

Architectural Coating	3.02	3.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	0.55	0.55	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.64	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	130	130	< 0.005	< 0.005	0.40	131
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.61	6.61	< 0.005	< 0.005	0.01	6.70
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.09	1.09	< 0.005	< 0.005	< 0.005	1.11
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	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.70	0.65	0.59	5.58	0.01	0.01	1.28	1.29	0.01	0.32	0.33	—	1,475	1,475	0.06	0.06	4.66	1,500
Parking Lot	0.10	0.09	0.08	0.79	< 0.005	< 0.005	0.18	0.18	< 0.005	0.05	0.05	—	208	208	0.01	0.01	0.66	212
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.80	0.74	0.68	6.37	0.02	0.01	1.46	1.47	0.01	0.37	0.38	—	1,683	1,683	0.06	0.07	5.32	1,712
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.66	0.61	0.63	4.69	0.01	0.01	1.28	1.29	0.01	0.32	0.33	—	1,385	1,385	0.06	0.07	0.12	1,407
Parking Lot	0.09	0.09	0.09	0.66	< 0.005	< 0.005	0.18	0.18	< 0.005	0.05	0.05	—	196	196	0.01	0.01	0.02	199

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.76	0.69	0.72	5.35	0.02	0.01	1.46	1.47	0.01	0.37	0.38	—	1,581	1,581	0.07	0.08	0.14	1,605
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.12	0.11	0.12	0.89	< 0.005	< 0.005	0.23	0.23	< 0.005	0.06	0.06	—	231	231	0.01	0.01	0.33	235
Parking Lot	0.02	0.02	0.02	0.13	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	32.7	32.7	< 0.005	< 0.005	0.05	33.3
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.14	0.13	0.13	1.01	< 0.005	< 0.005	0.26	0.27	< 0.005	0.07	0.07	—	264	264	0.01	0.01	0.38	269

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	497	497	0.05	0.01	—	500
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	76.0	76.0	0.01	< 0.005	—	76.4

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	573	573	0.05	0.01	—	577
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	497	497	0.05	0.01	—	500
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	76.0	76.0	0.01	< 0.005	—	76.4
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	573	573	0.05	0.01	—	577
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	82.3	82.3	0.01	< 0.005	—	82.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	12.6	12.6	< 0.005	< 0.005	—	12.7
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	94.9	94.9	0.01	< 0.005	—	95.5

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	697	697	0.06	< 0.005	—	699
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	697	697	0.06	< 0.005	—	699
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	697	697	0.06	< 0.005	—	699
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	697	697	0.06	< 0.005	—	699
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	115	115	0.01	< 0.005	—	116
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	115	115	0.01	< 0.005	—	116

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.45	2.45	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.88	0.81	0.04	4.95	< 0.005	0.01	—	0.01	0.01	—	0.01	—	20.4	20.4	< 0.005	< 0.005	—	20.4
Total	3.63	3.57	0.04	4.95	< 0.005	0.01	—	0.01	0.01	—	0.01	—	20.4	20.4	< 0.005	< 0.005	—	20.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.45	2.45	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	2.75	2.75	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.45	0.45	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.11	0.10	0.01	0.62	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.31	2.31	< 0.005	< 0.005	—	2.32
Total	0.61	0.60	0.01	0.62	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.31	2.31	< 0.005	< 0.005	—	2.32

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	50.5	179	230	5.19	0.13	—	397
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	50.5	179	230	5.19	0.13	—	397
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	50.5	179	230	5.19	0.13	—	397
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	50.5	179	230	5.19	0.13	—	397
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	8.36	29.7	38.0	0.86	0.02	—	65.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	8.36	29.7	38.0	0.86	0.02	—	65.7

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	57.7	0.00	57.7	5.77	0.00	—	202
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	57.7	0.00	57.7	5.77	0.00	—	202
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	57.7	0.00	57.7	5.77	0.00	—	202
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	57.7	0.00	57.7	5.77	0.00	—	202
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	9.55	0.00	9.55	0.95	0.00	—	33.4

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	9.55	0.00	9.55	0.95	0.00	—	33.4

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Site Preparation	Site Preparation	1/1/2026	1/14/2026	5.00	10.0	—
Grading	Grading	1/15/2026	2/25/2026	5.00	30.0	—
Building Construction	Building Construction	2/26/2026	4/21/2027	5.00	300	—

Paving	Paving	4/22/2027	5/19/2027	5.00	20.0	—
Architectural Coating	Architectural Coating	5/20/2027	6/16/2027	5.00	20.0	—

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
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	16.7	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	47.8	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	18.7	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	9.57	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	170,873	56,958	10,036

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	15.0	0.00	—
Grading	2,000	2,000	90.0	0.00	—
Paving	0.00	0.00	0.00	0.00	3.84

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	2.10	100%
Other Asphalt Surfaces	1.74	100%

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	532	0.03	< 0.005
2027	0.00	532	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-No Rail	165	165	165	60,290	1,807	1,807	1,807	659,695
Parking Lot	23.3	23.3	23.3	8,522	255	255	255	93,249
Other 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	170,873	56,958	10,036

5.10.3. Landscape Equipment

Season	Unit	Value

Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	524,277	346	0.0330	0.0040	2,174,886
Parking Lot	80,133	346	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	26,342,844	1,803,809
Parking Lot	0.00	0.00
Other 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	107	—
Parking Lot	0.00	—
Other 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

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

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

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	28.9	annual days of extreme heat
Extreme Precipitation	2.65	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	27.9	annual hectares burned

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

6.2. Initial Climate Risk Scores

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

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

6.3. Adjusted Climate Risk Scores

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

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	80.0
AQ-PM	36.4
AQ-DPM	60.0
Drinking Water	10.2
Lead Risk Housing	11.7
Pesticides	0.00
Toxic Releases	13.7
Traffic	6.51
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	0.00
Haz Waste Facilities/Generators	2.51
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	41.2
Cardio-vascular	92.2
Low Birth Weights	63.8

Socioeconomic Factor Indicators	—
Education	10.8
Housing	12.8
Linguistic	15.6
Poverty	15.3
Unemployment	89.9

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	80.07185936
Employed	72.89875529
Median HI	79.60990633
Education	—
Bachelor's or higher	58.65520339
High school enrollment	100
Preschool enrollment	37.79032465
Transportation	—
Auto Access	93.63531374
Active commuting	18.01616836
Social	—
2-parent households	79.04529706
Voting	48.72321314
Neighborhood	—
Alcohol availability	79.87937893
Park access	6.608494803
Retail density	19.67150006

Supermarket access	5.453612216
Tree canopy	4.927499038
Housing	—
Homeownership	73.73283716
Housing habitability	87.5914282
Low-inc homeowner severe housing cost burden	49.31348646
Low-inc renter severe housing cost burden	90.56845887
Uncrowded housing	58.74502759
Health Outcomes	—
Insured adults	74.51559091
Arthritis	0.0
Asthma ER Admissions	86.2
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	74.4
Cognitively Disabled	97.6
Physically Disabled	93.4
Heart Attack ER Admissions	2.2
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0

Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	4.1
SLR Inundation Area	0.0
Children	24.2
Elderly	85.6
English Speaking	89.6
Foreign-born	19.6
Outdoor Workers	80.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	53.0
Traffic Density	13.6
Traffic Access	23.0
Other Indices	—
Hardship	30.8
Other Decision Support	—
2016 Voting	63.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	15.0
Healthy Places Index Score for Project Location (b)	70.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	113,915 square feet self storage 130 RV parking spaces 11.12 acres on-site 1.74 acres off-site 113,764 square feet landscaping
Construction: Construction Phases	Default construction phases and durations
Operations: Vehicle Data	ITE Trip Generation Rates LLG Traffic Impact Assessment