PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE **AGENDA DATE: May 28, 2026**

FROM: PLANNING & DEVELOPMENT SERVICES **AGENDA TIME 1:30 PM / No.**

Linn Parking & Storage

PROJECT TYPE: CUP #25-0015 / MERG #00165 / IS #25-0033 SUPERVISOR DIST #5

059-363-025-000
059-363-020-000

LOCATION: 1624 Gateway Rd APN: 059-363-013-000

Calexico, CA PARCEL SIZE: 7.1 Acres

GENERAL PLAN (existing) Gateway of the Americas SPA GENERAL PLAN (proposed) N/A

ZONE (existing) Gateway Industrial ZONE(proposed) N/A

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 05/28/2026

INITIAL STUDY: #25-0033

☐ NEGATIVE DECLARATION ☒ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☐ NONE	☒ ATTACHED
AG	☐ NONE	☒ ATTACHED
APCD	☐ NONE	☒ ATTACHED
E.H.S.	☒ NONE	☐ ATTACHED
FIRE / OES	☐ NONE	☒ ATTACHED
SHERIFF	☒ NONE	☐ ATTACHED

OTHER Imperial Irrigation District (IID), Quechan Indian Tribe, Agua Caliente Indian Tribe

REQUESTED ACTION:

(See Attached)

☐ NEGATIVE DECLARATION
☒ MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

Conditional Use Permit #25-0015
Lot Merger #00165
Initial Study #25-0033
Linn Parking & Storage

Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
www.icpds.com

May 2026

EEC ORIGINAL PKG

TABLE OF CONTENTS

PAGE

SECTION 1

I. INTRODUCTION 3

SECTION 2

II. ENVIRONMENTAL CHECKLIST 8
PROJECT SUMMARY 10
ENVIRONMENTAL ANALYSIS 13

I. AESTHETICS 15
II. AGRICULTURE AND FOREST RESOURCES 15
III. AIR QUALITY 16
IV. BIOLOGICAL RESOURCES 17
V. CULTURAL RESOURCES 18
VI. ENERGY 18
VII. GEOLOGY AND SOILS 17
VIII. GREENHOUSE GAS EMISSION 20
IX. HAZARDS AND HAZARDOUS MATERIALS 21
X. HYDROLOGY AND WATER QUALITY 22
XI. LAND USE AND PLANNING 20
XII. MINERAL RESOURCES 23
XIII. NOISE 20
XIV. POPULATION AND HOUSING 24
XV. PUBLIC SERVICES 24
XVI. RECREATION 25
XVII. TRANSPORTATION 25
XVIII. TRIBAL CULTURAL RESOURCES 26
XIX. UTILITIES AND SERVICE SYSTEMS 26
XX. WILDFIRE 26

SECTION 3

III. MANDATORY FINDINGS OF SIGNIFICANCE 29
IV. PERSONS AND ORGANIZATIONS CONSULTED 30
V. REFERENCES 31
VI. NEGATIVE DECLARATION - COUNTY OF IMPERIAL 32
VII. FINDINGS 33

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY) 34
IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY) 35

EEC ORIGINAL PKG

SECTION 1
INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Conditional Use Permit #25-0015 and Lot Merger #00165. For purposes of this document, the abovementioned project will be called the "proposed application". (Refer to Exhibit "A" & "B").

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

☐ According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

☐ According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

☒ According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency,

in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

This Initial Study and Negative Declaration are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

PROJECT SUMMARY, LOCATION AND EVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in

EEC ORIGINAL PKG

preparation of this Initial Study and Negative Declaration.

V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.

2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.

3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".

4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and Negative Declaration will be conducted under a ☐ policy-level, ☒ project level analysis. Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared

EEC ORIGINAL PKG

for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- These documents must summarize the portion of the document being incorporated by reference or briefly

EEC ORIGINAL PKG

describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.

- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

EEC ORIGINAL PKG

II. Environmental Checklist

1. **Project Title**: Conditional Use Permit #25-0015 / Lot Merger #00165 / Initial Study #25-0033
2. **Lead Agency**: Imperial County Planning & Development Services Department
3. **Contact person and phone number**: Luis Bejarano, Planner II, (442) 265-1736, ext. 1745
4. **Address**: 801 Main Street, El Centro CA, 92243
5. **E-mail**: luisbejarano@co.imperial.ca.us
6. **Project location**: The location of the proposed project is 1624 Gateway Road, Calexico, CA, properties identified under Assessor's Parcel Numbers (APN) 059-363-013-000, 059-363-020-000 and 059-363-025-000, legally described as POR LOT A LLA#283 ALSO BEING LOT 4 OF TRACT 942 GATEWAY TO THE AMERICA SUB NO2 UNIT2 4.00AC, POR LOT A OF LLA#283 ALSO BEING POR REM. PAR A GATEWAY TO THE AMERICA SUB 2 UN 3 & LOT 4 GATEWAY TO THE AMERICA SUB 2 UN 4 ALSO BEING POR LOT B LLA#283, in an unincorporated area of the County of Imperial. See Exhibit "A" Vicinity Map.
7. **Project sponsor's name and address**: Oscar Linn
   1624 Gateway Rd, Calexico, CA 92231
8. **General Plan designation**: Gateway of the Americas Specific Plan Area
9. **Zoning**: GC (Gateway Commercial)
10. **Description of project**: The Applicant has submitted requests for Conditional Use Permit #25-0015 and Lot Merger #00165 to continue and expand the operation of a parking and storage facility, including mini-storage units designed to receive packages and boxes on behalf of customers from delivery parcel companies. Said expansion would replace the currently permitted operation under Conditional Use Permit #13-0005. Upon merger, the project site will cover approximately 7.1 acres, comprising contiguous parcels identified by Assessor's Parcel Numbers 059-363-013-000, 059-363-020-000, and 059-363-025-000. Access will remain via Gateway Road. This development is intended to accommodate the growing operational demands of Linn Parking & Storage by increasing parking capacity for commercial vehicles, including long-haul trucks and trailers. The facility is projected to handle around 30 passenger vehicles and 60 trucks entering and exiting daily, with capacity to park up to 60 passenger vehicles and 140 trucks and trailers of various sizes. Operations will run continuously, 24/7, with a staff of approximately eight employees. This expansion is anticipated to improve traffic circulation, reduce congestion within the existing lot, and enhance overall site safety and functionality for both drivers and personnel.
11. **Surrounding land uses and setting**: The project site is located within the Gateway of the Americas Specific Plan Area. Surrounded by parcels designated GI (Gateway Industrial) zoning towards north, south, east and west.
12. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)**: A) Planning Commission
13. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentially, etc.?**

    The Quechan Indian Tribe, the Campo Band of Mission Indians, and the Agua Caliente Band of Cahuilla Indians were contacted and invited to participate in the AB-52 Consultation and Request for Review and Comments as part of the Initial Study review process for a period of time between September 18, 2025, and October 20, 2025. The tribes had no comments on CUP #25-0015 / MERG #00165 / IS #25-0033.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code,

EEC ORIGINAL PKG

Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.

EEC ORIGINAL PKG

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology /Soils	☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials
☐	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☐	Noise	☐	Population / Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee has:

☐ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☒	☐	☐
ENVIRONMENTAL HEALTH SVCS	☒	☐	☐
OFFICE EMERGENCY SERVICES	☒	☐	☐
APCD	☒	☐	☐
AG	☒	☐	☐
SHERIFF DEPARTMENT	☒	☐	☐
ICPDS	☒	☐	☐

Sgn

Jim Minnick, Director of Planning/EEC Chairman

5-28-2026

Date:

PROJECT SUMMARY

A. **Project Location**: The location of the proposed project is 1624 Gateway Road, Calexico, CA, properties identified under Assessor's Parcel Numbers (APN) 059-363-013-000, 059-363-020-000 and 059-363-025-000, legally described as POR LOT A LLA#283 ALSO BEING LOT 4 OF TRACT 942 GATEWAY TO THE AMERICA SUB NO2 UNIT2 4.00AC, POR LOT A OF LLA#283 ALSO BEING POR REM. PAR A GATEWAY TO THE AMERICA SUB 2 UN 3 & LOT 4 GATEWAY TO THE AMERICA SUB 2 UN 4 ALSO BEING POR LOT B LLA#283, in an unincorporated area of the County of Imperial. See Exhibit "A" Vicinity Map.

B. **Project Summary**: The Applicant has submitted requests for Conditional Use Permit #25-0015 and Lot Merger #00165 to continue and expand the operation of a parking and storage facility, including mini-storage units designed to receive packages and boxes on behalf of customers from delivery parcel companies. Said expansion would replace the currently permitted operation under Conditional Use Permit #13-0005. Upon merger, the project site will cover approximately 7.1 acres, comprising contiguous parcels identified by Assessor's Parcel Numbers 059-363-013-000, 059-363-020-000, and 059-363-025-000. Access will remain via Gateway Road. This development is intended to accommodate the growing operational demands of Linn Parking & Storage by increasing parking capacity for commercial vehicles, including long-haul trucks and trailers. The facility is projected to handle around 30 passenger vehicles and 60 trucks entering and exiting daily, with capacity to park up to 60 passenger vehicles and 140 trucks and trailers of various sizes. Operations will run continuously, 24/7, with a staff of approximately eight employees. This expansion is anticipated to improve traffic circulation, reduce congestion within the existing lot, and enhance overall site safety and functionality for both drivers and personnel.

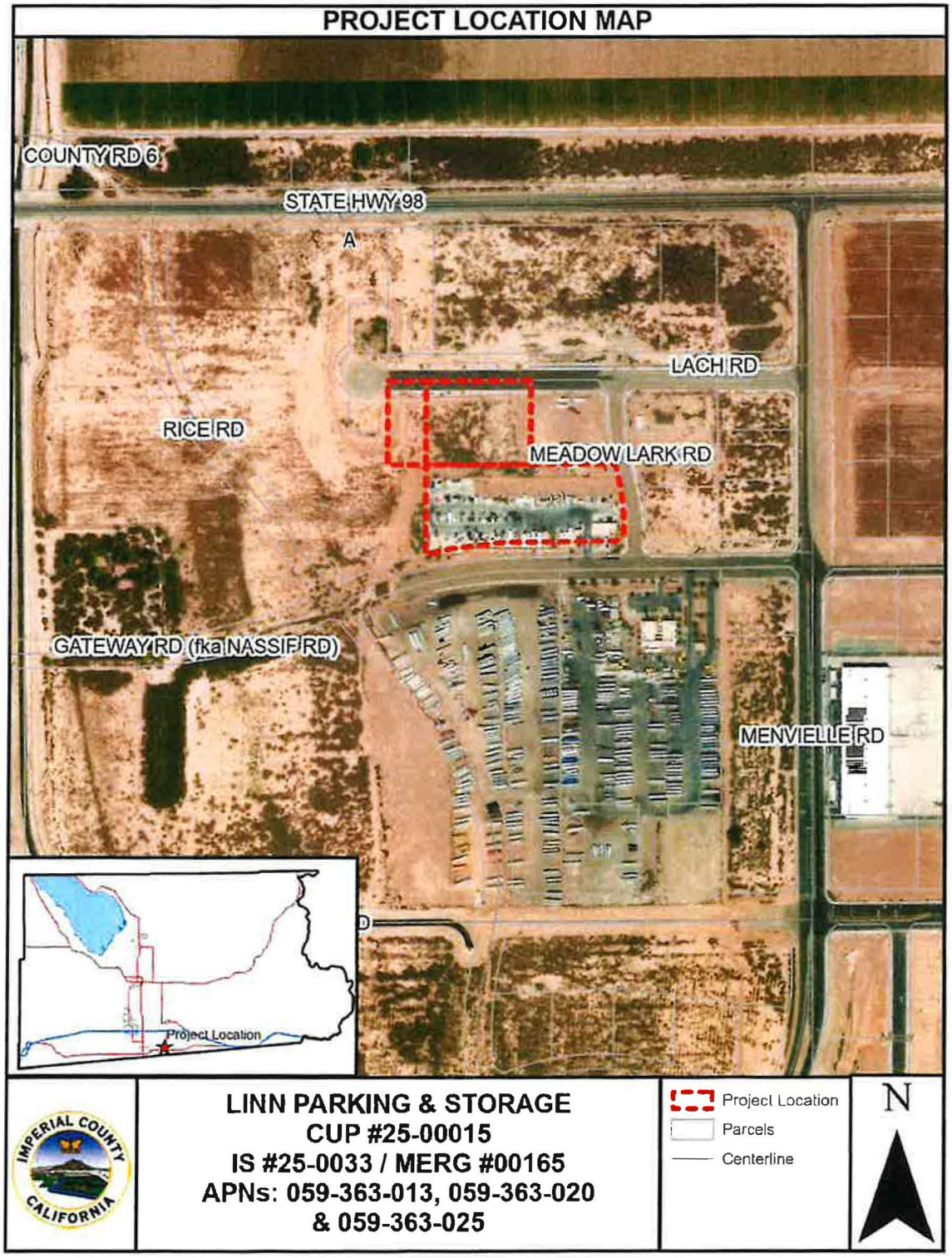
C. **Environmental Setting**: A portion of the project site (APN 059-363-013-000) is currently occupied by the proponent for a use that is substantially similar to the use proposed under this project. The project includes the expansion of this use onto two additional parcels (APN 059-363-020-000 and 059-363-025-000), which are proposed to be consolidated through Lot Merger #00165. These parcels are contiguous to the existing operation and are currently undeveloped.

D. **Analysis**: Under the Land Use Element of the Imperial County General Plan, the project site is designated as part of the Gateway of the Americas Specific Plan Area. It is classified as GI (Gateway Industrial) per Zone Map #18 of the Imperial County Land Use Ordinance (Title 9) and the Gateway of the Americas Specific Plan. Initial Study #25-0033 will analyze any impacts related to the proposed project.

E. **General Plan Consistency**: Per the Imperial County General Plan, the land is designated as part of the Gateway of the Americas Specific Plan Area and zoned GI (Gateway Industrial) per zone map #18 of the Imperial County Land Use Ordinance (Title 9) and the Gateway Specific Plan. The proposed project is consistent with the Gateway of the Americas Specific Plan (C. Uses permitted with a Conditional Use Permit, Section 5-a "Wholesale, Storage and Distribution".

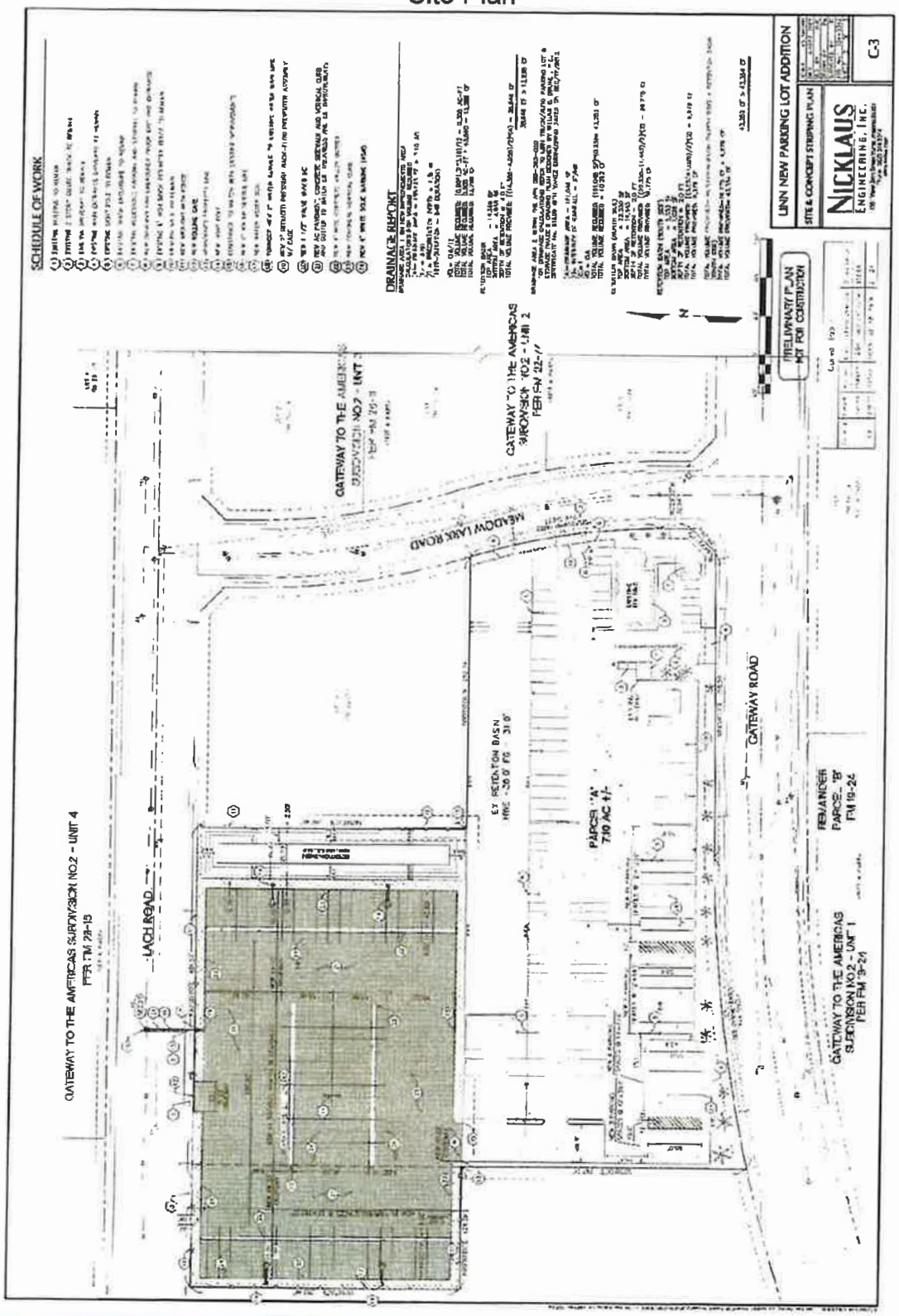
EEC ORIGINAL PKG

Exhibit "A"
Vicinity Map



EEC ORIGINAL PKG

Exhibit "B"
Site Plan



EEC ORIGINAL PKG

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

I. *AESTHETICS*

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista or scenic highway? ☐ ☐ ☐ ☒

a) The project site is not located near a scenic highway per the Imperial County Circulation and Scenic Highway Element[1]. The roads surrounding the parcel do not meet the scenic highway criteria found on the California Scenic Highway Program[2]; therefore, no impacts are expected to occur.

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? ☐ ☐ ☐ ☒

b) The site of the proposed project is located within the Gateway of the Americas Specific Plan, with principal focus on Industrial and Commercial Development. There are no scenic resources surrounding the project site, and will not damage scenic resources such as trees, rock outcroppings, or historic buildings within a scenic highway; therefore, no impacts are expected.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ☐ ☒ ☐ ☐

c) The proposed project site is located within the Gateway of the Americas Specific Plan and would not degrade the existing visual character or quality of the site and its surrounding area. The Gateway SPA PEIR concluded that the aesthetic impact resulting from agriculture land to industrial/commercial development, consequential to the implementation of the Gateway Specific Plan, would be significant but mitigable. This anticipated impact would be reduced below a level of significance through adherence to architectural and landscape design guidelines. Therefore, a less than significant impact with mitigations incorporated is expected.

Implementation of the following mitigation measures from the PEIR would reduce aesthetic impact to below a level of significance:

- **MM-AE1: Concurrent with approval of Plot Plans for each phase or unit of development shall be in substantial conformance with the design guidelines in Chapter IV of the Gateway Specific Plan to ensure compatibility with the planned design theme as adopted for the SPA. (Mitigation Measure 4.5-1)**
- **MM-AE2: Prior to issuance of a grading permit for each phase or unit of development within the SPA, a detailed landscape plan shall be prepared in conformance with the design guidelines in Chapter IV of the Gateway Specific Plan. (Mitigation Measure 4.5-2)**

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ☐ ☐ ☒ ☐

d) The proposed project site is surrounded by vacant land and by existing buildings with lighting on site, including the original operation, located on the southern parcel (APN 059-363-013-000), which is being expanded as part of this project. However, should any additional lighting be placed, they will need to be shielded and contained within the property boundary. Additionally, any added lighting shall comply with the Gateway SPA Land Use Regulations and Design Guidelines in Chapter IV. Addherance to these regulations will result in a less than significant impact.

II. *AGRICULTURE AND FOREST RESOURCES*

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. --Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps ☐ ☐ ☐ ☒

[1] Imperial County General Plan Circulation and Scenic Highways Element, page 30
[2] Imperial County General Plan Circulation and Scenic Highways Element, pages 80-108

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

a) According to the California Department of Conservation Farmland Mapping and Monitoring Program (2020), the project site is designated as "Urban and Built-Up Land"[3], there is no conversion of agricultural use to non-agricultural use being proposed. Additionally, the Specific Plan PEIR for the Gateway to the Americas Specific Plan indicated that new agricultural land could not be created to off-set any loss of agricultural lands and further concluded that the future development within the proposed project location would not result in significant impacts to agriculture. No mitigation measures or environmental conditions for agriculture are applicable to this proposed project; therefore, no impacts are expected.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? ☐ ☐ ☐ ☒

b) The proposed location is zoned as GI (Gateway Industrial), falling within the Gateway of the Americas Specific Plan Area. The proposed project location is not zoned for agricultural uses; therefore, there will be no impact regarding conflicts with a Williamson Act Contract, nor agricultural uses. No impacts are expected.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ☐ ☐ ☐ ☒

c) The project is not within any forestland; therefore, no impacts related to the conversion of timberlands or forest land are expected. Therefore, no impact is expected.

d) Result in the loss of forestland or conversion of forestland to non-forest use? ☐ ☐ ☐ ☒

d) As previously stated, the project site is not within or close to any forest land; therefore, no impact is expected.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use? ☐ ☐ ☐ ☒

e) The proposed project site is located within the Gateway to the Americas Specific Plan and will involve changes in the existing environment; however, as explained in II (a) above, the Specific Plan PEIR indicated that new agricultural land could not be created to off-set any loss of agricultural lands, and concluded the future development within the proposed project location would not result in significant impacts to agriculture. No mitigation measures or environmental conditions for agriculture are applicable to this proposed project. No impacts are expected to occur.

III. *AIR QUALITY*

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to the following determinations. Would the Project:

a) Conflict with or obstruct implementation of the applicable air quality plan? ☐ ☐ ☒ ☐

a) Mobile sources emissions make up a large portion of operational air emissions created by this type of development project and as such have the potential to conflict with an air quality plan. Based on the results provided within the Air Quality Analysis prepared by Birdseye, February 2026[4], the project would have a less than significant impact on conflicts with an applicable air quality Plan. Additionally the Air District modeling found operational emissions below the Tier 1 threshold of Table 1 in the District's CEQA Air Quality Handbook. Based on these results, the project would not conflict with the 2017 State Implementation Plan for the 2008 8-hour Ozone Standard (2017 SIP). Therefore, a less than significant impact would be expected.

b) 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? ☐ ☐ ☒ ☐

[3] California Department of Conservation Farmland Mapping https://maps.conservation.ca.gov/DLRP/CIFF/
[4] Air Quality/Greenhouse Gas Study, Birdseye, February 2026

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

b) According to the comment letter provided by the Air Pollution Control District, dated March 17, 2026[5], an increase in the number of vehicle trips during the operational lifetime of the project could potentially pose a cumulatively significant net increase of emissions. Therefore, the Air District requests that any future increase in vehicle traffic to project operations above that identified in this CUP application be submitted to the Air District for review and evaluation of air quality impacts. Adherence to the requirements set by the Air District will keep impacts to a level of less than significant.

c) Expose sensitive receptors to substantial pollutants concentrations? ☐ ☐ ☒ ☐

c) Based on the comment letter submitted by the Air District on March 17, 2026[5], the Air Quality Analysis shows that the project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, a less than significant impact is expected.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people? ☐ ☐ ☒ ☐

d) Based on **the comment letter submitted by the Air District on March 17, 2026[5], the Air Quality Analysis shows that the project would not result in other emissions (such as those leading to odors adversely affecting a substantial number of people. Therefore, a less than significant impact is expected.**

IV. *BIOLOGICAL RESOURCES Would the project:*

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

a) The proposed project site partially corresponds to an existing operation similar to the one proposed, currently operating under CUP #13-0005. Although the northern portion of the proposed project site, which is to be incorporated to the existing operation through Lot Merger #00165, is not disturbed land, this is land identified to be part of the Gateway to the Americas Specific Plan, which could have a substantial adverse effect, either directly or through habitat modification, or any species identified as a candidate, sensitive, or special status species in local or regional plan, policies, or regulation, or by the California Department of Fish and Wildlife, per the "Burrowing Owl Species Distribution Model" according to the Imperial County General Plan's Conservation and Open Space Element, Figure 2[6] and the Department of Fish and Wildlife Predicted Habitat Map[7], the project is located within a Burrowing Owl Species Distribution Model area. However, the site and its habitat and wildlife species have been reviewed previously within the Gateway of the Americas PEIR. The PEIR found that direct impacts on the burrowing owl due to direct habitat modification, were found to be significant and mitigable. The PEIR found uncontrolled project lighting from implementation of the Gateway Specific Plan would indirectly impact sensitive wildlife and biological resources near the Alamo River and sedimentation/siltation and urban runoff also would occur.
Implementation of the following mitigation measures identified in the PEIR would reduce impacts to the burrowing owl to a level of Less than Significant with Mitigations Incorporated.

- **MM-BIO1: Prior to issuance of a grading permit, the permit shall be conditioned to require a pre-construction survey in accordance with CDF&W Guidelines. The survey shall be conducted no more than 30 days prior to construction to ensure that no additional burrowing owls have established territories since the initial surveys and to quantify the number of burrows to be impacted. If ground-disturbing activities are delayed or suspended for more than 30 days after the pre-construction survey, the site shall be resurveyed. Any burrowing owls found that were not identified during the initial surveys shall require the same offsite acquisition and permanent protection of offsite foraging and nesting habitat as outlined in Mitigation Measure 4.7-5 of the Gateway of the Americas Specific Plan (Mitigation Measure 4.7-6).**
- **MM-BIO2: Any observed burrowing owls within 50 meters of construction shall be relocated pursuant to a management plan approved by the California Division of Fish and Wildlife (Mitigation Measure 4.7-7).**

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

[5] Air Pollution Control District Comment Letter, March 17, 2026

[6] Imperial County General Plan "Conservation and Open Space Element"

[7] California Department of Fish and Wildlife Burrowing Owl Predicted Habitat

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

b) As mentioned above, the proposed project site is located within the Gateway to the Americas Specific Plan and could have a substantial effect on any riparian habitat or other sensitive natural community as identified in local or regional plan, policies, or regulations or by the California Fish and Wildlife or U.S. Fish and Wildlife Services. However, with the implementation of the mitigation measures listed in (a) above, the impact would be below a level of significance.

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

c) The proposed project will not cause a substantial adverse effect on federal protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☐ ☐ ☒

d) The proposed project does not appear to interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife, corridors or impede the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance? ☐ ☐ ☐ ☒

e) The proposed project (designated as Specific Plan Area under the Imperial County General Plan, Land Use Map) does not conflict with any local policy or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? ☐ ☐ ☐ ☒

f) The proposed project is located within the Gateway to the Americas Specific Plan and does not lie within a Sensitive Area as shown on Figures 2a, (Sensitive Plants); 2b (Sensitive Wildlife Areas); or 2c (Unusual Plant Assemblages); of the Conservation and Open Space Element[6] of the Imperial County General Plan and does not appear to conflict with any provision of an adopted Habitat Conservation Plant, Natural Community Conservation Plan or other approved local, regional or state habitat conservation plan. Therefore, no impacts are expected.

V. *CULTURAL RESOURCES Would the project:*

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? ☐ ☐ ☒ ☐

a) The project site is not within or near any "Known Areas of Native American Cultural Sensitivity" as per Imperial County General Plan's Conservation and Open Space Element, Figure 6[6]; therefore, less than significant impacts are expected.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? ☐ ☐ ☒ ☐

b) As previously stated, it was found that the site location is not in or near any "Known Areas of Native American Cultural Sensitivity", nor within any Tribal Lands area according to the Tribal Lands in U. S. Environmental Protection Agency Region 9 Map[8]; therefore, less than significant impacts are expected.

c) Disturb any human remains, including those interred outside of dedicated cemeteries? ☐ ☐ ☒ ☐

c) As previously stated on items (V)(a) and (V)(b) above, the proposed project site is not located within or near a "Known Area of Native American Cultural Sensitivity". Additionally, no response or concern was received from the consulted parties. Any unknown human remains that may be discovered during subsurface activities shall be reported to the County Coroner pursuant to California Health and Safety Code Section 7050.5. Consequently, any impact would be less than significant.

[8] Tribal Lands in U. S. Environmental Protection Agency Region 9 Map

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

VI. ***ENERGY Would the project:***

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? ☐ ☐ ☐ ☒

a) No consumption of energy that would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation is expected. Therefore, no impact is expected.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ☐ ☐ ☐ ☒

b) No conflict or obstruction with local or state plans regarding energy are anticipated; therefore, no impacts are expected to occur.

VII. ***GEOLOGY AND SOILS Would the project:***

a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving: ☐ ☐ ☒ ☐

a) According to the Department of Conservation's Regulatory Maps[9], the project site is not in a fault zone, located approximately one-half mile to the west of the Imperial fault. Additionally future development or newly constructed structure would require compliance with the latest edition of the California Building Code as well as going through a ministerial building permit review. Compliance with said codes and County agencies' approvals would bring potential impacts to less than significant levels at the time of future development. Consequently, the proposed project would not directly or indirectly cause potential substantial adverse effects regarding risk of loss, injury, or death; therefore, less than significant impact is expected.

1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? ☐ ☐ ☒ ☐

1) As previously mentioned, the project is not located in a fault zone. Compliance with applicable County agencies' requirements would bring any potential impact to less than significant levels.

2) Strong Seismic ground shaking? ☐ ☐ ☒ ☐

2) The proposed project will not expose people to seismic ground shaking to a greater degree than the one of the surrounding developed areas since the site is not within a fault zone. As previously mentioned, if any construction was to be proposed in the future as part of the development, it would have to incorporate appropriate design measures. Less than significant impacts are expected to occur.

3) Seismic-related ground failure, including liquefaction and seiche/tsunami? ☐ ☐ ☐ ☒

3) The project site is not near a body of water of the characteristics that could cause any seismic-related ground failure, including liquefaction and seiche/tsunami. Therefore, no impact is expected.

4) Landslides? ☐ ☐ ☐ ☒

4) The site is not located within a landslide hazard zone; therefore, no impacts are expected to occur.

b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

b) The project proposes an expansion of the parking area of an existing truck parking facility, automobile storage and mini storage, proposing no additional buildings at this point. The project does not appear to result in the substantial loss of soil or loss of top soil. The project will be required to furnish a drainage and grading plan/study acceptable to the Imperial County Department of Public Works per their letter dated October 16, 2025[10]. Therefore, less than significant impacts are expected.

c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and ☐ ☐ ☒ ☐

[9] Department of Conservation Regulatory Maps http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps
[10] Imperial County Department of Public Works Comment Letter, dated October 16, 2025

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?

c) The proposed project site is not located on a geological unit that would become unstable or collapse as a result of the proposed parking expansion. Any future construction as part of this development will be subject to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Adherence and compliance to these standards and regulations would bring any impact to less than significant levels.

d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property? ☐ ☐ ☒ ☐

d) The proposed project will not cause substantial physical changes in the environment. The applicant shall confirm with ICPDS Building Division Manager whether a Soils Report will be required prior to future development plans, if any. Compliance with County agencies' requirements will bring project impacts to less than significant levels.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? ☐ ☐ ☐ ☒

e) No new septic tanks or other alternative wastewater disposal systems are being proposed as part of the scope of work for this project and no new structures are being proposed that would create the need for a septic system; therefore, no impacts are expected.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ☐ ☐ ☒ ☐

f) The proposed project does not propose any new construction that would create any significant disturbance on the land that could cause direct or indirect destruction of a unique paleontological resource or site of unique geologic feature. Therefore, less than significant impact is expected.

VIII. ***GREENHOUSE GAS EMISSION*** ***Would the project:***

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ☐ ☐ ☒ ☐

a) In September 2010, the SCAQMD CEQA Significance Thresholds GHG Working Group released recommendations of a threshold of 10,000 MT CO_2E per year for industrial projects and 3,000 MT CO_2E per year for commercial projects. According to the Air Quality and Greenhouse Gas Study prepared by Birdseye[4], the Project would generate approximately 122 metric tons of CO_2E annually. The proposed project is evaluated based on the threshold of 10,000 MT CO2E annually. Table 12 from the Air Quality and Greenhouse Gas Study combines construction, operational, and mobile GHG emissions associated with the proposed project. As shown, GHG emissions would not exceed the 10,000 metric ton screening threshold. GHG emissions would be less than significant.

Table 12
Combined Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Construction	2
Operational	
Energy	5 metric tons
Water/Solid Waste	1 metric tons
Area Sources	0 metric ton
Refrigerants	0 metric tons
Mobile	114 metric tons
Combined Total	**122**

b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☒ ☐

b) As stated above, the project would not exceed the 10,000 metric ton annual GHG standard. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

the statewide level; as such, compliance at the Project level is not addressed. The proposed project would not conflict with statewide plans and regulations. Therefore, a less than significant impact is expected.

IX. *HAZARDS AND HAZARDOUS MATERIALS Would the project:*

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ☐ ☐ ☒ ☐

a) The proposed project does not include any handling of hazardous materials and would therefore have a less than significant impact.

b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ☐ ☐ ☒ ☐

b) As previously mentioned, the project does not anticipate the use or release of any hazardous materials. As stated on the comment letter submitted by the Imperial County Fire Department on October 3, 2025[11], any material that may be stored on site, shall require a Hazardous Material Management Plan (HMMP), which shall be submitted to the Certified Unified Program Agency (CUPA) for their review and approval. Any spills shall be documented and reported to Imperial County Fire Department and CUPA as required by the Hazardous Waste Material Plan; therefore, a less than significant impact is expected.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ☐ ☐ ☐ ☒

c) No hazardous materials are being proposed in the project, and the project site is not within a quarter mile of an existing school; therefore, no impacts are expected.

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

d) Government Code Section 65962.5 requires the Department of Toxic Substances Control (DTSC) the DTSC EnviroStor Database[12] to compile and update a list of hazardous waste and substances sites. After review, it was found that the project was not located under a listed hazardous and substances site nor is it within a mile of such a site; therefore, no impacts are expected.

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

e) The project site is not located near a public airport or a known private airport; therefore, no impacts are expected to occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐ ☒

f) The proposed project will not impair the implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan; therefore, no impacts are expected.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? ☐ ☐ ☐ ☒

g) According to the California Department of Forestry and Fire Protection "Fire and Resource Assessment Program Map" [13] for Imperial County, the project site is not considered a fire hazard zone; therefore, no impacts are expected.

[11] Imperial County Fire Department comment letter, dated October 3, 2026
[12] EnviroStor Database http://www.envirostor.dtsc.ca.gov/public/
[13] FRAP Fire Hazard Severity Zones https://osfm.fire.ca.gov/media/6680/fhszs_map13.pdf

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

X. ***HYDROLOGY AND WATER QUALITY Would the project:***

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? ☐ ☐ ☒ ☐

a) The proposed project is an expansion to an existing truck parking facility and automobile storage within the Gateway to the Americas Specific Plan. This project does not anticipate violating any water quality standard or waste discharge requirement or otherwise substantially degrade surface or ground water quality. A less than significant impact is expected.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ☐ ☐ ☒ ☐

b) No groundwater will be impacted by the proposed project, no substantial changes to the existing operation are expected that would result in an impact that would decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The project shall maintain compliance with IID and County water requirements. Less than significant impacts are anticipated.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: ☐ ☐ ☒ ☐

c) The proposed project does not propose to sufficiently alter the existing drainage patterns of the site or area, including the alteration of stream or river, which would result in substantial erosion or siltation on or off-site. According to Figure 9 (Erosion Activity) of the Conservation and Open Space of the Imperial County General Plan[6], the area is in a designation of a low activity. Additionally, the Imperial County Public Works Department will require a Drainage and Grading Plan/Study for subject project per their letter dated October 16, 2025[10]. Any expected impact would be less than significant.

(i) result in substantial erosion or siltation on- or off-site; ☐ ☐ ☒ ☐

(i) As mentioned above, the proposed project does not propose a significant alteration to the existing drainage pattern of the site or area that could result in substantial erosion or siltation on or off-site. No erosion is expected to occur. Additionally, as explained above, the Imperial County Department of Public Works will require a Drainage and Grading Plan/Study for the subject project. Therefore, any impact would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; ☐ ☐ ☒ ☐

(ii) As mentioned above, the proposed project does not propose a significant alteration to the existing project site that could result in the alteration of a stream or river that could result in the substantial increase of the rate or amount of surface runoff in a manner which would result in flooding on-or offsite. Therefore, any impact would be less than significant..

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or; ☐ ☐ ☒ ☐

(iii) The proposed project includes the addition of a retention basin that will support the retention of water within the newly incorporated project area, as mentioned before a Drainage and Grading Plan/Study will be submitted to the Imperial County Department of Public Works for approval prior to construction of the project. Following this requirement prior to the execution of the project would result in the project having an expected impact of less than significant.

(iv) impede or redirect flood flows? ☐ ☐ ☒ ☐

(iv) As mentioned in the items above, the project will require a Drainage and Grading Plan/Study that will prevent any significant impact to the flood flows. Additionally, the proposed on-site retention basin will prevent any potential impact. Any impact would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? ☐ ☐ ☐ ☒

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

d) According to the California Emergency Management Agency and the Department of Conservation[14], the project site is not within a Tsunami Hazard Area for Emergency Planning and is not within a body of water; therefore, no impacts are expected.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ☐ ☐ ☐ ☒

e) The proposed project will create no changes to the groundwater management plan. Continual compliance with the IID and County water regulations will result in no expected impacts.

XI. *LAND USE AND PLANNING Would the project:*

a) Physically divide an established community? ☐ ☐ ☐ ☒

a) The project site is not within any established community; therefore, no impacts can be expected.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☐ ☒

b) The proposed project site is consistent with the intent of the County General Plan, the Gateway to the Americas Specific Plan and the Land Use Ordinance, provided that the project pay their pro-rata fees as determined by the Gateway CSA and landowners. As no significant impacts were identified in the FEIR, no mitigation measures or environmental conditions of approval are required. Therefore, no impacts are expected.

XII. *MINERAL RESOURCES Would the project:*

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ☐ ☐ ☐ ☒

a) The proposed project lies within the Gateway to the Americas Specific Plan Area and does not anticipate the removal of mineral resources, and it is not located within the boundaries of an active mine per Imperial Conty General Plan's Conservation and Open Space Element, Figure 8 - "Existing Mineral Resources Map"[15]. Additionally, no significant impacts were identified in the SPA FEIR, no mitigation or environmental conditions of approval are required. Therefore, no impact is expected.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ☐ ☐ ☐ ☒

b) The proposed project will not result in the loss of availability of a local important mineral resource recovery site delineated in the local general plan, specific plan or other land use plan. Therefore, no impacts are expected.

XIII. *NOISE Would the project result in:*

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ☐ ☐ ☒ ☐

a) The proposed development would be subject to the Imperial County General Plan Noise Element[16] which states that construction equipment operations shall be limited to the hours of 7a.m. to 7 p.m., Monday through Friday, and from 9 a.m. to 5 p.m. on Saturday. Additionally, construction noise from a single piece of equipment or combination shall not exceed 75 dBA when averaged over an eight (8) hour period. During operation, the noise level remains acceptable up to 65 dBA and becomes conditionally acceptable up to the 75 dBA. The proposed truck parking and automobile storage does not expect to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of the previously mentioned standards established in the Imperial County General Plan Noise Element. Compliance with Imperial

[14] Department of Conservation Tsunami Inundation Maps http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=tsunami
[15] Imperial County General Plan "Conservation and Open Space Element", Figure 8
[16] Imperial County General Plan "Noise Element"

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

County General Plan's Noise Element would bring any impact to less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☒ ☐

b) The proposed project does not anticipate nor include generation of noise which would be excessive groundborne vibration or groundborne noise levels. Additionally, as previously discussed in item (XIII)(a), the proposed development would be subject to the Imperial County General Plan's Noise Element. Any impacts are expected to be less than significant.

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

c) The project site is not within two miles of a public airport or a public use airport. In addition, the project would not expose people to excessive noise levels. The existing operation will be expanding towards north of the property where the operation currently operates, where the vicinity remains the same as the existing operation. Less than significant impacts are expected.

XIV. *POPULATION AND HOUSING* *Would the project:*

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)? ☐ ☐ ☒ ☐

a) The proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly, as no changes to the existing uses are being proposed. Therefore, any impacts are expected to be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☒ ☐

b) The proposed action will not displace substantial numbers of people necessitating the construction or replacement housing elsewhere. Any impacts are expected to be less than significant.

XV. *PUBLIC SERVICES*

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: ☐ ☐ ☒ ☐

a) The proposed project is for an expansion of an existing industrial operation. The proposed action does not anticipate that the proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios. Any impact would be less than significant.

1) Fire Protection? ☐ ☐ ☒ ☐

1) The proposed project is not expected to result in substantial impacts on fire protection. Any future construction or development may be subject to fire sprinklers and to have either a private or public source of water for fire suppression purposes such as pressurized hydrants. Compliance with ICFD comment letter submitted on October 3, 2025[11], would bring any impact to less than significant.

2) Police Protection? ☐ ☐ ☒ ☐

2) The proposed project is not expected to result in substantial impacts on police protection. Should any police protection be required, according to the Sheriff's Office Patrol Operation Map, the Sheriff's Office South County Patrol has active patrol operations in the area.[17] Any impacts are expected to be less than significant.

3) Schools? ☐ ☐ ☐ ☒

[17] Imperial County Sheriff's Office: Patrol Operation Map https://icso.imperialcounty.org/operations/

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

3) The nearest schools are more than 4 miles away and would not be impacted by the proposed project. No impacts are expected.

4) Parks? ☐ ☐ ☐ ☒

4) The proposed project does not include any activities related to parks and will not cause the need for one or to alter one; therefore, no impacts are being expected.

5) Other Public Facilities? ☐ ☐ ☐ ☒

5) The proposed project does not include any development or activities that might increase the need for alteration of public facilities services; therefore, no impacts are being expected.

XVI. *RECREATION*

a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ☐ ☐ ☐ ☒

a) There are no existing neighborhoods or regional parks within the proposed project area; therefore, the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impacts are expected.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment? ☐ ☐ ☐ ☒

b) The proposed project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment. Also, as previously stated on item (XVI)(a), there are no regional parks within the proposed project area; therefore, no impacts are expected.

XVII. *TRANSPORTATION* *Would the project:*

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ☐ ☒ ☐ ☐

a) The proposed project will result in an increase in traffic to and from the project site on local County roads. The Imperial County Public Works Department has requested in their comment letter dated October 16, 2025[10], a trip generation calculation related to the proposed project prior to issuance of Building or Grading Permits. Compliance with mitigation measures MM-TR1 and the implementation of the mitigation measures MM-TR2 and MM-TR3 from the SPA FEIR would bring the impact to a less than significant level.

- **MM-TR1: The applicant shall submit trip generation calculations related to the proposed project prior to the issuance of Building or Grading Permits. The project generation trips shall be calculated by a California-registered traffic engineer.**
- **MM-TR2: Appropriate traffic impact fees and Gateway Specific Plan, off-site improvement fees, shall be paid (Mitigation Measure 4.1-1/County Public Works Department)**
- **MM-TR3: Any appropriate roadway segments and intersection required by Public Works shall be completed or adequately assured prior to issuance of a certificate of occupancy for future development (Mitigation Measure 4.1-4).**

b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)? ☐ ☒ ☐ ☐

b) Implementation of the previously mentioned mitigation measures (MM-TR1, MM-TR2 and MM-TR3) will prevent the proposed project from conflicting or being inconsistent with the CEQA Guidelines section 15064.3, subdivision (b). Additionally, the applicant should comply with any requirements and conditions set forth by the Imperial County Department of Public Works and Caltrans. Less than significant impacts with mitigations incorporated are expected.

c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☐ ☒

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

c) The proposed project does not include a geometric design feature that may substantially increase hazards. There are no design features being proposed that could cause concern regarding traffic; therefore, no impacts are expected.

d) Result in inadequate emergency access? ☐ ☐ ☐ ☒

d) The current access to the site is not known to be inadequate and the project would not block any emergency access; therefore, no impacts are expected.

XVIII. *TRIBAL CULTURAL RESOURCES*

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is: ☐ ☐ ☒ ☐

a) According to the General Plan's Conservation and Open Space Element, Figure 6, the project site is not within any Native American Cultural Sensitivity Area. The Quechan, Agua Caliente and Campo of Mission Indian Tribes were contacted regarding this project and offered no comments. Less than significant impacts are expected.

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or ☐ ☐ ☒ ☐

(i) The proposed site was not listed under the California Historical Resources in County of Imperial[18] or seems to be eligible under Public Resources Code Section 21074 or 5020.1 (k); therefore, any impacts are expected to be less than significant.

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth is subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. ☐ ☐ ☒ ☐

(ii) No significant resources listed as defined in the Public Resources Code Section 5024.1 are expected to be impacted by the proposed project. Additionally, as previously discussed in item (XVIII)(a) above, AB 52 Consultation letters were sent to the Quechan, Agua Caliente and Campo Band of Mission Indian Tribes on September 18, 2025. No comments have been received for this project. Less than significant impacts are expected.

XIX. *UTILITIES AND SERVICE SYSTEMS Would the project:*

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects? ☐ ☐ ☒ ☐

a) The proposed project would not cause significant physical changes in the project area that could impact utilities nor service systems. The applicant shall pay Water and Sewer Fees, Benefit Impact Fees, and Traffic Mitigation Fees per the 2024/2025 Gateway Specific Plan-County Service Area Fee Schedule. Such fees shall be paid to the Department of Imperial County Public Works prior to issuance of Building or Grading Permit. Less than significant impacts are expected.

b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? ☐ ☐ ☒ ☐

b) As mentioned on item XIX a), the project will not significantly impact utilities nor service systems; therefore, no significant

[18] Office of Historic Preservation http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

increase in the need for additional water supplies is expected. Sufficient water supply is expected to be available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years. Any impacts are expected to be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ☐ ☐ ☒ ☐

c) The proposed project does not anticipate any impacts to wastewater, as previously stated in section (XIX)(b) above. Therefore, any impacts are expected to be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ☐ ☐ ☒ ☐

d) No activities that would create an excessive amount of solid waste are being proposed as part of this project. Less than significant impacts are expected.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? ☐ ☐ ☒ ☐

e) As previously stated on item (XIX)(d) above, the proposed expansion of the existing operation does not anticipate a significant generation of solid waste. Property owners shall comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Any impacts are expected to be less than significant.

XX. *WILDFIRE*

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☒ ☐

a) As previously stated on item (IX)(f) above, the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. The applicant would meet and adhere to any requirements requested by the Imperial County Fire/OES Department. Any impacts are expected to be less than significant. Compliance with Imperial County Fire Department (ICFD) standards and regulations would bring any impact to less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ☐ ☐ ☒ ☐

b) The project site is not located near or within any wildfire nor fire hazard severity zone. Additionally, as previously stated on section (IX)(f), the applicant would meet and adhere to ICFD's standards, requirements, and recommendations; therefore, impacts due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire are expected to be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ☐ ☐ ☒ ☐

c) As previously stated on item (XX)(a) above, the applicant would meet and adhere to Imperial County Fire/OES Department and IID standards, requirements, and recommendations. Less than significant impacts are expected.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ☐ ☐ ☐ ☒

d) As previously stated, the area is not within a wildfire area and will not expose people or structures to significant risks, including downslope or downstream flooding or landslides resulting from runoff, post-fire slope instability, or drainage change. Therefore, no impact is expected.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

EEC ORIGINAL PKG

	Potentially Significant Impact **(PSI)**	Less than Significant with Mitigation Incorporated **(LTSMI)**	Less Than Significant Impact **(LTSI)**	No Impact **(NI)**

Revised 2009- CEQA
Revised 2011- ICPDS
Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – ICPDS

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

a)	**Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?**	☐	☒	☐	☐
b)	**Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**	☐	☐	☒	☐
c)	**Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**	☐	☒	☐	☐

EEC ORIGINAL PKG

IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Planning Division Manager
- Luis Bejarano, Planner II
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- Native American Heritage Commission

(Written or oral comments received on the checklist prior to circulation)

EEC ORIGINAL PKG

V. REFERENCES

1. Imperial County General Plan "Circulation and Scenic Highways Element", page 30
2. Imperial County General Plan "Circulation and Scenic Highways Element", pages 80-108
3. California Department of Conservation Farmland Mapping https://maps.conservation.ca.gov/DLRP/CIFF/
4. Air Quality/Greenhouse Gas Study, Birdseye, February 2026
5. Air Pollution Control District Comment Letter, March 17, 2026
6. Imperial County General Plan "Conservation and Open Space Element"
7. California Department of Fish and Wildlife Burrowing Owl Predicted Habitat https://www.arcgis.com/apps/mapviewer/index.html?layers=7408ee3f25e8470488db163c4d00dc25
8. Tribal Lands in U. S. Environmental Protection Agency Region 9 Map https://www.epa.gov/sites/production/files/2020-02/epa-r9-tribal-lands.png
9. Department of Conservation Regulatory Maps
10. Imperial County Department of Public Works Comment Letter, dated October 16, 2025
11. Imperial County Fire Department Comment Letter, dated October 3, 2025
12. EnviroStor Database
13. FRAP Fire Hazard Severity Zones
14. Department of Conservation Tsunami Inundation Maps
15. Imperial County General Plan "Conservation and Open Space Element", Figure 8
16. Imperial County General Plan "Noise Element"
17. Imperial County Sheriff's Office: Patrol Operation Map https://icso.imperialcounty.org/operations/
18. Office of Historic Preservation http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

EEC ORIGINAL PKG

VI. NEGATIVE DECLARATION – County of Imperial

The following Negative Declaration is being circulated for public review in accordance with the California Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.

Project Name: Linn Parking and Storage - Conditional Use Permit #25-0015 / Lot Merger #00165 / Initial Study #25-0033

Project Applicant: Oscar R. Linn

Project Location: The location of the proposed project is at 1624 Gateway Road, Calexico, CA, properties identified under Assessor's Parcel Numbers (APN) 059-363-013-000, 059-363-020-000 and 059-363-025-000, legally described as POR LOT A LLA#283 ALSO BEING LOT 4 OF TRACT 942 GATEWAY TO THE AMERICA SUB NO2 UNIT2 4.00AC, POR LOT A OF LLA#283 ALSO BEING POR REM. PAR A GATEWAY TO THE AMERICA SUB 2 UN 3 & LOT 4 GATEWAY TO THE AMERICA SUB 2 UN 4 ALSO BEING POR LOT B LLA#283, in an unincorporated area of the County of Imperial. See Exhibit "A" Vicinity Map.

Project Summary: The Applicant has submitted requests for Conditional Use Permit #25-0015 and Lot Merger #00165 to continue and expand the operation of a parking and storage facility, including mini-storage units designed to receive packages and boxes on behalf of customers from delivery parcel companies. Said expansion would replace the currently permitted operation under Conditional Use Permit #13-0005. Upon merger, the project site will cover approximately 7.1 acres, comprising contiguous parcels identified by Assessor's Parcel Numbers 059-363-013-000, 059-363-020-000, and 059-363-025-000. Access will remain via Gateway Road. This development is intended to accommodate the growing operational demands of Linn Parking & Storage by increasing parking capacity for commercial vehicles, including long-haul trucks and trailers. The facility is projected to handle around 30 passenger vehicles and 60 trucks entering and exiting daily, with capacity to park up to 60 passenger vehicles and 140 trucks and trailers of various sizes. Operations will run continuously, 24/7, with a staff of approximately eight employees. This expansion is anticipated to improve traffic circulation, reduce congestion within the existing lot, and enhance overall site safety and functionality for both drivers and personnel.

EEC ORIGINAL PKG

VII. FINDINGS

This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing this Negative Declaration based upon the following findings:

☐ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☑ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

(3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A NEGATIVE DECLARATION will be prepared.

If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.

NOTICE

The public is invited to comment on the proposed Negative Declaration during the review period.

5-28-2026 for

Date of Determination Jim Minnick, Director of Planning & Development Services

The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.

Applicant Signature

May 28, 2026
Date

EEC ORIGINAL PKG

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

EEC ORIGINAL PKG

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

EEC ORIGINAL PKG

LINN PARKING & STORAGE
CONDITIONAL USE PERMIT (CUP) #25-0015 / LOT MERGER #00165 / INITIAL STUDY (IS) #25-0033
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

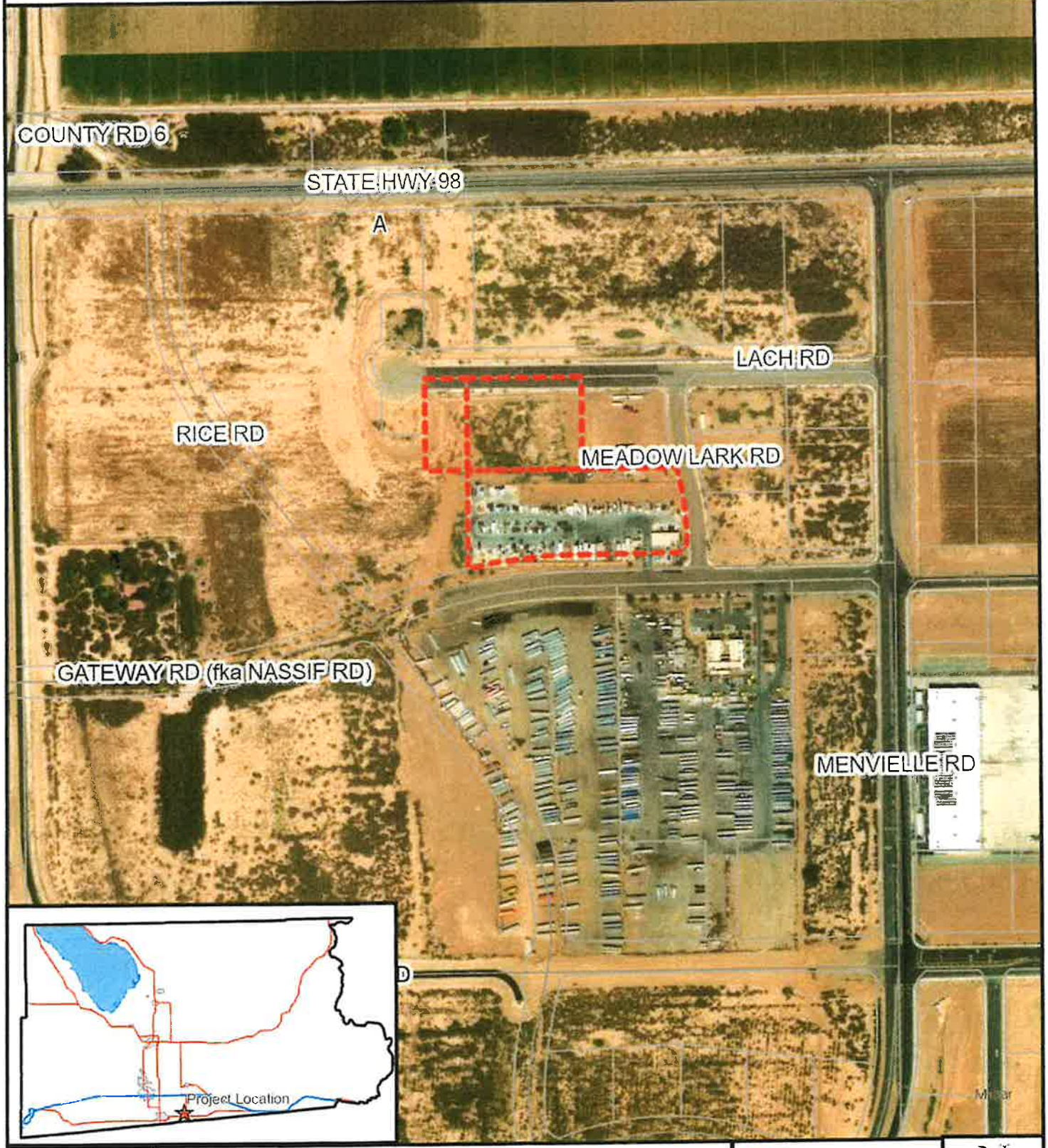
EEC ORIGINAL PKG

BIOLOGICAL RESOURCES (BIO)			
Mitigation Measure (MM) Description	**Responsible Party**	**Regulatory Agency**	**Implementation Schedule**
MM-AE1: Concurrent with approval of Plot Plans for each phase or unit of development shall be in substantial conformance with the design guidelines in Chapter IV of the Gateway Specific Plan to ensure compatibility with the planned design theme as adopted for the SPA. (Mitigation Measure 4.5-1)	Project Proponent	Imperial County Planning and Development Services (ICPDS)	At the submittal of Plot Plans.
MM-AE2: Prior to issuance of a grading permit for each phase or unit of development within the SPA, a detailed landscape plan shall be prepared in conformance with the design guidelines in Chapter IV of the Gateway Specific Plan. (Mitigation Measure 4.5-2)	Project Proponent	Imperial County Planning and Development Services (ICPDS)	Prior to issuance of grading permits.
MM-BIO1: Prior to issuance of a grading permit, the permit shall be conditioned to require a pre-construction survey in accordance with CDF&W Guidelines. The survey shall be conducted no more than 30 days prior to construction to ensure that no additional burrowing owls have established territories since the initial surveys and to quantify the number of burrows to be impacted. If ground-disturbing activities are delayed or suspended for more than 30 days after the pre-construction survey, the site shall be resurveyed. Any burrowing owls found that were not identified during the initial surveys shall require the same offsite acquisition and permanent protection of offsite foraging and nesting habitat as outlined in Mitigation Measure 4.7-5 of the Gateway of the Americas Specific Plan (Mitigation Measure 4.7-6).	Project Proponent	California Department of Fish and Wildlife (CDFW)	Prior to issuance of grading permits.
MM-BIO2: Any observed burrowing owls within 50 meters of construction shall be relocated pursuant to a management plan approved by the California Division of Fish and Wildlife (Mitigation Measure 4.7-7).	Project Proponent	California Department of Fish and Wildlife (CDFW)	Prior to issuance of building or grading permits.
MM-TR1: The applicant shall submit trip generation calculations related to the proposed project prior to the issuance of Building or Grading Permits. The project generation trips shall be calculated by a California-registered traffic engineer.	Project Proponent	Imperial County Planning and Development Services (ICPDS)	Prior to issuance of building or grading permits.
MM-TR2: Appropriate traffic impact fees and Gateway Specific Plan, off-site improvement fees, shall be paid (Mitigation Measure 4.1-1/County Public Works Department)	Project Proponent	Imperial County Planning and Development Services (ICPDS)	Prior to issuance of building permits.
MM-TR3: Any appropriate roadway segments and intersection required by Public Works shall be completed or adequately assured prior to issuance of a certificate of occupancy for future development (Mitigation Measure 4.1-4).	Project Proponent	Imperial County Planning and Development Services (ICPDS)	Prior to issuance of building permits.

VICINITY MAP

EEC ORIGINAL PKG

PROJECT LOCATION MAP



LINN PARKING & STORAGE
CUP #25-00015
IS #25-0033 / MERG #00165
APNs: 059-363-013, 059-363-020 & 059-363-025

Project Location
Parcels
Centerline

N

EEC ORIGINAL PKG

COMMENT LETTERS

EEC ORIGINAL PKG

Olivia Lopez

RECEIVED
SEP 19 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

From: Jill Mccormick <historicpreservation@quechantribe.com>
Sent: Friday, September 19, 2025 8:44 AM
To: Olivia Lopez; Luis Bejarano
Subject: Re: [EXTERNAL]:AB 52 Letter - Linn Parking & Storage (CUP25-0015/IS25-0033/MERG00165)

CAUTION: This email originated outside our organization; please use caution.

Good morning,
This email is to inform you that the Historic Preservation Office of the Ft. Yuma Quechan Tribe does not wish to comment on this project at this time.

Jill

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

From: Olivia Lopez <olivialopez@co.imperial.ca.us>
Sent: Thursday, September 18, 2025 4:47 PM
To: Tribal Secretary <tribalsecretary@quechantribe.com>; Jill Mccormick <historicpreservation@quechantribe.com>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>
Subject: [EXTERNAL]:AB 52 Letter - Linn Parking & Storage (CUP25-0015/IS25-0033/MERG00165)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

EEC ORIGINAL PKG

Kayla Henderson

From: Jill Mccormick <historicpreservation@quechantribe.com>
Sent: Friday, September 19, 2025 8:46 AM
To: Kayla Henderson; Planning - ICPDSCommentLetters
Subject: Re: [EXTERNAL]:CUP25-0015 / IS25-0033 / MERG00165 Request for Comments

CAUTION: This email originated outside our organization; please use caution.

Good morning,
This email is to inform you that the Historic Preservation Office of the Ft. Yuma Quechan Tribe does not wish to comment on this project at this time.

Jill

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

RECEIVED
SEP 19 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

GREAT SEAL FT. YUMA QUECHAN INDIANS TOGETHER WE PROGRESS

From: Kayla Henderson <kaylahenderson@co.imperial.ca.us>
Sent: Thursday, September 18, 2025 4:31 PM
To: Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <SheilaVasquezBazua@co.imperial.ca.us>; David Lantzer <davidlantzer@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; rkelley@icso.org <rkelley@icso.org>; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; iidenvironmental@iid.com <iidenvironmental@iid.com>; marcuscuero@campo-nsn.gov <marcuscuero@campo-nsn.gov>; dtsosie@campo-nsn.gov <dtsosie@campo-nsn.gov>; Tribal Secretary <tribalsecretary@quechantribe.com>; Jill Mccormick <historicpreservation@quechantribe.com>; THPO@aguacaliente.net <THPO@aguacaliente.net>;

EEC ORIGINAL PKG

RECEIVED
SEP 24 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Olivia Lopez

From: THPO Consulting <ACBCI-THPO@aguacaliente.net>
Sent: Tuesday, September 23, 2025 3:03 PM
To: Olivia Lopez
Subject: RE: AB 52 Letter - Linn Parking & Storage (CUP25-0015/IS25-0033/MERG00165)

CAUTION: This email originated outside our organization; please use caution.

Greetings,

A records check of the Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts.

Thank you,

Anthony Kline
Cultural Resources Analyst
akline@aguacaliente.net
C: (760) 413-5836 | D: (760) 883-1139
5401 Dinah Shore Drive, Palm Springs

From: Olivia Lopez <olivialopez@co.imperial.ca.us>
Sent: Thursday, September 18, 2025 4:47 PM
To: THPO Consulting <ACBCI-THPO@aguacaliente.net>; THPO@aguacaliente.net
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>
Subject: AB 52 Letter - Linn Parking & Storage (CUP25-0015/IS25-0033/MERG00165)

This email was sent by a person from outside your organization. Please verify the authenticity of this email before taking further action.

Good afternoon,

Please see attached AB52 letter for the Linn Parking & Storage Project (CUP25-0015/IS25-0033/MERG00165); APN 059-363-013.

Should you have any questions, please feel free to Luis Bejarano at (442) 265-1736, or by email at LuisBejarano@co.imperial.ca.us

Thank you,

EEC ORIGINAL PKG

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

AIR POLLUTION CONTROL DISTRICT

RECEIVED
OCT 02, 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

October 2, 2025

Mr. Jim Minnick
Planning & Development Services Director
801 Main St.
El Centro, CA 92243

SUBJECT: Application for Condition Use Permit 19-0015 and Lot Merger 00165

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review the application for Conditional Use Permit (CUP) 25-0015 and Lot Merger (MERG) 00165 that would allow the applicant Oscar Linn Parking & Storage to merge three (3) contiguous parcels for the purpose of expanding the current parking operations. The project as proposed will handle approximately 30 passenger vehicles and 60 trucks entering and exiting daily, with a capacity to park 60 passenger vehicles and 140 trucks and trailers of various sizes, along with the construction and operation of storage units. The project is located at 1624 Gateway Road in Calexico, also identified as Assessor Parcel Numbers 059-363-013-00, 059-363-020-000 and 059-363-025-000.

The following comments address the preparation of the Initial Study. Based on the proposed operations described in Exhibit B of the CUP, the Air District requests an **Air Quality Analysis** (AQA). As discussed in section 4.0 of the Air District's CEQA Air Quality Handbook (Handbook), all phases of development, both construction and operation as well as cumulative impacts, should be analyzed. Identifying levels of significance will fulfill the Checklist in Appendix G[1] of the California Environmental Quality Act (CEQA) and in section 4.0 of the Handbook. The Initial Study and AQA will be reviewed for accuracy and consistency with Air District rules and regulations and its Handbook.

As for the proposed lot merger, the Air District has no comment. Conditions for the CUP will be addressed once the Air District has reviewed the AQA and Initial Study. The Air District's regulations and CEQA Air Quality Handbook can be accessed via the internet at https://apcd.imperialcounty.org. Should you have questions, please call our office at (442) 265-1800.

Sincerely,

Curtis Blondell, APC Environmental Coordinator

Reviewed by Monica Soucier,
APC Division Manager

[1] Association of Environmental Professionals. (2025) *California Environmental Quality Act (CEQA) Statute and Guidelines.* https://www.califaep.org/docs/CEQA_Handbook_2025combined.pdf.

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

EEC ORIGINAL PKG

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

AIR POLLUTION CONTROL DISTRICT

RECEIVED
MAR 19 2026
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

March 17, 2026

Mr. Jim Minnick
Planning & Development Services Director
801 Main St.
El Centro, CA 92243

SUBJECT: Air Quality & Greenhouse Gas Study for Condition Use Permit 25-0015

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review the Air Quality and Greenhouse Gas Study associated with the application for Conditional Use Permit (CUP) 25-0015 and Lot Merger (MERG) 00165 that would allow the applicant Oscar Linn Parking & Storage to merge three (3) contiguous parcels for the purpose of expanding the current parking operations. The project as proposed will handle approximately 30 passenger vehicles and 60 trucks entering and exiting daily, with a capacity to park 60 passenger vehicles and 140 trucks and trailers of various sizes, along with the construction and operation of storage units. The project is located at 1624 Gateway Road in Calexico, also identified as Assessor Parcel Numbers 059-363-013-00, 059-363-020-000 and 059-363-025-000.

In its initial review of the project (10/2/2025), the Air District requested an Air Quality Analysis (AQA) to identify air quality impacts associated with the project and evaluate if mitigation is required for the project to meet the criteria identified in Appendix G of the California Environmental Air Quality Act (CEQA) as discussed in the AQA.

The first criterion is to determine if a proposed project will conflict with or obstruct implementation of an applicable air quality plan. Mobile source emissions make up a large portion of operational air emissions created by this type of development project and as such have the potential to conflict with an air quality plan. The AQA claims the project would be less than significant and therefore not conflict with an applicable air quality plan. However, the AQA estimates 15 truck/trailers would access the site daily while the California Emissions Estimator Model (CalEEMod) modeled 14 trips per day. There was no indication if these numbers represented one-way or round trips. The CUP application estimates the completed project will handle approximately 30 passenger vehicles and 60 trucks entering and exiting the site daily. Assuming 180 round trips (30 passenger vehicles and 60 trucks entering and exiting daily), the Air District's modeling found operational emissions below the Tier 1 threshold of Table 1 in the District's CEQA Air Quality Handbook (Handbook). Based on these results, the project would not conflict with the 2017 State Implementation Plan for the 2008 8-hour Ozone Standard (2017 SIP). Another pollutant of concern for operations is PM 2.5. Table 2 footnote of the AQA misidentifies the project as being outside the Imperial County PM2.5 non-attainment area. The project lies just inside the non-attainment area. However, based on its modeling the Air District found no findings of significance to the 2018 PM2.5 SIP Transportation Conformity Budget for PM2.5 emissions.

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

EEC ORIGINAL PKG

For the second criterion, an increase in the number of vehicle trips during the operational lifetime of the project could potentially pose a cumulatively significant net increase of emissions. Therefore, the Air District requests that any future increase in vehicle traffic to project operations above that identified in the CUP application be submitted to the Air District for review and evaluation of air quality impacts.

As for the remaining two criteria, based on its review of the project in its current form, the Air District does not find the project will expose sensitive receptors to substantial pollutant concentrations or result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The Air District finds that the project can maintain a "less than significant" finding for both operational and construction related emissions provided the following are **made conditions in the CUP**:

- The project will adhere to Regulation VIII at all times.
- A Construction Dust Control Plan (CDCP) must be submitted to the Air District for review. No construction can commence until the CDCP has been finalized by the Air District.
- A Construction Notice must be filed with the Air District no less than 10 days prior to the start of earthmoving.
- All Standard Mitigation Measures for Fugitive PM10 Control and Standard Mitigation Measures for Construction Combustion Equipment and Enhanced Mitigation Measures for Construction Equipment (using identical language for each mitigation as found in section 7.1 of the Handbook) must be adhered to.

The Air District requests a draft copy of the CUP for review prior to recording.

Air District rules and regulations and forms, along with our California Environmental Quality Act Handbook, can be found on our website at https://apcd.imperialcounty.org by accessing the Planning drop-down menu. The Air District can be contacted at (442) 265-1800.

Sincerely,

Curtis Blondell

Curtis Blondell
APC Environmental Coordinator II

Reviewed by Monica Soucier
APC Division Manager

EEC ORIGINAL PKG

ADMINISTRATION / TRAINING
1078 Dogwood Road
Heber, CA 92249

Administration
Phone: (442) 265-6000
Fax: (760) 482-2427

Training
Phone: (442) 265-6011

OPERATIONS/PREVENTION
2514 La Brucherie Road
Imperial, CA 92251

Operations
Phone: (442) 265-3000
Fax: (760) 355-1482

Prevention
Phone: (442) 265-3020

RECEIVED
OCT 3, 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

October 3, 2025

RE: Condition Use Permit 25-0015, MERG00165
Oscar Linn
1624 Gateway Rd, Calexico CA 92232

Imperial County Fire Department would like to thank you for the opportunity to review and comment on CUP 25-0015 and MERG00165 for Oscar Linn for the expansion and operation of a parking and storage facility including mini-storage units.

Imperial County Fire Department has the following comments and/or requirements.

- An approved water supply capable of supplying the required fire flow determined by the fire code official, appendix B in the California Fire Code shall be installed and maintained. Private fire service mains and appurtenance shall be installed in accordance with NFPA 24.
- Onsite fire hydrants where required by California Fire Code shall be installed. Private fire service mains and appurtenance shall be installed in accordance with NFPA 24 and approved by Imperial County Fire Department.
- Fire department access roads shall be at least 20 feet wide and all-weather surface capable of supporting fire apparatus. Fire department access roads will be provided with approved turn around approved by Imperial County Fire Department. Gates will be in accordance with the current adapted fire code and the facility will maintain a Knox Box/lock for access on site.
- Secondary access shall be required and shall be kept clear of vehicle congestion and other factors that could limit access.
- A Hazardous Waste Material Plan (HWMP) shall be submitted to Certified Unified Program Agency (CUPA) for their review and approval. All spills shall be documented and reported to Imperial County Fire Department and CUPA as required by the Hazardous Waste Material Plan.
- Hazardous Material Management Plan (HMMP) shall be required for all hazardous materials on site.
- All storage and handling of flammable and combustible liquids shall be in accordance with the California Fire Code and all federal, state, and local regulations, codes, and ordinances.
- Combustible waste material creating a fire hazard shall not be allowed to accumulate in buildings or structure or upon premises.
- Compliance with all required sections of the fire code.

EEC ORIGINAL PKG

ADMINISTRATION / TRAINING
1078 Dogwood Road
Heber, CA 92249

Administration
Phone: (442) 265-6000
Fax: (760) 482-2427

Training
Phone: (442) 265-6011

OPERATIONS/PREVENTION
2514 La Brucherie Road
Imperial, CA 92251

Operations
Phone: (442) 265-3000
Fax: (760) 355-1482

Prevention
Phone: (442) 265-3020

The project shall be in compliance at all times with requirements in the California Fire Code and local ordinances and requirements. Imperial County Fire Department shall conduct annual fire and life safety inspections

Imperial County Fire Department reserves the right to comment and request additional requirements pertaining to this project regarding fire and life safety measures, California Building and Fire Code, and National Fire Protection Association standards at a later time as we see necessary.

If you have any questions, please contact the Imperial County Fire Prevention Division at 442-265-3020 or 442-265-3021.

Sincerely
Andrew Loper *Andrew Loper*
Deputy Fire Marshal
Imperial County Fire Department
Fire Prevention Division

CC
David Lanzter
Fire Chief
Imperial County Fire Department

EEC ORIGINAL PKG

IID

A century of service.

www.iid.com

Since 1911

Friday, October 3, 2025

RECEIVED

OCT 06, 2025

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Luis Bejarano
Planner I
Planning and Development Services
801 Main Street.
El Centro, CA 92243

SUBJECT: Oscar Linn/ CUP25-0015 (APN:059-363-013-000, 059-363-020-000, 059-363-025-000)

Dear Luis Bejarano:

On Thursday, September 18, 2025, the Imperial Irrigation District received a request from the Imperial County Planning and Development Services for agency review regarding the Oscar Linn/ CUP25-0015 located at 1624 Gateway Rd, Calexico, CA 92232. The Applicant has submitted requests for Conditional Use Permit #25-0015 and Lot Merger #00165 to continue and expand the operation of a parking and storage facility, including mini-storage units designed to receive packages and boxes on behalf of customers from delivery parcel companies. Upon merger, the project site will cover approximately 7.1 acres, comprising contiguous parcels identified by Assessor's Parcel Numbers 059-363-013-000, 059-363-020-000, and 059-363-025-000. Access will remain via Gateway Road. This development is intended to accommodate the growing operational demands of Linn Parking & Storage by increasing parking capacity for commercial vehicles, including long-haul trucks and trailers. The facility is projected to handle around 30 passenger vehicles and 60 trucks entering and exiting daily, with capacity to park up to 60 passenger vehicles and 140 trucks and trailers of various sizes. Operations will run continuously, 24/7, with a staff of approximately eight employees. This expansion is anticipated to improve traffic circulation, reduce congestion within the existing lot, and enhance overall site safety and functionality for both drivers and personnel.

IID has reviewed the project information and has the following comments:

1. The project proponent will be required to provide and bear all costs associated with acquisition of land, rights of way, easements, and infrastructure relocations and realignments deemed necessary to accommodate the project. Any street or road improvements imposed by the local governing authority shall also be at the project proponent cost.

IMPERIAL IRRIGATION DISTRICT
GENERAL COUNSEL'S OFFICE · 333 E BARIONI BLVD · PO. BOX 937 · IMPERIAL, CA 92251
TELEPHONE (760) 339-9564 · FAX (760) 339-9062

EEC ORIGINAL PKG

2. Public utility easements over all private and public roads and additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure.

3. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which may include but is not limited to the dedication of real property for the purpose of siting an electrical utility substations to support the project, the cost of acquisition and dedication of rights of way and/or easements for the construction of electrical transmission and/or distribution lines and ancillary facilities associated with the conveyance of energy service) are to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation.

4. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project. In addition, the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties where no public access exists.

5. Substations and switchyards shall be located on property that will transferred to IID in fee simple ownership with legal access.

6. If and when the customer is contemplating electrical service upgrade, please contact the areas service planner Mr. Gabriel Ramirez at 760-339-9257 or email at GRamirez@IID.com. Customer is required to apply with IID for electrical service to the project. In addition to submitting a formal application (available for download at http://www.iid.com/home/showdocument?id=12923), the applicant will be required to submit an AutoCAD file of the site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to the project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to the project.

7. Electrical capacity is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.

8. Applicant shall provide a surveyed legal description and associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary to accommodate the project electrical infrastructure. Rights-of-Way and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities.

EEC ORIGINAL PKG

9. On page 2 under description of proposed sewer Exhibit D and proposed water system Exhibit E, Imperial Irrigation District should not be listed. Imperial County provides sewer and potable water to all sites within the Gateway to the Americas Specific Planning Area.

10. There are no Water Department facilities on APNs 059-363-013-000, 059-363-020-000, and 059-363-025-000. These parcels are located within the Gateway to the Americas Specific Planning area.

Should you have any questions, please do not hesitate to contact IID at iidenviornmental@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Geoff Holbrook
General Counsel

Cc: Matthew H Smelser – Manager, Power Dept.
Mike Pacheco – Manager, Water Dept.
Tina Shields – Manager, Water Dept
Paul Rodriguez – Deputy Mgr. Power Dept. Power Dept.
Guillermo Barraza – Mgr. of Distribution Srvcs. & Maint. Oprtns., Power Dept.
Laura Cervantes – Supervisor, Real Estate
Jessica Humes – Supervisor, Environmental Compliance Water
Vickie Doyle – Engineer Assistant
Ismael Gomez– Manager Water Dept.

EEC ORIGINAL PKG

COUNTY OF IMPERIAL

DEPARTMENT OF PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

Tel: (442) 265-1818
Fax: (442) 265-1858

Follow Us:

www.facebook.com/ImperialCountyDPW/

https://twitter.com/CountyDpw/

Public Works works for the Public

ICDPW

October 16, 2025

RECEIVED

OCT 16 2025

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Mr. Jim Minnick, Director
Planning & Development Services Department
801 Main Street
El Centro, CA 92243

Attention: David Black, Planner IV

SUBJECT: **CUP 25-0015 / IS 25-0033 Oscar Linn.**
Located at 1624 Gateway Road, Calexico, CA 92232.
APN's 059-363-013, 020 & 025.

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on September 18th, 2025, for the above-mentioned project. The applicant proposes to continue and expand the operation of a parking and storage facility, including mini-storage units designed to receive packages and boxes on behalf of customers from delivery parcel companies. Upon merger, the project site will cover approximately 7.1 acres, comprising contiguous parcels identified by APNs 059-363-013, 020 and 025. Access remains via Gateway Road. This development is intended to accommodate the growing the growing operational demands of Linn Parking & Storage by increasing parking capacity for commercial vehicles, including long-haul trucks and trailers. The facility is projected to handle around 30 passenger vehicles and 60 trucks entering and exiting daily, with capacity to park up to 60 passenger vehicles and 140 trucks and trailers for various sizes. Operations will run continuously, 24/7, with a staff of approximately eight employees. This expansion is anticipated to improve traffic circulation, reduce congestion within the existing lot, and enhance overall site safety and functionality for both drivers and personnel.

Department staff have reviewed the package information, and **all the following comments shall be Conditions of Approval as described**:

1. The Applicant shall furnish a **Drainage and Grading Plan/Study** to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site properties. The Study/Plan shall be submitted to the Department of Public Works for review and approval. Employment of the appropriate Best Management Practices (BMP's) should be included. Said plan shall be completed per the Engineering Design Guidelines Manual and comply with the State's MS4 guidelines.

EEC ORIGINAL PKG

2. On-site detention basins are to be incorporated as a landscape feature, often in the front yard area of a parcel, and should have a natural appearance using aggregate rock and drought-tolerant vegetation.

3. Any activity and/or work within Imperial County Right-of-Way shall be completed under a permit issued by this Department **(encroachment permit)** as per Chapter 12.12 - Excavations on or Near a Public Road of the Imperial County Ordinance. Encroachment Permit will be required for driveways, temporary traffic control devices, and any activities within County of Imperial Right-of-Way.

4. The proposed project within the Gateway SPA must comply with the **County of Imperial Codified Ordinances Chapter 13.17**, which concerns the Benefit Assessment Fee for Gateway of the Americas Specific Plan Area Public Improvements. These fees must be provided prior to the issuance of any building and grading permits.

5. The applicant shall submit trip generation calculations related to the proposed project prior to the issuance of Building or Grading Permits. The project generation trips shall be calculated by a California-registered traffic engineer.

6. The applicant shall pay Water and Sewer Fees, Benefit Impact Fees, and Traffic Mitigation Fees per the 2024/2025 Gateway Specific Plan- County Service Area Fee Schedule. Such fees shall be paid to this Department prior to the issuance of Building or Grading Permits.

7. The applicant must be responsible for any applicable **mitigation measures** listed on the Gateway Specific Plan

INFORMATIVE

- **NPDES Permit:** The project may require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior to county approval of the on-site grading plan.
- Requirements for the G1 (Gateway Industrial) landscaping shall be provided according to **Gateway of the Americas Specific Plan:**
- A minimum of ten percent (10%) of the total developed lot area shall be landscaped. This is in addition to any other required open space areas.
- All landscaping shall be permanently maintained in a neat and clean condition.
- off-street parking areas with five or more spaces: **5% of the parking area must be landscaped**. This landscaping should be evenly distributed throughout the parking area and include an appropriate number of trees.
- Other provisions stated in the Gateway of the Americas Specific Plan

EEC ORIGINAL PKG

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

John A. Gay, PE
Director of Public Works

By: Atondo V.
Veronica Atondo, PE. PLS
Deputy Director of Public Works - Engineering

EEC ORIGINAL PKG

COUNTY OF IMPERIAL
DEPARTMENT OF PUBLIC WORKS
155 S. 11th Street
El Centro, CA 92243
Tel: (442) 265-1818
Fax: (442) 265-1858
Follow Us:

Public Works works for the Public

ICDPW

October 22, 2025

RECEIVED
OCT 24 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Mr. Jim Minnick, Director
Planning & Development Services Department
801 Main Street
El Centro, CA 92243

Attention: Luis Bejarano, Planner I

SUBJECT: **LM 165 – Oscar Linn**;
Located on 1624 Gateway Rd, Calexico, CA 92232
APN's 059-363-013, 020 & 025..

Dear Mr. Minnick:

This letter is in response to your submittal package received by this department on September 18, 2025 for the above mentioned project. The applicant proposes a comprehensive lot merger to continue and expand the operation of a parking and storage facility. Upon merger, the project site will cover approximately 7.1 acres, comprising contiguous parcels identified by APNs 059-363013, 020 and 025.

Department staff has reviewed the package information and the following shall be conditions as described:

1. The legal description and plat shall be prepared by a California Licensed Land Surveyor and submitted to the Imperial County Department of Public Works for review and approval. The Engineer must be licensed in the category required by the California Business & Profession Code and shall be authorized to practice land surveying.
2. The lot merger shall be reflected in a deed, which shall be recorded.
3. One of the lots intended to be merged is encumbered by a deed of trust to secure a debt. Prior to issuance of a notice of merger, the Applicant shall cause said encumbrance to be removed, or cause the terms of the deed of trust to be modified so as to burden the entirety of the merged lots collectively.

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

John A. Gay, PE
Director of Public Works
By:

Atondo V.
Veronica Atondo, PE. PLS
Deputy Director of Public Works - Engineering

An Equal Opportunity / Affirmative Action Employer

EEC ORIGINAL PKG

Office of the Agricultural Commissioner
Sealer of Weights and Measures
852 Broadway, El Centro CA 92243

Jolene Dessert
Commissioner / Sealer

Rachel Garewal
Asst. Commissioner / Sealer

RECEIVED
OCT 21 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

March 15, 2025

To Landscapers, Nurseries, Retailers, Homeowners, and Planning Departments:

This letter is to remind you of the legal requirements you must follow for transporting plants and plant materials into Imperial County. There are numerous quarantines in place to safeguard landscape plants, the agricultural industry of Imperial County, and the whole of California from exotic pests and diseases. Please see the attached "Summary of Shipment Requirements and Quarantines," for information on quarantines that most commonly affect Imperial County.

All plants coming into Imperial County are required by law to be held for inspection by the Agricultural Commissioner prior to planting or being made available for sale. This applies to plants brought in by any party, including commercial businesses and homeowners. It is very important that our office is notified immediately upon arrival of any plant shipment. You must not commingle incoming shipments with other plants until after they are inspected and released by our office.

Call our office as early as possible to schedule an inspection. Inspectors are usually available Monday through Friday, 8:00 a.m. to 4:00 p.m. If you intend to bring a shipment in on a weekend or County holiday, please call ahead to see if an inspector will be available.

If you have any questions or concerns, our office is here to help. Please call us at (442) 265-1500.

Sincerely,

Nelson Perez
Deputy Agricultural Commissioner
Pest Detection and Eradication

EEC ORIGINAL PKG

Summary of Shipment Requirements and Quarantines

- All nursery stock must be accompanied by valid proof of ownership.
- Nursery stock shipments may be released by phone at the discretion of the Agricultural Commissioner.
- Landscapers and other entities that have a growing ground or holding yard where nursery stock is held prior to delivery to the planting site must be licensed as a nursery.

Pierce's Disease and the Glassy-winged Sharpshooter

The Pierce's Disease Control Program (PDCP) exists in California to prevent the artificial movement and spread of the glassy-winged sharpshooter (GWSS), a vector of Pierce's Disease. Pierce's Disease is caused by the bacterium Xylella fastidiosa. It is deadly to many plant species, and its vector, GWSS, has an extensive list of hosts including many agricultural crops and landscape plants. Imperial County is the only Southern California County not infested with GWSS.

It is unlawful to bring plants into Imperial County from inside the GWSS-infested area; however, nurseries located within the infested area may do so under a compliance agreement from their county's Agricultural Commissioner. It is lawful to bring plants in from a nursery within the infested area so long as they meet the terms of their compliance agreement. These terms include (but are not limited to):

- Notify the Imperial County Agricultural Commissioner (CAC) at least 24 hours prior to shipment.
- Shipment paperwork is stamped with a GWSS compliance agreement number.
- Shipment is accompanied by a "Blue Tag" shipping permit stating "Warning – Hold for Inspection".
- Shipment is accompanied by a valid Certificate of Quarantine Compliance (CQC), if applicable.

For additional information regarding the PDCP or GWSS, please visit https://www.cdfa.ca.gov/pdcp/.

Other Plants with Quarantine Restrictions

- All **citrus species** from other California counties and other states.
- All **palms of the Phoenix genus**, including Pygmy Date Palms (P. roebelenii), except when originating from certain areas of Riverside County.
- Nursery stock originating in **Florida** (specifically Burrowing and Reniform Nematode [3 CCR § 3271] and Imported Fire Ant [7 CFR § 301.81]).
- Nursery stock originating in **Arizona** (specifically Ozonium Root Rot [3 CCR § 3261]).
- All **lettuce plants** are prohibited unless tested for Lettuce Mosaic Virus.
- All plants shipped *from* Imperial County must be certified free from Ozonium Root Rot by the CAC.

Penalties for Failure to Comply with Requirements (California Food and Agricultural Code [FAC])

Any violation of quarantine requirements is an infraction punishable by a fine of one thousand dollars ($1,000) for the first offense. Second and subsequent offenses within three years are punishable as misdemeanors. (FAC § 5309)

In addition to any other penalties, any person violating quarantine requirements may be liable civilly in an amount not exceeding ten thousand dollars ($10,000) for each violation. (FAC § 5310)

In lieu of civil action, the Agricultural Commissioner (CAC) may levy a civil penalty of up to two thousand five hundred dollars ($2,500) for each violation. (FAC § 5311)

Anyone who negligently or intentionally violates any state or federal law or regulation by importing any plant or other article infested by pest or disease and causes an infestation or causes the spread of an existing infestation beyond quarantine boundaries is liable civilly up to twenty-five thousand dollars ($25,000) for each act that constitutes a violation. (FAC § 5028)

EEC ORIGINAL PKG

RECEIVED
MAY 18 2026
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

John Pierre Menvielle
897 West Ross Road
El Centro, CA. 92243

5-18-2026

Bari Bean
Assistant County Executive Officer
County Executive Office
940 West Main Street, Suite 208
El Centro, CA. 92243

David Dale
Director of Public Works
Imperial County Department of Public Works
155 South 11th Street
El Centro, CA. 92243

Jim Minnick
Planning & Development Service Director
Imperial County Planning & Development Services
801 Main Street
El Centro, CA. 92243

RE: Rice Gateway Tract 942, EEC Assessment #25-0033, Applicant Oscar Linn requesting CUP #25-0015 & Lot Merger #00165 expansion of 3 APN's 059-363-013-000, 059-363-020-000 & 059-363-025-000 for a combined total of 7.1 acres.

RE: Menvielle Road Median Improvement Reimbursement 50% Fair-Share $241,491.20 (2-25-26).

Hello Bari, David & Jim:

There has been much discussion within the County about Mike Vogt being reimbursed for his cost of improving Rice's Tract 942 1/2 median in Menvielle Road from Maggio Road to Gateway Road. The reason for this letter is a Public Notice printed in the Imperial Valley Press 5-16-2026 about Oscar Linn a Gateway landowner on the Rice Tract 942 is applying for a CUP #25-0015 & Lot Merger #00165 to be heard before the Imperial County Environmental Evaluation Committee on 5-28-2026 Board of Supervisors Chambers at 1:30pm. (See Attachment #1 Public Notice).

On 10-24-2024 Mr. Vogt wrote a letter to John Gay & Jim Minnick asking for his 50% fair-share of improvements his Company, Calexico Gateway Center, LLC made to the full median in Menvielle Road. Mr Oscar Rafael Linn was also copied on this letter which states Mr Vogt's understanding from the County is "the county will not approve any actions on the Rice Gateway subdivision parcels including development and building permits of any kind until such time that CGC is reimbursed in full". (See Attachment #2 Vogt 10-24-2024 letter).

The Rice's, Imperial County Board of Supervisors & Administrative Staff have all received requests from Mr. Vogt for his 50% fair-share reimbursement of improvements to Rice's Tract 942 1/2 median in Menvielle Road. (See Attachment #3 CGC Invoice #004R 2-4-2026).

EEC ORIGINAL PKG

On 4-6-2026 Mr. Vogt met at the County Administrative Building with Bari Bean & David Dale at 3pm to discuss the Menvielle Road median reimbursement issue. At this meeting Mr. Vogt presented David Dale with a 4-2-2026 letter written by Timothy B. Jones, former Imperial County Public Works Director. In the letter Mr. Jones explains how & why he wrote the 2-15-2006 Menvielle Road Report while he was still the Imperial County Public Works Director. The letter explains who the landowners are that are responsible for the full 4 lanes of Menvielle Road including the median. (See Attachment #4 Gateway to the Americas-Menvielle Road).

On 4-7-2026 Mr. Vogt emailed Bari Bean. David Dale & Jim Minnick asking for his 50% fair-share of his cost of improvements to Rice's Tract 942 1/2 median in Menvielle Road. Mr. Vogt "Again, I am asking Imperial County to reimburse my Company the 50% fair share and collect from the adjoining landowners when they seek permission to improve their lots. Until this issue is resolved, I trust that no approvals or permits will be issued by Imperial County on any parcel in the Rice tract map". (See Attachment #5 Vogt 4-7-2026 email to Bean, Dale & Minnick).

I am including as attachment #6 a list of landowners & their APN's on Rice's Tract 942 which totals 60.61 acres of which Oscar Rafael Linn has 7.1 acres or 11.71% of the Rice Tract 942 land ownership. (See Attachment #6 Rice Tract 942 landowners).

I trust Imperial County will do the correct thing & not process Oscar Linn's CUP #25-0015 & Lot Merger #00165 on 5-28-2026 until Mr. Vogt's Calexico Gateway Center, LLC is made whole on his 50% fair share reimbursement for his 1/2 Rice Tract 942 median improvement in Menvielle Road.

Sincerely,

John Pierre Menvielle
Gateway Landowner Tract 940 North.

cc: Mike Vogt

EEC ORIGINAL PKG

Attachment #1
5-18-2026

PUBLIC NOTICE

Pursuant to the requirements of the CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) and the County's "RULES AND REGULATIONS TO IMPLEMENT CEQA" the Imperial County Environmental Evaluation Committee will meet on **May 28, 2026** at **1:30 p.m.** in the Board of Supervisors Chambers, 940 Main Street, El Centro, to review the below-mentioned projects:

Assessment #25-0033: The Applicant, Oscar Linn, has submitted requests for Conditional Use Permit #25-0015 and Lot Merger #00165 to continue and expand the operation of a parking and storage facility, including mini-storage units designed to receive packages and boxes on behalf of customers from delivery parcel companies. Said expansion would replace the currently permitted operation under Conditional Use Permit #13-0005. Upon merger, the project site will cover approximately 7.1 acres, comprising contiguous parcels identified by Assessor's Parcel Numbers 059-363-013-000, 059-363-020-000, and 059-363-025-000. Access will remain via Gateway Road. This development is intended to accommodate the growing operational demands of Linn Parking & Storage by increasing parking capacity for commercial vehicles, including long-haul trucks and trailers. The facility is projected to handle around 30 passenger vehicles and 60 trucks entering and exiting daily, with capacity to park up to 60 passenger vehicles and 140 trucks and trailers of various sizes. Operations will run continuously, 24/7, with a staff of approximately eight employees. This expansion is anticipated to improve traffic circulation, reduce congestion within the existing lot, and enhance overall site safety and functionality for both drivers and personnel. The location of the proposed project is 1624 Gateway Rd, Calexico, CA, and further described as POR LOT A LLA#283 ALSO BEING LOT 4 OF TRACT 942 GATEWAY TO THE AMERICA SUB NO2 UNIT2 4.00AC, POR LOT A OF LLA#283 ALSO BEING POR REM. PAR A GATEWAY TO THE AMERICA SUB 2 UN 3 & LOT 4 GATEWAY TO THE AMERICA SUB 2 UN 4 ALSO BEING POR LOT B LLA#283, located in the unincorporated Imperial County; State of California (Supervisory District #5), [Luis Bejarano, Planner II at 442-265-1736, or via email at luisbejarano@co.imperial.ca.us].

Jim Minnick, Chairman
Environmental Evaluation Committee

Si usted requiere esta información en español, favor de llamar al (442) 265-1736.

LB\KH\S:\Clerical\AGENDAS\2026\EEC\05 28 26 EEC Agenda.docx

EEC ORIGINAL PKG

IRE DEVELOPMENT
A Division of IRE Enterprises, Inc.
Commercial Properties

Attachment #2
5-18-2026

1986 ESTABLISHED

October 24, 2024

John Gay
Director of Public Works
Imperial County Department of Public Works
155 South 11th Street
El Centro, CA 92243

Jim Minnick
Planning & Development Services Director
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243

RE: Menvielle Median Improvement Reimbursements

Gentlemen:

As you are aware, Calexico Gateway Center LLC ("CGC") has completed the two east lanes of Menvielle Road between Maggio Road and Gateway Road. Those improvements also included a landscaped median as required by the Gateway of the Americas Specific Plan Area ("SPA"). The entire cost of the full median was fronted by my company, CGC, the owner of the subdivision fronting the east side of Menvielle Road from Maggio Road to Gateway Road. A fifty percent (50%) reimbursement of those improvements is due to my company from the Rice family and others who own parcels in the Rice Gateway subdivision, which fronts the west side of Menvielle Road.

On July 25, 2024, an invoice and back up documents were sent to the Rice family for these median improvements in accordance with several documents that call for a fair share reimbursement of public improvements equally benefiting adjacent owners in the SPA. Despite numerous e-mails, telephone conversations, and an in-person meeting, the Rice's have taken the position that they do not owe CGC half of the improvements benefiting their adjacent subdivision. Accordingly, we are asking for Imperial County to take action to resolve this matter as quickly as possible. In the meantime, it is our understanding from conversations that I have had with both of you, that the county will not approve any actions on the Rice Gateway subdivision parcels including development and building permits of any kind until such time that CGC is reimbursed in full. Also, as CGC moves forward to develop the north half of the subdivision, it will construct the two east lanes of Menvielle Road between Gateway Road and Highway 98. This will also include a landscaped median which CGC expects to be reimbursed by the Rice's et al. on the same 50% basis.

EEC ORIGINAL PKG

As you are both keenly aware, Menvielle Road has become the most traveled road at the Gateway. The ADTs on Menvielle Road even exceed those of Highway 7 in the SPA. This important thoroughfare must be completed from Highway 98 to Carr Road. CGC intends to do its part; however, it is imperative that the landowners on the west side also take action to fully improve their half of Menvielle Road. The two west lanes, which were constructed without the final lift of asphalt, have deteriorated beyond repair after more than two decades of use. Those lanes must now be reconstructed/rebuilt.

In my opinion, this situation has risen to a crisis level that must be addressed by the county immediately, as the liability risk to the public is extreme.

I would like to call for a special meeting on what steps the county and its agencies are taking to address this urgent matter.

Sincerely
IRE DEVELOPMENT

Michael A. Vogt
President

cc: Jesus Eduardo Escobar, Board of Supervisor – District 1
Luis A. Plancarte, Board of Supervisor – District 2
Michael W. Kelley, Board of Supervisor – District 3
Ryan E. Kelley, Board of Supervisor – District 4
John Hawk, Board of Supervisor – District 5
Miguel Figueroa
Naomi C. Robles
Mitchell Driskill, Esq.
Eric R. Havens, Esq.
Steven Wellington, Esq.
Eric & Frances Rice
Sandhu Kamalpreet Kaur et al.
Hector Campos & Guadalupe S.
Ismael Reyes
Rosalio Beltran et al.
Oscar Rafael Linn
Quality Equipment International LLC
Intercam Financial Services Inc.
Border Properties LLC
Los Cuates Produce et al.
Chinh Do
Grady Dutton

EEC ORIGINAL PKG

Attachment #3
5-18-2026

INVOICE: 004R
DATE: 7/25/2024
UPDATED: 2/4/2026

Calexico Gateway Center LLC

2432 Fenton Street, Suite 100
Chula Vista, CA 91914
FEIN: 87-3469101

Bill To:

Imperial County Department of Public Works Eric & Frances Rice 155 S. 11th Street El Centro, CA 92243	TOTAL DUE $ 241,491.20

Item Description	Total Costs
Median @ Menvielle Road - Improvements Reimbursement	
A&R Construction	$ 106,096.97
Tom Watson (Landscape Meter Pedestal)	$ 14,676.82
Alvizia Corporation (Landscaping)	$ 53,893.00
Imperial County Public Works (Permit Fees)	$ 621.57
GroundLevel Landscape Architecture	$ 6,000.00
Subtotal	$ 181,288.36
Engineering / Overhead / Admin (15%)	$ 27,193.25
Interest: from 7/25/2024 to 6/25/2025 @ 10%	$ 19,110.81
Interest: from 6/26/2025 to 12/25/2025 @ 10%	$ 10,424.08
Interest: from 12/26/2025 to 2/25/2026 @ 10%	$ 3,474.69
TOTAL:	$ 241,491.20

Payment Terms: Due Upon Receipt

Please make check payable to *Calexico Gateway Center LLC*. Thank you!

EEC ORIGINAL PKG

Attachment #4
5-18-2026

Precision
—ENGINEERING & SURVEYING, INC—
P.O. Box 2216 El Centro, CA 92244
799 E. Heil Ave., El Centro, CA 92243.
Office Telephone (760) 353-2684

April 2, 2026

Michael A. Vogt, President
IRE Development
2432 Fenton Street Suite 100
Chula Vista, CA 91914

Subject: Gateway to the Americas – Menvielle Road

Dear Mr. Vogt:

This letter is in response to your request for clarification on the history, justification and purpose of the "Menvielle Road Report" that I issued on February 15, 2006.

The Report includes traffic data, cost estimates, fair share by Tract maps, recommendations and an implementation plan. As Director of Public Works and Road Commissioner in 2006, I personally wrote, calculated quantities, performed cost estimates and tabulated shares required for each Tract Map/Landowners.

It should be noted the report did not require Board of Supervisors approval. As Road Commissioner, I was the only official that had the authority to issue this type of report under the "State of California Streets and Highway Code".

I discussed the report with Robertta Burns, CEO of Imperial County, and she authorized the preparation to interpret and settle any conflicts that may have arise from previous documents covering the issues surrounding the construction of Menvielle Road. In particular, the fair share of estimated costs. The report's main purpose was to establish and memorialize the Department of Public Works' interpretation of all legal and physical requirements for Menvielle Road.

Based on the foregoing, it is clear to me that the Menvielle Road median improvements your company completed in July of 2024 should be subject to a 50% fair share reimbursement by the adjacent property owner(s).

I understand that you have billed the Rice Family for their fair share, however, they have refused to pay you, citing their belief that they owe only 10.66% not 50% per a "Completion Agreement for Menvielle Road" dated October 19, 1998. This agreement was the subject of litigation, and was settled on May 2, 2001, where adjoining property owners would pay their fair share of improvements. It is importatnt to note that the lawsuit and settlement clearly replaced the Completion Agreement of 1998. The previous multitude of property owners throughout the Gateway that were required to contribute to the construction of Menvielle Road were replaced with only those owners adjoining Menvielle Road. The concept of "adjoining owners" being the responsible parties for public improvements is an industry wide standard practice.

Since you do not have any security (collateral) for the shared improvements that you completed as required by Imperial County, I would recommend that the County reimburse you. The County has the leverage to collect on the Rice Tract Map owners at various stages of map approvals and building permits.

In conclusion, the Menvielle Road Report is self-explanatory and is the final word on this issue since I have not seen any report or document to replace the Report dated 2006.

If you have any questions or need any additional information, please contact me.

Repectively,

Timothy B. Jones, RCE/LS
Retired Director of Public Works
Cell 760-791-7760

EEC ORIGINAL PKG

Attachment #5 5-18-2026

From: Mike Vogt
Sent: Tuesday, April 7, 2026 4:35 PM
To: Bari Bean <baribean@co.imperial.ca.us>
Cc: David Dale <daviddale@co.imperial.ca.us>; 'Jim Minnick' <JimMinnick@co.imperial.ca.us>
Subject: Reimbursement Meeting

Bari,

Thank you for taking the time to meet with me regarding the reimbursement due to my company for the median cost of Menvielle Road from Maggio Road to Gateway Road.

As you are aware, this public improvement was constructed in accordance with my subdivision requirements as dictated by Imperial County. The cost of these types of improvements is customarily fronted by the first to improve (install infrastructure) on unimproved land with a 50% reimbursement by the adjoining landowner. This protocol is kept in check by the jurisdiction overseeing the approval, permitting and construction of said public improvements. That jurisdiction has the power to enforce the "fair share" cost responsibilities among landowners in order to maintain orderly development of public improvements.

Again, I am asking Imperial County to reimburse my company the 50% fair share and collect from the adjoining landowners when they seek permission to improve their lots. Until this issue is resolved, I trust that no approvals or permits will be issued by Imperial County on any parcel in the Rice tract map.

Please contact me if you have any questions.

Best regards,

Mike

Michael A. Vogt

IRE Development | President
2432 Fenton Street Suite 100

Chula Vista, CA 91914

O: 619.661.6681 | D: 619.591.2424

mike@iredevelopment.com

EEC ORIGINAL PKG

Attachment #6
5-18-2026

John Pierre Menvielle
PO Box 2723
El Centro, CA. 92244

September 7, 2024

Calexico Gateway Center, North and South
2432 Fenton Street, Suite 100
Chula Vista, CA. 91914

C/O: Mike Vogt, Perla Guiterrez & Emily Mathias

RE: RICE GATEWAY TM 942: Landowners and APN's Fronting Menvielle Road.

Gateway Road South to Maggio Road.

(03) Landowner: INTERCAM FINANCIAL SERVICES, INC., APN: 059-372-003-000
C/O Raul Hernandez
364 E. San Ysidro Blvd.
San Diego, CA. 92173

(04) Landowner: RICE, ERIC D. & FRANCES M., APN: 059-372-004-000
1601 E. US HWY 98
Calexico, CA. 92231

HWY 98 South to Gateway Road.

(16) Landowner: BORDER PROPERTIES LLC., APN: 059-363-016-000
1778 Zinetta Road, Suite A.
Calexico, CA. 92231

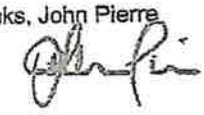
(17) Landowner: SANDHU KAMALPREET KAUR ET AL, APN: 059-363-017-000
C/O Harinder Singh
8193 Swing Drive / Jurupa Valley
Riverside, CA. 92509

(18) Landowner: SANDHU KAMALPREET KAUR ET AL., APN; 059-363-018-000
C/O Harinder Singh
8193 Swing Drive / Jurupa Valley
Riverside, CA. 92509

(19) Landowner: SANDHU KAMALPREET KAUR ET AL., APN; 059-363-019-000
C/O Harinder Singh
8193 Swing Drive / Jurupa Valley
Riverside, CA. 92509

Mike, Perla and Emily, this information came from Imperial County Assessors office (9-6-2024). Hope this information is helpful in dealing with landowner reimbursements. John Gay and Grady Dutton should be aware of who the present landowners are fronting Menvielle Road on Rice's TM 942. (Landowner Documents & Maps Included)

Thanks, John Pierre



EEC ORIGINAL PKG

John Pierre Menvielle
PO Box 2723
El Centro, CA. 92244

September 25, 2024

Calexico Gateway Center, North and South
2432 Fenton Street, Suite 100
Chula Vista, CA. 91914

C/O Mike Vogt, Perla Guiterrez and Emily Mathis

RE: Rice Gateway TM 942: Landowners and APN's West of Menvielle Road.

Gateway Road South to Maggio Road West of Menvielle Road.

(01) Landowner: LOS CUATES PRODUCE ETAL, APN: 059-372-001-000
1327 E US HWY 98
Calexico, CA. 92231

(02) Landowner: CAMPOS HECTOR G & GUADALUPE S JT, APN: 059-372-002-000
1632 Gateway Road
Calexico, CA. 92231

HWY 98 South to Gateway Road West of Menvielle Road.

(08) Landowner: REYES ISMAEL, APN: 059-363-008-000
PO Box 2134
Calexico, CA. 92231

(10) Landowner: REYES ISMAEL, APN: 059-363-010-000
PO Box 2134
Calexico, CA. 92231

(11) Landowner: REYES ISMAEL APN: 059-363-011-000
PO Box 2134
Calexico, CA. 92231

(12) Landowner: BELTRAN ROSALIO JT ETAL, APN: 059-363-012-000
214 Independence Street
San Luis, AZ. 85349

(13) Landowner: LINN OSCAR RAFAEL, APN: 059-363-013-000
1624 Gateway Road
Calexico, CA. 92231

(20) Landowner: LINN OSCAR RAFAEL, APN: 059-363-020-000
1624 Gateway Road
Calexico, CA. 92231

(22) Landowner: BORDER PROPERTIES LLC, APN: 059-363-022-000
1778 Zinetta Road, Suite A
Calexico, CA. 92231

EEC ORIGINAL PKG

Rice Gateway TM 942: Landowners and APN's West of Menvielle Road.

(23) Landowner: QUALITY EQUIPMENT INTERNATIONAL LLC, APN: 059-363-023-000
PO Box 4763
Calexico, CA. 92231

(24) Landowner: QUALITY EQUIPMENT INTERNATIONAL LLC, APN: 059-363-024-000
PO Box 4763
Calexico, CA. 92231

(25) Landowner: LINN OSCAR RAFEL, APN: 059-363-025-000
1624 Gateway Road
Calexico, CA. 92231

(26) Landowner: RICE ERIC D & FRANCES M CP, APN: 059-363-026-000
1601 East Highway 98
Calexico, CA. 92231

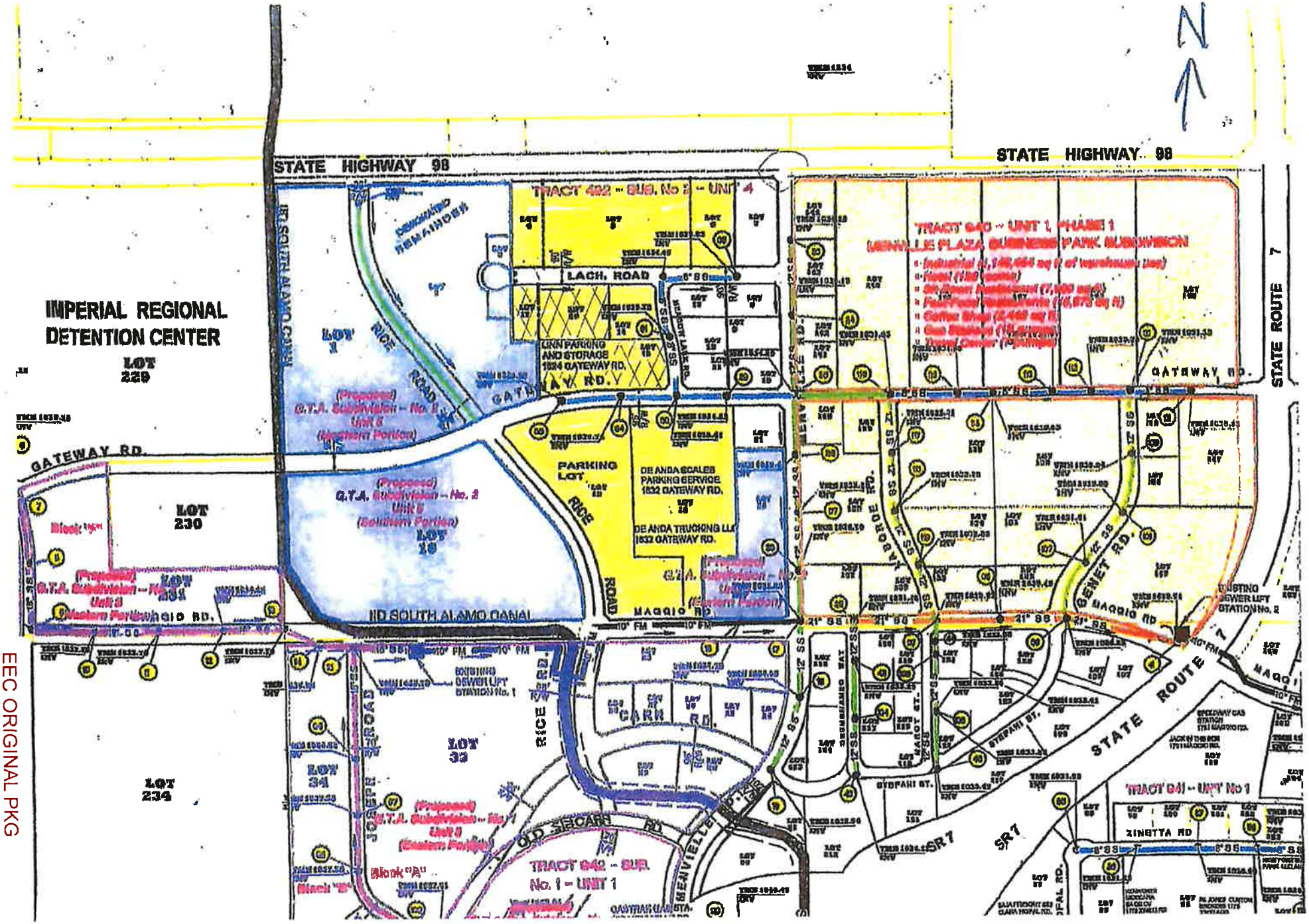
Mike, Perla and Emily, this Landowner and APN's information came from Imperial County's Assessors office (9-23-24). This information will be helpful with the Landowner reimbursements concerning the Menvielle Road median and Menvielle Road lanes 1 and 2 fronting Rice's TM 942. I will deliver a copy of this information to John Gay and Grady Dutton.

Thank you,

John Pierre

cc: John Gay
Grady Dutton

EEC ORIGINAL PKG



EEC ORIGINAL PKG

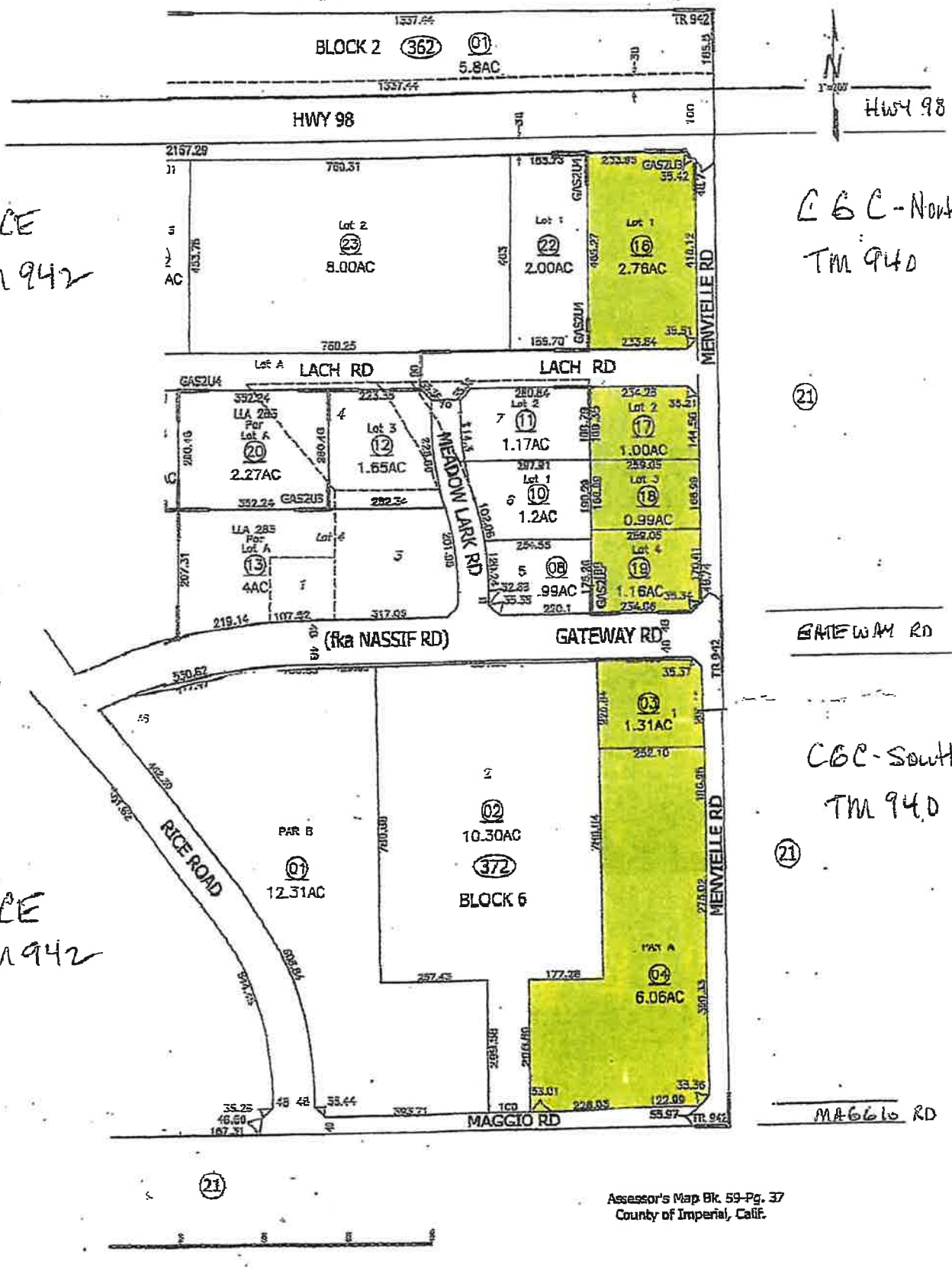
9-9-2024
JPM

942

GATEWAY TO THE AMERICAS SUB. NO. 2-UNIT 2 & FM 22-74
2-UNIT 3 & SUB. NO. 2-UNIT 4
FM 28-15

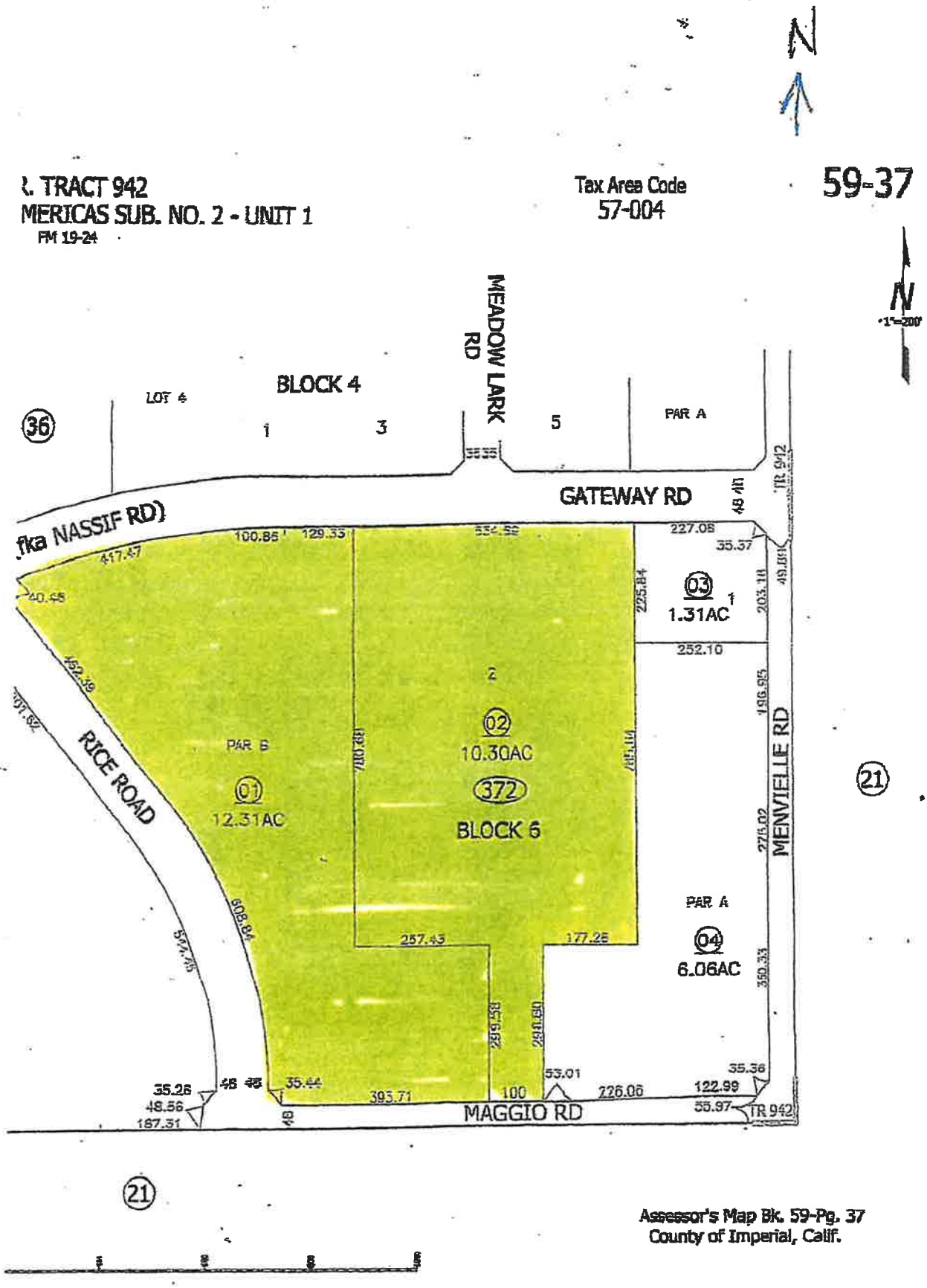
Tax Area Code 57-004

59-36



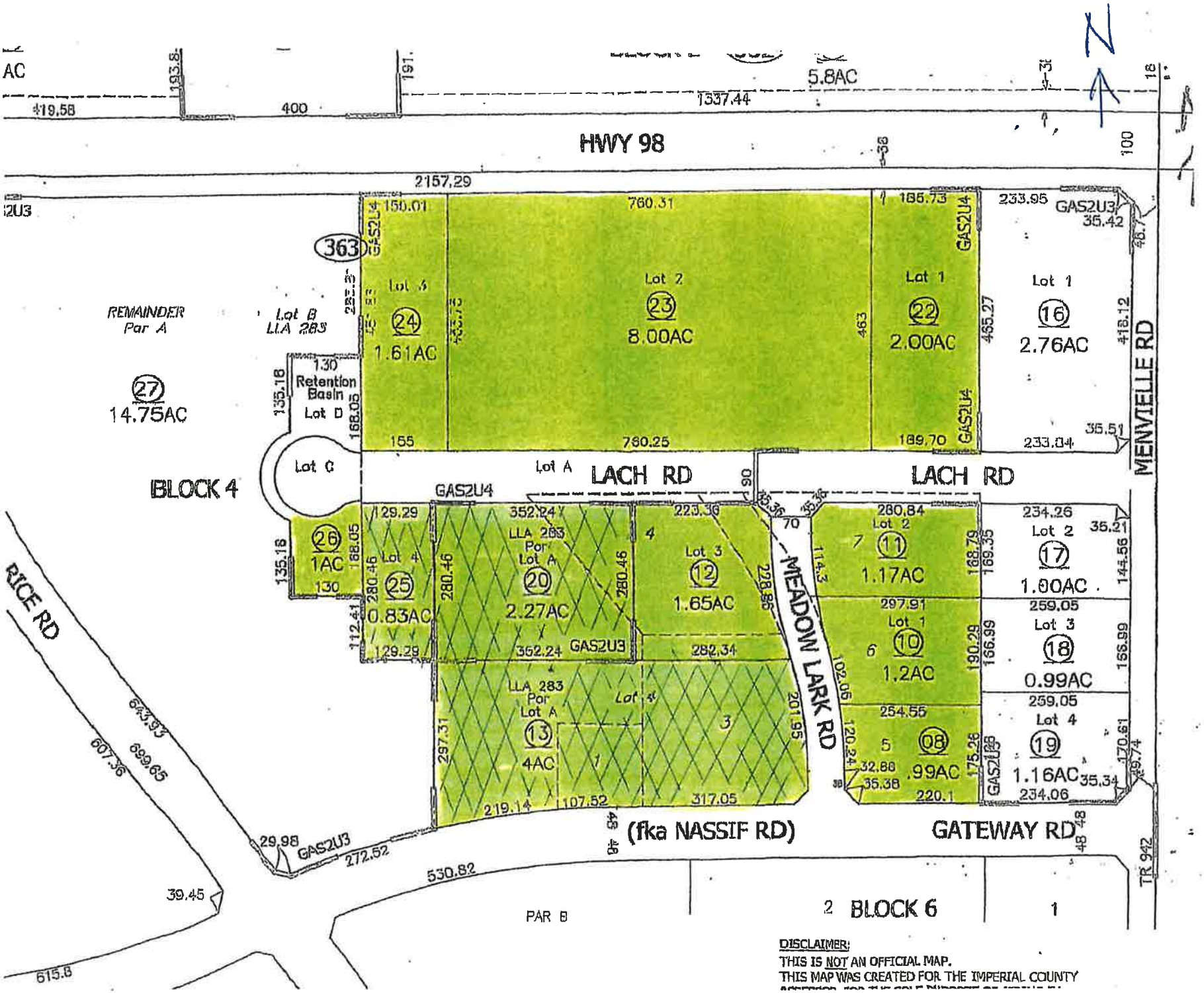
Assessor's Map Bk. 59-Pg. 37
County of Imperial, Calif.

EEC ORIGINAL PKG



Assessor's Map Bk. 59-Pg. 37
County of Imperial, Calif.

EEC ORIGINAL PKG



EEC ORIGINAL PKG

APPLICATION

EEC ORIGINAL PKG

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (442) 265-1736

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1. PROPERTY OWNER'S NAME: Oscar R. Linn		EMAIL ADDRESS: orlinn@outlook.com	
2. MAILING ADDRESS (Street / P O Box, City, State): 1624 Gateway Rd. Suite 1. Calexico, CA. 92231		ZIP CODE: 92231	PHONE NUMBER: 760-890-1334
3. APPLICANT'S NAME: Oscar R. Linn		EMAIL ADDRESS: orlinn@outlook.com	
4. MAILING ADDRESS (Street / P O Box, City, State): 1624 Gateway Rd. Suite 1. Calexico, CA.		ZIP CODE: 92231	PHONE NUMBER: 760-890-1334
4. ENGINEER'S NAME: Antonio Alvarez. PE	CA. LICENSE NO. C79509	EMAIL ADDRESS: aalvarez@neiaw.com	
5. MAILING ADDRESS (Street / P O Box, City, State): 1461 Main Street, El Centro CA.		ZIP CODE: 92243	PHONE NUMBER: 928-344-8374

6. ASSESSOR'S PARCEL NO.: 059-363-013 & 059-363-020 & 059-363-025	SIZE OF PROPERTY (in acres or square foot): 7.10 Acres	ZONING (existing): Industrial

7. PROPERTY (site) ADDRESS: 1624 Gateway Road, Calexico, CA.

8. GENERAL LOCATION (i.e. city, town, cross street): Portion of remainder Parcel "A" and Lot 4 Gateway to the Americas Subd. No 2 Calexico, CA.

9. LEGAL DESCRIPTION: See attached Exhibit "A"

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail): See attached Exhibit "B"

11. DESCRIBE CURRENT USE OF PROPERTY: See attached Exhibit "C"

12. DESCRIBE PROPOSED SEWER SYSTEM: See attached Exhibit "D"

13. DESCRIBE PROPOSED WATER SYSTEM: See attached Exhibit "E"

14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM: Existing access at 1624 Gateway Rd. Calexico, CA.

15. IS PROPOSED USE A BUSINESS? ☒ Yes ☐ No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? 8

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT

Oscar R. Linn — Print Name
Signature
April 30, 2025 — Date

ANTONIO ALVAREZ — Print Name
Signature
5/9/25 — Date

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. FEE
C. OTHER
D. OTHER

APPLICATION RECEIVED BY: LB	DATE 08/18/25	REVIEW / APPROVAL BY OTHER DEPT'S required	
APPLICATION DEEMED COMPLETE BY:	DATE	☐ P W	
APPLICATION REJECTED BY:	DATE	☐ E H S	
TENTATIVE HEARING BY:	DATE	☐ A P C D	
FINAL ACTION: ☐ APPROVED ☐ DENIED	DATE	☐ O E S	
		☐	

CUP # 25-0015
IS25-0033

EEC ORIGINAL PKG

EXHIBIT "A"

LOT MERGER NO. ____
EXISTING LEGAL DESCRIPTIONS

PARCEL 1: (EXISTING LEGAL DESCRIPTION)

THAT PORTION OF REMAINDER PARCEL "A", OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 3, TRACT NO. 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 26, PAGE 11 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, TOGETHER WITH THAT PORTION OF LOT 4, OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2, TRACT NO. 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 22, PAGE 74 OF FINAL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF LOT 3 OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2, TRACT NO. 942, ACCORDING TO MAP FILED IN BOOK 22, PAGE 74 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER; THENCE WEST A DISTANCE OF 352.24 FEET TO A POINT ON THE NORTHERLY EXTENSION OF THE WEST LINE OF LOT 4 OF SAID GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2; THENCE SOUTH A DISTANCE OF 280.46 FEET TO THE NORTHWEST CORNER OF SAID LOT 4; THENCE CONTINUING SOUTH ALONG THE WEST LINE OF SAID LOT 4, A DISTANCE OF 297.31 FEET TO THE SOUTHEAST CORNER OF REMAINDER PARCEL "A" OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 3, TRACT NO. 942, ACCORDING TO MAP FILED IN BOOK 26, PAGE 11 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER AND THE BEGINNING OF A 1548.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTH, A RADIAL TO SAID BEGINNING BEARS NORTH 12° 37' 21" WEST; THENCE EASTERLY, ALONG SAID CURVE AND SOUTHERLY LINE OF SAID LOT 4, THROUGH A CENTRAL ANGLE OF 12° 05' 26" AN ARC DISTANCE OF 326.66 FEET; THENCE TANGENT TO SAID CURVE, NORTH 89° 28' 05" EAST, ALONG THE SOUTHERLY LINE OF SAID LOT 4, A DISTANCE OF 317.05 FEET; THENCE NORTH 44° 29' 17" EAST, ALONG THE SOUTHERLY LINE OF SAID LOT 4, A DISTANCE OF 35.34 FEET; THENCE NORTH 00° 29' 31" WEST, ALONG THE EASTERLY LINE OF SAID LOT 4, A DISTANCE OF 32.94 FEET TO THE BEGINNING OF A 695.00 FOOT RADIUS TANGENT CURVE, CONCAVE TO THE WEST; THENCE NORTHERLY, ALONG SAID CURVE AND EASTERLY LINE OF LOT 4, THROUGH A CENTRAL ANGLE OF 16° 38' 56" AN ARC DISTANCE OF 201.95 FEET TO THE NORTHEAST CORNER OF SAID LOT 4; THENCE NON-TANGENT TO SAID CURVE, WEST A DISTANCE OF 282.34 FEET TO THE SOUTHWEST CORNER OF SAID LOT 3; THENCE NORTH A DISTANCE OF 280.46 FEET TO THE POINT OF BEGINNING.

SAID LAND IS ALSO KNOWN AS LOT "A" (ADJUSTED PARCEL) OF CERTIFICATE OF COMPLIANCE FOR LOT LINE ADJUSTMENT #00283, RECORDED DECEMBER 16, 2016 AS DOCUMENT NO. 2016027069 OF OFFICIAL RECORDS.

SAID AREA CONTAINING 6.27 ACRES, MORE OR LESS.

PARCEL 2: (EXISTING LEGAL DESCRIPTION)

LOT 4, OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 4, TRACT 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 28, PAGE 15 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY.

SAID AREA CONTAINING 0.83 ACRES, MORE OR LESS.



EEC ORIGINAL PKG

EXHIBIT "B"

Storage of merchandise by customers in small storage units (mini-storages), loading and unloading of merchandise from incoming trucks or trailers, receiving of packages and boxes in the name of our customers from delivery parcels companies, parking and storage of road tractors for semi-trailers, agricultural tractors, commercial and school buses, coaches, trolley buses, cars, sport cars, racing cars, golf cars, snowmobiles, ambulances, vans, motor-homes, motor-campers, trucks for transporting merchandise, delivery trucks, tank trucks, dump trucks, shuttle trucks, self-loading trucks, crane trucks, pump trucks, drill trucks, concrete mixer trucks, broadcast trucks, fork-lift trucks, trailers, semi-trailers, flat-bed trailers, housing trailers, camping trailers, agricultural trailers, self-loading trailers, animal transporting trailers, tank trailers, pump trailers, motorcycles, bulldozers, angledozers, graders, levelers, scrapers, excavators, and backhoes. It is projected that this site will begin with 8 employees, working 24 hours, seven days a week. In addition, 60 cars and 140 trucks and trailers of different types will park in this facility. Moreover, there will be approximately 30 cars and 60 trucks entering and exiting every day using the existing access on Gateway Road and since the site is surrounded by vacant land, except to the south, across Gateway Road, where there is another parking facility which access is 300 ft to the east of the site's access, it is projected that outside traffic will not be available to block or interrupt the site's access. In addition, lines to access the site are seldom above 3 trucks or 3 cars since there is always an employee guarding the entrance.

EEC ORIGINAL PKG

EXHIBIT "C"

Parking and storage of road tractors, trailers, semi-trailers, automobiles, and others, see attachment "B". Storage of merchandise by customers in small storage units (mini-storage), loading and unloading of merchandise from incoming trucks or trailers, and receiving of packages and boxes from delivery parcels companies under the name of our customers.

EEC ORIGINAL PKG

EXHIBIT "D"

Public Sewer System in accordance with the Imperial Irrigation District and Imperial County Public Works standards

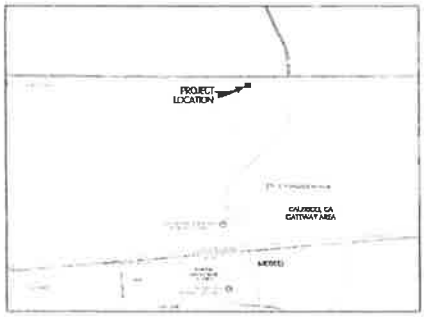
EEC ORIGINAL PKG

EXHIBIT "E"

Public Water System in accordance with the Imperial Irrigation District and Imperial County Public Works standards

EEC ORIGINAL PKG

LINN NEW PARKING LOT ADDITION

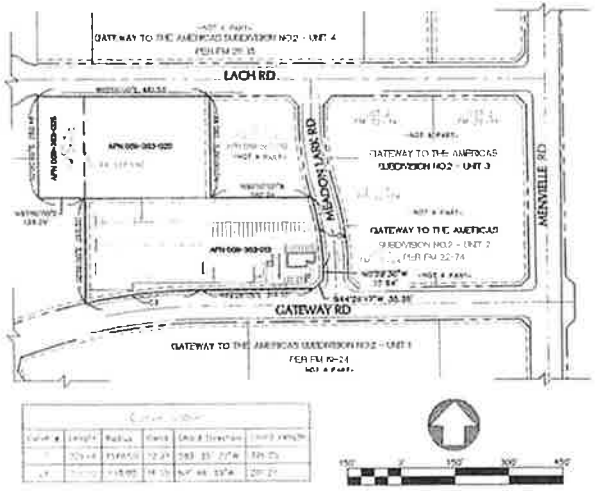


PROJECT LOCATION MAP
NTS

LEGEND

EXISTING CENTERLINE
EXISTING RIGHT OF WAY
EXISTING EASEMENT
EXISTING LOT LINE
PROPERTY LINE
EXISTING STRIPING
EXISTING UNDERGROUND ELECTRIC LINE
EXISTING WATER LINE
EXISTING SEWER LINE
EXISTING CURB & GUTTER
EXISTING VERTICAL CURB
EXISTING CHAIN LINK FENCE
NEW VERTICAL CURB
NEW STRIPING
EXISTING ASPHALT PAVEMENT
EXISTING CONCRETE

EXISTING LANDSCAPE
EXISTING BUILDING
EXISTING DIRT AREA
NEW ASPHALT PAVEMENT
EXISTING SEWER MANHOLE
EXISTING LIGHT POLE
EXISTING DOUBLE LIGHT POLE
EXISTING WATER VALVE
EXISTING FIRE HYDRANT
EXISTING GRATE
EXISTING INLET
EXISTING SIGN
NEW LIGHT POLE
NEW DOUBLE LIGHT POLE
NEW SIGN



VICINITY MAP
NTS

NAME & ADDRESS OF OWNER

OSCAR LINN
1824 GATEWAY RD
CALEXICO, CA 92231

ENGINEER

NICKLAUS ENGINEERING INC
1461 MAIN ST
EL CENTRO, CA 92243

APN & LEGAL DESCRIPTION

APN 059-363-013
POR LOT A OF LLA #283 ALSO BEING LOT 4 OF TRACT 942

APN 059-363-035
POR LOT A OF LLA #283 ALSO BEING POR REM PAR A

APN 059-363-035
LOT 4 GATEWAY TO THE AMERICA SUB 2 BN 4

SITE DATA

ZONING: U
DESCRIPTION OF USE: TRUCK AND CARS PARKING LOT

SITE AREAS:

TOTAL LOT SIZE: ±309,647 SQ FT (7.1 ACRES)

PROPOSED NEW PARKING LOT AREA: ±105,985 SQ FT
EXISTING PARKING LOT & BLDG: ±172,243 SQ FT

LANDSCAPE AREA REQUIRED: 22,071.50 SQ FT
(10% OF DEVELOPED AREA)

EXISTING LANDSCAPE PROVIDED: ±20,090 SQ FT
PROPOSED LANDSCAPE PROVIDED: ±12,673 SQ FT

EXISTING RETENTION BASIN: ±47,354 CF
PROPOSED NEW RETENTION BASIN: ±30,548 CF

PROJECT DESCRIPTION

THE PROJECT CONSIST OF THE EXTENSION OF AN EXISTING HEAVY TRUCK, TRAILERS, AND CAR PARKING LOT TO NORTH PROPERTY WITH THE EXTENSION OF THE PAVING LOT, NEW IMPROVEMENTS SUCH AS ELECTRICAL WORK, NEW RETENTION BASIN, NEW LANDSCAPE, NEW PERIMETER FENCE

SHEET INDEX

C-1 COVER SHEET, VICINITY MAP, LOCATION MAP AND INDEX
C-2 DEMOLITION PLAN
C-3 SITE AND CONCEPT STRIPING PLAN

UTILITY WARNING

THE UNDERGROUND UTILITIES SHOWN HAVE BEEN LOCATED FROM FIELD SURVEY INFORMATION AND EXISTING DRAWINGS. THE SURVEYOR AND ENGINEER OF RECORD MAKE NO GUARANTEE THAT THE UNDERGROUND UTILITIES SHOWN COMPRISE ALL SUCH UTILITIES IN THE AREA, EITHER IN SERVICE OR ABANDONED. THE SURVEYOR AND ENGINEER OF RECORD FURTHER DOES NOT WARRANT THAT THE UNDERGROUND UTILITIES SHOWN ARE IN THE EXACT LOCATION INDICATED ALTHOUGH HE DOES CERTIFY THAT THEY ARE LOCATED AS ACCURATELY AS POSSIBLE FROM INFORMATION AVAILABLE. THE SURVEYOR AND ENGINEER OF RECORD HAVE NOT PHYSICALLY LOCATED THE UNDERGROUND UTILITIES

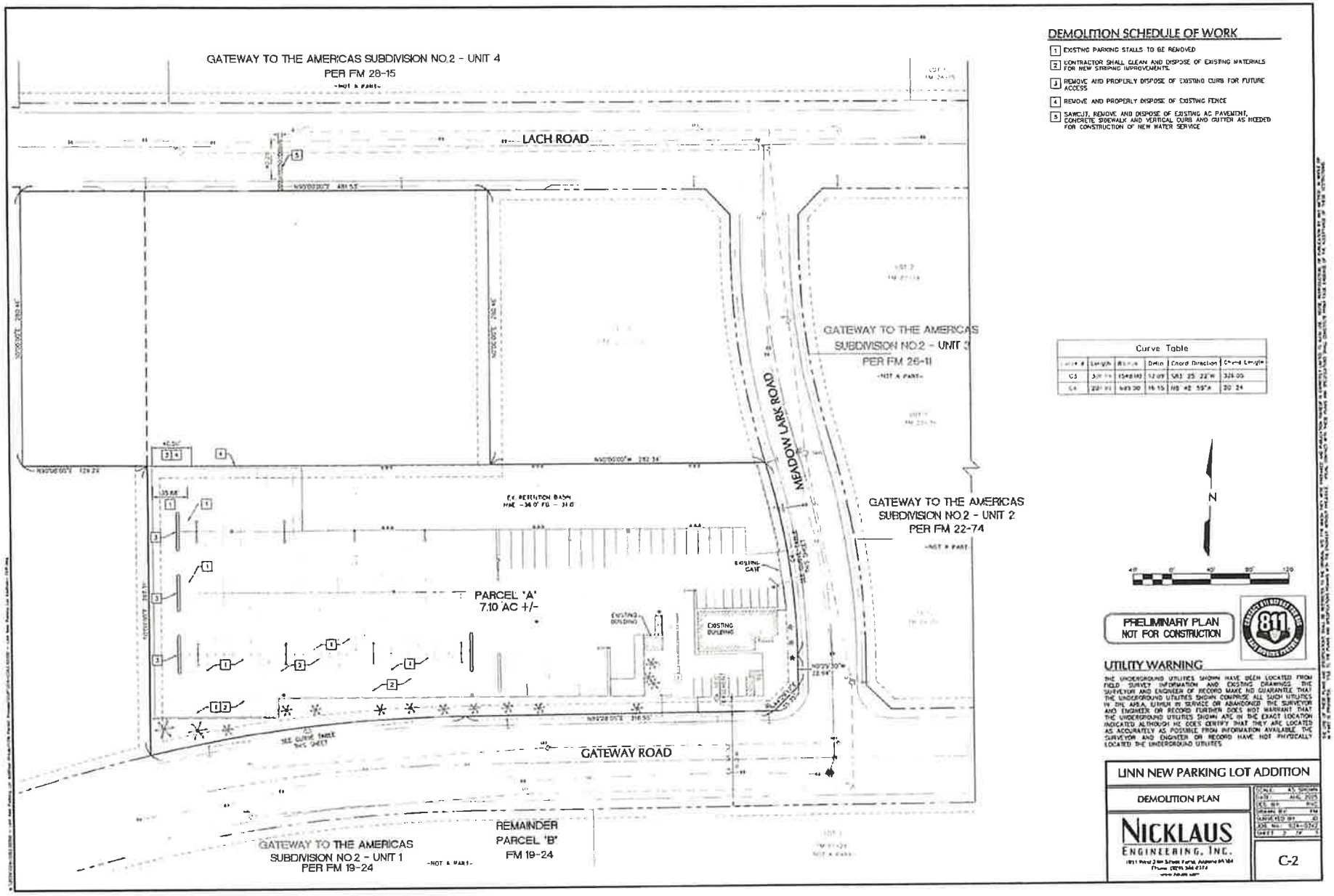
PRELIMINARY PLAN
NOT FOR CONSTRUCTION

LINN NEW PARKING LOT ADDITION
COVER SHEET, VICINITY MAP, LOCATION MAP AND INDEX

NICKLAUS ENGINEERING, INC.

C-1

EEC ORIGINAL PKG

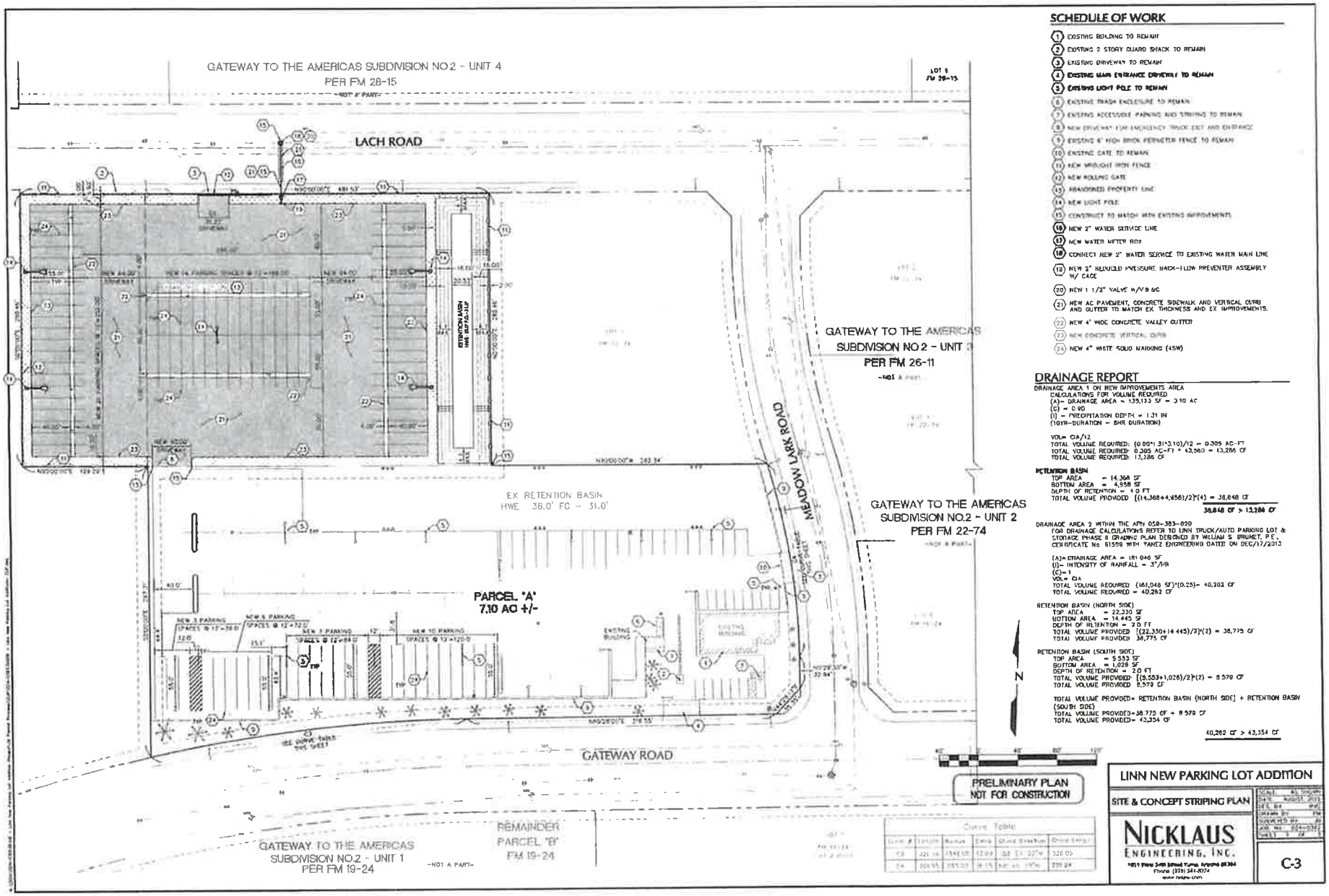


DEMOLITION SCHEDULE OF WORK

1. EXISTING PARKING STALLS TO BE REMOVED
2. CONTRACTOR SHALL CLEAN AND DISPOSE OF EXISTING MATERIALS FOR NEW STRIPING IMPROVEMENTS
3. REMOVE AND PROPERLY DISPOSE OF EXISTING CURB FOR FUTURE ACCESS
4. REMOVE AND PROPERLY DISPOSE OF EXISTING FENCE
5. SAWCUT, REMOVE AND DISPOSE OF EXISTING AC PAVEMENT, CONCRETE SIDEWALK AND VERTICAL CURB AND GUTTER AS NEEDED FOR CONSTRUCTION OF NEW WATER SERVICE

Curve Table					
Curve #	Length	Radius	Delta	Chord Direction	Chord Length
C3	326.16	1548.00	12°04'09"	S83°25'22"W	325.55
C4	22.61	483.00	2°40'55"	N8°42'59"W	22.61

EEC ORIGINAL PKG



SCHEDULE OF WORK

1. EXISTING BUILDING TO REMAIN
2. EXISTING 2 STORY GUARD SHACK TO REMAIN
3. EXISTING DRIVEWAY TO REMAIN
4. EXISTING MAIN ENTRANCE DRIVEWAY TO REMAIN
5. EXISTING LIGHT POLE TO REMAIN
6. EXISTING TRASH ENCLOSURE TO REMAIN
7. EXISTING ACCESSIBLE PARKING AND STRIPING TO REMAIN
8. NEW DRIVEWAY FOR EMERGENCY TRUCK EXIT AND ENTRANCE
9. EXISTING 6' HIGH BRICK PERIMETER FENCE TO REMAIN
10. EXISTING GATE TO REMAIN
11. NEW WROUGHT IRON FENCE
12. NEW ROLLING GATE
13. ABANDONED PROPERTY LINE
14. NEW LIGHT POLE
15. CONSTRUCT TO MATCH WITH EXISTING IMPROVEMENTS
16. NEW 2" WATER SERVICE LINE
17. NEW WATER METER BOX
18. CONNECT NEW 2" WATER SERVICE TO EXISTING WATER MAIN LINE
19. NEW 2" REDUCED PRESSURE BACK-FLOW PREVENTER ASSEMBLY W/ CAGE
20. NEW 1 1/2" VALVE W/V B.C.
21. NEW AC PAVEMENT, CONCRETE SIDEWALK AND VERTICAL CURB AND GUTTER TO MATCH EX. THICKNESS AND EX. IMPROVEMENTS.
22. NEW 4' WIDE CONCRETE VALLEY GUTTER
23. NEW CONCRETE VERTICAL CURB
24. NEW 4" WHITE SOLID MARKING (4SW)

DRAINAGE REPORT

DRAINAGE AREA 1 ON NEW IMPROVEMENTS AREA
CALCULATIONS FOR VOLUME REQUIRED
(A)= DRAINAGE AREA = 135,133 SF = 3.10 AC
(C) = 0.90
(I) = PRECIPITATION DEPTH = 1.31 IN
(10YR-DURATION - 6HR DURATION)

VOL= CIA/12
TOTAL VOLUME REQUIRED: (0.90*1.31*3.10)/12 = 0.305 AC-FT
TOTAL VOLUME REQUIRED: 0.305 AC-FT * 43,560 = 13,286 CF
TOTAL VOLUME REQUIRED: 13,286 CF

RETENTION BASIN
TOP AREA = 14,368 SF
BOTTOM AREA = 4,958 SF
DEPTH OF RETENTION = 4.0 FT
TOTAL VOLUME PROVIDED [(14,368+4,958)/2]*(4) = 38,652 CF

38,652 CF > 13,286 CF

DRAINAGE AREA 2 WITHIN THE APN 050-383-020
FOR DRAINAGE CALCULATIONS REFER TO LINN TRUCK/AUTO PARKING LOT & STORAGE PHASE II GRADING PLAN DESIGNED BY WILLIAM S. BRUNET, P.E., CERTIFICATE No. 61558 WITH TANEZ ENGINEERING DATED ON DEC/17/2013

(A)= DRAINAGE AREA = 181,048 SF
(I)= INTENSITY OF RAINFALL = 3"/HR
(C)= 1
VOL= CIA
TOTAL VOLUME REQUIRED (181,048 SF)*(0.25)= 40,262 CF
TOTAL VOLUME REQUIRED = 40,262 CF

RETENTION BASIN (NORTH SIDE)
TOP AREA = 22,330 SF
BOTTOM AREA = 14,445 SF
DEPTH OF RETENTION = 2.0 FT
TOTAL VOLUME PROVIDED [(22,330+14,445)/2]*(2) = 38,775 CF
TOTAL VOLUME PROVIDED 38,775 CF

RETENTION BASIN (SOUTH SIDE)
TOP AREA = 5,553 SF
BOTTOM AREA = 1,026 SF
DEPTH OF RETENTION = 2.0 FT
TOTAL VOLUME PROVIDED: [(5,553+1,026)/2]*(2) = 6,579 CF
TOTAL VOLUME PROVIDED 6,579 CF

TOTAL VOLUME PROVIDED= RETENTION BASIN (NORTH SIDE) + RETENTION BASIN (SOUTH SIDE)
TOTAL VOLUME PROVIDED=38,775 CF + 6,579 CF
TOTAL VOLUME PROVIDED= 43,354 CF

40,262 CF > 43,354 CF

Curve Table

Curve #	Length	Radius	Delta	Chord Direction	Chord Length
C3	326.16	1946.00'	9°36'07"	S6° 54' 27"W	325.75
C4	304.55	1855.00'	9°24'31"	S6° 48' 46"W	304.24

LINN NEW PARKING LOT ADDITION

SITE & CONCEPT STRIPING PLAN

NICKLAUS ENGINEERING, INC.
1951 West 24th Street Yuma, Arizona 85364
Phone (928) 341-8074

C-3

EEC ORIGINAL PKG

LOT MERGER

I.C. PLANNING & DEVELOPMENT SERVICES DEPT
801 Main Street, El Centro, CA 92243 (442) 265-1736

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1. PROPERTY OWNER'S NAME Oscar Rafael Linn	EMAIL ADDRESS orlinn@outlook.com	
2. MAILING ADDRESS 1624 Gateway Road, Calexico, CA.	ZIP CODE 92231	PHONE NUMBER , 760-554-3035
3. ENGINEER'S NAME / CAL. LICENSE NO. Antonio Alvarez, PE / C79509	EMAIL ADDRESS aalvarez@NEIAW.COM	
4. MAILING ADDRESS 1461 Main Street, El Centro	ZIP CODE 92243	PHONE NUMBER (928) 344-8374
5. PROPERTY "A" (site) ADDRESS 1624 Gateway Road, Calexico, CA.	LOCATION Portion of remainder Parcel "A" Gateway to the Americas Subd. No 2	
6. PROPERTY "A" ASSESSOR'S PARCEL NO.(s) APN's 059-363-013 & 059-363-020 & 059-363-025	SIZE OF PROPERTY (in acres or square foot) 6.27 acres	
7. EXISTING USE Commercial Parking Lot		CURRENT ZONE GI - Gateway Industrial
8. PROPERTY "A" LEGAL DESCRIPTION (attach separate sheet if necessary) See attachment		
9. PROPERTY "B" (site) ADDRESS Lach Road	LOCATION Lot 4, Gateway to the Americas Subd. No 2	
10. PROPERTY "B" ASSESSOR'S PARCEL NO.(s) APN's 059-363-025	SIZE OF PROPERTY (in acres or square foot) 0.83 acres	
11. EXISTING USE Vacant Lot		CURRENT ZONE
12. PROPERTY "B" LEGAL DESCRIPTION (attach separate sheet if necessary) See attachment		
13. EXPLAIN PURPOSE/REASON FOR LOT MERGER New Commercial Parking Lot development		
14. PROPOSED MERGED PARCEL SIZE 7.10 Acres	PROPOSED USE New Commercial Parking Lot development	

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

15. DESCRIBE PROPOSED SEWER SYSTEM(s)	N/A, Exist. Parking lot remains with exist. Utilities as is, see project Description Attached
16. DESCRIBE PROPOSED WATER SYSTEM	NA. Exist. Parking lot remains with exist. Utilities as is. see Project Description attached.
17. DESCRIBE PROPOSED ACCESS TO MERGED PARCEL	See Exhibit "B"
18. IS THIS PARCEL PLANNED TO BE ANNEXED? ☐ Yes ☐ No	IF YES, TO WHAT CITY or DISTRICT?

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT

Oscar R. Linn — Print Name (owner) — February 21, 2025 — Date

Signature (owner)

Antonio Alvarez — Print Name (Agent) — 02/28/25 — Date

Signature (Agent)

An owners notarized affidavit is required if application is signed by Agent

REQUIRED SUPPORT DOCUMENTS

- A. SITE PLAN
- B. PROPOSED LEGAL DESCRIPTION
- C. PRELIMINARY TITLE REPORT (6 months or newer)
- D. FEE _____
- E. OTHER _____

APPLICATION RECEIVED BY:		DATE	
APPLICATION DEEMED COMPLETE BY:		DATE	
APPLICATION REJECTED BY:		DATE	
TENTATIVE HEARING BY:		DATE	
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE	

REVIEW / APPROVAL BY OTHER DEPT'S required
- ☐ P W
- ☐ E H S.
- ☐ A P C. D
- ☐ O E. S.
- ☐ _____
- ☐ _____

MERG# _____

EEC ORIGINAL PKG

NICKLAUS
ENGINEERING, INC.

High Quality, Client-Focused Solutions
8(a) | WOSB | SBE

June 2025.

Imperial County Planning &
Development Services Department.
801 Main Street
El Centro, CA 92243

Project: Linn Parking Lot Project

The Linn Parking Lot Project involves the development of a new heavy truck and trailer parking facility on approximately 3.1 acres of land located in unincorporated Imperial County, California. The project site is positioned immediately north of an existing parking lot and consists of relatively flat, unimproved land, making it ideal for expansion with minimal grading or site preparation.

The proposed development aims to support the growing operational needs of Linn Parking & Storage by significantly increasing the available parking capacity for commercial vehicles, including long-haul trucks and trailers. This expansion is expected to improve traffic flow, reduce congestion within the existing lot, and enhance overall site functionality and safety for both drivers and staff.

To facilitate the development, the project includes a lot merger of three contiguous parcels—APNs 059-363-013, 059-363-020, and 059-363-025—into a single legal parcel. This merger is a critical step in ensuring a cohesive site layout and is necessary for compliance with Imperial County's planning and permitting requirements. The unified parcel will streamline the design process, simplify utility coordination, and support the efficient implementation of infrastructure improvements such as drainage systems, lighting, and access points.

The property is served by a storm drainage system, a sanitary sewer system, and a water supply line that connects to the City of Calexico utilities along Gateway Road. Meadow Lark Road has a 12-inch storm drain running north-south between Highway No. 98 and Lach Road. South of Meadow Lark Road, the storm drain size increases, with a 24-inch pipe connecting to Gateway Road, which features a 36-inch drainpipe. Lach Road includes both 12-inch and 18-inch storm drain pipes.

The sewer system consists of an existing 8-inch pipeline along the north side of Lach Road and another 8-inch line along Meadow Lark Road, both of which connect to Gateway Road via a 12-inch pipe. Water lines run along Lach Road with a 12-inch pipeline, while Meadow Lark Road also has a 12-inch water line that continues south and intersects with Gateway Road, where another 12-inch water line is present. The property also has underground electrical lines and light poles running along Gateway Road and power poles running along Meadow Lark Road.

NICKLAUS ENGINEERING, INC.

Roman Vega, PE

EEC ORIGINAL PKG

EXHIBIT "A"

LOT MERGER NO. ___
EXISTING LEGAL DESCRIPTIONS

PARCEL 1: (EXISTING LEGAL DESCRIPTION)

THAT PORTION OF REMAINDER PARCEL "A", OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 3, TRACT NO. 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 26, PAGE 11 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, TOGETHER WITH THAT PORTION OF LOT 4, OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2, TRACT NO. 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 22, PAGE 74 OF FINAL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF LOT 3 OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2, TRACT NO. 942, ACCORDING TO MAP FILED IN BOOK 22, PAGE 74 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER; THENCE WEST A DISTANCE OF 352.24 FEET TO A POINT ON THE NORTHERLY EXTENSION OF THE WEST LINE OF LOT 4 OF SAID GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2; THENCE SOUTH A DISTANCE OF 280.46 FEET TO THE NORTHWEST CORNER OF SAID LOT 4; THENCE CONTINUING SOUTH ALONG THE WEST LINE OF SAID LOT 4, A DISTANCE OF 297.31 FEET TO THE SOUTHEAST CORNER OF REMAINDER PARCEL "A" OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 3, TRACT NO. 942, ACCORDING TO MAP FILED IN BOOK 26, PAGE 11 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER AND THE BEGINNING OF A 1548.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTH, A RADIAL TO SAID BEGINNING BEARS NORTH 12° 37' 21" WEST; THENCE EASTERLY, ALONG SAID CURVE AND SOUTHERLY LINE OF SAID LOT 4, THROUGH A CENTRAL ANGLE OF 12° 05' 26" AN ARC DISTANCE OF 326.66 FEET; THENCE TANGENT TO SAID CURVE, NORTH 89° 28' 05" EAST, ALONG THE SOUTHERLY LINE OF SAID LOT 4, A DISTANCE OF 317.05 FEET; THENCE NORTH 44° 29' 17" EAST, ALONG THE SOUTHERLY LINE OF SAID LOT 4, A DISTANCE OF 35.34 FEET; THENCE NORTH 00° 29' 31" WEST, ALONG THE EASTERLY LINE OF SAID LOT 4, A DISTANCE OF 32.94 FEET TO THE BEGINNING OF A 695.00 FOOT RADIUS TANGENT CURVE, CONCAVE TO THE WEST; THENCE NORTHERLY, ALONG SAID CURVE AND EASTERLY LINE OF LOT 4, THROUGH A CENTRAL ANGLE OF 16° 38' 56" AN ARC DISTANCE OF 201.95 FEET TO THE NORTHEAST CORNER OF SAID LOT 4; THENCE NON-TANGENT TO SAID CURVE, WEST A DISTANCE OF 282.34 FEET TO THE SOUTHWEST CORNER OF SAID LOT 3; THENCE NORTH A DISTANCE OF 280.46 FEET TO THE POINT OF BEGINNING.

SAID LAND IS ALSO KNOWN AS LOT "A" (ADJUSTED PARCEL) OF CERTIFICATE OF COMPLIANCE FOR LOT LINE ADJUSTMENT #00283, RECORDED DECEMBER 16, 2016 AS DOCUMENT NO. 2016027069 OF OFFICIAL RECORDS.

SAID AREA CONTAINING 6.27 ACRES, MORE OR LESS.

PARCEL 2: (EXISTING LEGAL DESCRIPTION)

LOT 4, OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 4, TRACT 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 28, PAGE 15 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY.

SAID AREA CONTAINING 0.83 ACRES, MORE OR LESS.



2-7-25

EEC ORIGINAL PKG

EXHIBIT "A" (CONTINUED)

LOT MERGER NO. ___
ADJUSTED LEGAL DESCRIPTION FOR MERGED LOT

PARCEL "A": (ADJUSTED LEGAL DESCRIPTION)

LOT "A" OF LOT LINE ADJUSTMENT NO. 00283, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO CERTIFICATE OF COMPLIANCE FILED AS INSTRUMENT NO. 2016-027069 IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, TOGETHER WITH LOT 4 OF GATEWAY TO THE AMERICAS SUBDIVISION NO.2 - UNIT 4, TRACT NO. 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 28, PAGE 15 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY.

SAID AREA CONTAINING 7.10 ACRES, MORE OR LESS.

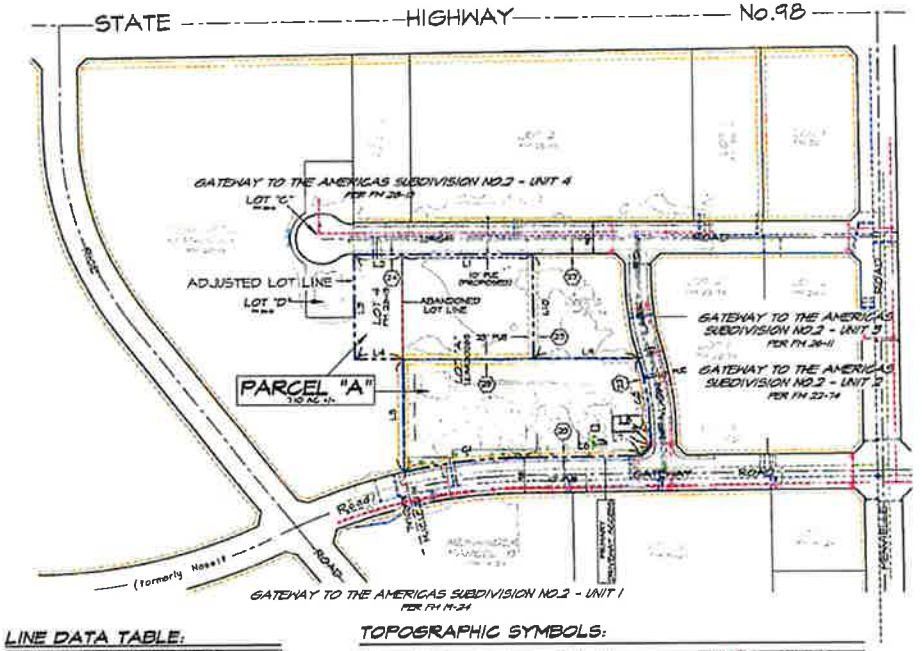
PROFESSIONAL LAND SURVEYOR
GORDON O OLSON
No. 7107
STATE OF CALIFORNIA

2-7-25

EEC ORIGINAL PKG

LOT MERGER NO. _____

A PORTION OF SECTION 12, T.11S., R.15E. S.B.M.,
IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA



LINE DATA TABLE:

LINE	LENGTH	BEARING	REFERENCE
L1	392.24'	WEST	LLA #002283, FM 28-19
L2	124.28'	WEST	FM 28-19
L3	280.46'	SOUTH	FM 28-19
L4	124.28'	WEST	FM 28-19
L5	241.57'	SOUTH	LLA #002283, FM 28-19
L6	311.09'	N44°28'09"E	LLA #002283, FM 22-14
L7	99.34'	N44°24'11"E	LLA #002283, FM 22-14
L8	52.44'	N00°34'31"W	LLA #002283, FM 22-14
L9	382.54'	WEST	LLA #002283, FM 22-14
L10	280.46'	NORTH	LLA #002283, FM 22-14

CURVE DATA TABLE:

CURVE	LENGTH	RADIUS	DELTA	REFERENCE
C1	528.66'	1948.00'	15°33'28"	LLA #002283, FM 22-14
C2	201.93'	649.00'	17°49'36"	LLA #002283, FM 22-14

TOPOGRAPHIC SYMBOLS:

SYMBOL	DESCRIPTION	SYMBOL	DESCRIPTION
	EXISTING PARKING STRIPPING		ROAD SIGN
	EXISTING PIPE FENCE		ELECTRIC BOX
	EXISTING WOOD FENCE		LIGHT POLE
	EXISTING CHAINLINK FENCE		MANHOLE
	EXISTING OVERHEAD ELECTRIC		STORM DRAIN
	EXISTING CMU WALL		WATER VALVE
	EXISTING CANAL OUTLINE		POWER POLL
	EXISTING DIRT/GRAVEL ROAD		FIRE HYDRANT
	EXISTING BUILDING SITE		WATER METER
	EXISTING CONCRETE		PALM TREE
	EXISTING ASPHALT PAVEMENT		STANDARD TREE
	EXISTING STORM DRAIN PER IMPROVEMENT PLANS		BUSH
	EXISTING WATER LINE PER IMPROVEMENT PLANS		
	EXISTING SEWER LINE PER IMPROVEMENT PLANS		

LEGEND:

(23) RECORD EASEMENT
L3 LINE DATA PER LINE DATA TABLE
C3 CURVE DATA PER CURVE DATA TABLE
(LLA#002283) RECORD DATA PER LLA #283 RECORDED AS INST#2016-021069
(ROS) RECORD OF SURVEY RECORDED IN BOOK AND PAGE AS NOTED.
(PM) RECORD DATA PER PARCEL MAP RECORD RECORDED IN BOOK AND PAGE AS NOTED.
(FM) RECORD DATA PER FINAL MAP RECORD RECORDED IN BOOK AND PAGE AS NOTED.
SUBDIVISION BOUNDARY LINE
EXISTING LOT LINE TO BE ABANDONED
EXISTING EASEMENT

RECORDED EASEMENTS:

THE FOLLOWING EASEMENTS HAVE BEEN REPORTED AS AFFECTING PARCEL 1: (APN's 054-365-015-000 & 054-365-020-000) BY PRELIMINARY TITLE REPORT ISSUED BY CHICAGO TITLE AS FILE NO. "1072402948-SB DATED DECEMBER 17, 2024

7. WATER RIGHTS, CLAIMS OR TITLE TO WATER, WHETHER OR NOT DISCLOSED BY THE PUBLIC RECORDS.
(THE EXACT EXTENT AND LOCATION OF SAID RIGHTS CANNOT BE DETERMINED FROM THE RECORD. NOT PLOTTABLE)

8 EASEMENT(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR POWER LINE RECORDED DECEMBER 8, 1931 IN BOOK 378, PAGE 248 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(SAID EASEMENT LIES OUTSIDE THE BOUNDARY OF THIS SITE. NOT PLOTTED)

9. EASEMENT(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR POWER LINE RECORDED MARCH 9, 1934 IN BOOK 391, PAGE 14 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. NOT PLOTTABLE)

10. EASEMENT(S) FOR FOR CANALS, ETC. RECORDED MARCH 9, 1934 IN BOOK 391, PAGE 20 OF OFFICIAL RECORDS AND IN BOOK 514, PAGE 22 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. NOT PLOTTABLE)

SUBJECT TO THE AFFECT OF A QUITCLAIM DEED RECORDED FEBRUARY 27, 1936 AS DOCUMENT NO. 36 OF OFFICIAL RECORDS

11. EASEMENT(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR POWER LINE RECORDED JUNE 3, 1942 IN BOOK 568, PAGE 109 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. NOT PLOTTABLE)

12. EASEMENT(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR IRRIGATION, WASTE OR DRAINAGE CANALS, OR POWER OR TELEPHONE LINES RECORDED MAY 31, 1950 IN BOOK 1190, PAGE 344 OF OFFICIAL RECORDS.
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. NOT PLOTTABLE)

13. EASEMENT(S) AS GRANTED TO PAUL PROCALAMOS AND HELEN PROCALAMOS, HUSBAND AND WIFE, AND NORRIS AND DARISSA RECORDED FEBRUARY 27, 1952 IN BOOK 833, PAGE 134 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(SAID EASEMENT LIES OUTSIDE THE BOUNDARY OF THIS SITE. NOT PLOTTED)

14. EASEMENT(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR IRRIGATION, WASTE OR DRAINAGE CANALS, OR POWER OR TELEPHONE LINES RECORDED MARCH 11, 1953 IN BOOK 897, PAGE 284 OF OFFICIAL RECORDS.
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. NOT PLOTTABLE)

15. EASEMENT(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR IRRIGATION, WASTE OR DRAINAGE CANALS, OR POWER OR TELEPHONE LINES RECORDED APRIL 1, 1953 IN BOOK 894, PAGE 69 OF OFFICIAL RECORDS.
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. NOT PLOTTABLE)

16. EASEMENT(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR IRRIGATION WASTE OR DRAINAGE CANALS, OR POWER OR TELEPHONE LINES RECORDED APRIL 19, 1957 IN BOOK 1318, PAGE 1129 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. NOT PLOTTABLE)

17. EASEMENT(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR CONCRETE LINED CANAL OR CANALS, OPEN AND/OR UNDERGROUND, TELEPHONE AND/OR ELECTRIC POWER LINE OR LINES, OVERHEAD AND/OR UNDERGROUND, TOWERS AND EXPRESS RECORDED JULY 2, 1999 AS RECORDING NO.: 99-14911 IN BOOK 1901, PAGE 1060 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(SAID EASEMENT LIES OUTSIDE THE BOUNDARY OF THIS SITE. NOT PLOTTED)

18. EASEMENT(S) AS GRANTED TO COUNTY OF IMPERIAL FOR TEMPORARY EASEMENT FOR EMERGENCY VEHICLE ACCESS RECORDED JANUARY 21, 2000 AS RECORDING NO.: 00-01319 IN BOOK 2007, PAGE 542 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(SAID EASEMENTS WERE TEMPORARY AND BECAME NULL AND VOID WITH THE FILING OF FM 22-14 AND FM 28-9. NOT PLOTTED)

20. EASEMENT(S) AS GRANTED TO COUNTY OF IMPERIAL FOR PUBLIC UTILITIES, WATER LINES, SEWER LINES, STORM DRAIN LINES, FACILITIES, BUILDING AND OTHER RELATED APPURTENANCES RECORDED JANUARY 21, 2000 AS RECORDING NO.: 00-01318 IN BOOK 2005, PAGE 544 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS
(SAID EASEMENT LIES OUTSIDE THE BOUNDARY OF THIS SITE. NOT PLOTTED)

21. EASEMENT(S) AS DELINEATED OR AS OFFERED FOR DEDICATION, ON THE MAP OF SAID TRACT/PLAT MAP OF: GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 1, TRACT NO. 942 FOR PUBLIC UTILITY EASEMENT
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(SAID EASEMENT STILL IN AFFECT AND REMAINING AFTER THE FILING OF FM 22-14 AND FM 28-9. LIE OUTSIDE THE BOUNDARY OF THIS SITE. NOT PLOTTED)

(22) 23. EASEMENT(S) AS DELINEATED OR AS OFFERED FOR DEDICATION, ON THE MAP OF SAID TRACT/PLAT MAP OF: GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 3, NO. TRACT 943 FOR PUBLIC UTILITY EASEMENT
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(PLOTTED HEREON)

(23) 25. EASEMENT(S) AS DELINEATED OR AS OFFERED FOR DEDICATION, ON THE MAP OF SAID TRACT/PLAT MAP OF: GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 3, NO. TRACT 943 FOR PUBLIC UTILITY EASEMENT
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(PLOTTED HEREON)

(24) 24. EASEMENT(S) AS DELINEATED OR AS OFFERED FOR DEDICATION, ON THE MAP OF SAID TRACT/PLAT MAP OF: GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 4, TRACT NO. 942 FOR PUBLIC UTILITY EASEMENT
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS
(PLOTTED HEREON)

28. EASEMENT(S) AS GRANTED TO COUNTY OF IMPERIAL FOR MEADOWLARK ROAD AND TEMPORARY EASEMENT AND RETENTION BASIN RECORDED DECEMBER 29, 2004 RECORDING NO.: 04044443 IN BOOK 2265, PAGE 1218 OF OFFICIAL RECORDS
REFERENCE IS MADE TO SAID DOCUMENT FOR FULL PARTICULARS.
(SAID EASEMENT WAS TEMPORARY AND BECAME NULL AND VOID WITH THE FILING OF FM 28-9. NOT PLOTTED)

OWNERS:

THE FOLLOWING HAVE BEEN REPORTED TO HAVE AN ESTATE OR INTEREST IN PARCEL 1: (APN's 054-365-015-000 & 054-365-020-000) BY PRELIMINARY TITLE REPORT ISSUED BY CHICAGO TITLE AS FILE NO. "1072402948-SB DATED DECEMBER 17, 2024

IN FEE: OSCAR RAFAEL LINN, A MARRIED MAN AS HIS SOLE AND SEPARATE PROPERTY

EXISTING LEGAL DESCRIPTIONS:

PARCEL 1: (APN's 054-365-015-000 & 054-365-020-000)

THAT PORTION OF REMAINDER PARCEL "A", OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2, TRACT NO. 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 28, PAGE 11 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, TOGETHER WITH THAT PORTION OF LOT 4, OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2, TRACT NO. 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 22, PAGE 74 OF FINAL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF LOT 3 OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2, TRACT NO. 942, ACCORDING TO MAP FILED IN BOOK 22, PAGE 74 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER; THENCE WEST A DISTANCE OF 392.24 FEET TO A POINT ON THE NORTHERLY EXTENSION OF THE WEST LINE OF LOT 4 OF SAID GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 2; THENCE SOUTH A DISTANCE OF 280.46 FEET TO THE NORTHWEST CORNER OF SAID LOT 4; THENCE CONTINUING SOUTH ALONG THE WEST LINE OF SAID LOT 4, A DISTANCE OF 241.31 FEET TO THE SOUTHEAST CORNER OF REMAINDER PARCEL "A" OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 3, TRACT NO. 943, ACCORDING TO MAP FILED IN BOOK 28, PAGE 11 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER AND THE BEGINNING OF A 1,948.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTH, A RADIAL TO SAID BEGINNING BEARS NORTH 12° 31' 31" WEST; THENCE EASTERLY, ALONG SAID CURVE AND SOUTHERLY LINE OF SAID LOT 4, THROUGH A CENTRAL ANGLE OF 13° 05' 28" AN ARC DISTANCE OF 528.66 FEET; THENCE TANGENT TO SAID CURVE, NORTH 84° 28' 09" EAST, ALONG THE SOUTHERLY LINE OF SAID LOT 4, A DISTANCE OF 311.09 FEET; THENCE NORTH 44° 24' 11" EAST, ALONG THE SOUTHERLY LINE OF SAID LOT 4, A DISTANCE OF 99.34 FEET; THENCE NORTH 00° 34' 31" WEST, ALONG THE EASTERLY LINE OF SAID LOT 4, A DISTANCE OF 52.44 FEET TO THE BEGINNING OF A 649.00 FOOT RADIUS TANGENT CURVE, CONCAVE TO THE WEST; THENCE NORTHERLY, ALONG SAID CURVE AND EASTERLY LINE OF LOT 4, THROUGH A CENTRAL ANGLE OF 18° 15' 36" AN ARC DISTANCE OF 201.93 FEET TO THE NORTHEAST CORNER OF SAID LOT 4; THENCE NON-TANGENT TO SAID CURVE, WEST A DISTANCE OF 382.54 FEET TO THE SOUTHWEST CORNER OF SAID LOT 3; THENCE NORTH A DISTANCE OF 280.46 FEET TO THE POINT OF BEGINNING.

SAID LAND IS ALSO KNOWN AS LOT "A" (ADJUSTED PARCEL) OF CERTIFICATE OF COMPLIANCE FOR LOT LINE ADJUSTMENT #00288, RECORDED DECEMBER 16, 2016 AS DOCUMENT NO. 2016027069 OF OFFICIAL RECORDS

SAID AREA CONTAINING 6.21 ACRES +/-

PARCEL 2: (APN 054-365-025-000)

LOT 4, OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 4, TRACT 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 28, PAGE 15 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY.

SAID AREA CONTAINING 0.85 ACRES +/-

ADJUSTED LEGAL DESCRIPTIONS:

PARCEL "A":

LOT "A" OF LOT LINE ADJUSTMENT NO. 00288, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO CERTIFICATE OF COMPLIANCE FILED AS INSTRUMENT NO. 2016-021069 IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, TOGETHER WITH LOT 4 OF GATEWAY TO THE AMERICAS SUBDIVISION NO. 2 - UNIT 4, TRACT NO. 942, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 28, PAGE 15 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY.

SAID AREA CONTAINING 7.10 ACRES, MORE OR LESS.

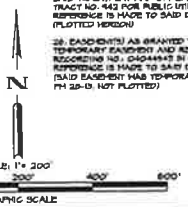
SUBJECT TO ALL EASEMENTS AND RIGHT OF WAY OF RECORD.

SURVEYOR'S NOTE:

THIS PLAT IS BASED ON RECORD DATA AS REFERENCED HEREON.

GORDON D. OLSON, PLS 7107 DATE

PROFESSIONAL LAND SURVEYOR GORDON D. OLSON No. 7107 STATE OF CALIFORNIA



Arizona, California and New Mexico Land Surveyors and Civil Engineers

LOT MERGER GATEWAY TO THE AMERICAS			SHEET 1 OF 1
IMPERIAL COUNTY	DATE 06-06-25		P.O.
CLIENT NEI	FILE NAME 24070.01LM.dwg		JOB NUMBER 24070.01

EEC ORIGINAL PKG

AIR QUALITY / GREENHOUSE GAS STUDY

EEC ORIGINAL PKG

LINN TRUCK AND AUTO PARKING LOT AND STORAGE PROJECT

AIR QUALITY/GREENHOUSE GAS STUDY

Prepared for:

Mr. Oscar Linn
1624 Gateway Road
Calexico, CA 92231

Prepared by:

BPG
BIRDSEYE
PLANNING GROUP

February 2026

EEC ORIGINAL PKG

LINN TRUCK AND AUTO PARKING LOT AND STORAGE PROJECT
IMPERIAL COUNTY, CALIFORNIA

AIR QUALITY and GREENHOUSE GAS STUDY

Table of Contents

Page

PROJECT DESCRIPTION 1

SETTING 1
- Air Pollution Regulation 1
- Air Quality Management Plan 9
- Sensitive Receptors 11

AIR QUALITY IMPACT ANALYSIS 12
- Methodology and Significance Thresholds 12
- Construction Emissions 14
- Long-Term Regional Impacts 17

GREENHOUSE GAS EMISSIONS 19

CLIMATE CHANGE IMPACT ANALYSIS 30

REFERENCES 46

List of Figures

Figure 1 Regional Location Map 2
Figure 2 Site Plan 3

List of Tables

Table 1 State and Federal Ambient Air Quality Standards 10
Table 2 Imperial County Air Quality Standard Attainment Status 11
Table 3 Ambient Air Quality Data 15
Table 4 ICAPCD Tier I and Tier II Daily Operational Thresholds 20
Table 5 IPAPCD Daily Emission Thresholds 20

EEC ORIGINAL PKG

Table 6 Estimated Maximum Daily Construction Emissions 21
Table 7 Estimated Operational Emissions 26
Table 8 Estimated Construction Related GHG Emissions 40
Table 9 Estimated Annual Energy Related GHG Emissions 42
Table 10 Estimated Solid Waste and Water Use GHG Emissions 43
Table 11 Estimated Annual Mobile Emissions of Greenhouse Gases 43
Table 12 Combined Construction, Stationary and Mobile Source Emissions 44
Table 13 2017 Scoping Plan Consistency Summary 46

Appendices

Appendix A CalEEMod Air Quality and Greenhouse Gas Emissions Model Results

EEC ORIGINAL PKG

LINN TRUCK AND AUTO PARKING LOT AND STORAGE PROJECT
IMPERIAL COUNTY, CALIFORNIA

AIR QUALITY and GREENHOUSE GAS STUDY

This report is an analysis of the potential air quality and greenhouse gas impacts associated with the proposed Linn Truck and Auto Parking Lot and Storage Project in unincorporated Imperial County, California. This report has been prepared by Birdseye Planning Group (BPG) under contract to the applicant to support preparation of the environmental documentation pursuant to the California Environmental Quality Act (CEQA).

PROJECT DESCRIPTION

The Linn Truck and Auto Parking Lot and Storage Project would be a Phase II expansion of an existing parking lot located at 1624 Gateway Drive east of Calexico in unincorporated Imperial County. The site is located northwest of the Gateway Drive/Meadow Lark Lane intersection. As proposed, the project would construct and operate 70 new parking spaces on a 3-acre site located adjacent to and north of the Linn Parking and Storage facility. The new lot would be accessed from the northwest corner of the existing lot and from the north via an existing driveway south from Lach Road. Grading would require approximately 1,080 cubic yards of soils export. The project is intended to accommodate semi-truck and trailer parking. The majority of the truck/trailer units would be parked long-term (up to two weeks). It is expected that 15 truck/trailers would access the site daily. A four-foot block wall would be installed along the northern site boundary. A stormwater retention basin would be installed along the eastern site boundary. Access would be gated. Nighttime security lighting and cameras would be installed on-site. The site would be accessible 24-hour per day. Construction is anticipated to occur in mid-2026 and be completed within 6 months. The project site is shown in Figure 1. The proposed site plan is shown in Figure 2.

SETTING

Air Pollution Regulation

The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate emissions of airborne pollutants and have established ambient air quality standards for the protection of public health. The EPA is the federal agency designated to administer air quality regulation, while the California Air Resources Board (ARB) is the state equivalent in California. Federal and state standards have been established for six criteria pollutants, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and lead (Pb).

EEC ORIGINAL PKG



Figure 1—Vicinity Map

-Project Site

EEC ORIGINAL PKG

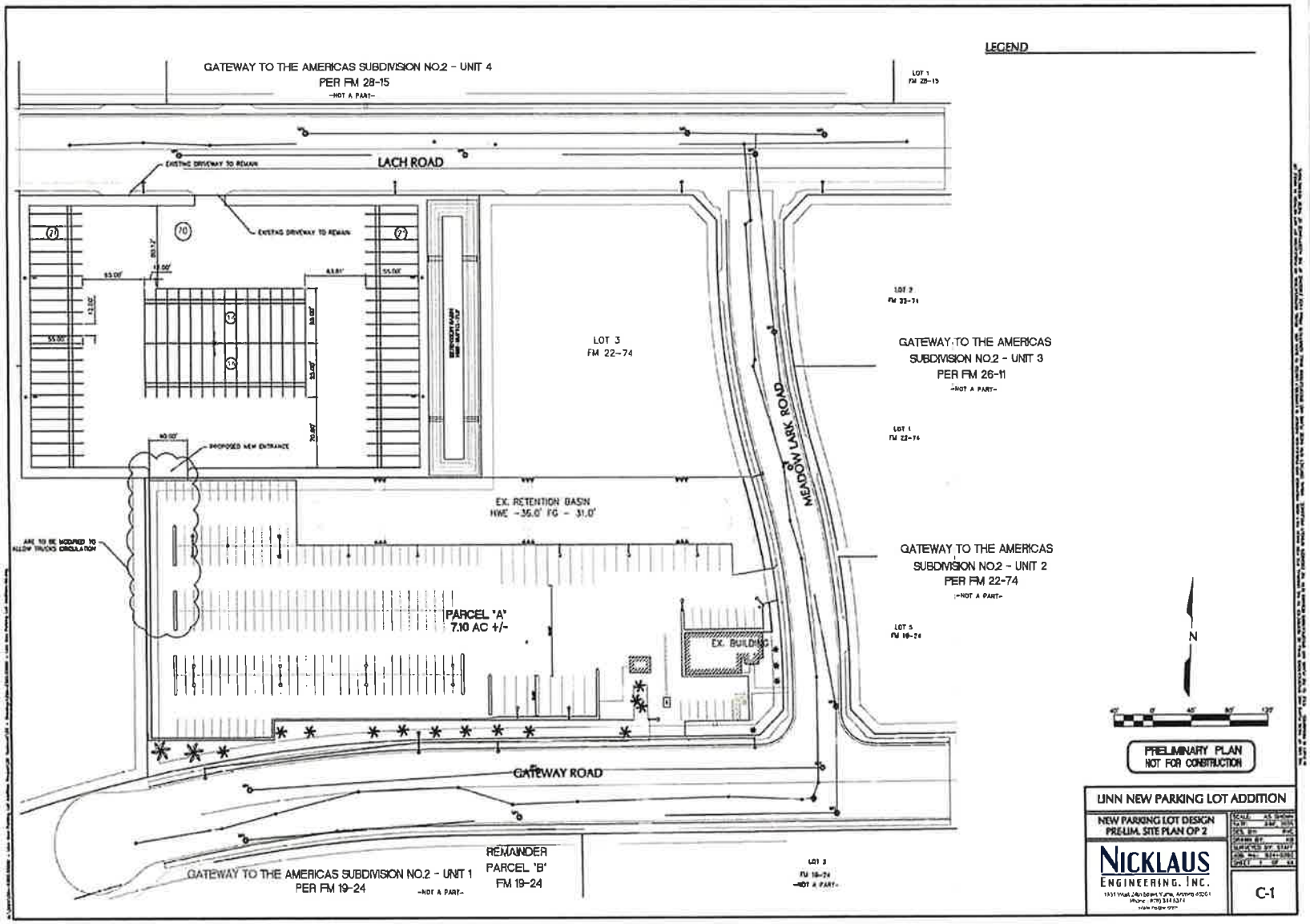


Figure 2—Site Plan

EEC ORIGINAL PKG

California has also set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Table 1 lists the current federal and state standards for each of these pollutants. Standards have been set at levels intended to be protective of public health. California standards are generally more restrictive than federal standards for each of these pollutants except lead and the eight-hour average for CO.

Table 1
Ambient Air Quality Standards

Pollutant	Average Time	California Standards	National Standards
Ozone (O_3)	1 hour	0.09 ppm	--
	8 hours	0.070 ppm	0.070 ppm
Carbon Monoxide (CO)	8 hours	9.0 ppm	9 ppm
	1 hour	20 ppm	35 ppm
Nitrogen Dioxide (NO_2)	Annual Average	0.030 ppm	0.053 ppm
	1 hour	0.18 ppm	100 ppb
Sulfur Dioxide (SO_2)	Annual Average	--	0.03 ppm
	24 hours	0.04 ppm	0.14 ppm
	1 hour	0.25 ppm	75 ppb
Respirable Particulate Matter (PM_{10})	24 hours	50 mg/m^3	150 mg/m^3
	Annual Arithmetic Mean	20 mg/m^3	--
Fine Particulate Matter ($PM_{2.5}$)	Annual Arithmetic Mean	12 mg/m^3	12 mg/m^3
	24 hours	--	35 mg/m^3
Sulfates	24 hours	25 mg/m^3	--
Lead	30-day Average	1.5 mg/m^3	--
	Calendar Quarter	--	1.5 mg/m^3
	3-month Rolling Average	--	0.15 mg/m^3
Hydrogen Sulfide	1 hour	0.03 ppm	--
Vinyl Chloride	24 hours	0.010 ppm	--

Notes:
ppm = parts per million
ppb – parts per billion
mg/m3 = micrograms per cubic meter
mg/m3 = milligrams per cubic meter
Source: California Air Resources Board 2016

Local control in air quality management is provided by the ARB through county-level or regional (multi-county) APCDs. The ARB establishes air quality standards and is responsible for control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The ARB has established 14 air basins statewide.

EEC ORIGINAL PKG

The project site is located within the Salton Sea Air Basin (Basin), which includes all of Imperial County and a portion of central Riverside County. Air quality conditions in the Imperial County portion of the Basin are under the jurisdiction of the Imperial County APCD (ICAPCD). The remainder in Riverside County is managed by the South Coast Air Quality Management District. The ICAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." Table 2 shows the attainment status for the Salton Sea Air Basin.

Table 2
Imperial County Air Quality Standard Attainment Status

Pollutant	CAAQS	NAAQS
Ozone (O_3)	Nonattainment	Nonattainment - Moderate
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Respirable Particulate Matter (PM_{10})	Nonattainment	Nonattainment - Serious
Fine Particulate Matter ($PM_{2.5}$)[1]	Unclassified[2]	Unclassified/Attainment
Nitrogen Dioxide (NO_2)	Attainment	Unclassified/Attainment
Lead (Pb)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Sulfates	Attainment	No Federal Standards
Vinyl Chloride	Unclassified	
Hydrogen Sulfide (H_2S)	Attainment	
Visibility Reducing Particles	Unclassified	

Source: County of Imperial, September, 2013
[1] Part of Imperial County is designated nonattainment for the NAAQS; however, the nonattainment area does not include the project location
[2] Insufficient data to designate area or designations have yet to be made

The Basin in which the project area is located, is designated non-attainment area for the federal and state standards for ozone and PM_{10}. The Basin is in attainment or unclassified for the remaining pollutants. Characteristics of the pollutants referenced above are described below.

Ozone. Ozone is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_x) and reactive organic gases (ROG)[1]. Nitrogen oxides are formed during the combustion of fuels, while reactive organic compounds are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

[1] *Organic compound precursors of ozone are routinely described by a number of variations of three terms: hydrocarbons (HC), organic gases (OG), and organic compounds (OC). These terms are often modified by adjectives such as total, reactive, or volatile, and result in a rather confusing array of acronyms: HC, THC (total hydrocarbons), RHC (reactive hydrocarbons), TOG (total organic gases), ROG (reactive organic gases), TOC (total organic compounds), ROC (reactive organic compounds), and VOC (volatile organic compounds). While most of these differ in some significant way from a chemical perspective, from an air quality perspective two groups are important: non-photochemically reactive in the lower atmosphere, or photochemically reactive in the lower atmosphere (HC, RHC, ROG, ROC, and VOC).*

EEC ORIGINAL PKG

Carbon Monoxide. Carbon monoxide is a local pollutant that is found in high concentrations only near the source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is automobile traffic. Elevated concentrations, therefore, are usually only found near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

Nitrogen Dioxide. Nitrogen dioxide (NO_2) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NOx. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

Suspended Particulates. PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads, and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates ($PM_{2.5}$) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Lead (Pb). Lead is a naturally occurring metal used in a variety of industrial and commercial applications. Historically, the majority of lead emissions were attributed to automobiles using leaded gasoline. As leaded gasoline has been phased out of use, lead emissions have dropped dramatically, and current primary sources are ore processing and aircraft that use leaded aircraft fuel. Lead exposure has been associated with learning disabilities and behavioral problems in children, kidney damage, and negative effects on the nervous and cardiovascular systems.

Sulfur Dioxide (SO_2). SO_2 is one of several highly reactive gasses known as oxides of sulfur (SOx) and is formed by burning fuel containing sulfur. Typical sources include emissions from

EEC ORIGINAL PKG

burning coal or oil at power plants and factories. Typical health effects associated with exposure to sulfur dioxide include respiratory illness and exacerbation of respiratory symptoms in people with asthma.

Sulfates. Sulfates are the fully oxidized ionic form of sulfur produced when sulfur dioxide is fully oxidized in the atmosphere. Sulfates are produced by emissions from automobiles, power plants, and industrial activity, and contribute to general atmospheric haziness. Typical health effects associated with exposure to sulfates include respiratory illness and an increased risk of cardio-pulmonary disease.

Vinyl Chloride. Vinyl chloride is an artificially created colorless gas with a mild, slightly sweet odor. The gas is used in the manufacture of vinyl products, including polyvinyl chloride (PVC) plastic. Vinyl chloride emissions are produced from the vinyl manufacturing process as well as from the breakdown of vinyl products in landfills and hazardous waste sites. The health effects associated with vinyl chloride include dizziness, headaches, and drowsiness from shortterm exposure, and liver damage and cancer resulting from long-term exposure. In 1990, the California Air Resources Board (CARB) designated vinyl chloride as a toxic air contaminant.

Hydrogen Sulfide (H_2S). H_2S is a naturally occurring, colorless gas that, at low concentrations, produces a distinctive rotten egg odor. At higher concentrations, the gas produces a sweet odor. The gas is produced through the bacteriological breakdown of organic materials as well as some types of geothermal activity. Health effects associated with H2S include exposure to a disagreeable odor, coughing, irritation to eyes, and impairment of the respiratory system.

Visibility Reducing Particles. Visibility reducing particles are particulate matter composed of many different substances that are suspended in the atmosphere and contribute to haze and diminished visibility.

Toxic Air Contaminants/Hazardous Air Pollutants. Toxic air contaminants (TACs), also known as hazardous air pollutants (HAPs), are a wide range of pollutants that may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazards to human health (CARB 2010). Health effects associated with TACs, including cancer, are typically the result of acute or repeated exposure to these pollutants.

TACs are emitted from a number of different sources, including industrial sources (e.g., refining, manufacturing, utilities, and mining) commercial sources (e.g., gas stations and dry cleaners) and diesel-fueled vehicles. Currently, both the EPA and the State of California have recognized nearly 200 different contaminants as TACs/HAPs. CARB has identified 10 specific pollutants as posing the greatest risk to human health based on ambient background levels in the state. These pollutants include: acetaldehyde (CH3CHO), benzene (C6H6), 1,3-butadiene (C4H6), carbon tetrachloride (CCl4), hexavalent chromium, para-dichlorobenzene (C6H4Cl2), formaldehyde (CH2O), methylene chloride (CH2Cl2), perchloroethylene (C2Cl4), and diesel particulate matter (DPM). The potential TACs of most concern that are associated with the proposed project are benzene (C6H6) and diesel particulate matter (DPM).

EEC ORIGINAL PKG

Benzene (C6H6). Benzene is a colorless, flammable liquid with a pleasant, sweet odor that evaporates quickly when exposed to air. Benzene is produced naturally through geothermal processes, as a component of petroleum and natural gas, and as a byproduct of burning wood and other plant matter. Anthropomorphic sources of benzene include use as an ingredient in solvents and as an additive to gasoline.

Diesel Particulate Matter (DPM). DPM is produced by the combustion of diesel fuel and is composed of a mixture of various gases and fine particulate matter (i.e., soot). CARB recognized the particulate matter in DPM as a TAC in 1998 based on its potential to cause cancer and contribute to other adverse health effects (CARB 2011). This TAC is the most prevalent of the 10 specific pollutants identified by CARB and poses the greatest health risk.

Odors. Odors are generally considered a nuisance rather than a health hazard and can lead to discomfort and distress among the general public. However, as the human nose is the only means by which odors can be detected, the ability to identify and qualify odors is highly subjective. Some people have a greater ability to detect odors from minute emissions of odor causing substances and may take offense at certain odors that are unnoticeable or considered pleasant by others. In addition, regular exposure to odor may cause desensitization, resulting in "odor fatigue," whereby once recognized odors go unnoticed unless there is a change in the odor's intensity. Odors produced as a result of geothermal energy production can include the sulfurous, rotten egg smell characteristic of emissions of hydrogen sulfide (H2S). Ammonia (NH3) is also produced and has a sharp and irritating odor. The combustion of diesel fuel to power construction or operations related equipment can produce odors due to the sulfur content of diesel fuel.

Regional Climate and Local Air Quality

The proposed project is located in Imperial County, the southeastern most county in California. Imperial County is one of the hottest and driest parts of California and is located in a low latitude desert characterized by hot, dry summers and relatively mild winters. Average annual precipitation within Imperial County is less than 3 inches. The normal maximum temperature in January is approximately 70 degrees Fahrenheit (°F), and the normal minimum temperature is approximately 41°F. In July, the normal maximum temperature can exceed 107°F, while the normal minimum temperature is approximately 75°F. Relative humidity in the summer is low, averaging 30 to 50 percent in the early morning and 10 to 20 percent in the afternoon. During the hottest part of the day, the relative humidity can drop below 10 percent. However, the effect of extensive agricultural operations in the widely-irrigated Imperial Valley tends to increase local humidity. The prevailing weather conditions promote intense heating during the day in summer with cooling at night. During the fall, winter, and spring, regional winds tend to come from the northwest. During the summer, winds tend to come from the southeast.

The ICAPCD operates a network of 5 ambient air monitoring stations throughout Imperial County. The purpose of the monitoring stations is to measure ambient concentrations of the pollutants to determine whether the ambient air quality meets the California and federal

EEC ORIGINAL PKG

standards. The air quality monitoring station located nearest to the project site is located at 1029 Ethel Street in Calexico (Calexico High School), approximately 5.2 miles west of the project site. Table 3 provides a summary of monitoring data at the El Centro for ozone and PM_{10}. As referenced, the Salton Sea Basin is a nonattainment area for these two pollutants. $PM_{2.5}$ data are also provided for reference purposes.

Both CARB and USEPA use this type of monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Unclassified is used in an area that cannot be classified on the basis of available information as meeting or not meeting the standards. If an area is redesignated from nonattainment to attainment, the CAA requires a revision to the SIP, called a maintenance plan, to demonstrate how the air quality standard will be maintained for 10 years.

Table 3
Ambient Air Quality Data

Pollutant	2022	2023	2024
Ozone, ppm - Worst Hour	0.083	0.087	0.095
Number of days of Federal exceedances (>0.070 ppm)*	6	22	29
Particulate Matter <10 microns, µg/m3 Worst 24 Hours	184.8	199.3	185.5
Number of samples of State exceedances (>50 µg/m3)	162	133	164
Number of samples of Federal exceedances (>150 µg/m3)	2	2	5
Particulate Matter <2.5 microns, µg/m3 Worst 24 Hours	41.9	40.5	59.1
Number of samples of State exceedances (>50 µg/m3)	5	1	9
Number of samples of Federal exceedances (>150 µg/m3)	5	1	9

Source: California Air Resources Board, 2022, 2023, 2024 Annual Air Quality Data Summaries available at https://www.arb.ca.gov/adam/topfour/topfour2.php

As shown, the state ozone standard was exceeded at the Calexico monitoring station 199 times during 2023. The state PM_{10} standard was exceeded 164 times in 2024. $PM_{2.5}$ exceedances were also reported during the previous three monitoring years.

Air Quality Management Plan

ICAPCD is the local air pollution control agency for Imperial County and the southern portion of the Salton Sea Air Basin. The ICAPCD has primary responsibility for ensuring that state and federal air quality standards are attained and maintained within the ICAPCD's jurisdiction. Thus, the ICAPCD is responsible for preparing clean air plans, issuing construction and operation permits, monitoring ambient air quality, as well as developing and implementing rules and regulations that govern air quality within Imperial County. The ICAPCD meets its regulatory responsibilities through the State of California State Implementation Plan (SIP). The ICAPCD adopted its first SIP in 1971 and has prepared updates to the SIP over the years. SIPs

EEC ORIGINAL PKG

for controlling PM_{10}, ozone, and a reasonably available control technology SIP are in place for Imperial County and constitute the Air Quality Attainment Plan (AQAP) for Imperial County.

A SIP revision for revised rules under ICAPCD Regulation VIII for fugitive dust PM_{10} was reviewed by EPA and the final rule was signed on March 27, 2013 and published in the Federal Register (Federal Register 2013). The ICAPCD adopted the rules on October 16, 2012, to regulate PM_{10} emissions from sources of fugitive dust (e.g., unpaved roads and disturbed soils in open and agricultural areas). CARB submitted these rules to EPA for approval on November 7, 2012; EPA proposed approval of these revisions to the ICAPCD portion of the California SIP on January 7, 2013. The ICAPCD developed the 2018 PM10 Plan and requested redesignation of Imperial County Planning Area as attainment. The 2018 SIP for PM10 was approved by CARB on December 13, 2018, and received EPA approval on October 19, 2020. ICAPCD adopted the 2013 $PM_{2.5}$ plan on December 2, 2014. The plan was transmitted to CARB on December 9, 2014. CARB reviewed and approved the plan on December 18, 2015, as a revision to the California State Implementation Plan for Imperial County. The plan was submitted to the U.S. EPA on January 9, 2015, and is pending approval.

Rules and regulations promulgated by the ICAPCD and in the SIP revision applicable to the proposed project include the following:

- ICAPCD Rule 207.C.1, New and Modified Stationary Source Review (best available control technologies [BACT]), requires that any new or modified emissions unit that has a potential to emit 25 pounds per day or more of any nonattainment pollutant or its precursors, or 55 pounds per day of H_2S, must include BACT as a part of the project.

- ICAPCD Rule 400, Nuisances, forbids the emission of air contaminants or other materials that would cause a nuisance to the public, including non-agricultural related odors.
- ICAPCD Rule 800 General Requirements for Control of Fine Particulate Matter (PM-10), requires actions to prevent, reduce, or mitigate PM-10 emissions from anthropogenic (man-made) Fugitive Dust (PM-10) sources generated within Imperial County.

- ICAPCD Regulation VIII, Rule 801 (Construction and Earthmoving Activities) establishes a 20 percent opacity limit, requires the implementation of a dust management control plan for all nonresidential projects of 5 acres or more, and requires compliance with other portions of Regulation VIII regarding bulk materials (Rule 802), carry-out and track-out (Rule 803), and paved and unpaved roads (Rule 805). The rule exempts single-family homes and waives the 20 percent opacity limit in winds over 25 miles per hour (mph) under certain conditions.

EEC ORIGINAL PKG

- ICAPCD Rule 804 Open Areas, requires actions to prevent, reduce or mitigate the amount of fine Particulate Matter (PM-10) emissions generated from Open Areas. Open areas are defined as any open area having 0.5 acres or more within urban areas, or 3.0 acres or more within rural areas; and contains at least 1,000 square feet of disturbed surface area.

- ICAPCD Rule 310 Operstional Development Fee, has been adopted by the ICAPCD as a sound method for mitigating the emissions produced from the operations of new development projects throughout the County of Imperial. All project proponents have the option of either providing off-site mitigation or paying an Operational Development Fee.

- ICAPCD Rule 428 Wood Burning Applicances, has been adopted by ICAPCD to limit emissions of particulate matter from wood burning appliances. Effective 04/12/2019, no person shall sell, offer for sale, supply, install, or transfer a new wood burning appliance unless it: is a wood heater that complies with New Source Performance Standards (NSPS) certification requirements in effect at the time of installation, has a permanently affixed label certifying compliance with NSPS certification requirements in effect at the time of installation, or a U.S. EPA-Qualified Fireplace.

- Rule 400.6 Natural Gas Water Heaters, has been adopted by ICAPCD to limit oxides of nitrogen emissions from natural gas-fired water heaters. This rule shall apply to manufacturers, distributors, retailers, and installers of natural gas-fired Water Heaters with heat input less than 75,000 British Thermal Units per hour, unless exempted pursuant to Section E of this rule.

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. The nearest receptors are single-family residences located west of Anderholt Road, approximately 1.5 miles west of the site. The Imperial Regional Detention Facility is located approximately 0.4 miles west of the site at 1572 Gateway Road.

EEC ORIGINAL PKG

AIR QUALITY IMPACT ANALYSIS

Methodology and Significance Thresholds

This air quality analysis conforms to the methodologies recommended in the ICAPCDs *CEQA Air Quality Handbook* (amended November 2007). The handbook includes thresholds for emissions associated with both construction and operation of proposed projects. All emissions associated with construction vehicle and equipment operations were calculated using the California Emissions Estimator Model (CalEEMod) software version 2022.1. As referenced, construction emissions would be associated with clearing, grading, excavation and construction of the buildings, paving and application of architectural coatings (i.e., paint). These emissions would consist of diesel exhaust and dust emissions. Construction equipment that would generate criteria air pollutants includes excavators, graders, dump trucks, and loaders used during the construction. It was assumed that all construction equipment used would be diesel-powered. Construction emissions associated with development of the proposed project by estimating the types of equipment (including the number) that would be used on-site during each of the construction phases and scope of improvements required to implement the project as defined herein.

To determine whether construction of the project would cause a regional air quality impact. The increase in emissions would be compared with the ICAPCD's recommended regional thresholds for operational emissions.

Regional Thresholds. Based on Appendix G of the *CEQA Guidelines*, a project would have a significant air quality impact if it would:

a) *Conflict with or obstruct implementation of the applicable air quality plan;*

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

c) *Expose sensitive receptors to substantial pollutant concentrations; or*

d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

a. Conflict with or obstruct implementation of the applicable air quality plan;

A project may be inconsistent with the SIP or related AQAP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQAP. As referenced, the ICAPCD meets its regulatory responsibilities through the State of California SIP. The ICAPCD adopted its first SIP in 1971 and has prepared updates to the SIP over the years. SIPs for controlling PM_{10}, ozone, and a reasonably available control technology SIP are in place for Imperial County and constitute the AQAP for Imperial County.

EEC ORIGINAL PKG

The ICAPCD air quality plans aim to reduce emissions of criteria pollutants for which the region is in nonattainment by establishing a program of rules and regulations directed at reducing air pollutant emissions and achieving state and national air quality standards.

As described herein, the proposed project would not generate emissions in excess of the ICAPCD thresholds. No housing would be provided and no additional employees would be required to manage the parking lot. The project would be required to comply with applicable ICAPCD rules, regulations, and requirements for minimizing emissions. Impacts would be less than significant under threshold a.

b. ***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?***

New development with a potential to emit criteria pollutants below significance levels defined by the ICAPCD is referred to as a "Tier I project," and is considered by the Imperial County APCD to have less than significant potential adverse impacts on local air quality. For Tier I projects, the project proponent should implement a set of feasible "standard" mitigation measures (determined by the Imperial County APCD) to reduce the air quality impacts to less than significant. A "Tier II project" is one whose emissions exceed any of the thresholds. Its impact is significant and the project proponent should select and implement all feasible "discretionary" mitigation measures (as determined by the Imperial County APCD) in addition to the standard measures. Tier I and Tier II thresholds are shown in Table 4.

Table 4
ICAPCD Tier I and Tier II Daily Operational Thresholds

Pollutant	Tier I	Tier II
NOx and ROG	Less than 137 lbs/day	Greater than 137 lbs/day
PM_{10} and SOx	Less than 150 lbs/day	Greater than 150 lbs/day
CO and $PM_{2.5}$	Less than 550 lbs/day	Greater than 550 lbs/day
ROG = reactive organic gas; NOX = oxides of nitrogen; CO = carbon monoxide; PM10 = particulate matter with an aerodynamic diameter 10 microns or less; lbs/day = pounds per day SOURCE: Imperial County APCD 2017		

The ICAPCD has developed specific quantitative thresholds that apply to short-term construction activities and project operation (see ICAPCD 2017 CEQA Handbook, Table 1, Page 10) The thresholds are shown in Table 5.

Table 5
ICAPCD Daily Emission Thresholds

Pollutant	Construction (pounds/day)	Operation (pounds/day)
Reactive Organic Gases	75	137
Nitrogen Oxide	100	137

EEC ORIGINAL PKG

Carbon Monoxide	550	550
Particulate Matter 10	150	150
Particulate Matter 2.5	N/A	55*
Sulfur Oxides	N/A	150

Source: ICAPCD CEQA Handbook, 2007

Note: The ICAPCD has not adopted a significance threshold for operational or construction related emission of PM2.5 or construction related emissions of SOx. Recent projects in the ICAPCD have used a PM2.5 threshold for operation emissions of 55 pounds per day based on the SCAQMD's Final Methodology to Calculate PM2.5 and PM2.5 Significance Thresholds (SCAQMD 2006).
NA = Construction thresholds for PM2.5 and SOx are not applicable.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles. Construction would generally consist of site preparation, grading and excavation to prepare the development pad, placement of paving and striping, fencing and installation of lighting and related improvements. For modeling purposes, it was assumed that 1,080 cubic yards of soil would be exported from the site. Construction emission estimates are shown in Table 6 for each phase.

Table 6
Estimated Maximum Daily Construction Emissions

Construction Phase	Maximum Emissions (lbs/day)					
	ROG	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
Construction – 2026	1.1	11.7	11.1	0.03	6.5	3.1
ICAPCD Regional Thresholds	*75*	*100*	550	*No Standard*	*150*	*No Standard*
Threshold Exceeded	**No**	**No**	**No**	**No**	**No**	**No**

Summer emissions shown

The emissions shown in Table 6 assume exposed soil areas would be watered twice daily to control fugitive dust emissions. To minimize fugitive dust and general construction emissions, the applicant would be required to implement fugitive dust control measures per ICAPCD Rules 801 and 804 as referenced herein. The fugitive dust control plan and related requirements to control fugitive dust emissions during construction are addressed as follows and assumed to be conditions of approval for the project:

> **Condition of Approval AQ-1:** Prior to commencing construction, the project applicant will be required to submit a Dust Control Plan to the ICAPCD for approval. The Dust Control Plan will identify all sources of PM_{10} emissions and associated mitigation measures during the construction and operational phases (see Rule 801 F.2). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust

EEC ORIGINAL PKG

emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standard for dust control and address the following parameters:

- All disturbed areas, including bulk material storage that is not being actively used, shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material, such as vegetative groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or inorganic material consisting of or containing particulate matter with 5 percent or greater silt content. For modeling purposes, it was assumed that watering would occur twice daily.

- All on-site unpaved roads segments or areas used for hauling materials shall be effectively stabilized. Visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by restricting vehicle access, paving, application of chemical stabilizers, dust suppressants and/or watering.

- The transport of bulk materials on public roads shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material, prior to using the trucks to haul material on public roadways.

- All track-out or carry-out on paved public roads, which includes bulk materials that adhere to the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto the pavement, shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.

- Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line except where such material or activity is exempted from stabilization by the rules of ICAPCD.

Each project proponent shall implement all applicable standard measures for construction combustion equipment for the reduction of excess NOx emissions as contained in the Imperial County CEQA Air Quality Handbook and associated regulations. These measures include:

- Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.

EEC ORIGINAL PKG

- Minimize idling time, either by shutting equipment off when not in use or reducing the time of idling to five minutes at a maximum.

- Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner).

- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways.

- Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts).

With implementation of condition of approval AQ-1, construction related impacts would be less than significant. No mitigation would be required.

Construction-Related Toxic Air Contaminant Impacts

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. Health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". The California Office of Environmental Health Hazard Assessment (OEHHA) health risk guidance states that a residential receptor should be evaluated based on a 30-year exposure period. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 or 70 year) exposure to a substantial source of toxic air contaminant emissions; and thus, would not be exposed to the related individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project.

Construction-Related Odor Impacts

Potential sources of odor during construction activities include equipment exhaust and activities such as paving. The objectionable odors that may be produced during the construction process would occur periodically and end when construction is completed. No significant impact related to odors would occur during construction of the proposed project per threshold (d) referenced above.

EEC ORIGINAL PKG

Long-Term Regional Impacts

Regional Pollutant Emissions

An analysis of maximum daily emissions during operation was conducted to determine if emissions would exceed the daily thresholds for any pollutant of concern. The maximum daily operational emissions would occur at project buildout. Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), and area sources including landscape equipment and architectural coating emissions as the structures are repainted over the life of the project. Modeling assumed that no fireplaces or wood burning stoves would be installed withing the residential units.

Motor Vehicle Emissions. Motor vehicle emissions refer to exhaust and road dust emissions from the automobiles that would travel to and from the project site. Project trip generation rates were obtained from the applicant and assumes 15 heavy truck/trailer trips daily. The vehicle fleet mix is defined as the mix of motor vehicle classes active during the operation of the project. Emission factors are assigned to the expected vehicle mix as a function of vehicle class, speed, and fuel use (gasoline and diesel-powered vehicles). In this case, it was assumed that all vehicles accessing the site would be heavy trucks. The CalEEMod 2022.1 trip rates were adjusted to match the project trip generation rates. The default fleet mix was used for all calculations.

Architectural Coatings (Painting). Paints release VOC emissions during application and drying. The parking lot would be restriping on occasion. The project is required to comply with the ICAPCD Rule 424—Architectural Coatings. The rule required flat paints to meet a standard of 100 g/l for non-flat coatings and 150 g/l for traffic/pavement markings.

Landscape Equipment. This category assumes use of equipment including lawnmowers/trimmers, blowers and related maintenance equipment. Default emission rates developed for CalEEMod were used for modeling purposes.

Electricity. Electricity used by the project (for lighting, etc.) would result in emissions from the power plants that would generate electricity distributed on the electrical power grid. Electricity emissions estimates are only used in the GHG analysis. CalEEMod was used to estimate these emissions from the project.

Solid Waste. GHG emissions would be generated from the decomposition of solid waste generated by the project. CalEEMod was used to estimate the GHG emissions from this source.

Table 7 summarizes emissions associated with project operation. Daily PM10 emissions are reflective of the fleet mix. As stated, it was assumed that 100 percent of the fleet accessing the site would be heavy trucks. As shown, daily emissions would not exceed the ICAPCD standards for pollutants modeled.

EEC ORIGINAL PKG

Table 7
Estimated Operational Emissions

Proposed Project	Estimated Emissions (lbs/day)					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile, Area and Energy						
Operational Emissions	0.02	0.78	0.02	0.006	74.2	7.4
ICAPCD Thresholds	**137**	**137**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Summer emissions shown.

c. Expose sensitive receptors to substantial pollutant concentrations

Construction-Related Toxic Air Contaminant Impacts. The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project and truck traffic. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the short-term phased construction schedule, the proposed project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and related individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project phases or components of each phase as they are proposed.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The State of California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700, SCAQMD Rule 403, and City of Perris Municipal Code Section 19.44.070, commonly referred to as public nuisance law, prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Projects required to obtain permits from SCAQMD are evaluated by staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.
SCAQMD Rule 402 (Public Nuisance) also prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that involves a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. Odor issues are very subjective by the nature of odors themselves and because measurements are difficult to quantify. As a result, this guideline is qualitative and focuses on the existing and potential surrounding uses and location of sensitive receptors.

EEC ORIGINAL PKG

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints. Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to exhaust emissions, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with other emissions (such as those leading to odors) adversely affecting a substantial number of people during construction would be less than significant.

Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities. The project would construct and operate a new parking lot. This use is not associated with emissions (such as those leading to odors) adversely affecting a substantial number of people that could rise to the level of significance. Therefore, impacts would be **less than significant** per threshold (d).

GREENHOUSE GAS EMISSIONS

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6) (California Environmental Protection Agency [CalEPA], 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, methane (CH_4) has a GWP of 28, meaning its global warming effect is 28 times greater than carbon dioxide on a molecule per molecule basis (IPCC, 2014).

EEC ORIGINAL PKG

The largest source of GHG in California is transportation, contributing 39.9 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 21 percent of the state's GHG emissions. California emissions result in part to its geographic size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. In July 2017, California's state legislature passed Assembly Bill (AB) 398 to reauthorize and extend until 2030 the state's economy-wide GHG reduction program. California has established a GHG target of at least 40% below the 1990 level of emissions by 2030.

California Regulations

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 states that by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent of 1990 levels (CalEPA, 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA, 2006). The 2006 CAT Report recommended various strategies that the state could pursue to reduce GHG emissions. These strategies could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture.

Assembly Bill 32 and CARB's Scoping Plan
To further the goals established in EO S-3-05, the Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, CARB is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources. This program is used to monitor and enforce compliance with established standards. CARB also is required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.
In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_2E). CARB's adoption of this limit is in accordance with Health and Safety Code, Section 38550.

Further, in 2008, CARB adopted the Scoping Plan in accordance with Health and Safety Code Section 38561. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various emission sources/sectors to 1990

EEC ORIGINAL PKG

levels by 2020. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction features by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards;
2. Achieving a statewide renewable energy mix of 33%;
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions;
2. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
3. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
4. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In the Scoping Plan (CARB 2008), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5% from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020) absent GHG reducing laws and regulations (referred to as Business-As-Usual (BAU)). To calculate this percentage reduction, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards.

In the 2011 Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (CARB 2011a), CARB revised its estimates of the projected 2020 emissions level in light of the economic recession and the availability of updated information about GHG reduction regulations. Based on the new data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7% (down from 28.5%) from the BAU conditions. When the 2020 emissions level projection was updated to account for newly implemented regulatory measures, including Pavley I (model years 2009– 2016) and the Renewables Portfolio Standard (RPS) (12% to 20%), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16% (down from 28.5%) from the BAU conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update; CARB 2014). The stated purpose of the First Update is to "highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to

EEC ORIGINAL PKG

80% below 1990 levels by 2050" (CARB 2014). The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels needed to stay on track to reduce emissions to 80% below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050" (CARB 2014). Those six areas are (1) energy, (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure), (3) agriculture, (4) water, (5) waste management, and (6) natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate achievement of EO S-3-05's 2050 reduction goal (CARB 2014).

Based on CARB's research efforts presented in the First Update, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050" (CARB 2014). Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level using more recent GWPs identified by the IPCC. Using the recalculated 1990 emissions level (431 MMT CO_2E) and the revised 2020-emissions-level projection identified in the 2011 Final Supplement, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of approximately 15% (instead of 28.5% or 16%) from the BAU conditions (CARB 2014).

In January 2017, CARB released, *The 2017 Climate Change Scoping Plan Update* (Second Update; CARB 2017b), for public review and comment. This update proposes CARB's strategy for achieving the state's 2030 GHG target as established in Senate Bill (SB) 32 (discussed below), including continuing the Cap-and-Trade Program through 2030, and includes a new approach to reduce GHGs from refineries by 20%. The Second Update incorporates approaches to cutting short-lived climate pollutants (SLCPs) under the Short-Lived Climate Pollutant Reduction Strategy (a planning document that was adopted by CARB in March 2017), acknowledges the need for reducing emissions in agriculture, and highlights the work underway to ensure that California's natural and working lands increasingly sequester carbon. During development of the Second Update, CARB held a number of public workshops in the Natural and Working Lands, Agriculture, Energy, and Transportation sectors to inform development of the 2030 Scoping Plan Update (CARB 2016). The Second Update has not been considered by CARB's Governing Board at the time this analysis was prepared.

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard ("LCFS") for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.

EEC ORIGINAL PKG

Other regulations affecting state and local GHG planning and policy development are summarized as follows:

Assembly Bill 939 and Senate Bill 1374
Assembly Bill 939 (AB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills.

Senate Bill 1368
SB 1368 required the California Public Utilities Commission (CPUC) to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007 and for local publicly owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas-fired plant. Furthermore, the legislation states that all electricity provided to the State, including imported electricity, must be generated by plants that meet the standards set by CPUC and California Energy Commission (CEC).

Senate Bill 97
Senate Bill 97 (SB 97) was adopted August 2007 and acknowledges that climate change is an environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify and adopt those guidelines by January 1, 2010. On December 30, 2009, the Natural Resources Agency adopted amendments to the CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided and no specific mitigation measures were identified. The GHG emission reduction amendments went into effect on March 18, 2010 and are summarized below:

1. Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.

2. Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines,

EEC ORIGINAL PKG

OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.

3. When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.

4. New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.
5. OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."

6. OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.

7. Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

Senate Bills 1078, 107, and X1-2 and Executive Orders S-14-08 and S-21-09
Senate Bill 1078 (SB 1078) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. Senate Bill 107 (SB 107) changed the target date to 2010. Executive Order S-14-08 was signed on November 2008 and expands the State's Renewable Energy Standard to 33 percent renewable energy by 2020. Executive Order S-21-09 directed CARB to adopt regulations by July 31, 2010, to enforce S-14-08. Senate Bill X1-2 codifies the 33 percent renewable energy requirement by 2020.

California Code of Regulations (CCR) Title 24, Part 6
CCR Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

The 2022 Title 24 standards are the currently applicable building energy efficiency standards. These standards became effective on January 1, 2023. The 2022 Title 24 Building Energy Efficiency Standards will further reduce energy used and related GHG emissions compared to prior standards.

EEC ORIGINAL PKG

On August 11, 2021, the CEC adopted the 2022 Energy Code. In December 2021, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

Senate Bill 375

SB 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations are then responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, a metropolitan planning organization must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. Pursuant to California Government Code Section 65080(b)(2)(K), an SCS does not regulate the use of land; supersede the land use authority of cities and counties; or require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

In 2010, CARB adopted the SB 375 targets for the regional metropolitan planning organizations. The targets adopted for SANDAG in 2010 are a 7% reduction in per-capita passenger-vehicle GHG emissions by 2020 and a 13% reduction by 2035, measured relative to 2005 GHG emissions. In 2018, CARB adopted the second round of SB 375 reduction targets, and increased SANDAG's 2020 target to a 15% reduction in per-capita passenger-vehicle GHG emissions, and the 2035 target to a 19% reduction using the same 2005 baseline.

Senate Bill X7-7

Senate Bill X7-7 (SB X7-7), enacted on November 9, 2009, mandates water conservation targets and efficiency improvements for urban and agricultural water suppliers. SB X7-7 requires the Department of Water Resources (DWR) to develop a task force and technical panel to develop alternative best management practices for the water sector. Additionally, SB X7-7 required the DWR to develop criteria for baseline uses for residential, commercial, and industrial uses for both indoor and landscaped area uses. The DWR was also required to develop targets and regulations that achieve a statewide 20 percent reduction in water usage.

EEC ORIGINAL PKG

California Green Building Standards

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25402(b)(1)). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402(d)) and cost effectiveness (California Public Resources Code, Sections 25402(b)(2) and (b)(3)). These standards are updated to consider and incorporate new energy efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2019 Title 24 building energy efficiency standards and became effective on January 1, 2020 and addressed lighting, heating, cooling, ventilation, and water heating standards. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards and strengthens ventilation standards.

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as "CALGreen," and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards initially took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings and schools and hospitals. The CALGreen 2019 standards became effective on January 1, 2020. The CALGreen 2022 standards are the most current and became effective January 2023. The 2025 standards became effective on January 1, 2026. The 2025 standards focus on increased electric vehicle (EV) charging requirements, stricter embodied carbon considerations and enhanced energy efficiency through heat pump technology. The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings;

EEC ORIGINAL PKG

- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water
- Efficient Landscape Ordinance;
- Diversion of 65% of construction and demolition waste from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations; and
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle board.

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements, stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 75% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs (24 CCR Part 11).

The California Public Utilities Commission, CEC, and CARB also have a shared, established goal of achieving zero net energy (ZNE) for new construction in California. The key policy timelines include the following: (1) all new residential construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030 (CPUC 2013).[2] As most recently defined by the CEC in its 2015 Integrated Energy Policy Report., a ZNE code building is "one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building" using the CEC's Time Dependent Valuation metric.

In November 2022, CARB released a proposal to set new targets for renewable energy, clean buildings, carbon removal, and clean fuels in the transportation sector. If adopted by CARB, this plan will implement actions to build out a 100% clean energy grid, achieve carbon neutrality by 2045.

Title 20

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air

[2] It is expected that achievement of the ZNE goal will occur through revisions to the Title 24 standards.

EEC ORIGINAL PKG

conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050 as set forth in EO S-3-05. To facilitate achievement of this goal, EO B-30-15 calls for an update to CARB's Scoping Plan to express the 2030 target in terms of MMT CO2E. EO B-30-15 also calls for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, make changes to CARB's membership, increase legislative oversight of CARB's climate change–based activities, and expand dissemination of GHG and other air quality–related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state's climate policies. AB 197 added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

SB 350— Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50 percent

EEC ORIGINAL PKG

reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

1. Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.

2. Double the energy efficiency in existing buildings by 2030. This target will be achieved through the CPUC, the CEC, and local publicly-owned utilities.

3. Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

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

Executive Order B-55-18
On September 10, 2018, Governor Brown signed Executive Order B-55-2018 which established a new statewide goal to achieve carbon neutrality as soon as possible and no later than 2045. The executive order also states that California will achieve and maintain net negative emissions thereafter.

AB 2127
AB 2127 promotes better planning for EV infrastructure build-out across all vehicle classes. AB 2127 would help the state meet the goal of 5 million zero-emission vehicles (ZEV) on the road by 2030.

Local Regulations and CEQA Requirements
Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents but contain no suggested thresholds of significance for GHG emissions. Instead, lead agencies are given the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing

EEC ORIGINAL PKG

California legislation adopted to reduce statewide GHG emissions needed to move the state towards climate stabilization. If a project would generate GHG emissions above the threshold level, its contribution to cumulative impacts would be considered significant.

The California Supreme Court addressed the issue of GHG emissions and the evaluation of potential impacts in CEQA documents, in the Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming case, (2015) 224 Cal.App.4th 1105 (CBD vs. CDFW), also known as the "Newhall Ranch" case. The justices examined one of the most common approaches to GHG analyses for development projects which was evaluating the efficiency of a project's emissions reduction in the context of the AB 32's 2020 reduction goal, as presented in the statewide CARB Scoping Plan, using a comparison to an unregulated, "business as usual (BAU)" emissions scenario. As discussed in the Newhall Ranch decision, determining consistency with local GHG reduction plans or Climate Action Plans that qualify under Section 15183.5 of the CEQA Guidelines may be the most effective strategy for local governments to assess the significance of GHG emissions from proposed land development projects. Qualified CAPs also provide a workable option for addressing post-2020 GHG emissions and resolving issues that arise out of project-level GHG analyses raised in the Court's decision.

The Imperial County Transportation Commission adopted a Climate Action Plan (June 2021); however, no specific quantitative thresholds are provided to evaluate whether specific projects would have adverse impacts with respect to GHG emissions. As stated in Section 15064.7(c) of the CEQA Guidelines, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the lead agency's decision is supported by substantial evidence. Thus, in the absence of any GHG emissions significance thresholds, the projected emissions are compared to the SCAQMD numeric threshold of 3,000 metric tons of CO2e (carbon dioxide equivalent) annually. This threshold is also appropriate as the SCAQMD GHG thresholds were formulated based on similar geography and climate patterns as found in Imperial County and are used for determining the significance of GHG emissions in the Riverside County portion of the Salton Sea Air Basin, the air basin where the project is located.

Therefore, the 3,000 metric ton of CO2e threshold is appropriate for analysis of the proposed project. The project is also evaluated for consistency with regulations or requirements adopted by the 2017 CARB Climate Change Scoping Plan and 2022 Scoping Plan Update. GHG emissions were modeled using CalEEMod 2022.1, the statewide land use emissions computer model designed to estimate air and GHG emissions associated with both construction and operations from land development projects.

CLIMATE CHANGE IMPACT ANALYSIS

Thresholds of Significance

Pursuant to the requirements of SB 97, the Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions

EEC ORIGINAL PKG

in March 2010. These guidelines are used in evaluating the cumulative significance of GHG emissions from the proposed project. According to the adopted CEQA Guidelines, impacts related to GHG emissions from the proposed project would be significant if the project would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355).

Methodology

GHG emissions associated with construction and operation of the proposed project and existing development have been estimated using California Emissions Estimator Model (CalEEMod) version 2022.1.

Construction Emissions

Construction of the proposed project would generate temporary GHG emissions primarily associated with the operation of construction equipment, worker trips and truck trips required for hauling excavation spoils, materials and equipment. Site preparation and grading typically generate the greatest emission quantities because the use of heavy equipment is greatest during this phase of construction. Emissions associated with the construction period were estimated based on the projected maximum amount of equipment that would be used on-site at one time. Air districts such as the SDAPCD have recommended amortizing construction-related emissions over a 30-year period to calculate annual emissions. Complete CalEEMod results and assumptions can be viewed in Appendix A.

Operational Emissions

Default values used in CalEEMod version 2022.1 are based on the California Energy Commission (CEC) sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies. CalEEMod provides operational emissions of CO_2, N_2O and CH_4. This methodology has been subjected to peer review by numerous public and private stakeholders, and in particular by the CEC; and therefore, is considered reasonable and reliable for use in GHG impact analysis pursuant to CEQA. It is also recommended by CAPCOA (January 2008).

EEC ORIGINAL PKG

Emissions associated with area sources (i.e., consumer products, landscape maintenance, and architectural coating) were calculated in CalEEMod based on standard emission rates from CARB, USEPA, and district supplied emission factor values (CalEEMod User Guide, 2022). Emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CalEEMod User Guide, 2022). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle). The proposed project is expected to generate minimal area source or solid waste disposal emissions

Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California. Emissions from mobile sources were based on trip generation data provided by the applicant.

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

Construction Emissions

The construction activity analysis is based on the anticipated construction period shown in Table 8 below. Based on CalEEMod results, construction activity would generate an estimated 73 metric tons of carbon dioxide equivalent (CO_2E Amortized over a 30-year period (the assumed life of the project), construction of each phase would generate a combined total of 2 metric tons of CO_2E per year.

Table 8
Estimated Construction Related Greenhouse Gas Emissions

Year	Annual Emissions (metric tons CO_2E)
2026	73
Amortized over 30 years	**2**

See Appendix for CalEEMod software program output

Operational Indirect and Stationary Direct Emissions

Long-term emissions relate to energy use, solid waste, water use, and transportation. Each source is discussed below and includes the emissions anticipated emissions that would result from the proposed project.

Energy Use. Operation would consume electricity (see Appendix A for CalEEMod results). The generation of electricity through combustion of fossil fuels typically yields CO_2, and to a smaller

EEC ORIGINAL PKG

extent, N_2O and CH_4. As shown in Table 9, the combined net increase in energy use at the project site would result in approximately 5 metric tons of CO_2E per year.

Water Use Emissions/Solid Waste. The project would require a minimal amount of water for cleaning/maintenance purposes. Based on the amount of electricity needed to supply and convey water demand for the project and emissions generated by the disposal of solid waste, as shown in Table 10, unmitigated, the Project would generate 1 metric tons of CO_2E per year.

Table 9
Estimated Annual Energy-Related Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Electricity	5
Natural Gas	0
Combined Total	**30**

See Appendix for CalEEMod software program output

Table 10
Estimated Annual
Solid Waste and Water Use Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Water	1 metric tons
Solid Waste	0 metric tons
Total Water and Solid Waste	**1 metric tons**

See Appendix for CalEEMod software program output

Transportation Emissions. Mobile source GHG emissions were estimated using modified trip generation rates provided by the applicant. Table 11 shows the estimated mobile GHG emissions. The Project would generate approximately 114 metric tons of CO_2E associated with mobile sources.

Table 11
Estimated Annual Mobile Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2E)
Mobile	114 metric tons
Total	**114 metric tons**

See Appendix for CalEEMod software program output.

EEC ORIGINAL PKG

Combined Construction, Stationary and Mobile Source Emissions

Table 12 combines construction, operational, and mobile GHG emissions associated with the proposed project. The Project would generate approximately 122 metric tons of CO2E annually. The proposed project is evaluated based on the threshold of 3,000 MT CO_2E annually. As shown, GHG emissions would not exceed the 3,000 metric ton screening threshold. GHG emissions would be less than significant per threshold a.

Table 12
Combined Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Construction	2
Operational	
Energy	5 metric tons
Water/Solid Waste	1 metric tons
Area Sources	0 metric ton
Refrigerants	0 metric tons
Mobile	114 metric tons
Combined Total	**122**

See Appendix for CalEEMod software program output.

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

As stated, the County of Imperial does not have a Climate Action Plan and the Imperial County Transportation Commission June 2021 Climate Action Plan does not provide GHG emission thresholds for use in determining impacts for CEQA purpose. However, as stated, the project would not exceed the 3,000 metric ton annual GHG standard. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at the statewide level; as such, compliance at the Project level is not addressed. The proposed project would not conflict with statewide plans and regulations. The following summarizes project consistency with Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy and the 2017 CARB scoping plan and 2022 Scoping Plan Update.

Connect SoCal 2020-2045 RTP/SCS Consistency. On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), and the addendum to the Connect SoCal Program Environmental Impact Report. Connect SoCal is a long-range visioning plan

EEC ORIGINAL PKG

that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern California residents within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

Further, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG emission reduction goals and federal CAA requirements. The project would utilize the existing street network for primary access to the project site. The project would not conflict with plans to integrate the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The project does not involve any improvements to the regional transportation system. The project would be consistent with or would not conflict with any of the goals identified in Connect SoCal.

SB 32/2017 Scoping Plan Consistency. The 2017 Scoping Plan Update reflects the statewide 2030 target of a 40% reduction in GHG emissions below 1990 levels, set by EP B-30-15 and codified by SB 32. Table 13 summarizes the Project's consistency with applicable action elements of the 2017 Scoping Plan.

Table 13
2017 Scoping Plan Consistency Summary

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	California Public Utility Commission (CPUC), California Energy Commission (CEC) and California Air Resources Board (CARB)	**No Conflict.** The Project would use energy from the Imperial Irrigation District (IID). IID has met or exceed the renewable portfolio standard of 33% by 2020. The Project would not interfere with or obstruct IID's energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		**No Conflict.** The Project would be constructed in compliance with current CBC requirements including the 2019 Building and Energy Efficiency Standards and the applicable 2025 California Green Building Standard requirements or those requirements in place at the time the project is submitted for design review.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource		

EEC ORIGINAL PKG

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plugin hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, Office of Planning and Research (OPR), Local Agencies	**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project must comply with the standards as applicable; and thus, would comply with the strategy.
At least 4.2 million zero emission and plugin hybrid light-duty EVs by 2030.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, Office of Planning and Research (OPR), Local Agencies	**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean		**Not Applicable.** This measure is not related to the project scope.

EEC ORIGINAL PKG

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.		
Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		**No Conflict.** The majority of all project trips would be new trips. If the project triggers a VMT reduction strategy, then one would be prepared as part of the overall traffic impact evaluation process.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	**No Conflict.** The project would not exceed the ICAPCD GHG emission standards and would implement all applicable code requirements to reduce GHG emissions as conditions of approval. The project would not conflict with GHG reduction efforts.

EEC ORIGINAL PKG

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	**No Conflict.** The project would not conflict with use of adjacent streets by pedestrians, bicycles or transit service provided by Imperial Valley Transit.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, California Transportation Commission (CTC), OPR, SGC, CARB	**Not Applicable.** This measure is not related to the project scope.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, California Natural Resource Agency (CNRA), CARB, Caltrans, CEC, GO-Biz	**No Conflict.** This measure would apply to all trucks accessing the project site. It is presumed that heavy trucks would comprise the majority of overall traffic volumes.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near zero emission freight vehicles and equipment powered by renewable energy by 2030.		**Not applicable.** This measure is unrelated to the project scope.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	**No Conflict.** When adopted, this measure would apply to all fuel sold on site and purchased for use in vehicles accessing the project site. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, California Department of Food and Agriculture (CDFA), California State	**No Conflict.** The Project would be required to comply with this measure and reduce any Project-source SLPS emissions

EEC ORIGINAL PKG

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
	Water Resource Control Board (SWRCB), Local Air Districts	accordingly. The Project would not obstruct or interfere with agency efforts to reduce SLPS emissions.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**No Conflict.** The Project would be required to comply with applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	**Not applicable.** The Project site is not an identified property that needs to be conserved.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		**Not applicable.** The entire site is planned for development.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		**No Conflict.** The project would be a parking lot. No wood or agricultural products would be required. Landscaping would utilize native species.
Establish scenario projections to serve as the foundation for the Implementation Plan.		**Not applicable.** This measure is unrelated to the project scope.
Implement Forest Carbon Plan.	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	**Not applicable.** This measure is unrelated to the project scope.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not applicable.** This measure is unrelated to the project scope.

2022 Scoping Plan Consistency

CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB

EEC ORIGINAL PKG

1279. The 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5. Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy ZEV buses and trucks. Additional transportation policies include the Off-Road Zero Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation.

The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology. As indicated above, GHG reductions are also achieved as a result of State of California energy and water efficiency requirements for new residential development. These efficiency improvements correspond to reductions in secondary GHG emissions. For example, in California, most of the electricity that powers homes is derived from natural gas combustion. Therefore, energy saving measures, such as Title 24, reduces GHG emissions from the power generation facilities by reducing load demand. The 2022 Scoping Plan Appendix D provides local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. The 2022 Scoping Plan Appendix D focuses on Residential and Mixed-Use Projects. The 2022 Scoping Plan Appendix D lists potential actions that support the State's climate goals. However, the 2022 Scoping Plan notes that the applicability and performance of the actions may vary across the regions. The document is organized into two categories (A) examples of plan-level GHG reduction actions that could be implemented by local governments and (B) examples of on-site project design features, mitigation measures, that could be required of individual projects under CEQA, if feasible, when the local jurisdiction is the lead agency. As individual phases or components of each phase are submitted for design review, it is anticipated that each would include standard conditions and mitigation measures to reduce construction and operational emissions. For example, the 2022 Scoping Plan's construction actions include enforcing idling time restrictions on construction vehicles and requiring construction vehicles to operate highest tier engines commercially available. The project would include a majority of the feasible operational mitigation measures listed in the 2022 Scoping Plan Appendix D as design features. Some of the recommended operational measures would include providing bicycle parking, creating on- and off-site safety improvements for bike, pedestrian, and transit connections, requiring solar panels, drought-tolerant landscaping, and energy conserving appliances. As discussed above, the Project would be consistent with all applicable plan goals and applicable

EEC ORIGINAL PKG

regulatory programs designed to reduce GHG emissions generated by land use projects. Further, the Project would be subject to compliance with all building codes in effect at the time of construction, which include energy conservation measures mandated by California Building Standards Code Title 24 – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high- efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. As shown above, the majority of the Project's emissions are from energy and mobile sources, which would be further reduced by the 2022 Scoping Plan actions described above. The County has no control over vehicle emissions; however, these emissions would decline in the future because of Statewide measures as well as cleaner technology and fleet turnover. Many State plans and policies would contribute to a reduction in the Project's mobile source emissions, including the following:

CARB's Advanced Clean Truck Regulation: Adopted in June 2020, CARB's Advanced Clean Truck Regulation requires truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8.

Executive Order N-79-20: Executive Order N-79-20 establishes the goal for all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, to be zero-emission by 2035 and all medium and heavy-duty vehicles to be zero-emission by 2045. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent."

CARB's Mobile Source Strategy: CARB's Mobile Source Strategy takes an integrated planning approach to identify the level of transition to cleaner mobile source technologies needed to achieve all of California's targets by increasing the adoption of ZEV buses and trucks.

CARB's Sustainable Freight Action Plan: The Sustainable Freight Action Plan which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. This Plan applies to all trucks accessing the Project site and may include existing trucks or new trucks that are part of the Statewide goods movement sector.

CARB's Emissions Reduction Plan for Ports and Goods Movement: CARB's Emissions Reduction Plan for Ports and Goods Movement identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While these measures are not directly applicable to the Project, any commercial activity associated with goods movement would be required to comply with these measures as adopted.

EEC ORIGINAL PKG

The Project would not obstruct or interfere with efforts to increase ZEVs or State efforts to improve system efficiency. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, Sustainable Freight Action Plan, and Advanced Clean Truck Regulation; Executive Order N-79-20; SB 100/renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045, etc.) would ensure consistency with State and regional GHG reduction planning efforts, including the 2022 Scoping Plan. It is also noted that the Project would not convert any Natural and Working Lands (NWL) and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan.

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that Project operations would benefit from applicable measures enacted to meet State GHG reduction goals. The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Thus, impacts related to consistency with the 2022 Scoping Plan would be less than significant. The Project would not conflict with the applicable plans and regulatory programs that are discussed above; and therefore, with respect to this particular threshold, the Project does not have a significant impact

As discussed, the project CO2e emissions would not exceed 3,000 MT annually as stated above per threshold a. Further, the project would be consistent with Connect SoCal RTP/SCS and the 2017 CARB scoping plan and the 2022 Scoping Plan goals intended to reduce overall regional GHG emissions. The project will not impede or delay local or statewide initiatives to reduce GHG emissions. Impacts would be **less than significant.**

As stated, design measures implemented by the project per Title 24 of the California Energy Code and Calgreen code intended to reduce overall GHG emissions would also contribute to GHG reduction goals mandated by AB 32 and further address in EO S-3-05 and SB 32. Thus, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases and impacts would be **less than significant.**

EEC ORIGINAL PKG

REFERENCES

California Natural Resources Agency. *2023 California Environmental Quality Act (CEQA) Statute and Guidelines*. Association of Environmental Professionals. 2023

California Air Pollution Control Officers Association. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA)*. January 2008.

California Air Pollution Control Officers Association. *California Emission Estimator Model version 2022.1*, May 2022.

California Air Resources Board. *Ambient Air Quality Standards*. Updated February 2016. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf

California Air Resources Board. 2021, 2022 & 2023 Annual Air Quality Data Summaries. http://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed December 2024.

California Air Resources Board. June 2019. *Greenhouse Gas Inventory Data Inventory Program*. Available: https://www.arb.ca.gov/cc/inventory/inventory.htm

California Air Resources Board. April 2012. *Greenhouse Gas Inventory Data – 2020 Emissions Forecast*. Available: http://www.arb.ca.gov/cc/inventory/data/forecast.htm

California Air Resources Board. May 2014. *2020 Business As Usual Emission Projection, 2014 Edition*. Available: http://www.arb.ca.gov/cc/inventory/data/tables/2020_bau_forecast_by_scoping_category_2014-05-22.pdf

California Air Resources Board. April 2005. *Air Quality and Land Use Handbook, A Community Health Perspective*. https://ww3.arb.ca.gov/ch/handbook.pdf

California Climate Action Registry General Reporting Protocol, *Reporting Entity-Wide Greenhouse Gas Emissions*, Version 3.1, January 2009.

California Environmental Protection Agency, March 2006. *Climate Action Team Report to Governor Schwarzenegger and the Legislature*. http://www.climatechange.ca.gov/climate_action_team/reports/2006-04-03_FINAL_CAT_REPORT_EXECSUMMARY.PDF

Imperial County Air Pollution Control District, *State Implementation Plan*, https://ww2.arb.ca.gov/our-work/programs/california-state-implementation-plans/nonattainment-area-plans/imperial-county

EEC ORIGINAL PKG

Imperial County Air Pollution Control District, *CEQA Air Quality Handbook*, November, 2007.

Intergovernmental Panel on Climate Change [IPCC]. *Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories*. [Kroeze, C.; Mosier, A.; Nevison, C.; Oenema, O.; Seitzinger, S.; Cleemput, O. van; Conrad, R.; Mitra, A.P.; H.U., Neue; Sass, R.]. Paris: OECD, 1997.

Office of the California Attorney General. The California Environmental Quality Act, Addressing Global Warming Impacts at the Local Agency Level. Updated May 21, 2008. http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf

SCAQMD. *Air Quality Significance Threshold*, March 2023

United States Environmental Protection Agency (U.S. EPA). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2010*. U. S. EPA #430-R-11-005. April 2012. http://www.epa.gov/climatechange/emissions/usinventoryreport.html

United States Environmental Protection Agency (U.S. EPA). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015*. U. S. EPA #430-P-17-001. April 2017. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2015

United States Environmental Protection Agency (U.S. EPA). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019*, U. S. EPA #430-R-21-001. February 2021

EEC ORIGINAL PKG

Appendix A

CalEEMod Air Quality and Greenhouse Gas Emissions Report

EEC ORIGINAL PKG

Linn Parking and Storage Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.3. Construction Emissions by Year, Mitigated

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

2.6. Operations Emissions by Sector, Mitigated

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

3.2. Demolition (2026) - Mitigated

3.3. Site Preparation (2026) - Unmitigated

EEC ORIGINAL PKG

3.4. Site Preparation (2026) - Mitigated

3.5. Grading (2026) - Unmitigated

3.6. Grading (2026) - Mitigated

3.7. Building Construction (2026) - Unmitigated

3.8. Building Construction (2026) - Mitigated

3.9. Paving (2026) - Unmitigated

3.10. Paving (2026) - Mitigated

3.11. Architectural Coating (2026) - Unmitigated

3.12. Architectural Coating (2026) - Mitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.1.2. Mitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.2. Electricity Emissions By Land Use - Mitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.2.4. Natural Gas Emissions By Land Use - Mitigated

EEC ORIGINAL PKG

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.3.2. Mitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.4.2. Mitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.5.2. Mitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.6.2. Mitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.7.2. Mitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.8.2. Mitigated

EEC ORIGINAL PKG

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.9.2. Mitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.2.2. Mitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.3.2. Mitigated

EEC ORIGINAL PKG

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.9.2. Mitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.10.4. Landscape Equipment - Mitigated

5.11. Operational Energy Consumption

5.11.1. Unmitigated

EEC ORIGINAL PKG

5.11.2. Mitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.12.2. Mitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.13.2. Mitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.14.2. Mitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

EEC ORIGINAL PKG

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

EEC ORIGINAL PKG

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

8.1. Justifications

8.4. Construction

8.4.4. Dust from Material Movement

8.4.7. On-Road Fugitive Dust

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

8.5.1.2. Fleet Mix

EEC ORIGINAL PKG

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Linn Parking and Storage
Construction Start Date	6/2/2026
Operational Year	2027
Lead Agency	Imperial County
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40000
Precipitation (days)	4.80000
Location	32.69106622175066, -115.38960463281775
County	Imperial
City	Unincorporated
Air District	Imperial County APCD
Air Basin	Salton Sea
TAZ	5699
EDFZ	19
Electric Utility	Imperial Irrigation District
Gas Utility	Southern California Gas
App Version	2022.1.1.37

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
Parking Lot	70.0000	Space	0.63000	0.00000	500.000	—	—	—

EEC ORIGINAL PKG

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling

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

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.11721	11.7452	11.1343	0.03941	0.46396	6.04657	6.51053	0.43044	2.76733	3.19777	—	5,456.23	5,456.23	0.09491	0.72004	9.72336	5,682.52
Mit.	1.11721	11.7452	11.1343	0.03941	0.46396	6.04657	6.51053	0.43044	2.76733	3.19777	—	5,456.23	5,456.23	0.09491	0.72004	9.72336	5,682.52
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.41052	4.80600	6.90565	0.01205	0.18874	0.22874	0.40781	0.17364	0.05362	0.21836	—	1,304.47	1,304.47	0.05291	0.01536	0.02245	1,308.94
Mit.	2.41052	4.80600	6.90565	0.01205	0.18874	0.22874	0.40781	0.17364	0.05362	0.21836	—	1,304.47	1,304.47	0.05291	0.01536	0.02245	1,308.94
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.20195	1.59258	2.25204	0.00396	0.06145	0.04493	0.10638	0.05658	0.01789	0.07447	—	438.167	438.167	0.01703	0.00747	0.03458	440.852
Mit.	0.20195	1.59258	2.25204	0.00396	0.06145	0.04493	0.10638	0.05658	0.01789	0.07447	—	438.167	438.167	0.01703	0.00747	0.03458	440.852
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.03686	0.29065	0.41100	0.00072	0.01122	0.00820	0.01941	0.01033	0.00326	0.01359	—	72.5435	72.5435	0.00282	0.00124	0.00573	72.9881
Mit.	0.03686	0.29065	0.41100	0.00072	0.01122	0.00820	0.01941	0.01033	0.00326	0.01359	—	72.5435	72.5435	0.00282	0.00124	0.00573	72.9881
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.11721	11.7452	11.1343	0.03941	0.46396	6.04657	6.51053	0.43044	2.76733	3.19777	—	5,456.23	5,456.23	0.09491	0.72004	9.72336	5,682.52
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.41052	4.80600	6.90565	0.01205	0.18874	0.22874	0.40781	0.17364	0.05362	0.21836	—	1,304.47	1,304.47	0.05291	0.01536	0.02245	1,308.94
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.20195	1.59258	2.25204	0.00396	0.06145	0.04493	0.10638	0.05658	0.01789	0.07447	—	438.167	438.167	0.01703	0.00747	0.03458	440.852
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.03686	0.29065	0.41100	0.00072	0.01122	0.00820	0.01941	0.01033	0.00326	0.01359	—	72.5435	72.5435	0.00282	0.00124	0.00573	72.9881

EEC ORIGINAL PKG

2.3. Construction Emissions by Year, Mitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.11721	11.7452	11.1343	0.03941	0.46396	6.04657	6.51053	0.43044	2.76733	3.19777	—	5,456.23	5,456.23	0.09491	0.72004	9.72336	5,682.52

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.41052	4.80600	6.90565	0.01205	0.18874	0.22874	0.40781	0.17364	0.05362	0.21836	—	1,304.47	1,304.47	0.05291	0.01536	0.02245	1,308.94
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.20195	1.59258	2.25204	0.00396	0.06145	0.04493	0.10638	0.05658	0.01789	0.07447	—	438.167	438.167	0.01703	0.00747	0.03458	440.852
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.03686	0.29065	0.41100	0.00072	0.01122	0.00820	0.01941	0.01033	0.00326	0.01359	—	72.5435	72.5435	0.00282	0.00124	0.00573	72.9881

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02379	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	0.00000	685.565	685.565	0.00818	0.10373	1.29050	717.972
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02208	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	0.00000	686.300	686.300	0.00810	0.10385	0.03348	717.484
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02307	0.84276	0.23661	0.00616	0.01407	73.3028	73.3169	0.01346	7.31964	7.33310	0.00000	685.874	685.874	0.00815	0.10378	0.55724	717.562
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.00421	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	0.00000	113.554	113.554	0.00135	0.01718	0.09226	118.801

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)

EEC ORIGINAL PKG

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01849	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	—	655.454	655.454	0.00600	0.10347	1.29050	687.728
Area	0.00530	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Water	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Waste	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.02379	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	0.00000	685.565	685.565	0.00818	0.10373	1.29050	717.972
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01678	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	—	656.190	656.190	0.00592	0.10359	0.03348	687.240
Area	0.00530	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Water	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Waste	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.02208	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	0.00000	686.300	686.300	0.00810	0.10385	0.03348	717.484
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01777	0.84276	0.23661	0.00616	0.01407	73.3028	73.3169	0.01346	7.31964	7.33310	—	655.763	655.763	0.00597	0.10352	0.55724	687.318
Area	0.00530	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Water	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Waste	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.02307	0.84276	0.23661	0.00616	0.01407	73.3028	73.3169	0.01346	7.31964	7.33310	0.00000	685.874	685.874	0.00815	0.10378	0.55724	717.562
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Mobile	0.00324	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	—	108.569	108.569	0.00099	0.01714	0.09226	113.793
Area	0.00097	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	4.97829	4.97829	0.00036	0.00004	—	5.00029
Water	—	—	—	—	—	—	—	—	—	—	0.00000	0.00682	0.00682	< 0.000005	< 0.000005	—	0.00685
Waste	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00421	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	0.00000	113.554	113.554	0.00135	0.01718	0.09226	118.801

2.6. Operations Emissions by Sector, Mitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01849	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	—	655.454	655.454	0.00600	0.10347	1.29050	687.728
Area	0.00530	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Water	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Waste	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.02379	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	0.00000	685.565	685.565	0.00818	0.10373	1.29050	717.972
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01678	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	—	656.190	656.190	0.00592	0.10359	0.03348	687.240
Area	0.00530	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Water	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Waste	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.02208	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	0.00000	686.300	686.300	0.00810	0.10385	0.03348	717.484

EEC ORIGINAL PKG

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01777	0.84276	0.23661	0.00616	0.01407	73.3028	73.3169	0.01346	7.31964	7.33310	—	655.763	655.763	0.00597	0.10352	0.55724	687.318
Area	0.00530	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Water	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Waste	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.02307	0.84276	0.23661	0.00616	0.01407	73.3028	73.3169	0.01346	7.31964	7.33310	0.00000	685.874	685.874	0.00815	0.10378	0.55724	717.562
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.00324	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	—	108.569	108.569	0.00099	0.01714	0.09226	113.793
Area	0.00097	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	4.97829	4.97829	0.00036	0.00004	—	5.00029
Water	—	—	—	—	—	—	—	—	—	—	0.00000	0.00682	0.00682	< 0.000005	< 0.000005	—	0.00685
Waste	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00421	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	0.00000	113.554	113.554	0.00135	0.01718	0.09226	118.801

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44081	4.09093	5.57793	0.00877	0.13431	—	0.13431	0.12356	—	0.12356	—	851.928	851.928	0.03456	0.00691	—	854.851
Demolition	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01208	0.11208	0.15282	0.00024	0.00368	—	0.00368	0.00339	—	0.00339	—	23.3405	23.3405	0.00095	0.00019	—	23.4206
Demolition	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00220	0.02045	0.02789	0.00004	0.00067	—	0.00067	0.00062	—	0.00062	—	3.86428	3.86428	0.00016	0.00003	—	3.87754
Demolition	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06162	0.05710	1.08060	0.00000	0.00000	0.13071	0.13071	0.00000	0.03064	0.03064	—	151.087	151.087	0.00584	0.00496	0.49575	153.207
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00143	0.00178	0.02113	0.00000	0.00000	0.00357	0.00357	0.00000	0.00084	0.00084	—	3.76070	3.76070	0.00017	0.00014	0.00586	3.81122
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

EEC ORIGINAL PKG

Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00026	0.00032	0.00386	0.00000	0.00000	0.00065	0.00065	0.00000	0.00015	0.00015	—	0.62263	0.62263	0.00003	0.00002	0.00097	0.63099
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2. Demolition (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44081	4.09093	5.57793	0.00877	0.13431	—	0.13431	0.12356	—	0.12356	—	851.928	851.928	0.03456	0.00691	—	854.851
Demolition	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01208	0.11208	0.15282	0.00024	0.00368	—	0.00368	0.00339	—	0.00339	—	23.3405	23.3405	0.00095	0.00019	—	23.4206
Demolition	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Off-Road Equipment	0.00220	0.02045	0.02789	0.00004	0.00067	—	0.00067	0.00062	—	0.00062	—	3.86428	3.86428	0.00016	0.00003	—	3.87754
Demolition	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06162	0.05710	1.08060	0.00000	0.00000	0.13071	0.13071	0.00000	0.03064	0.03064	—	151.087	151.087	0.00584	0.00496	0.49575	153.207
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00143	0.00178	0.02113	0.00000	0.00000	0.00357	0.00357	0.00000	0.00084	0.00084	—	3.76070	3.76070	0.00017	0.00014	0.00586	3.81122
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00026	0.00032	0.00386	0.00000	0.00000	0.00065	0.00065	0.00000	0.00015	0.00015	—	0.62263	0.62263	0.00003	0.00002	0.00097	0.63099
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3. Site Preparation (2026) - Unmitigated

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

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

EEC ORIGINAL PKG

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43578	3.73818	5.54403	0.00793	0.18506	—	0.18506	0.17026	—	0.17026	—	858.447	858.447	0.03482	0.00696	—	861.393
Dust From Material Movement	—	—	—	—	—	0.57271	0.57271	—	0.06368	0.06368	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00119	0.01024	0.01519	0.00002	0.00051	—	0.00051	0.00047	—	0.00047	—	2.35191	2.35191	0.00010	0.00002	—	2.35998
Dust From Material Movement	—	—	—	—	—	0.00157	0.00157	—	0.00017	0.00017	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00022	0.00187	0.00277	< 0.000005	0.00009	—	0.00009	0.00009	—	0.00009	—	0.38939	0.38939	0.00002	< 0.000005	—	0.39072
Dust From Material Movement	—	—	—	—	—	0.00029	0.00029	—	0.00003	0.00003	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Worker	0.03081	0.02855	0.54030	0.00000	0.00000	0.06535	0.06535	0.00000	0.01532	0.01532	—	75.5433	75.5433	0.00292	0.00248	0.24787	76.6033
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.09295	5.02363	1.26678	0.03148	0.08995	1.23074	1.32069	0.08995	0.34516	0.43511	—	4,522.24	4,522.24	0.04198	0.71059	9.47549	4,744.52
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00007	0.00009	0.00106	0.00000	0.00000	0.00018	0.00018	0.00000	0.00004	0.00004	—	0.18803	0.18803	0.00001	0.00001	0.00029	0.19056
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00025	0.01484	0.00350	0.00009	0.00025	0.00336	0.00361	0.00025	0.00094	0.00119	—	12.3938	12.3938	0.00012	0.00195	0.01121	12.9881
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00001	0.00002	0.00019	0.00000	0.00000	0.00003	0.00003	0.00000	0.00001	0.00001	—	0.03113	0.03113	< 0.000005	< 0.000005	0.00005	0.03155
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00004	0.00271	0.00064	0.00002	0.00004	0.00061	0.00066	0.00004	0.00017	0.00022	—	2.05194	2.05194	0.00002	0.00032	0.00186	2.15032

3.4. Site Preparation (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43578	3.73818	5.54403	0.00793	0.18506	—	0.18506	0.17026	—	0.17026	—	858.447	858.447	0.03482	0.00696	—	861.393
Dust From Material Movement	—	—	—	—	—	0.57271	0.57271	—	0.06368	0.06368	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

EEC ORIGINAL PKG

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00119	0.01024	0.01519	0.00002	0.00051	—	0.00051	0.00047	—	0.00047	—	2.35191	2.35191	0.00010	0.00002	—	2.35998
Dust From Material Movement	—	—	—	—	—	0.00157	0.00157	—	0.00017	0.00017	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00022	0.00187	0.00277	< 0.000005	0.00009	—	0.00009	0.00009	—	0.00009	—	0.38939	0.38939	0.00002	< 0.000005	—	0.39072
Dust From Material Movement	—	—	—	—	—	0.00029	0.00029	—	0.00003	0.00003	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03081	0.02855	0.54030	0.00000	0.00000	0.06535	0.06535	0.00000	0.01532	0.01532	—	75.5433	75.5433	0.00292	0.00248	0.24787	76.6033
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.09295	5.02363	1.26678	0.03148	0.08995	1.23074	1.32069	0.08995	0.34516	0.43511	—	4,522.24	4,522.24	0.04198	0.71059	9.47549	4,744.52
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00007	0.00009	0.00106	0.00000	0.00000	0.00018	0.00018	0.00000	0.00004	0.00004	—	0.18803	0.18803	0.00001	0.00001	0.00029	0.19056

EEC ORIGINAL PKG

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00025	0.01484	0.00350	0.00009	0.00025	0.00336	0.00361	0.00025	0.00094	0.00119	—	12.3938	12.3938	0.00012	0.00195	0.01121	12.9881
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00001	0.00002	0.00019	0.00000	0.00000	0.00003	0.00003	0.00000	0.00001	0.00001	—	0.03113	0.03113	< 0.000005	< 0.000005	0.00005	0.03155
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00004	0.00271	0.00064	0.00002	0.00004	0.00061	0.00066	0.00004	0.00017	0.00022	—	2.05194	2.05194	0.00002	0.00032	0.00186	2.15032

3.5. Grading (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.02452	9.19052	9.69044	0.01582	0.41898	—	0.41898	0.38547	—	0.38547	—	1,714.25	1,714.25	0.06954	0.01391	—	1,720.14
Dust From Material Movement	—	—	—	—	—	5.33317	5.33317	—	2.57177	2.57177	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00561	0.05036	0.05310	0.00009	0.00230	—	0.00230	0.00211	—	0.00211	—	9.39317	9.39317	0.00038	0.00008	—	9.42540
Dust From Material Movement	—	—	—	—	—	0.02922	0.02922	—	0.01409	0.01409	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00102	0.00919	0.00969	0.00002	0.00042	—	0.00042	0.00039	—	0.00039	—	1.55515	1.55515	0.00006	0.00001	—	1.56048
Dust From Material Movement	—	—	—	—	—	0.00533	0.00533	—	0.00257	0.00257	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04621	0.04282	0.81045	0.00000	0.00000	0.09803	0.09803	0.00000	0.02298	0.02298	—	113.315	113.315	0.00438	0.00372	0.37181	114.905
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.04647	2.51181	0.63339	0.01574	0.04497	0.61537	0.66034	0.04497	0.17258	0.21756	—	2,261.12	2,261.12	0.02099	0.35530	4.73774	2,372.26
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00022	0.00027	0.00317	0.00000	0.00000	0.00054	0.00054	0.00000	0.00013	0.00013	—	0.56410	0.56410	0.00002	0.00002	0.00088	0.57168
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00025	0.01484	0.00350	0.00009	0.00025	0.00336	0.00361	0.00025	0.00094	0.00119	—	12.3938	12.3938	0.00012	0.00195	0.01121	12.9881
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00004	0.00005	0.00058	0.00000	0.00000	0.00010	0.00010	0.00000	0.00002	0.00002	—	0.09339	0.09339	< 0.000005	< 0.000005	0.00015	0.09465
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00004	0.00271	0.00064	0.00002	0.00004	0.00061	0.00066	0.00004	0.00017	0.00022	—	2.05194	2.05194	0.00002	0.00032	0.00186	2.15032

EEC ORIGINAL PKG

3.6. Grading (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.02452	9.19052	9.69044	0.01582	0.41898	—	0.41898	0.38547	—	0.38547	—	1,714.25	1,714.25	0.06954	0.01391	—	1,720.14
Dust From Material Movement	—	—	—	—	—	5.33317	5.33317	—	2.57177	2.57177	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00561	0.05036	0.05310	0.00009	0.00230	—	0.00230	0.00211	—	0.00211	—	9.39317	9.39317	0.00038	0.00008	—	9.42540
Dust From Material Movement	—	—	—	—	—	0.02922	0.02922	—	0.01409	0.01409	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00102	0.00919	0.00969	0.00002	0.00042	—	0.00042	0.00039	—	0.00039	—	1.55515	1.55515	0.00006	0.00001	—	1.56048
Dust From Material Movement	—	—	—	—	—	0.00533	0.00533	—	0.00257	0.00257	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04621	0.04282	0.81045	0.00000	0.00000	0.09803	0.09803	0.00000	0.02298	0.02298	—	113.315	113.315	0.00438	0.00372	0.37181	114.905
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.04647	2.51181	0.63339	0.01574	0.04497	0.61537	0.66034	0.04497	0.17258	0.21756	—	2,261.12	2,261.12	0.02099	0.35530	4.73774	2,372.26
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00022	0.00027	0.00317	0.00000	0.00000	0.00054	0.00054	0.00000	0.00013	0.00013	—	0.56410	0.56410	0.00002	0.00002	0.00088	0.57168
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00025	0.01484	0.00350	0.00009	0.00025	0.00336	0.00361	0.00025	0.00094	0.00119	—	12.3938	12.3938	0.00012	0.00195	0.01121	12.9881
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00004	0.00005	0.00058	0.00000	0.00000	0.00010	0.00010	0.00000	0.00002	0.00002	—	0.09339	0.09339	< 0.000005	< 0.000005	0.00015	0.09465
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00004	0.00271	0.00064	0.00002	0.00004	0.00061	0.00066	0.00004	0.00017	0.00022	—	2.05194	2.05194	0.00002	0.00032	0.00186	2.15032

3.7. Building Construction (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49393	4.80600	6.90565	0.01205	0.18874	—	0.18874	0.17364	—	0.17364	—	1,304.47	1,304.47	0.05291	0.01058	—	1,308.94

EEC ORIGINAL PKG

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49393	4.80600	6.90565	0.01205	0.18874	—	0.18874	0.17364	—	0.17364	—	1,304.47	1,304.47	0.05291	0.01058	—	1,308.94
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13532	1.31671	1.89196	0.00330	0.05171	—	0.05171	0.04757	—	0.04757	—	357.388	357.388	0.01450	0.00290	—	358.614
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02470	0.24030	0.34528	0.00060	0.00944	—	0.00944	0.00868	—	0.00868	—	59.1697	59.1697	0.00240	0.00048	—	59.3727
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

EEC ORIGINAL PKG

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.8. Building Construction (2026) - Mitigated

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

Location	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	0.49393	4.80600	6.90565	0.01205	0.18874	—	0.18874	0.17364	—	0.17364	—	1,304.47	1,304.47	0.05291	0.01058	—	1,308.94
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49393	4.80600	6.90565	0.01205	0.18874	—	0.18874	0.17364	—	0.17364	—	1,304.47	1,304.47	0.05291	0.01058	—	1,308.94
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13532	1.31671	1.89196	0.00330	0.05171	—	0.05171	0.04757	—	0.04757	—	357.388	357.388	0.01450	0.00290	—	358.614

EEC ORIGINAL PKG

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02470	0.24030	0.34528	0.00060	0.00944	—	0.00944	0.00868	—	0.00868	—	59.1697	59.1697	0.00240	0.00048	—	59.3727
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

EEC ORIGINAL PKG

3.9. Paving (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49102	4.24080	5.29941	0.00857	0.17907	—	0.17907	0.16474	—	0.16474	—	822.965	822.965	0.03338	0.00668	—	825.790
Paving	0.33012	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00673	0.05809	0.07259	0.00012	0.00245	—	0.00245	0.00226	—	0.00226	—	11.2735	11.2735	0.00046	0.00009	—	11.3122
Paving	0.00452	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00123	0.01060	0.01325	0.00002	0.00045	—	0.00045	0.00041	—	0.00041	—	1.86646	1.86646	0.00008	0.00002	—	1.87286
Paving	0.00083	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Worker	0.08507	0.11420	1.06599	0.00000	0.00000	0.22874	0.22874	0.00000	0.05362	0.05362	—	223.442	223.442	0.01100	0.00868	0.02245	226.327
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00126	0.00155	0.01849	0.00000	0.00000	0.00312	0.00312	0.00000	0.00073	0.00073	—	3.29061	3.29061	0.00015	0.00012	0.00513	3.33481
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00023	0.00028	0.00337	0.00000	0.00000	0.00057	0.00057	0.00000	0.00013	0.00013	—	0.54480	0.54480	0.00002	0.00002	0.00085	0.55212
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.10. Paving (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49102	4.24080	5.29941	0.00857	0.17907	—	0.17907	0.16474	—	0.16474	—	822.965	822.965	0.03338	0.00668	—	825.790
Paving	0.33012	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Off-Road Equipment	0.00673	0.05809	0.07259	0.00012	0.00245	—	0.00245	0.00226	—	0.00226	—	11.2735	11.2735	0.00046	0.00009	—	11.3122
Paving	0.00452	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00123	0.01060	0.01325	0.00002	0.00045	—	0.00045	0.00041	—	0.00041	—	1.86646	1.86646	0.00008	0.00002	—	1.87286
Paving	0.00083	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08507	0.11420	1.06599	0.00000	0.00000	0.22874	0.22874	0.00000	0.05362	0.05362	—	223.442	223.442	0.01100	0.00868	0.02245	226.327
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00126	0.00155	0.01849	0.00000	0.00000	0.00312	0.00312	0.00000	0.00073	0.00073	—	3.29061	3.29061	0.00015	0.00012	0.00513	3.33481
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00023	0.00028	0.00337	0.00000	0.00000	0.00057	0.00057	0.00000	0.00013	0.00013	—	0.54480	0.54480	0.00002	0.00002	0.00085	0.55212
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

EEC ORIGINAL PKG

3.11. Architectural Coating (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12031	0.85645	1.13283	0.00173	0.02315	—	0.02315	0.02130	—	0.02130	—	133.504	133.504	0.00542	0.00108	—	133.963
Architectural Coatings	2.29021	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00165	0.01173	0.01552	0.00002	0.00032	—	0.00032	0.00029	—	0.00029	—	1.82883	1.82883	0.00007	0.00001	—	1.83510
Architectural Coatings	0.03137	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00030	0.00214	0.00283	< 0.000005	0.00006	—	0.00006	0.00005	—	0.00005	—	0.30278	0.30278	0.00001	< 0.000005	—	0.30382
Architectural Coatings	0.00573	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

EEC ORIGINAL PKG

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.12. Architectural Coating (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12031	0.85645	1.13283	0.00173	0.02315	—	0.02315	0.02130	—	0.02130	—	133.504	133.504	0.00542	0.00108	—	133.963

EEC ORIGINAL PKG

Architect Coatings	2.29021	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00165	0.01173	0.01552	0.00002	0.00032	—	0.00032	0.00029	—	0.00029	—	1.82883	1.82883	0.00007	0.00001	—	1.83510
Architectural Coatings	0.03137	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00030	0.00214	0.00283	< 0.000005	0.00006	—	0.00006	0.00005	—	0.00005	—	0.30278	0.30278	0.00001	< 0.000005	—	0.30382
Architectural Coatings	0.00573	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

EEC ORIGINAL PKG

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.01849	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	—	655.454	655.454	0.00600	0.10347	1.29050	687.728
Total	0.01849	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	—	655.454	655.454	0.00600	0.10347	1.29050	687.728
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.01678	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	—	656.190	656.190	0.00592	0.10359	0.03348	687.240
Total	0.01678	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	—	656.190	656.190	0.00592	0.10359	0.03348	687.240
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00324	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	—	108.569	108.569	0.00099	0.01714	0.09226	113.793
Total	0.00324	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	—	108.569	108.569	0.00099	0.01714	0.09226	113.793

EEC ORIGINAL PKG

4.1.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.01849	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	—	655.454	655.454	0.00600	0.10347	1.29050	687.728
Total	0.01849	0.78272	0.23412	0.00616	0.01406	74.2783	74.2924	0.01345	7.41682	7.43027	—	655.454	655.454	0.00600	0.10347	1.29050	687.728
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.01678	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	—	656.190	656.190	0.00592	0.10359	0.03348	687.240
Total	0.01678	0.85812	0.24003	0.00617	0.01408	74.2783	74.2924	0.01348	7.41682	7.43029	—	656.190	656.190	0.00592	0.10359	0.03348	687.240
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00324	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	—	108.569	108.569	0.00099	0.01714	0.09226	113.793
Total	0.00324	0.15380	0.04318	0.00112	0.00257	13.3778	13.3803	0.00246	1.33583	1.33829	—	108.569	108.569	0.00099	0.01714	0.09226	113.793

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	30.0692	30.0692	0.00217	0.00026	—	30.2020

EEC ORIGINAL PKG

Total	—	—	—	—	—	—	—	—	—	—	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Total	—	—	—	—	—	—	—	—	—	—	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	4.97829	4.97829	0.00036	0.00004	—	5.00029
Total	—	—	—	—	—	—	—	—	—	—	—	4.97829	4.97829	0.00036	0.00004	—	5.00029

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Total	—	—	—	—	—	—	—	—	—	—	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Total	—	—	—	—	—	—	—	—	—	—	—	30.0692	30.0692	0.00217	0.00026	—	30.2020
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	4.97829	4.97829	0.00036	0.00004	—	5.00029
Total	—	—	—	—	—	—	—	—	—	—	—	4.97829	4.97829	0.00036	0.00004	—	5.00029

EEC ORIGINAL PKG

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

EEC ORIGINAL PKG

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00216	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00314	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00530	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Consumer	0.00216	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00314	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00530	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00039	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00057	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00097	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.3.2. Mitigated

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

Source	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	0.00216	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00314	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

EEC ORIGINAL PKG

Total	0.00530	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00216	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00314	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00530	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00039	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00057	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00097	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138

EEC ORIGINAL PKG

Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.00682	0.00682	< 0.000005	< 0.000005	—	0.00685
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.00682	0.00682	< 0.000005	< 0.000005	—	0.00685

4.4.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.04120	0.04120	< 0.000005	< 0.000005	—	0.04138
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.00682	0.00682	< 0.000005	< 0.000005	—	0.00685
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.00682	0.00682	< 0.000005	< 0.000005	—	0.00685

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.5.2. Mitigated

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

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

EEC ORIGINAL PKG

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

EEC ORIGINAL PKG

4.6.2. Mitigated

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

Land Use	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	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

4.7.2. Mitigated

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

Equipment Type	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	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

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

Equipment Type	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	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

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

Equipment Type	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	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

EEC ORIGINAL PKG

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

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

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

EEC ORIGINAL PKG

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

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

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

EEC ORIGINAL PKG

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

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

EEC ORIGINAL PKG

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

EEC ORIGINAL PKG

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	6/2/2026	6/16/2026	5.00000	10.00000	—
Site Preparation	Site Preparation	6/17/2026	6/18/2026	5.00000	1.000000	—
Grading	Grading	6/19/2026	6/21/2026	5.00000	2.00000	—
Building Construction	Building Construction	6/22/2026	11/9/2026	5.00000	100.0000	—
Paving	Paving	11/10/2026	11/17/2026	5.00000	5.00000	—
Architectural Coating	Architectural Coating	11/18/2026	11/25/2026	5.00000	5.00000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00000	6.00000	84.0000	0.37000
Demolition	Rubber Tired Dozers	Diesel	Average	1.000000	1.000000	367.000	0.40000
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Site Preparation	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Grading	Graders	Diesel	Average	1.000000	6.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	6.00000	367.000	0.40000
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.000000	7.00000	84.0000	0.37000
Building Construction	Cranes	Diesel	Average	1.000000	4.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	2.00000	6.00000	82.0000	0.20000

EEC ORIGINAL PKG

Building Construction	Tractors/Loaders/Back	Diesel	Average	2.00000	8.00000	84.0000	0.37000
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.000000	7.00000	84.0000	0.37000
Paving	Cement and Mortar Mixers	Diesel	Average	4.00000	6.00000	10.00000	0.56000
Paving	Pavers	Diesel	Average	1.000000	7.00000	81.0000	0.42000
Paving	Rollers	Diesel	Average	1.000000	7.00000	36.0000	0.38000
Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Back hoes	Diesel	Average	2.00000	6.00000	84.0000	0.37000
Demolition	Rubber Tired Dozers	Diesel	Average	1.000000	1.000000	367.000	0.40000
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Site Preparation	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Grading	Graders	Diesel	Average	1.000000	6.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	6.00000	367.000	0.40000
Grading	Tractors/Loaders/Back hoes	Diesel	Average	1.000000	7.00000	84.0000	0.37000
Building Construction	Cranes	Diesel	Average	1.000000	4.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	2.00000	6.00000	82.0000	0.20000
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	2.00000	8.00000	84.0000	0.37000
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.000000	7.00000	84.0000	0.37000
Paving	Cement and Mortar Mixers	Diesel	Average	4.00000	6.00000	10.00000	0.56000

EEC ORIGINAL PKG

Paving	Pavers	Diesel	Average	1.000000	7.00000	81.0000	0.42000
Paving	Rollers	Diesel	Average	1.000000	7.00000	36.0000	0.38000
Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	10.00000	18.5000	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2000	HHDT,MHDT
Demolition	Hauling	0.00000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	5.00000	18.5000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2000	HHDT,MHDT
Site Preparation	Hauling	68.0000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	7.50000	18.5000	LDA,LDT1,LDT2
Grading	Vendor	—	10.2000	HHDT,MHDT
Grading	Hauling	34.0000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	0.00000	18.5000	LDA,LDT1,LDT2
Building Construction	Vendor	0.00000	10.2000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	17.5000	18.5000	LDA,LDT1,LDT2
Paving	Vendor	—	10.2000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT

EEC ORIGINAL PKG

Architectural Coating	Worker	0.00000	18.5000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2000	HHDT,MHDT
Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	10.00000	18.5000	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2000	HHDT,MHDT
Demolition	Hauling	0.00000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	5.00000	18.5000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2000	HHDT,MHDT
Site Preparation	Hauling	68.0000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	7.50000	18.5000	LDA,LDT1,LDT2
Grading	Vendor	—	10.2000	HHDT,MHDT
Grading	Hauling	34.0000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	0.00000	18.5000	LDA,LDT1,LDT2
Building Construction	Vendor	0.00000	10.2000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	17.5000	18.5000	LDA,LDT1,LDT2
Paving	Vendor	—	10.2000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	0.00000	18.5000	LDA,LDT1,LDT2

EEC ORIGINAL PKG

Architectural Coating	Vendor	—	10.2000	HHDT,MHDT
Architectural Coating	Hauling	0.00000	20.0000	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	0.00000	0.00000	0.00000	0.00000	1,646.57

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)
Demolition	0.00000	0.00000	0.00000	—	0.00000
Site Preparation	—	540.000	0.50000	0.00000	0.00000
Grading	—	540.000	1.50000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.63000

5.6.2. Construction Earthmoving Control Strategies

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

EEC ORIGINAL PKG

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Parking Lot	0.63000	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	0.00000	456.543	0.03300	0.00400

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
Parking Lot	14.0000	14.0000	14.0000	5,110.00	199.285	199.285	199.285	72,738.9

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Parking Lot	14.0000	14.0000	14.0000	5,110.00	199.285	199.285	199.285	72,738.9

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Parking Lot	Wood Fireplaces	0	0
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0
Parking Lot	No Fireplaces	0	0

EEC ORIGINAL PKG

Parking Lot	Conventional Wood Stoves	0	0
Parking Lot	Catalytic Wood Stoves	0	0
Parking Lot	Non-Catalytic Wood Stoves	0	0
Parking Lot	Pellet Wood Stoves	0	0

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)
0.00000	0.00000	0.00000	0.00000	1,646.57

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	180.000

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	180.000

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)
Parking Lot	24,039.9	456.543	0.0330	0.0040	0.00000

EEC ORIGINAL PKG

5.11.2. Mitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Parking Lot	24,039.9	456.543	0.0330	0.0040	0.00000

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Parking Lot	0.00000	10,234.9

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Parking Lot	0.00000	10,234.9

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Parking Lot	0.00000	0.00000

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Parking Lot	0.00000	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

EEC ORIGINAL PKG

5.14.1. Unmitigated

5.14.2. Mitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

EEC ORIGINAL PKG

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

5.18.2.2. Mitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	29.4800	annual days of extreme heat
Extreme Precipitation	0.00000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00000	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.

EEC ORIGINAL PKG

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	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	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	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

EEC ORIGINAL PKG

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	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 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	65.7250
AQ-PM	48.6994
AQ-DPM	30.1431
Drinking Water	57.2374
Lead Risk Housing	30.7246
Pesticides	89.4828
Toxic Releases	46.0490
Traffic	8.75000
Effect Indicators	—
CleanUp Sites	50.3173
Groundwater	74.8298
Haz Waste Facilities/Generators	86.6049
Impaired Water Bodies	99.5170
Solid Waste	95.0057

EEC ORIGINAL PKG

Sensitive Population	—
Asthma	68.4696
Cardio-vascular	89.3819
Low Birth Weights	20.3490
Socioeconomic Factor Indicators	—
Education	73.4244
Housing	39.6958
Linguistic	85.2483
Poverty	72.0854
Unemployment	65.6299

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	24.4193507
Employed	22.93083537
Median HI	21.92993712
Education	—
Bachelor's or higher	23.23880405
High school enrollment	14.0639035
Preschool enrollment	58.10342615
Transportation	—
Auto Access	48.80020531
Active commuting	25.67688952
Social	—
2-parent households	77.12049275
Voting	20.99319902

EEC ORIGINAL PKG

Neighborhood	—
Alcohol availability	67.0986783
Park access	38.22661363
Retail density	7.955857821
Supermarket access	24.95829591
Tree canopy	1.424355191
Housing	—
Homeownership	51.98254844
Housing habitability	38.4832542
Low-inc homeowner severe housing cost burden	37.62350828
Low-inc renter severe housing cost burden	23.55960477
Uncrowded housing	28.33311947
Health Outcomes	—
Insured adults	30.39907609
Arthritis	0.0
Asthma ER Admissions	42.3
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	90.7
Cognitively Disabled	19.2
Physically Disabled	15.4
Heart Attack ER Admissions	7.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0

EEC ORIGINAL PKG

Obesity	0.0
Pedestrian Injuries	39.5
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	0.0
SLR Inundation Area	0.0
Children	33.8
Elderly	39.7
English Speaking	4.1
Foreign-born	93.6
Outdoor Workers	18.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	72.6
Traffic Density	16.8
Traffic Access	23.0
Other Indices	—
Hardship	80.6
Other Decision Support	—
2016 Voting	0.0

EEC ORIGINAL PKG

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	84.0000

Healthy Places Index Score for Project Location (b)	26.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Construction: Dust From Material Movement	A total of 1,080 cy of spoils would be removed from the site.
Construction: On-Road Fugitive Dust	Assumes all roads are paved.
Operations: Vehicle Data	Assumes 15 truck/trailer trips daily.
Operations: Fleet Mix	Assumes 100 percent of fleet is heavy duty trucks.

EEC ORIGINAL PKG

8.4. Construction

8.4.4. Dust from Material Movement

Phase Name	Model Parameter	Units	Default Value	New Value
Site Preparation	Material Exported	Cubic Yards	—	540.000

Grading	Material Exported	Cubic Yards	—	540.000

8.4.7. On-Road Fugitive Dust

Phase Name	Model Parameter	Units	Default Value	New Value
Demolition	Worker Trip Paved	%	50.0000	100.0000
Demolition	Vendor Trip Paved	%	50.0000	100.0000
Demolition	Hauling Trip Paved	%	50.0000	100.0000
Site Preparation	Worker Trip Paved	%	50.0000	100.0000
Site Preparation	Vendor Trip Paved	%	50.0000	100.0000
Site Preparation	Hauling Trip Paved	%	50.0000	100.0000
Grading	Worker Trip Paved	%	50.0000	100.0000
Grading	Vendor Trip Paved	%	50.0000	100.0000
Grading	Hauling Trip Paved	%	50.0000	100.0000
Building Construction	Worker Trip Paved	%	50.0000	100.0000
Building Construction	Vendor Trip Paved	%	50.0000	100.0000
Building Construction	Hauling Trip Paved	%	50.0000	100.0000
Paving	Worker Trip Paved	%	50.0000	100.0000
Paving	Vendor Trip Paved	%	50.0000	100.0000
Paving	Hauling Trip Paved	%	50.0000	100.0000
Architectural Coating	Worker Trip Paved	%	50.0000	100.0000
Architectural Coating	Vendor Trip Paved	%	50.0000	100.0000
Architectural Coating	Hauling Trip Paved	%	50.0000	100.0000

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

EEC ORIGINAL PKG

Land Use	Model Parameter	Units	Default Value	New Value
Parking Lot	Weekday Trip Rate	size/day	0.00000	0.20000
Parking Lot	Saturday Trip Rate	size/day	0.00000	0.20000
Parking Lot	Sunday Trip Rate	size/day	0.00000	0.20000

8.5.1.2. Fleet Mix

Land Use	Season	Model Parameter	Units	Default Value	New Value
Parking Lot	A	Heavy-Heavy-Duty Trucks	%	2%	100%
Parking Lot	A	Passenger Cars	%	48%	0%
Parking Lot	A	Light-Duty Trucks 1	%	4%	0%
Parking Lot	A	Light-Duty Trucks 2	%	22%	0%
Parking Lot	A	Light Heavy-Duty Trucks 1	%	3%	0%
Parking Lot	A	Light Heavy-Duty Trucks 2	%	1%	0%
Parking Lot	A	Motorcycles	%	2%	0%
Parking Lot	A	Medium-Duty Trucks	%	17%	0%
Parking Lot	A	Motor Homes	%	< 0.5%	0%
Parking Lot	A	Medium-Heavy-Duty Trucks	%	1%	0%
Parking Lot	A	Other Buses	%	< 0.5%	0%
Parking Lot	A	School Buses	%	< 0.5%	0%
Parking Lot	A	Urban Buses	%	< 0.5%	0%
Parking Lot	S	Heavy-Heavy-Duty Trucks	%	2%	100%
Parking Lot	S	Passenger Cars	%	48%	0%
Parking Lot	S	Light-Duty Trucks 1	%	4%	0%
Parking Lot	S	Light-Duty Trucks 2	%	22%	0%
Parking Lot	S	Light Heavy-Duty Trucks 1	%	3%	0%
Parking Lot	S	Light Heavy-Duty Trucks 2	%	1%	0%
Parking Lot	S	Motorcycles	%	2%	0%
Parking Lot	S	Medium-Duty Trucks	%	17%	0%

EEC ORIGINAL PKG

Parking Lot	S	Motor Homes	%	< 0.5%	0%
Parking Lot	S	Medium-Heavy-Duty Trucks	%	1%	0%
Parking Lot	S	Other Buses	%	< 0.5%	0%
Parking Lot	S	School Buses	%	< 0.5%	0%
Parking Lot	S	Urban Buses	%	< 0.5%	0%
Parking Lot	W	Heavy-Heavy-Duty Trucks	%	2%	100%
Parking Lot	W	Passenger Cars	%	48%	0%
Parking Lot	W	Light-Duty Trucks 1	%	4%	0%
Parking Lot	W	Light-Duty Trucks 2	%	22%	0%
Parking Lot	W	Light Heavy-Duty Trucks 1	%	3%	0%
Parking Lot	W	Light Heavy-Duty Trucks 2	%	1%	0%
Parking Lot	W	Motorcycles	%	2%	0%
Parking Lot	W	Medium-Duty Trucks	%	17%	0%
Parking Lot	W	Motor Homes	%	< 0.5%	0%
Parking Lot	W	Medium-Heavy-Duty Trucks	%	1%	0%
Parking Lot	W	Other Buses	%	< 0.5%	0%
Parking Lot	W	School Buses	%	< 0.5%	0%
Parking Lot	W	Urban Buses	%	< 0.5%	0%

EEC ORIGINAL PKG