Appendix A

Air Quality Report

Kimley»Horn

Air Quality Assessment

525 South Virgil Avenue Project

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Appendix A: Air Quality Modeling Data

LIST OF ABBREVIATED TERMS

AQMP	Air Quality Management Plan
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
BACT	Best available control technology
CARB	California Air Resources Board
CAAQS	California Ambient Air Quality Standards
CCAA	California Clean Air Act
CalEEMod	California Emissions Estimator Model
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CO	Carbon monoxide
CUP	Conditional Use Permit
cy	Cubic yards
DPM	Diesel particulate matter
EDFZ	Electricity Demand Forecast Zone
EV	Electric vehicle
EMFAC	EMission FACtor
FCAA	Federal Clean Air Act
HVAC	Heating, ventilation, and air conditioning
H_2S	Hydrogen sulfide
GHG	Greenhouse gas
Pb	Lead
LST	Localized significance threshold
LADOT	Los Angeles Department of Transportation
LAMC	Los Angeles Municipal Code
$\mu g/m^3$	Micrograms per cubic meter
mg/m^3	Milligrams per cubic meter
NAAQS	National Ambient Air Quality Standards
NSR	New Source Review
NO_2	Nitrogen dioxide
NO_x	Nitrogen oxide
OEHHA	Office of Environmental Health Hazard Assessment
O_3	Ozone
PM_{10}	Coarse particulate matter
$PM_{2.5}$	Fine particulate matter
ppm	Parts per million
ROG	Reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SRA	Source receptor area
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
sf	Square foot

SO_4^{-2}	Sulfates
SO_2	Sulfur dioxide
SIP	State Implementation Plan
TAC	Toxic air contaminant
U.S. EPA	United States Environmental Protection Agency
C_2H_3Cl	Vinyl chloride
VMT	Vehicle Miles Traveled
VOC	Volatile organic compound

1.0 INTRODUCTION

This report documents the results of an Air Quality Assessment completed for the 525 South Virgil Avenue Project ("Project" or "proposed Project"). This Air Quality Assessment evaluates the potential construction and operational air emissions associated with the Project and determines the potential level of impact the Project's emissions would have on the environment.

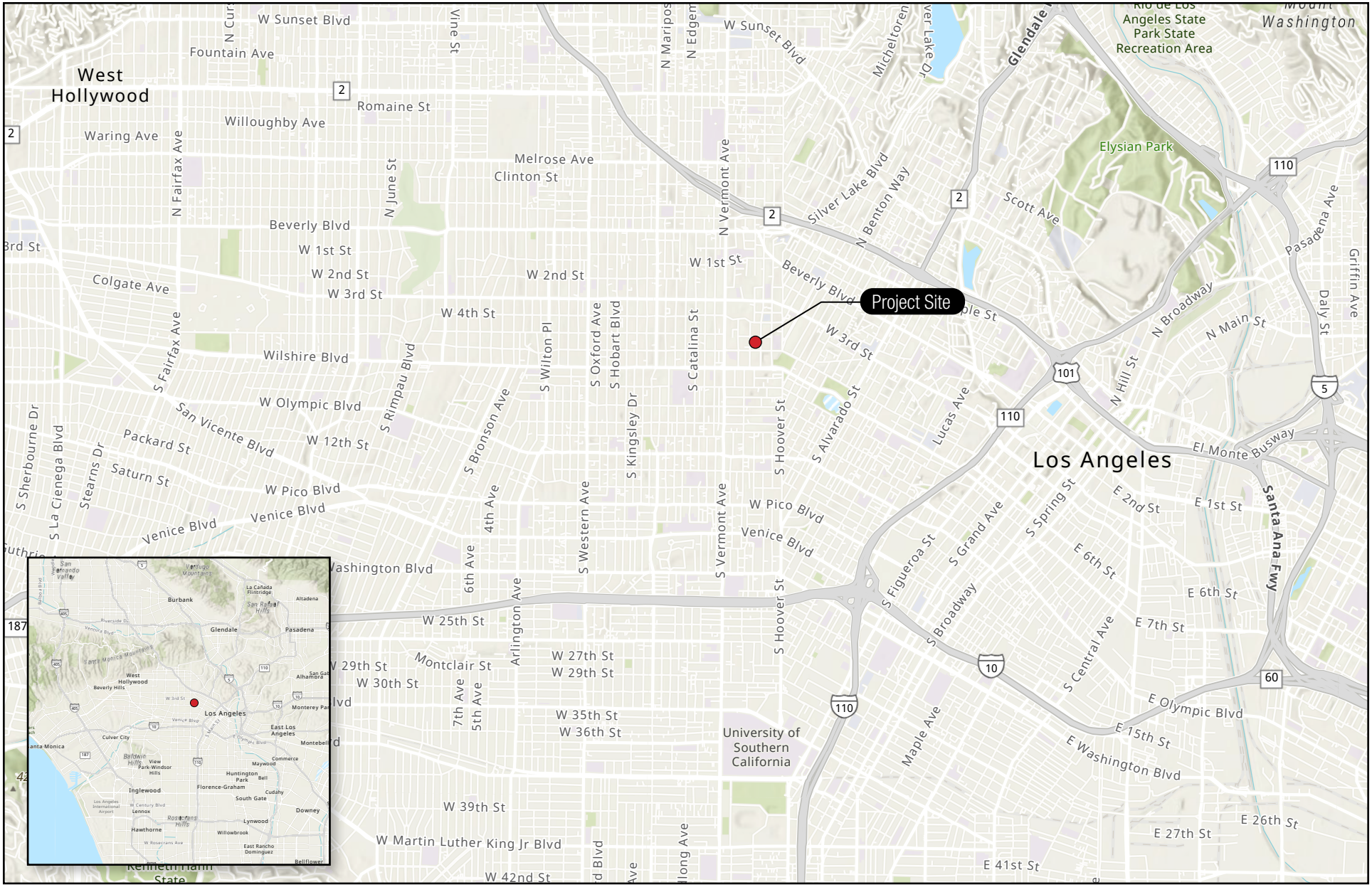
1.1 Project Location

The Project is currently developed with a vacant, approximately 56,072 square foot (sf), four-story commercial building constructed in 1965, a surface parking lot, and metal fencing along the perimeter of the Project Site. The Project Site is bordered by adjacent office/medical, commercial, and residential development to the north, Virgil Avenue to the east, commercial development, including a Carl's Jr. restaurant, to the south, and Westmoreland Avenue and residential development to the west. Directly north of the Project Site is a residential apartment building and a medical office building. East of the Project Site across South Virgil Avenue is a surface parking lot, pharmacy, food bank, and medical clinic. South of the Project Site is a surface parking lot, restaurants, auto body shop, and a hair salon. Directly to the west of the Project Site across Westmoreland Avenue is a church, multi-family housing, and associated surface parking. Please refer to Figure 1: Regional Vicinity and Figure 2: Local Vicinity Map.

Regional vehicle access to the Project Site is provided by the U.S. 101 (US 101 Freeway) located 0.9 miles to the north of the Project Site, California State Route 110 (I-110) Freeway located 1.74 miles to the southeast of the Project Site, and California State Route 10 (I-10) located 1.87 miles south of the Project Site. Local vehicle access to the Project Site is provided via 5th Street to the north, Virgil Avenue to the east, 6th Street to the south, and Westmoreland Avenue to the west. The Project Site is in proximity to several transit options. Numerous Metro transit and Los Angeles Department of Transportation (LADOT) transit bus lines run and stop in the greater vicinity of the Project, including Metro Lines 18, 20, and 204 and the LADOT Wilshire Center/Koreatown Clockwise and Counterclockwise Line. Los Angeles Metro Bus Route 18 is located approximately 310 feet southwest of the Project Site and runs east to west on 6th Street. LA Metro Bus Route 20 is located approximately 962 feet south of the Project Site and runs east to west on Wilshire Boulevard. LA Metro Bus Route 204 and LADOT Wilshire Center/Koreatown Clockwise and Counterclockwise Bus Route are located approximately 0.3 miles west of the Project Site and run north to south along Vermont Avenue. The Project Site is located approximately 0.25 miles northeast of the Wilshire and Vermont Metro Station, which serves the B Line (formally the Red line) and the D Line (formally the Purple Line). Additionally, the Project Site is approximately 0.8 miles northeast of the Wilshire and Normandie Station, which serves the D line (formally the Purple line).

1.2 Project Description

The Project would demolish the existing 56,072 sf vacant office building and its associated parking lot and construct an approximately 252,876 sf, eight-story self-storage building and ground-level parking. See Figure 3: Project Site **Plan.** The ground floor would also contain an office, a lobby, restrooms, elevators, a transformer yard, and bicycle parking spaces. A street-level display window on Virgil Avenue showcasing products available for purchase would be located on the ground floor of the Project. Also located on the ground floor would be approximately 24 automobile stalls,

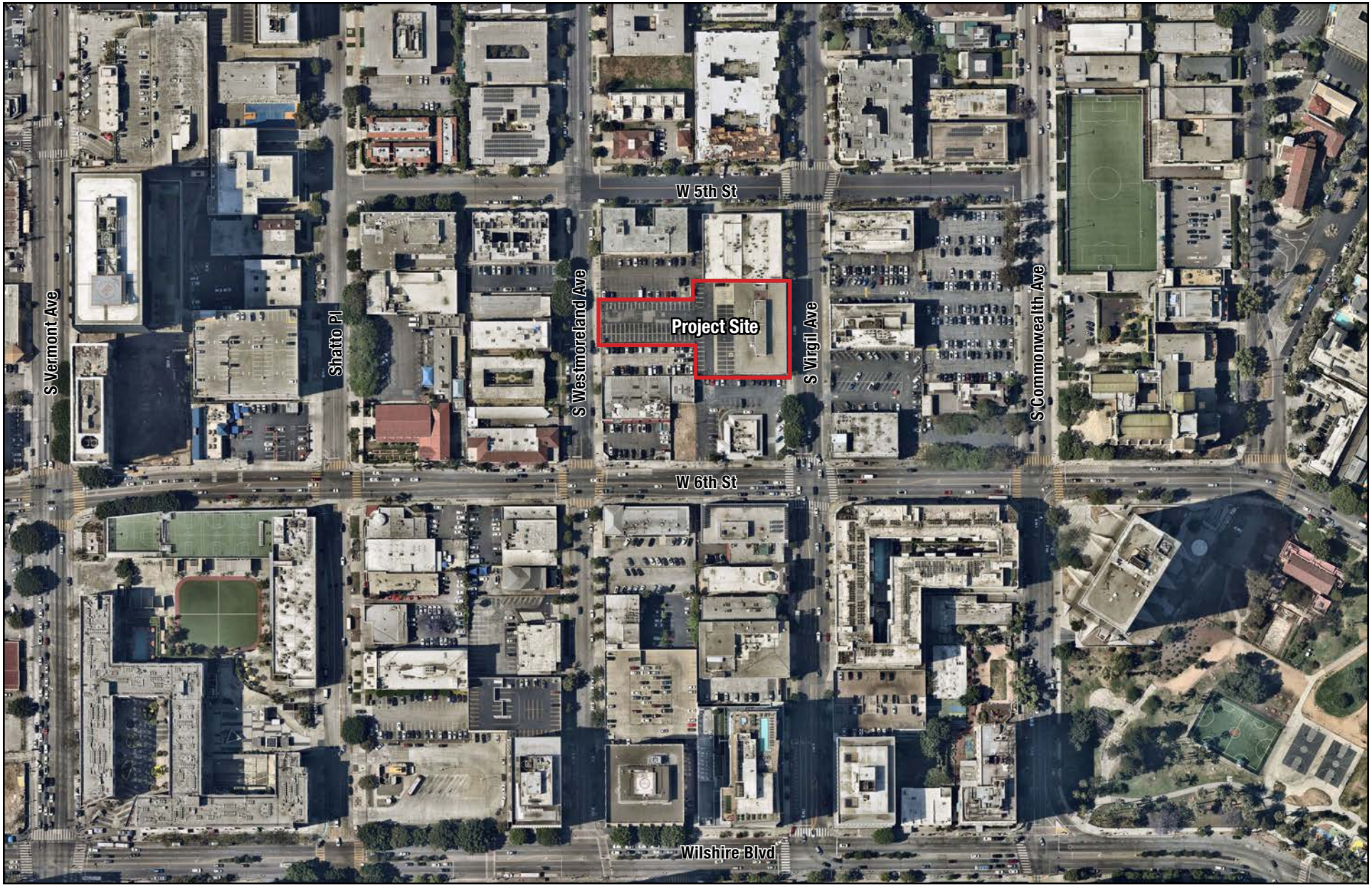


SOURCE: ArcGIS Pro, 2025

FIGURE 1: Regional Vicinity Map

525 SOUTH VIRGIL AVENUE PROJECT

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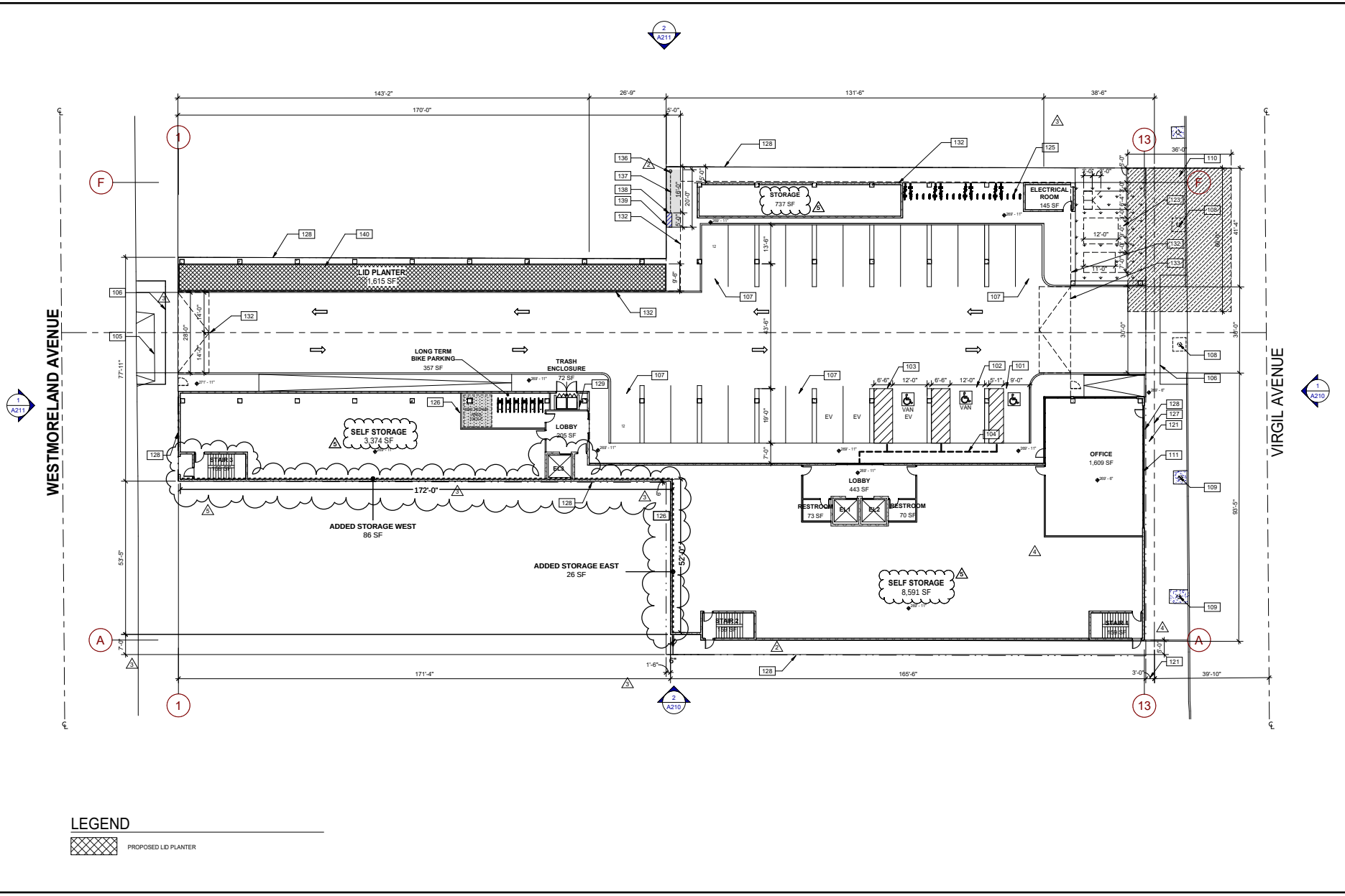


SOURCE: Nearmap, 2025

FIGURE 2: Local Vicinity Map

525 SOUTH VIRGIL AVENUE PROJECT

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SOURCE: Ware Malcomb, 2026

FIGURE 3: Project Site Plan

525 SOUTH VIRGIL AVENUE PROJECT

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including Americans with Disabilities Act (ADA) compliant stalls and electric vehicle (EV) parking stalls. The Project would also include some drought-tolerant landscaping as well as multiple large murals.

1.3 Open Space and Landscaping

The Project would not include residential uses; therefore, no open space requirements would apply to the Project. There are no trees on the Project Site and four street trees (*Ficus Nitida*) located along Virgil Avenue. The Project proposes the removal of the two northern street trees and the retention of the two southern street trees. None of the trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873. Furthermore, any removal of street trees would require approval from the City of Los Angeles Bureau of Street Services. Additionally, the Project would include some drought-tolerant landscaping and green roof trays.

1.4 Site Security

During construction, the Project Site would be secured with perimeter fencing. During Project operations, the Project would be open seven days a week. The front office would be open to the public from approximately 9:00 a.m. to 6:00 p.m. daily, where visitors can purchase supplies and other conveniences, but otherwise the storage portions of the facility would only be accessible to customers and only between the hours of approximately 6:00 a.m. to 10:00 p.m. daily.

The Project would incorporate numerous safety features, including security cameras, burglar alarms, access control to the building, and bolt-cutter resistant cylinder locks. The plans for the Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. The Project would include well-illuminated public and semi-public spaces designed with minimal dead space to eliminate areas of concealment.

1.5 Sustainability Features

The Project would comply, as applicable, with the Green Building Code, which requires the use of numerous conservation measures beyond those required by Title 24 of the California Administrative Code. The Green Building Code contains both mandatory and voluntary green building measures to conserve energy. The Project would include EV spaces, bike parking and storage, and low-flow water fixtures. The Project would utilize drought tolerant landscaping and water efficient irrigation. The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled (VMT) for the Project.

1.6 Anticipated Construction Schedule

Development of the Project would require the export of approximately 5,600 cubic yards (cy) of soil (7,280 cy with a 30-percent swell factor applied). All necessary utility improvements, including water, sewer, and storm drain, would be constructed within the Project Site. For the purposes of this analysis, the Project's construction schedule is assumed to be approximately 18 months, with construction beginning in the second quarter of 2027 and ending in the fourth quarter of 2028. The Project is anticipated to be operational in 2028.

Construction activities would be performed in accordance with all applicable State and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of the Los Angeles Municipal Code (LAMC), the permissible hours of construction within the City are 7:00 a.m. to 9:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on any Saturday or national holiday. No construction activities are permitted on Sundays. Project construction will comply with LAMC Section 41.40.

2.0 ENVIRONMENTAL SETTING

2.1 Climate and Meteorology

The California Air Resources Board (CARB) divides the State into 15 air basins that share similar meteorological and topographical features.[1] The Project is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, as well as all of Orange County. The SCAB is on a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean on the southwest and high mountains forming the remainder of the perimeter.[2] Air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions. These factors along with applicable regulations are discussed below.

The SCAB is part of a semi-permanent high-pressure zone in the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. This usually mild weather pattern is occasionally interrupted by periods of extreme heat, winter storms, and Santa Ana winds. The annual average temperature throughout the 6,645-square-mile SCAB ranges from low 60 to high 80 degrees Fahrenheit with little variance.[3] With more oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas.

Contrasting the steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all annual rainfall occurs between the months of November and April.[4] Summer rainfall is reduced to widely scattered thundershowers near the coast, with slightly heavier activity in the east and over the mountains.

Although the SCAB has a semiarid climate, the air closer to the Earth's surface is typically moist because of the presence of a shallow marine layer. Except for occasional periods when dry, continental air is brought into the SCAB by offshore winds, the "ocean effect" is dominant. Periods of heavy fog are frequent and low clouds known as high fog are characteristic climatic features, especially along the coast. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB.[5]

Wind patterns across the SCAB are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is typically higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day.[6] During winter and fall, surface high-pressure systems over the SCAB,

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1 South Coast Air Quality Management District, 2022 Air Quality Management District, page 1-6, 2022. https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan. Accessed November 19, 2025

2 Ralph W. Keith, A Climatological/ Air Quality Profile, California South Coast Air Basin, page 2, 1980,https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/reports/l6016.pdf. Accessed November 24, 2025.

3 South Coast Air Quality Management District, CEQA Air Quality Handbook, page A8-1, 1993, https://ssfl.msfc.nasa.gov/files/documents/seisreferences/SCAQMD-1993.pdf. Accessed November 24, 2025.

4 Ralph W. Keith, A Climatological/ Air Quality Profile, California South Coast Air Basin, page 31, 1980, https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/reports/l6016.pdf. Accessed November 24, 2025.

5 South Coast Air Quality Management District, CEQA Air Quality Handbook, page A8-1, 1993, https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_2-AirQuality/SCAQMD_1993_-_CEQA_Handbook.pdf. Accessed November 25, 2025.

6 Julian X.L. Wang and James K. Angell, Air Stagnation Climatology for the United States (1948-1998), page 1, 1999, https://www.nrc.gov/docs/ML0722/ML072260075.pdf. Accessed November 24, 2025.

combined with other meteorological conditions, result in very strong, downslope Santa Ana winds.[7] These winds normally continue for a few days before predominant meteorological conditions are reestablished.[8]

The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SCAB generally ranges from good to moderate and is similar to air quality in most of coastal Southern California.[9] The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.[10]

In addition to the characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which air pollutants are mixed. These inversions are the marine inversion and the radiation inversion.[11] The height of the base of the inversion at any given time is called the "mixing height."[12] The combination of winds and inversions is a critical determinant leading to highly degraded air quality for the SCAB in the summer and generally good air quality in the winter.[13]

2.2 Air Pollutants of Concern

Certain air pollutants can cause notable health problems and environmental damage due to their presence in elevated concentrations in the atmosphere. The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by state and federal laws. These regulated air pollutants are known as "criteria air pollutants" and are categorized into primary and secondary pollutants.

Primary air pollutants are those emitted directly from the sources. The primary air pollutants for which national and state criteria and standards have been promulgated and which are most relevant to current air quality planning and regulation in the SCAB are: carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_X), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead (Pb).[14] Of these, CO, NO_X, SO_2, PM_{10}, $PM_{2.5}$, and lead are criteria pollutants.[15] ROG and NO_X are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere.[16]

For example, the criteria pollutant ozone (O_3) is formed by a chemical reaction between ROG and

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7 Alexander Gershunov, et. al, Hot and Cold Flavors of Southern California's Santa Ana Winds: Their Causes, Trends, and Links with Wildfire, 2021, https://pmc.ncbi.nlm.nih.gov/articles/PMC8165508/. Accessed November 24, 2025.

8 California Air Resources Board, Almanac Resources, 2024, https://ww2.arb.ca.gov/resources/documents/almanac-resources. Accessed October 8, 2025.

9 United States Environmental Protection Agency, AirNow, https://www.airnow.gov/. Accessed November 25, 2025.

10 Julian X.L. Wang and James K. Angell, Air Stagnation Climatology for the United States (1948-1998), page 1, 1999, https://www.nrc.gov/docs/ML0722/ML072260075.pdf. Accessed November 24, 2025.

11 Ralph W. Keith, A Climatological/ Air Quality Profile, California South Coast Air Basin, page 2, 1980, https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/reports/l6016.pdf. Accessed November 24, 2025.

12 Ralph W. Keith, A Climatological/ Air Quality Profile, California South Coast Air Basin, page 19, 1980, https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/reports/l6016.pdf. Accessed November 24, 2025.

13 Ralph W. Keith, A Climatological/ Air Quality Profile, California South Coast Air Basin, page 34, 1980, https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/reports/l6016.pdf. Accessed November 24, 2025.

14 United States Environmental Protection Agency, NAAQS Table, https://19january2017snapshot.epa.gov/criteria-air-pollutants/naaqs-table_.html. Accessed November 24, 2025.

15 United States Environmental Protection Agency, Criteria Air Pollutants, https://www.epa.gov/criteria-air-pollutants. Accessed November 24, 2025.

16 United States Environmental Protection Agency, Ground-level Ozone Basics, 2025, https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics. Accessed November 24, 2025.

NO_X in the presence of sunlight. O_3 and nitrogen dioxide (NO_2) are the principal secondary pollutants.[17] Sources and health effects commonly associated with criteria pollutants are summarized in Table 1: Air Contaminants and Associated Public Health Concerns.

Table 1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources	Human Health Effects
Particulate Matter (PM_{10} and $PM_{2.5}$)	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases/volatile organic compounds (ROG or VOC)[1] and nitrogen oxides (NO_X) in the presence of sunlight. Motor vehicle exhaust industrial emissions, gasoline storage and transport, solvents, paints and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Sulfur Dioxide (SO_2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to O_3. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions	Exposure to lead occurs mainly through inhalation of air and ingestion of lead in food, water, soil, or dust. It accumulates in

[17] United States Environmental Protection Agency, NAAQS Table, https://19january2017snapshot.epa.gov/criteria-air-pollutants/naaqs-table_.html. Accessed November 24, 2025

Table 1: Air Contaminants and Associated Public Health Concerns		
Pollutant	**Major Man-Made Sources**	**Human Health Effects**
	have historically been motor vehicles (such as cars and trucks) and industrial sources. Due to the phase out of leaded gasoline, metals processing is the major source of lead emissions to the air today. The highest levels of lead in the air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers.	the blood, bones, and soft tissues and can adversely affect the kidneys, liver, nervous system, and other organs. Excessive exposure to lead may cause neurological impairments such as seizures, intellectual disabilities, and behavioral disorders. Even at low doses, lead exposure is associated with damage to the nervous systems of fetuses and young children, resulting in learning deficits and lowered IQ.
1. Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROGs and VOCs. Both ROGs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).		
Sources: United States Environmental Protection Agency, Criteria Air Pollutant, https://www.epa.gov/criteria-air-pollutants. Accessed October 8, 2025.		

Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e., chronic, carcinogenic or cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. CARB maintains a list of TACs in California. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.[18]

CARB has identified diesel particulate matter (DPM) as a TAC.[19] DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles (such as DPM) and gases produced when an engine burns diesel fuel. DPM includes the particle-phase constituents in diesel exhaust. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerating, decelerating), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs.[20]

[18] California Air Resources Board, CARB Identified Toxic Air Contaminants, https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants. Accessed November 24, 2025.

[19] California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts. Accessed November 24, 2025.

[20] California Air Resource Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health, Accessed December 1, 2025.

Almost all diesel exhaust particle mass is 10 microns or less in diameter.[21] Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.[22]

Ambient Air Quality

CARB monitors ambient air quality at approximately 250 air monitoring stations across the State.[23] These stations usually measure pollutant concentrations ten feet above ground level[24]; therefore, air quality is often referred to in terms of ground-level concentrations. Existing levels of ambient air quality, historical trends, and projections near the Project Site are documented by measurements made by the South Coast Air Quality Management District (SCAQMD), the air pollution regulatory agency in the SCAB that maintains air quality monitoring stations which process ambient air quality measurements.

The closest air monitoring station to the Project Site that monitors ambient concentrations of O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ is the Los Angeles-North Main Street (located approximately three miles to the east of the Project Site).[25] Local air quality data from 2022 to 2024 (the latest currently available) are provided in Table 2: Ambient Air Quality Data, which lists the monitored maximum concentrations and number of exceedances of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for each year. The CAAQS and NAAQS specify thresholds for emissions that are considered sufficient to protect public health and welfare.

[21] California Air Resources Board, The Report on Diesel Exhaust, 1998, https://ww2.arb.ca.gov/sites/default/files/classic/toxics/dieseltac/de-fnds.htm. Accessed November 24, 2025.

[22] California Air Resources Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed November 24, 2025.

[23] California Air Resources Board, Ambient Air Monitoring – Regulatory, https://ww2.arb.ca.gov/our-work/programs/ambient-air-monitoring-regulatory. Accessed November 24, 2025.

[24] Code of Federal Regulation (CFR), 40 CFR Part 58 Section 2.1

[25] California Air Resources Board, Air Monitoring Sites – Interactive Map, https://ww2.arb.ca.gov/applications/air-monitoring-sites-interactive-map. Accessed November 24, 2025.

Table 2: Ambient Air Quality Data			
Criteria Pollutant	**2022[1]**	**2023[1]**	**2024[1]**
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.138	0.097	0.107
Maximum 8-hour Concentration (ppm)	0.090	0.082	0.081
Days exceeding CAAQS (0.09 ppm)	1	1	2
Days exceeding NAAQS (0.070 ppm)	6	7	6
Carbon Monoxide (CO)			
Maximum 1-hour Concentration (ppm)	1.7	1.4	1.8
Days exceeding NAAQS (35 ppm)	--	--	--
Days exceeding CAAQS (20 ppm)	--	--	--
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.08	0.06	0.08
Days exceeding NAAQS (100 ppm)	--	--	--
Days exceeding CAAQS (0.18 ppm)	--	--	--
Sulfur Dioxide (SO_2)			
Maximum 1-hour Concentration (ppm)	0.007	0.008	0.002
99th Percentile 1-hour Concentration (ppm)	0.002	0.002	0.002
Days exceeding NAAQS (0.075 ppm)	--	--	--
Days exceeding CAAQS (0.25 ppm)	--	--	--
Coarse Particulate Matter (PM_{10})			
Maximum 24-hour Concentration	60	57	77
Annual Average Concentration	28.9	24.3	25.4
Days exceeding NAAQS (150 µg/m^3)	0	0	0
Days exceeding CAAQS (50 µg/m^3)	4	2	10
Fine Particulate Matter ($PM_{2.5}$)			
Maximum 24-hour Concentration	33.7	30.6	55.7
Days exceeding NAAQS 24-hour (35 µg/m^3)	0	0	5
Lead (Pb)			
Maximum Monthly Average Concentration (µg/m^3)	0.008	0.007	0.008
Maximum 3-Month Rolling Average Concentration (µg/m^3)	0.007	0.007	0.008
Days exceeding NAAQS (1.5 µg/m^3)	--	--	--
Days exceeding CAAQS (1.5 µg/m^3)	--	--	--
Sulfate (SO_4)			
Maximum 24-hour Concentration (µg/m^3)	5.8	6.5	14.1
Days exceeding CAAQS (25 µg/m^3)	--	--	--

NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million; µg/m^3 = micrograms per cubic meter; -- = not measured

1. Measurements were taken at the Los Angeles-North Main Street Monitoring Station located at 1630 North Main Street, Los Angeles, California 90012 (CARB #70087).

Source: South Coast Air Quality Management District, Historical Data by Year, https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year. Accessed October 8, 2025.

2.3 Sensitive Receptors

Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors are locations where sensitive populations congregate. Therefore, sensitive receptors that are in proximity to localized sources of toxics are of particular concern. Land uses considered sensitive receptors for purposes of air quality analysis are residences, schools,

childcare centers, hospitals, parks, and similar uses.[26] The air quality sensitive receptor closest to the Project Site are the residential uses located approximately 44 feet to the north. All other air quality sensitive receptors near the Project Site are farther from the Project Site and would thus be less impacted by Project emissions.

[26] City of Los Angeles, L.A. CEQA Thresholds Guide, page B.1-4, 2006, https://planning.lacity.gov/eir/CrossroadsHwd/deir/files/references/A07.pdf. Accessed November 24. 2025.

3.0 REGULATORY SETTING

3.1 Federal

Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA; 42 United States Code §§ 7401 et seq.) and its amendments. Under the FCAA, the United States Environmental Protection Agency (U.S. EPA) developed the primary and secondary NAAQS for the criteria air pollutants including O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and Pb. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each state to prepare a State Implementation Plan (SIP) to demonstrate how it will attain the NAAQS within the federally imposed deadlines.[27]

The U.S. EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a state fails to correct these planning deficiencies within two years of Federal notification, the U.S. EPA is required to develop a federal implementation plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations Parts 51 and 93 apply in all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. The U.S. EPA has designated enforcement of air pollution control regulations to the individual states.[28] Applicable federal standards are summarized in Table 3: State and Federal Ambient Air Quality Standards.

Table 3: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1,2]	Federal Standards[3,4,5]
Ozone (O_3)[6]	1 Hour	0.09 ppm (180 µg/m^3)	NA
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)
Respirable Particulate Matter (PM_{10})[7]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter ($PM_{2.5}$)[7]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	9.0 µg/m^3
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
	8 Hour	9.0 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)
Nitrogen Dioxide (NO_2)[8]	1 Hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2)[9]	1 Hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Lead (Pb)[10,11]	30-Day Average	1.5 µg/m^3	NA
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Visibility Reducing Particles[12]	8 hours	See Note 11	NA
Sulfates (SO_4^{-2})	24 Hour	25 µg/m^3	NA
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (42 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl)[10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; NA = no information available

[27] United States Environmental Protection Agency, Basics of SIP Requirements, 2025, https://www.epa.gov/ground-level-ozone-pollution/basics-sip-requirements. Accessed November 24, 2025.

[28] United States Environmental Protection Agency, Delegation of Clean Air Act Authority, 2024, https://www.epa.gov/caa-permitting/delegation-clean-air-act-authority. Accessed November 25, 2025.

Table 3: State and Federal Ambient Air Quality Standards

1. California standards for O_3, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25° C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25° C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
3. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
7. On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 µg/m^3 to 9.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15.0 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
8. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
9. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
10. The ARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
11. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Source: South Coast Air Quality Management District, Table of Air Quality Standards, 2024, https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf. Accessed October 8, 2025.

3.2 State of California

California Air Resources Board

CARB administers State air quality policy in California. The CAAQS were established in 1969 pursuant to the Mulford-Carrell Act. These standards, included with the NAAQS in Table 3, are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates.[29]

The California Clean Air Act (CCAA) requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS. These AQMPs also serve as the basis for the preparation of the SIP for meeting the federal clean air standards for the State of California.[30] Like the U.S. EPA, CARB also designates areas within California as either attainment or

[29] California Air Resources Board, California Ambient Air Quality Standards, https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards. Accessed November 24, 2025.

[30] South Coast Air Quality Management District, State Implementation Plan (SIP) Credit Guidance, https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/facility-based-mobile-source-measures/sip-credit-

nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as being in nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years.[31] Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc., are not considered violations of a state standard, and are not used as a basis for designating areas as being in nonattainment. The applicable State standards are summarized above in Table 3.

3.3 Regional

South Coast Air Quality Management District

SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that state and federal ambient air quality standards are attained and maintained in the SCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All development projects are subject to SCAQMD rules and regulations in effect at the time of construction.[32]

The SCAQMD is also the lead agency in charge of developing each AQMP, with input from the Southern California Association of Governments (SCAG) and CARB.[33] The AQMP is a comprehensive plan that includes control strategies to reduce emissions from stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures.[34] CARB, in coordination with federal agencies, has jurisdiction over mobile sources.[35]

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017.[36] The purpose of the 2016 AQMP is to set forth a comprehensive and integrated program that would lead the SCAB into compliance with those NAAQS for which the SCAB is in nonattainment (i.e., the federal 24-hour $PM_{2.5}$ standard) and to provide an update to the SCAQMD's commitments towards meeting the federal 8-hour O_3 standards. The 2016 AQMP incorporated the latest scientific and technological information and planning assumptions, including the *2016-2040* Regional *Transportation*

guidance#:~:text=The%20control%20strategy%20within%20the,provided%20as%20it%20becomes%20available. Accessed November 25, 2025.

31 California Air Resources Board, Public Hearing to Consider the Proposed 2023 Amendments to the Area Designations for State Air Quality Standards, page 6, 2023, https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/areades/isor.pdf. Accessed November 25, 2025.

32 South Coast Air Quality Management District, Regulations, https://www.aqmd.gov/home/rules-compliance/regulations. Accessed November 25, 2025.

33 South Coast Air Quality Management District, Air Quality Element, page 4, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/model-air-quality-element.pdf?sfvrsn=0. Accessed November 25, 2025.

34 South Coast Air Quality Management District, Final 2003 AQMP, page ES-3, 2003, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-executive-summary.pdf. Accessed November 25, 2025.

35 South Coast Air Quality Management District, Air Quality Element, page 4, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/model-air-quality-element.pdf?sfvrsn=0. Accessed November 25, 2025.

36 South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, 2017, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf. Accessed November 25, 2025

Plan/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories.[37]

On October 1, 2015, the U.S. EPA strengthened the NAAQS for ground-level O_3.[38] The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the strengthened requirements for meeting the 2015 ground-level 8-hour O_3 standard.[39] The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour O_3 NAAQS. Like earlier AQMPs, the 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including the *2020-2045* RTP/SCS and updated emission inventory methodologies for various source categories.[40]

The SCAQMD has published the *CEQA Air Quality Handbook* (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Local Significance Thresholds [LST] in 2008).[41] The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by California Environmental Quality Act (CEQA) and suggests thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of SCAQMD's *CEQA Air Quality Handbook* and associated guidance, lead agencies, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments.[42]

The State and federal attainment status designations for the SCAB are summarized in Table 4: South Coast Air Basin Attainment Status. The SCAB is currently designated as a nonattainment area with respect to the State O_3, PM_{10}, and $PM_{2.5}$ standards, as well as the federal O_3 and $PM_{2.5}$ standards. The SCAB is designated as partial nonattainment for Pb only in the Los Angeles County portion. The SCAB

[37] Southern California Association of Governments, The 2016 – 2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557. Accessed October 8, 2025.

[38] United States Environmental Protection Agency, 2015 Revision to 2008 Ozone National Ambient Air Quality Standards (NAAQS) Related Documents, 2025, https://www.epa.gov/ground-level-ozone-pollution/2015-revision-2008-ozone-national-ambient-air-quality-standards-naaqs. Accessed November 25, 2025.

[39] South Coast Air Quality Management District, 2022 Air Quality Management Plan, 2022, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf. Accessed November 25, 2025.

[40] Southern California Association of Governments, Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy), 2020, https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020. Accessed October 8, 2025.

[41] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, Revised 2008, https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed October 8. 2025.

[42] Southern California Association of Governments, About Us, https://scag.ca.gov/about-us. Accessed November 25, 2025.

is designated as attainment or unclassified for the remaining State and federal standards.

Table 4: South Coast Air Basin Attainment Status

Pollutant	State	Federal
Ozone (O_3) (1 Hour Standard)	Nonattainment	Nonattainment (Extreme)
Ozone (O_3) (8 Hour Standard)	Nonattainment	Nonattainment (Extreme)
Particulate Matter ($PM_{2.5}$) (24 Hour Standard)	–	Nonattainment (Serious)
Particulate Matter ($PM_{2.5}$) (Annual Standard)	Nonattainment	Nonattainment (Moderate)
Particulate Matter (PM_{10}) (24 Hour Standard)	Nonattainment	Attainment (Maintenance)
Particulate Matter (PM_{10}) (Annual Standard)	Nonattainment	–
Carbon Monoxide (CO) (1 Hour Standard)	Attainment	Attainment (Maintenance)
Carbon Monoxide (CO) (8 Hour Standard)	Attainment	Attainment (Maintenance)
Nitrogen Dioxide (NO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2) (Annual Standard)	Attainment	Attainment (Maintenance)
Sulfur Dioxide (SO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO_2) (24 Hour Standard)	Attainment	–
Lead (Pb) (3 Month Standard)	--	Nonattainment (Partial)[1]
Sulfates (SO_4^{-2}) (24 Hour Standard)	Attainment	–
Hydrogen Sulfide (H_2S) (1 Hour Standard)	Unclassified	–

– = no information available
1. Partial Nonattainment designation – Los Angeles County portion of SCAB only for near-source monitors.

Source: South Coast Air Quality Management District, 2022 Air Quality Management Plan, page 2-15, 2022, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed November 25, 2025.

The following is a list of relevant SCAQMD rules with which construction activities associated with the Project must comply:

- **Rule 401 (Visible Emissions)**[43] – A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.
- **Rule 402 (Nuisance)**[44] – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which

[43] South Coast Air Quality Management District, Rule 401: Visible Emissions, Amended 2001. https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf. Accessed November 25, 2025.
[44] South Coast Air Quality Management District, Rule 402: Nuisance, Adopted 1976, https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf. Accessed November 25, 2025.

endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for growing crops or the raising of fowl or animals.

- **Rule 403 (Fugitive Dust)**[45] - This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

  a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

  b) All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.

  c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

  d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

  e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the work day to remove soil from pavement.

- **Rule 431.2 (Sulfur Content of Liquid Fuels)**[46] - This rule limits the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines.

- **Rule 1113 (Architectural Coatings)**[47] – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

- **Rule 1143 (Consumer Paint Thinners and Multi-Purpose Solvents)**[48] – This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their volatile organic compound (VOC) content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

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45 South Coast Air Quality Management District, Rule 403: Fugitive Dust, Amended 2005, https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf. Accessed November 25, 2025.

46 South Coast Air Quality Management District, Rule 431.2: Sulfur Content of Liquid Fuels, Amended 2000, https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf. Accessed November 25, 2025.

47 South Coast Air Quality Management District, Rule 1113: Architectural Coatings, Amended 2016, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf. Accessed November 25, 2025.

48 South Coast Air Quality Management District, Rule 1143: Consumer Paint Thinners and Multi-Purpose Solvents, Amended 2010, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1143.pdf. Accessed November 25, 2025.

- **Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities)**[49] – This rule requires owners and operators or any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.
- **Rule 1415 (Reduction of Refrigerant Emissions from Stationary Air Conditioning Systems)**[50] – The purpose of this rule is to reduce emissions of high-global warming potential refrigerants from stationary air conditioning systems by requiring projects to reclaim, recover, or recycle refrigerant and minimize leakage.
- **Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines)**[51] **–** This rule would minimize emissions associated with stationary engines over 50 horsepower by establishing operating requirements and emission standards, enforcing the Airborne Toxics Control Measure, and requiring owners and operators to submit a Compliance Status Report and a Compliance Plan to the SCAQMD.

3.4 Local

City of Los Angeles General Plan

Air Quality Element

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City of Los Angeles' General Plan contains policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and the City.

The City's General Plan Air Quality Element (Air Quality Element) is the most relevant plan and was adopted on November 24, 1992.[52] The Air Quality Element sets forth goals, objectives, and policies that guide the City in its implementation of its air quality improvement programs and strategies. Specifically, the goals, objectives, and policies focus on traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency. The Air Quality Element establishes the following goals:

Goal 1: Good air quality in an environment of continued population growth and healthy economic

[49] South Coast Air Quality Management District, Rule 1403: Asbestos Emissions from Demolition/Renovation Activities, Amended 2007, https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf. Accessed November 25, 2025.

[50] South Coast Air Quality Management District, Rule 1415: Reduction of Refrigerant Emissions from Stationary Air Conditioning Systems, Amended 2010, https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1415.pdf?sfvrsn=1c3b1d61_4. Accessed November 25, 2025.

[51] South Coast Air Quality Management District, Rule 1470: Requirements of Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines, amended 2021, https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf. Accessed November 25, 2025.

[52] Los Angeles City Planning, Air Quality Element, 1992, https://planning.lacity.gov/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf. Accessed November 25, 2025.

structure.

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques.

Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures, including passive measures such as site orientation and tree planting.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

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

Health and Wellness Element

The Health and Wellness Element (Plan for a Healthy Los Angeles) was adopted by the City Council on March 31, 2015 and amended in November 2021 and lays the foundation to create healthier communities for all residents in the City.[53] As an element of the General Plan, it provides a high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods; a clean environment (i.e., improved ambient and indoor air quality); the opportunity to thrive; and access to health services, affordable housing, and healthy and sustainably produced food.

City of Los Angeles Municipal Code

In December 2022, the City approved Ordinance No. 187,714, which amends Divisions 2, 4, and 5 of Article 9 of Chapter IX of the LAMC to require all new buildings to be all-electric buildings with exceptions.[54] The ordinance is applicable to new buildings in which an application for a building permit was submitted after April 1, 2023. Consistent with this new ordinance, Chapter IX of the LAMC, Section 99.02.202 defines an all-electric building as:

[53] Los Angeles City Planning, Plan for a Healthy Los Angeles, A Health, Wellness, and Equity Element of the General Plan, 2021, https://planning.lacity.gov/odocument/2442d4df-34b3-4683-8eb9-b5ea1182782b/Plan_for_a_Healthy_Los_Angeles.pdf. Accessed November 25, 2025.

[54] City of Los Angeles, Ordinance No. 187,714, 2022, https://cityclerk.lacity.org/onlinedocs/2022/22-0151_ord_187714_1-23-23.pdf. Accessed November 25, 2025.

> *"A building that contains no combustion equipment, plumbing for combustion equipment, gas piping, or fuel gas serving any use including, but not limited to, space heating (including fireplaces), water heating (including pools and spas), cooking appliances (including barbeques), and clothes drying, within the building or building property lines, and instead uses electricity as the sole source of energy for all lighting, appliances and/or equipment, including, but not limited to, space heating, water heating, cooking appliances, and drying appliances."*[55]

Equipment typically powered by natural gas, such as space heating, water heating, cooking appliances and clothes drying, would need to be powered by electricity for new construction. Chapter IX of the LAMC, Section 99.05.106.14 provides exemptions from the requirements for cooking equipment contained within kitchens in a public use area, such as restaurants, commissaries, cafeterias, and community kitchens as long as electrical infrastructure is installed; gas-powered emergency life-saving systems, including emergency backup; and gas-powered process equipment in institutions, such as hospitals, industrial, motion picture and television production studio sound stages (without spectators), and laboratories. The LAMC is consistent with the 2022 Title 24 goals of encouraging all-electric development, which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas (GHG) emissions, which is more than any other sector in the City.[56] These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035[57], rather than relying on fossil fuels.

In June 2025, the City published a draft ordinance to repeal the all-electric new construction standard established in Ordinance No. 187,714 and the amended LAMC Chapter IX sections 99.02.202, 99.04.106.8, and 999.05.106.14.[58] The ordinance was drafted in accordance with the decision in *California Restaurant Association v. City of Berkeley*, 65 F.4th 1045, 1052, 1056 (9th Cir. 2023), in which the Ninth Circuit Court of Appeals held that the City of Berkeley's ban on installing natural gas piping in new building construction is preempted by the federal Energy Policy and Conservation Act and that states and localities cannot prevent consumers from using certain covered products through regulations on the products themselves or their infrastructure. Once approved, the City's ordinance would retroactively apply to any building permit for which an occupancy certificate has not yet been issued. In anticipation of this repeal, this analysis conservatively assumes the proposed Project would utilize natural gas and electricity to power the self-storage facility as that would have greater air quality impacts than an all-electric building.

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55 City of Los Angeles, City of Los Angeles Municipal Code, Section 99.02.202: Definitions, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-291758. Accessed November 25, 2025.

56 City of Los Angeles, District 4 Press Release, LA City Council Adopts Building Corde Ordinance to Require All New Buildings Constructed in Los Angeles be Zero-Carbon, 2022, https://cd4.lacity.gov/press-releases/cd4-release-decarbonized-construction-12722/. Accessed November 25, 2025.

57 City of Los Angeles, District 4 Press Release, LA City Council Adopts Building Corde Ordinance to Require All New Buildings Constructed in Los Angeles be Zero-Carbon, 2022, https://cd4.lacity.gov/press-releases/cd4-release-decarbonized-construction-12722/. Accessed November 25, 2025.

58 City of Los Angeles, Draft Ordinances Repealing the All-Electric Building Standards in Ordinance No. 187,714 and Providing an Option for Retroactivity, 2025, https://cityclerk.lacity.org/onlinedocs/2022/22-0151_rpt_atty_6-24-25.pdf. Accessed November 25, 2025.

4.0 SIGNIFICANCE CRITERIA AND METHODOLOGY

4.1 Air Quality Thresholds

State CEQA Guidelines Appendix G

Based upon the criteria derived from State CEQA Guidelines Appendix G, the City has determined that the Project normally would have a significant air quality effect on the environment if it would:

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

L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide was adopted in 2006 and identified the following factors that may be relevant to preparing the air quality impact analysis:

Construction Emissions

- Combustion Emissions from Construction Equipment
    - Type, number of pieces and usage for each type of construction equipment;
    - Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
    - Emission factors for each type of equipment.
- Fugitive Dust – Grading, Excavation and Hauling
    - Amount of soil to be disturbed on-site or moved off-site;
    - Emission factors for disturbed soil;
    - Duration of grading, excavation and hauling activities;
    - Type and number of pieces of equipment to be used; and
    - Projected haul route.
- Fugitive Dust – Heavy-Duty Equipment Travel on Unpaved Road
    - Length and type of road;
    - Type, number of pieces, weight and usage of equipment; and
    - Type of soil.
- Other Mobile Source Emissions
    - Number and average length of construction worker trips to Project Site, per day; and

- Duration of construction activities.

Operational Emissions

- Operational emissions exceeding 10 tons per year of volatile organic gases or any of the daily thresholds presented below (as reprinted from the CEQA Air Quality Handbook):

Pollutant	Significance Threshold (pounds per day)
Reactive Organic Gases (ROG)	55
Nitrogen Oxide (NO_X)	55
Carbon Monoxide (CO)	550
Coarse Particulate Matter (PM_{10})	150
Sulfur Oxides (SO_X)	150

- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
    - The proposed project causes or contributes to an exceedance of the State 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or
    - The incremental increase due to the project is equal to or greater than 1.0 ppm for the State 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.
- The project creates an objectionable odor at the nearest sensitive receptor.

Toxic Air Contaminants

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

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

South Coast Air Quality Management District

Under CEQA, the significance criteria established by SCAQMD may be relied upon to determine the significance of a project's air emissions impacts. According to CEQA Appendix G, an air quality impact is considered significant if the Project would conflict with or obstruct implementation of the applicable air quality plan, result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment, 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.

Consistency with Applicable Air Quality Plans

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's *CEQA Air Quality Handbook*,

the following criteria were used to evaluate the Project's consistency with the SCAQMD and SCAG regional plans and policies, including the AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations;
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?
  - In addition, the Project's consistency with the General Plan's Air Quality Element is discussed.

Mass Emissions Thresholds

SCAQMD has established thresholds of significance for criteria pollutant and precursor emissions during construction and operational activities of land use development projects, as shown in Table 5: South Coast Air Quality Management District Emissions Thresholds.

Table 5: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors	Daily Emissions (pounds per day)	
	Construction-Related	Operational-Related
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55

Source: South Coast Air Quality Management District, CEQA Air Quality Significance Thresholds, 2023.

Localized Significance Thresholds

The SCAQMD developed LSTs for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at new development sites. LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contributing to an exceedance of the most stringent CAAQS or NAAQS. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is required for all projects that disturb 5 acres or less on a single day. The Project Site is located within SCAQMD SRA 1 (Central Los Angeles). Table 6: Local Significance Thresholds for Construction/Operations, summarizes the LSTs for 1-acre, 2-acre, and 5-acre projects in SRA 1 with sensitive receptors located within 25 meters of the Project Site, which represents the closest distance for LSTs.

Table 6: Local Significance Thresholds for Construction/Operations				
Daily Acres Disturbed/Project Size	**Maximum Emissions (pounds per day)**			
	Nitrogen Oxide (NO_x)	**Carbon Monoxide (CO)**	**Coarse Particulates (PM_{10})**	**Fine Particulates ($PM_{2.5}$)**
1 Acre	74/74	680/680	5/2	3/1
2 Acres	108/108	1,048/1,048	8/2	5/2
5 Acres	161/161	1,861/1,861	16/4	8/2
Source: South Coast Air Quality Management District, Localized Significance Threshold Methodology, 2008.				

LSTs associated with all acreage categories are provided in Table 6 for informational purposes. Table 6 shows that the LSTs increase as acreages increase. It should be noted that LSTs are screening thresholds and are therefore conservative. The construction LST acreage is determined based on the daily acreage disturbed by the Project. The operational LST acreage is based on the total area of the Project Site.

Toxic Air Contaminants

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

- Off-site incremental increase in cancer risk of 10 in one million or greater, or
- Acute of chronic hazard index of 1.0 or greater, or
- Cancer burden of more than 0.5 excess cancer cases (in areas ≥ one in one million risk)

Localized Carbon Monoxide

In addition to the daily thresholds listed above, development associated with the Project would also be subject to CAAQS or NAAQS. These are addressed through an analysis of localized CO impacts known as the CO "hot spots" analysis. An analysis of CO "hot spots" determines whether the change in the level of service of an intersection as a result of the Project implementation would have the potential to result in exceedances of the ambient air quality standards, the more stringent California standards are 20 ppm for 1-hour and 9 ppm for 8-hour.[59] The SCAB has been designated as attainment under the 1-hour and 8-hour standards.[60]

The 2003 AQMP is the most recent AQMP that addressed CO concentrations. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an analysis was performed utilizing dispersion modeling.[61] The Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35 ppm federal standard. As an initial screening step, if a roadway segment within the Project area does not exceed an ADT of 100,000 per day, then the Project does not need to prepare a detailed CO hot spot analysis.

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[59] South Coast Air Quality Management District, Table of Air Quality Standards, 2024, https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf. Accessed October 8, 2025.

[60] South Coast Air Quality Management District, 2022 Air Quality Management Plan, page 2-15, 2022, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed November 25, 2025.

[61] South Coast Air Quality Management District, Final 2003 AQMP, Appendix V, Modeling and Attainment Demonstrations, 2003, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=73051d61_2. Accessed November 25, 2025.

Cumulative Impacts

Based on SCAQMD guidance, projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment. As discussed in SCAQMD's *White Pater on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*:

> *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR … Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally noy considered to be cumulatively significant."*[62]

The cumulative analysis of air quality impacts herein follows SCAQMD's guidance such that Project construction or operational emissions would be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold.

4.2 Methodology

The Project would result in direct emissions of criteria pollutants generated by the following emissions sources:

- Construction: emissions associated with demolition of existing uses, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with consumer products, architectural coatings, and landscape maintenance equipment;
- Energy source (building operations): emissions associated with space heating and cooling, and water heating; and
- Mobile source: emissions associated with vehicles accessing the Project Site.

This air quality impact analysis considers construction and operational impacts associated with the Project. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod) version 2022 (the most recent version). CalEEMod is a Statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Air quality impacts were assessed according to methodologies recommended by CARB and the SCAQMD. As discussed above, the SCAQMD provides significance thresholds for emissions associated with proposed project construction and operations. The proposed Project's construction and operational emissions are compared to the daily criteria pollutant emissions significance thresholds in order to determine the significance of the Project's impact on regional air quality. The localized effects from the Project's on-site emissions for both construction and operations were evaluated in accordance with SCAQMD's LST methodology, which uses on-site mass emissions rate

[62] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, page D-3, 2003, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf. Accessed November 25, 2025.

look-up tables and Project-specific modeling. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable CAAQS or NAAQS and are developed based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. These ambient standards were established at levels that provide public health protection and allow an adequate margin of safety, including protecting the health of sensitive populations.

Construction Emissions

Construction equipment, trucks, worker vehicles, and ground-disturbing activities associated with Project construction would generate emissions of criteria air pollutants and precursors. Daily regional construction emissions are estimated by assuming construction occurs at the earliest feasible date (i.e., a conservative estimate of construction activities) and applying off-road, fugitive dust, and on-road emissions factors in CalEEMod. The input values were adjusted to be Project-specific based on equipment types and the construction schedule and used to generate criteria pollutant emissions values for each construction activity. CalEEMod default values were used for equipment and vehicle emission factors, equipment load factors, and vehicle trip lengths. It should be noted that the maximum daily emissions were conservatively predicted values for the worst-case day and do not represent the emissions that would occur for every day of Project construction.

Off-Road Equipment

The emissions calculations associated with off-road equipment engine use was based on the Project-specific equipment list and construction phase length. Since the majority of the off-road construction equipment used for construction projects are diesel fueled, CalEEMod conservatively assumes all of the equipment operates on diesel fuel. Construction equipment emissions vary with engine model years in which newer equipment would emit fewer pollutants. As a conservative assumption, the CalEEMod model uses an emission rate for equipment which represents an average model year for available equipment within the SCAB. CalEEMod calculates the exhaust emissions based on the CARB OFFROAD methodology presented below:

$$\text{Emissions Diesel (pounds per day)} = (\Sigma_i (EF_i \times Pop_i \times AvgHP_i \times Load_i \times Activity_i)$$

Where:
- EF_i = Emission Factor from OFFROAD (pounds per horsepower-hour)
- Pop_i = Population (quantity of same equipment)
- $AvgHP_i$ = Maximum rated average horsepower (horsepower)
- $Load_i$ = Load Factor (dimensionless)
- $Activity_i$ = Hours of operation (hours per day)
- $_i$ = Summation index

Fugitive dust emissions from off-road equipment usage were calculated using CalEEMod based on the types of equipment expected to be used during the Project's grading activities and on the amount of the import/export dirt anticipated to be loaded or unloaded into haul trucks. These methods have been adapted from the U.S. EPA's AP-42 method for Western Coal Mining. As recommended by SCAQMD, the fugitive dust emissions from the grading phase are calculated using the methodology

described in U.S. EPA AP-42. PM_{10} and $PM_{2.5}$ emissions from fugitive dust would be controlled by watering the construction site three times a day in accordance with SCAQMD Rule 403, which would reduce emissions by 61 percent.

On-Road Vehicles

Construction generates on-road vehicle exhaust, evaporative, and dust emissions from personal vehicles for worker commuting, vendor deliveries, and trucks for soil and material hauling. These emissions are based on the number of trips and VMT along with emission factors from CARB's EMission FACtors (EMFAC) model. The emissions from mobile sources were calculated using Project-specific trip rates, trip lengths, and emission factors for running from EMFAC as follows:

Emissions pollutant (pounds per day) = VMT * EF running, pollutant

Where: VMT = vehicle miles traveled (miles)

EF running, pollutant = emission factor for running emissions for each pollutant (pounds per mile)

Evaporative emissions, starting, and idling emissions in CalEEMod were calculated by multiplying the number of trips by the respective emission factor for each pollutant.

Architectural Coatings

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings. CalEEMod calculates the VOC evaporative emissions from application of residential and non-residential surface coatings using the following equation:

Emissions Architectural Coatings (pounds per day) = EF_{AC} x F * A_{paint}

Where: EF_{AC} = Emission Factor (pounds per square feet)

F = Fraction of surface area (%)

A_{paint} = Building Surface Area (square feet)

For non-residential coatings, the CalEEMod model assumes the total surface for painting equals two times the square footage. The default values based on SCAQMD methods used in their building coating rules are 75 percent for the interior surfaces and 25 percent for the exterior shell. Parking areas are based on six-percent coverage.

The emission factor is based on the VOC content of the surface coatings and is calculated using the equation below:

$EF_{AC} = C_{VOC}$/454 (gram per pound) x 3.785 (liter per gal)/180*square feet)

Where: EF_{AC} = Emission Factor (pounds per square feet)

C_{VOC} = VOC content (gram per liter)

The emission factors for coating categories were calculated using the equation above based on default VOC content provided by the air districts or CARB's Statewide limits in CalEEMod. Architectural coating VOC emission factors are also consistent with SCAQMD Rule 1113.

Paving

CalEEMod estimates VOC off-gassing emissions associated with asphalt paving of parking lots using the following equation:

Emissions Paving (pounds per day) = $EF_{AP} \times A_{parking}$

Where: EF_{AP} = emission factor (pounds per acre)

$A_{parking}$ = area of the parking lot (acre)

Operational Emissions

Project operations would result in emissions from area sources (consumer products, architectural coatings, and landscape maintenance equipment), energy sources (natural gas usage), and mobile sources (motor vehicles from Project-generated vehicle trips). Similar to construction, CalEEMod was used to estimate Project emissions during operation.

Mobile

Mobile source emissions were calculated using the CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with employees and visitor vehicles visiting the Project based on the number of daily trips generated and VMT. According to the *Transportation Assessment* (Transportation Analysis) prepared by Gibson Transportation Consulting (2025), the Project would generate 433 total daily vehicle trips.[63] This Project trip generation was entered into CalEEMod. Mobile source emissions were generally calculated in CalEEMod as follows:

Mobile Emissions (pounds per day) = Σ_i (Units x ADT x D_{TRIP} x EF_i)

Where: Units = Number of vehicles (same vehicle model year and class)

ADT = Average daily trip rate (trips per day)

D_{TRIP} = Trip distance (miles per trip)

EF = Pollutant emission factor (pounds per mile)

$_i$ = Summation index

Area Source

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes consumer products, architectural coatings, and landscape maintenance equipment. Pollutant emissions generated by the Project were calculated using the CalEEMod defaults, based upon the land uses that would be included in the Project.

Consumer products are chemically formulated products used by household and institutional consumers, including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products; but does not include other paint products,

[63] Gibson Transportation Consulting, Transportation Assessment for the 525 S. Virgil Avenue Self-Storage Project, Los Angeles, California, 2025.

furniture coatings, or architectural coatings. SCAQMD did an evaluation of consumer product use compared to the total square footage of buildings using data from CARB's consumer product Emission Inventory.[64] To calculate the VOC emissions from consumer product use, the following equation was used in CalEEMod:

Emissions Consumer Products (pounds per day) = EF_{CP} x Building Area

Where:

EF_{CP} = Emission factor (pound per square feet) = 1.98×10^{-5} pounds per square feet for SCAQMD areas.

Building Area = the total building area (square feet)

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers. The operational emission methodology from architecture coatings is the same as the construction methodology discussed above. CalEEMod conservatively assumes that all land use buildings are repainted at a rate of 10 percent of area per year based on the assumption used by SCAQMD.

The combustion of fossil fuels to operate landscape equipment, such as lawnmowers and trimmers, results in pollutant emissions. These emissions occur on-site and are considered a direct source of pollutant emissions. The emissions for landscaping equipment are based on the size of the land uses and the pollutant emission factors for fuel combustion. Pollutant emissions from landscaping equipment are generally calculated in CalEEMod as follows:

Landscaping Equipment Emissions (grams per day) = $(\Sigma_i (Units \times EF_{LE} \times ALE)_i)$

Where: Units = Building area (1,000 sf)

EF_{LE} = Emission factor (grams per 1,000 sf per day)

$_i$ = Summation index

Electricity

Combustion of fossil fuel emits pollutant emissions directly into the atmosphere. Pollutant emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant, and this is an indirect source of emissions associated with electricity use in a building.

Energy demand emissions were calculated using the CalEEMod emissions inventory model, accounting for energy needed to provide lighting, heating, and cooling and energy consumed by such sources as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 Building Energy Efficiency Standards (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

[64] California Air Pollution Control Officers Association, CalEEMod User Guide, Appendix D: Technical Source Documentation for Emissions Calculations, page D-8, 2022, https://www.caleemod.com/documents/user-guide/05_Appendix%20D.pdf. Accessed November 25, 2025.

Because power plants are existing stationary sources permitted by air districts and/or the U.S. EPA, criteria pollutant emissions are generally associated with the power plants themselves and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered to be the maximum feasible level of mitigation for stack emissions. In contrast, GHG emissions from power plants are not subject to stationary source permitting requirements to the same degree as criteria pollutants. As such, GHGs emitted by power plants may be indirectly attributed to individual buildings and electricity users, who have the greatest ability to decrease usage by applying mitigation measures to individual electricity "end uses". CalEEMod therefore calculates GHG emissions (but not criteria pollutant emissions) from regional power plants associated with building energy use.

Natural Gas

Pollutant emissions are generated by the combustion of natural gas for space heating and cooling and water heating. Natural gas emissions were calculated using the CalEEMod emissions inventory model, which accounts for space heating and water heating covered by Title 24 and other miscellaneous uses not covered by Title 24. Pollutant emissions generated by the Project were calculated using CalEEMod defaults, which are based upon the land uses that would be included in the proposed Project.

CalEEMod calculates emissions associated with buildings by multiplying the natural gas use by the appropriate natural gas emission factors

Natural Gas Emissions (pounds per year) = $(\Sigma_i (EF_i \times \text{Energy Intensity} \times \text{Size})$

Where:

EF = emission factor (pound per thousand British thermal units)

Energy Intensity = natural gas energy intensity for the land use (thousand British thermal units per square feet per year)

Size = building area (square feet)

The energy intensity in CalEEMod is based on the California Energy Commission's (CEC) *2018–2030 Uncalibrated Commercial Sector Forecast* (Commercial Forecast), which provides the 2019 natural gas demand per square foot of building area by the Electricity Demand Forecast Zone (EDFZ), land use subtype, and end use. The Project Site is located within EDFZ LAWPD Coastal.[65]

Carbon Monoxide Hotspots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for

[65] California Air Pollution Control Officers Association, CalEEMod User Guide, Appendix D: Technical Source Documentation for Emissions Calculations, page D-15, 2022, https://www.caleemod.com/documents/user-guide/05_Appendix%20D.pdf. Accessed November 25, 2025.

passenger cars (requirements for certain vehicles are more stringent).[66] With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the SCAB by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP[67] and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[68] CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and AQMPs. The SCAB was re-designated as attainment for CO in 2007.[69] Therefore, CO is no longer addressed in the SCAQMD's AQMP.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day.

The 2003 AQMP is the most recent AQMP that addressed CO concentrations because the SCAB was designated as maintenance of the CO NAAQS in 2007. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).[70] The Wilshire Boulevard and Veteran Avenue intersection, one of the most congested intersections in Southern California with an ADT volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35 ppm federal standard. Thus, a project would only potentially result in a CO hot spot if a project intersection would exceed 100,000 vehicles per day. If all nearby intersections have an ADT of less than 100,000 after factoring in a project, it can be assumed that the project will not create a CO hot spot.

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66 California Air Resources Board, The California Low-Emission Vehicle Regulations, page 20, 2019, https://ww2.arb.ca.gov/sites/default/files/2019-07/cleancomplete%20lev-ghg%20regs%2010-19.pdf. Accessed November 25, 2025.

67 South Coast Air Quality Management District, Final 2003 AQMP, Appendix V, Modeling and Attainment Demonstrations, 2003, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=73051d61_2. Accessed November 25, 2025.

68 South Coast Air Quality Management District, Federal Attainment Plan for Carbon Monoxide, 1992.

69 South Coast Air Quality Management District, CO Attainment Status, 2007, https://www.aqmd.gov/docs/default-source/bact/policy-and-guidance-documents/8-9-07-coattainmentstatus2.pdf?sfvrsn=6. Accessed November 25, 2025.

70 South Coast Air Quality Management District, Final 2003 AQMP, Appendix V, Modeling and Attainment Demonstrations, 2003, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=73051d61_2. Accessed November 25, 2025.

5.0 POTENTIAL IMPACTS

5.1 Air Quality Analysis

Threshold 5.1 Would the Project conflict with or obstruct implementation of the applicable air quality plan?

SCAQMD's CEQA Air Quality Handbook

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the CAAQS require an air quality attainment plan to be prepared for areas designated as nonattainment under State or federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the SCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP and 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving the CAAQS and NAAQS.[71] The 2022 AQMP builds upon measures already in place from previous AQMPs.[72] The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour O_3 NAAQS. Air quality management planning is a regional and multi-agency effort including the SCAQMD, CARB, SCAG, and U.S. EPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:[73]

- **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air

[71] South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, page 1-1, 2017, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf. Accessed November 25, 2025.

[72] South Coast Air Quality Management District, 2022 Air Quality Management Plan, page ES-2, 2022, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed November 25, 2025.

[73] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.[74]

Consistency Criterion No. 1

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown below in Threshold 5.2 and Threshold 5.3, the Project would not exceed the SCAQMD's thresholds of significance for construction or operations. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. As such, the Project would be consistent with the AQMP under the first criterion.

Consistency Criterion No. 2

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's 2020-2045 RTP/SCS. SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The City of Los Angeles General Plan designates the Project Site as Community Commercial. The eastern portion of the Project Site is zoned CR-1 and the western portion of the Project Site is zoned R4P-1. The Project proposes a General Plan Amendment to change the land use designation to Regional Commercial and a zone change to change the entire Project Site zoning to C2-2. Once the designation and zoning is updated, the proposed Project would be permitted with a Conditional Use Permit (CUP)[75] pursuant to LAMC Section 12.24.W.50.

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[76] Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that employment within the City will increase from 1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, an increase of 287,600 jobs.[77] Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that employment within the City will increase from 1,954,000 in 2019 to 2,137,700 in 2050, an increase of 183,700 jobs.[78] The self-storage facility is anticipated to employ approximately four people (two full time and two part time employees). As the proposed Project would be consistent with the applicable land use regulations and represent approximately 0.001 percent of the anticipated employment increase projected by the 2020-2045 RTP/SCS and 0.002 percent of the increase projected by the 2024-2050 RTP/SCS, the Project's employee increase would be within local and regional employment projections. The Project would also generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn

74 South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

75 City of Los Angeles, City of Los Angeles Municipal Code, Section 12.24, Conditional Use Permits and Other Similar Quasi-Judicial Approvals, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-115396. Accessed November 25, 2025.

76 Southern California Association of Governments, Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy), page 12, 2020, https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020. Accessed October 8, 2025.

77 Southern California Association of Governments, Connect SoCal, Demographics and Growth Forecast, page 35, 2020, https://scag.ca.gov/sites/default/files/old/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed November 25, 2025.

78 Southern California Association of Governments, Connect SoCal 2024, Demographics and Growth Forecast, page 40, 2024, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf. Accessed November 25, 2025.

from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed and are not typically brought from other regions to work on developments such as the Project. Thus, the Project would also be consistent with the AQMP under the second criterion.[79]

As an infill development, the Project advances goals of the AQMP and RTP/SCS to reduce VMT and related vehicle emissions. Pursuant to California Health and Safety Code § 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the Plan with those prepared by SCAG.

City of Los Angeles Policies

As discussed above, the Air Quality Element was adopted on November 24, 1992, and sets forth the goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goals, objectives, and policies provided in the Air Quality Element applicable to the Project include the following:

Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.

- Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
- Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
    - Policy 1.3.1: Minimize particulate emissions from construction sites.
    - Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

- Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.
- Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle

[79] The AQMP also contains assumptions for housing units and population growth; however, because the Project is not a housing project and because the Project is not expected to generate an increase in population, as discussed above, these assumptions are not pertinent to this analysis.

miles traveled associated with land use patterns.

- Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

The Project Site location within an existing developed urban area would reduce VMT and related vehicle emissions in comparison to a project located in a non-urban environment. High population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT with the co-benefit of decreasing pollutant emissions from mobile sources. The Project would provide alternative modes of transportation, including access to public transit within 0.5 miles of the Project Site and opportunities for walking and biking, thereby facilitating a reduction in VMT. The Project would provide short- and long-term bicycle parking spaces and EV parking spaces as required by the LAMC. In addition, the Project would be consistent with the development pattern in the vicinity that features greater concentration of urban density along major arterials and near transit options. As such, the Project would not conflict with or obstruct implementation of the Air Quality Element.

Conclusion

The analysis above is based on the Project's consistency with the AQMP as well as the Air Quality Element goals, objectives, and policies that are relevant to the Project. The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the SCAB. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project is consistent with the growth projections that form the basis of the 2022 AQMP, the Project would be consistent with the emission forecasts in the AQMP. Furthermore, with adherence to the regulatory requirements identified above, no significant air quality impacts would occur and as such, no mitigation measures are necessary for the Project to meet this AQMP consistency criterion. As the Project would support the City's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures.

Project implementation would not exceed the SCAQMD's LSTs, which were developed to ensure no exceedances of the CAAQS or NAAQS. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NOX, CO, SO_X, PM_{10}, and $PM_{2.5}$), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP or the Air Quality Element. Therefore, impacts would be less than significant, and no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

Threshold 5.2 Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard?

Construction Emissions

Construction associated with the Project, including motor vehicle exhaust associated with on- and off-site construction equipment, materials deliveries and worker trips, and the movement of construction equipment, particularly on unpaved surfaces, would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the SCAB include O_3-precursor pollutants (i.e., VOC and NO_X), PM_{10}, and $PM_{2.5}$. Construction-generated emissions of these criteria pollutants would be short-term and temporary, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated were to exceed the SCAQMD's thresholds of significance.

Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance. With respect to ground disturbance, the volume of airborne particulate matter is largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water as dust control. Mobile source emissions, primarily NO_X, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. Construction emissions would vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Fugitive dust emissions from construction may temporarily become a nuisance and potential health hazard to those living and working nearby. Project construction would comply with applicable SCAQMD rules and regulations, including SCAQMD Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). SCAQMD Rule 402 (Nuisance) prohibits the discharge of air contaminants or other material that cause a nuisance. SCAQMD Rule 403 (Fugitive Dust) requires fugitive dust control measures. SCAQMD Rule 1113 (Architectural Coatings) provides specifications on painting practices and regulates the ROG content of paint. Project construction would additionally comply with CARB's anti-idling regulations, which prohibit heavy-duty diesel vehicle idling for more than five minutes.

Construction activities for the Project are expected to begin in the second quarter of 2027. Construction-generated emissions associated with the Project were calculated using CalEEMod, version 2022, which is designed to model emissions for land use development projects based on typical construction requirements. Project construction would include demolition, site preparation, shoring and grading, infrastructure improvements/detention system, building construction, architectural coating applications, and paving, as well as off-site driveway improvements. It was conservatively assumed the demolition haul mileage would be the worst-case disposal site distance and that the anticipated construction equipment would operate simultaneously during each construction phase. Based on Applicant input, all construction phases except building construction are conservatively anticipated to have a maximum of 20 daily worker trips. Based on the Project's Transportation Analysis, the building construction phase is conservatively anticipated to have a maximum of 88 daily worker trips and 50 daily vendor trips and the grading phase is conservatively

anticipated to have a maximum of 100 daily vendor and 100 daily hauling trips.[80] Thus, the maximum daily trips during each construction phase was conservatively modeled in CalEEMod to represent a worst-case scenario. Additionally, the construction schedule conservatively assumes construction will take place six days per week (Monday through Saturday) in accordance with the City's regulations. See Appendix A: Air Quality Modeling Data for more information regarding the construction assumptions used in this analysis.

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in Table 7: Regional Project Construction Criteria Pollutant Emissions.

Table 7: Regional Project Construction Criteria Pollutant Emissions

Construction Year	Maximum Daily Emissions (pounds per day)[1,2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 1 (2027) Maximum Daily Construction Emissions	1.58	20.41	21.71	0.09	3.75	1.30
Year 2 (2028) Maximum Daily Construction Emissions	31.19	15.53	22.78	0.04	2.52	1.08
Cumulative Maximum Daily Construction Emissions	31.19	20.41	22.78	0.09	3.75	1.30
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

1. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust is assumed. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Refer to Appendix A for Model Data Outputs.
2. Worst-case seasonal maximum daily emissions are reported.

Source: CalEEMod version 2022. Refer to Appendix A for model outputs.

The results summarized in Table 7 show that the Project's regional criteria pollutant emissions during construction would remain well below applicable thresholds for VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. As noted above, Project compliance with SCAQMD Rules 402 (Nuisance) and Rule 1113 (Architectural Coatings) and CARB's anti-idling regulations was not assumed when estimating the Project's construction emissions in Table 7. Therefore, the Project's maximum-day construction emissions of criteria pollutants are conservative and are expected to be even lower than reported in Table 7 when the Project's compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations are taken into account.

As shown above, the Project's estimated criteria pollutant emissions during construction would be below their respective thresholds and thus impacts would be less than significant. No mitigation is required.

Operational Emissions

The Project's operational emissions would be associated with area sources, energy sources, and mobile sources. Primary sources of operational criteria pollutants are from motor vehicle use and area sources. Operational-generated emissions associated with the Project were calculated using

[80] Gibson Transportation Consulting, Transportation Assessment for the 525 S. Virgil Avenue Self-Storage Project, Los Angeles, California, 2025.

CalEEMod, which is designed to model emissions based on land use activity data and the Project vehicle trip generation. The model did not take into account the emissions from the existing land use that would offset the Project's emissions, and thus the model provides a conservative, worst-case analysis. Long-term operational emissions attributable to the Project are summarized in Table 8: Operational Criteria Pollutant Emissions. The operational emissions sources are described below.

- *Area Source Emissions*. Area source emissions would be generated due to on-site equipment, architectural coatings, and landscape maintenance equipment. Area source emissions were calculated using CalEEMod default rates.
- *Energy Source Emissions*. Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary energy uses include space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As stated above, electricity consumption would not generate criteria pollutant emissions. Natural gas source emissions were calculated using CalEEMod default rates.
- *Mobile Source Emissions*. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, VOC, NO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern. NO_X and VOC react with sunlight to form O_3, known as photochemical smog. Additionally, wind currents readily transport PM_{10} and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

  Project-generated vehicle emissions are based on the Project's trip generation estimates and have been incorporated into CalEEMod, as recommended by the SCAQMD. The Project is expected to generate 433 total daily vehicle trips.[81]

Table 8: Operational Criteria Pollutant Emissions

Source	Emissions (pounds per day)[1, 2]					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	7.87	0.09	11.00	0.00	0.02	0.01
Energy	0.06	1.08	0.91	0.01	0.08	0.08
Mobile	1.24	0.84	8.89	0.02	1.99	0.51
Estimated Project Total	9.16	2.01	20.79	0.03	2.09	0.61
SCAQMD Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter
1. Worst-case seasonal maximum daily emissions are reported.
2. Emissions may not add up due to rounding.

Source: CalEEMod version 2022. Refer to Appendix A for model outputs.

As shown in Table 8, operational (i.e., area, energy, mobile) emissions would be well below SCAQMD thresholds for each criteria pollutant without factoring in any offset from the removal of existing emissions. Should emissions associated with existing uses (to be demolished) be accounted for and subtracted from the total emissions, the net Project emissions would be even lower than shown in Table 8. As such, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. As a result, approval of the Project would not result in

[81] Gibson Transportation Consulting, Transportation Assessment for the 525 S. Virgil Avenue Self-Storage Project, Los Angeles, California, 2025.

any significant project-level effects relating to an increase of a criteria pollutant for which the Project region is in nonattainment. Thus, impacts associated with Project operational emissions would be less than significant, and no mitigation measures are required.

Cumulative Impacts

The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. SCAQMD developed the construction and operational thresholds of significance utilized in this analysis based on the level above which individual project emissions would result in a cumulatively considerable effect on the SCAB's existing air quality conditions. Future growth is considered by SCAQMD when determining emissions thresholds. Thus, thresholds set by SCAQMD are sufficient to bring the region into attainment inclusive of new development such as the Project. In addition, Appendix D of the SCAQMD *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance are deemed to result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary.[82] Therefore, a project whose emissions would exceed SCAQMD thresholds would also contribute to a cumulatively significant impact and, conversely, a project whose emissions are below SCAQMD thresholds would not make a cumulatively considerable contribution to a significant cumulative impact.[83]

Cumulative Construction Impacts

The SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ under the State standards and nonattainment for O_3 and $PM_{2.5}$ under the federal standards. As discussed above, the Project's construction-related emissions, by themselves, would not exceed the SCAQMD significance thresholds for criteria pollutants. Furthermore, if a project is estimated to result in emissions that do not exceed SCAQMD thresholds, the project's contribution to the cumulative impact on air quality in the SCAB is not cumulatively considerable.[84] As shown in Table 7 above, Project construction-related emissions would not exceed SCAQMD significance thresholds for any of the criteria pollutants. Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

SCAQMD has developed strategies to reduce criteria pollutant emissions as outlined in the AQMP pursuant to the FCAA mandates. The analysis assumes fugitive dust controls would be used during construction, including frequent water applications in accordance with SCAQMD requirements. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB, which would include the related

[82] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, page D-3, 2003, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf. Accessed November 25, 2025.

[83] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, page D-3, 2003, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf. Accessed November 25, 2025.

[84] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, page D-3, 2003, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf. Accessed November 25, 2025.

projects. As concluded above, the Project's construction-related impacts would be less than significant, and its compliance with SCAQMD rules and regulations would further minimize the proposed Project's construction-related emissions. Therefore, Project-related construction emissions, in combination with those from other, related projects in the area, would not substantially deteriorate the local air quality. Thus, the Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Operational Impacts

As discussed above, projects that would result in operational emissions that do not individually exceed SCAQMD regional thresholds of significance are not considered to make a cumulatively considerable contribution to a significant cumulative impact on air quality in the SCAB. Table 8 demonstrates that the Project's operational emissions would not exceed SCAQMD thresholds. As a result, operational emissions associated with the Project would not make a cumulatively considerable contribution to significant cumulative air quality impacts. Therefore, cumulative operational impacts would be less than significant.

Mitigation Measures: No mitigation is required.

Level of Significance: Impacts would be less than significant.

Threshold 5.3 Would the Project expose sensitive receptors to substantial pollutant concentrations?

Localized Construction Significance Analysis

To assess the potential for Project construction to create impacts to sensitive receptors, SCAQMD recommends utilizing its LSTs for construction.[85] The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative and are based on the ambient concentrations of the pollutant at issue for each source receptor area and distance to the nearest sensitive receptor.[86] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the State or federal ambient air quality standard (applying the more stringent of the two).[87] SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance.[88] The LST methodology assists lead agencies with conducting project-specific analysis of the potential localized impacts associated with proposed development projects.

CalEEMod calculates construction emissions based on the number of equipment hours and the

[85] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

[86] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, page 1-1, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

[87] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, page 1-1, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

[88] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

maximum daily soil disturbance activity possible for each piece of equipment. Based on the LST guidance and disturbance rates from CalEEMod, Table 9: Equipment-Specific Grading Rates was used to determine the maximum daily disturbed acreage for the LST analysis.[89] For this Project, the appropriate SRA for the LSTs is SRA 1 (Central Los Angeles), since this area includes the Project Site. LSTs only take into consideration emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$.[90] SCAQMD produced look-up tables for projects that disturb areas less than or equal to five acres in size.[91] Based on the Project-specific construction equipment modeled in CalEEMod and Table 9, the grading phase of Project construction was calculated to disturb approximately half an acre in a single day. As SCAQMD does not provide LSTs for daily soil disturbances less than 1-acre, the 1-acre LST threshold was used to analyze the local significance of Project construction emissions.

Table 9: Equipment-Specific Grading Rates

Construction Phase	Equipment Type[1]	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Dozer	0	0.5	8	0
	Grader	1	0.5	8	0.5
	Crawler Tractor	0	0.5	8	0
	Scraper	0	1	8	0
				Total Acres Graded per Day	0.5

1. The LST guidance states the maximum number of acres disturbed on the peak day of construction should be calculated using rates from CalEEMod Appendix A for the equipment listed, which were determined by SCAQMD in consultation with building estimator references.

Source: CalEEMod version 2022; South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=98641d61_2. Accessed November 24, 2025; California Air Pollutions Control Officers Association, CalEEMod, Appendix A, Calculations Details for CalEEMod, https://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixa.pdf. Accessed November 24, 2025.
Refer to Appendix A for the model outputs.

SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs."[92] Therefore, for purposes of the construction LST analysis, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The nearest sensitive receptor to the Project Site are residential uses located approximately 44 feet (13 meters) to the northwest. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters (approximately 82 feet) or less from the Project Site.[93] Therefore, the LSTs for a 1-acre site with a sensitive receptor distance of 25 meters was used

89 South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=98641d61_2. Accessed November 25, 2025.

90 South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, page 2-5, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

91 South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-up Tables, Revised 2009, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=8e641d61_2. Accessed November 25, 2025.

92 South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, page 1-4, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

93 South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, page 3-3, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

for the LST construction analysis, consistent with the SCAQMD's LST guidance and methodology.

Table 10: Localized Significance of Construction Emissions presents the Project's localized emissions during construction, which were modeled in compliance with SCAQMD Rule 403. As stated above, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations were not assumed when estimating the Project's localized construction emissions for Table 10 even though the Project would ultimately comply with these requirements, as applicable. Therefore, the Project's maximum-day localized construction emissions analysis is conservative and actual emissions would actually be lower than reported in Table 10.

Table 10: Localized Significance of Construction Emissions

Construction Phase [1]	Emissions (pounds per day)[2, 3,4]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Individual Construction Phase				
Demolition (2027)	2.79	4.84	1.36	0.21
Site Preparation (2027)	4.25	6.57	0.33	0.19
Shoring (2027)	4.93	8.06	0.18	0.16
Grading (2027)	4.18	6.99	0.33	0.19
Infrastructure Improvements/ Detention System (2027)	3.02	4.34	0.09	0.09
Building Construction (2027)	11.62	13.20	0.60	0.55
Building Construction (2028)	11.15	13.13	0.59	0.54
Architectural Coating (2028)	1.62	2.24	0.03	0.03
Paving (2028)	2.32	3.70	0.09	0.08
Overlapping Construction Phases				
Shoring + Grading (2027)	9.11	15.05	0.50	0.35
Building Construction + Architectural Coating (2028)	12.77	15.37	0.62	0.57
Building Construction + Paving (2028)	13.47	16.83	0.67	0.62
Maximum Daily Emissions	13.47	16.83	1.45	0.62
SCAQMD LST (for 1.0 acres at 25 meters)	74	680	5	3
Exceed Threshold?	**No**	**No**	**No**	**No**

NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter
1. Construction timing estimates are approximate.
2. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust assumed. Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Refer to Appendix A for Model Data Outputs.
3. Worst-case seasonal maximum daily emissions are reported.
4. Emissions may not add up due to rounding.

Source: CalEEMod version 2022. Refer to Appendix A for model outputs.

Table 10 shows that the emissions of these pollutants on the peak day of construction would be well below the LSTs and therefore would not expose the nearest sensitive receptors to substantial pollutant concentrations or cause or contribute to an exceedance of State or federal ambient air quality standards. Thus, impacts relating to localized construction air pollutant concentrations would be less than significant and no mitigation measures are required.

Localized Operational Significance Analysis

According to SCAQMD's LST methodology, operational LSTs apply only to on-site sources.[94] LSTs for receptors located at 25 meters for SRA 1 were utilized in this analysis. The Project Site is approximately 0.97-acres. As SCAQMD does not provide LSTs for projects less than 1-acre, the 1-

[94] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, page 3-2, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

acre LST threshold was used for the Project Site.[95] The on-site operational emissions were calculated using CalEEMod and are compared to the LST thresholds in Table 11: Localized Significance of Operational Emissions. The operational emissions shown in Table 11 include all on-site Project-related sources (i.e., area and energy). On-site operational sources include stationary sources and/or on-site mobile equipment[96]; off-site mobile emissions should not be included.[97]

Table 11: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day)[1, 2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Localized Summer Emissions				
On-Site Emissions (Area and Energy Sources)	1.17	11.90	0.10	0.10
SCAQMD LST (1.0 acre at 25 meters)	74	680	2	1
Exceed Threshold?	**No**	**No**	**No**	**No**

NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter
1. On-site emissions consist of area sources and energy sources.
2. Emissions may not add up due to rounding.

Source: CalEEMod version 2022. Refer to Appendix A for model outputs.

Table 11 shows the maximum daily emissions during operations would be well below the respective SCAQMD LSTs and are thus not expected to result in significant concentrations of pollutants at the nearest sensitive receptors. Therefore, Project implementation would not cause or contribute to an exceedance of State or federal ambient air quality standards. Impacts relating to localized operational air pollutant concentrations would be less than significant and no mitigation measures are required.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's significant air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. Cnty. of Fresno*, 431 P. 3d 1151, 1164-66 (2018)). As explained below, the Project's air emissions will not cause detrimental health impacts.

SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme O_3 nonattainment areas such as the SCAB) as emitting 10 tons per year.[98] The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program[99] was created by

[95] The construction LST analysis is based on the amount of daily ground disturbance, which was calculated to be 0.5-acre. The operational LST analysis is based on the actual Project Site acreage, which is approximately 0.97-acre.

[96] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, page 1-4, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

[97] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.

[98] South Coast Air Quality Management District, Nonattainment NSR Compliance Demonstration, page 3, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/nnsr-demonstration.pdf?sfvrsn=10#:~:text=2008%20ozone%20NAAQS.-,1.,in%20the%20District's%20NSR%20program. Accessed November 25, 2025.

[99] Code of Federal Regulation (CFR) [i.e., PSD (40 CFR § 52.21, 40 CFR § 51.166, 40 CFR § 51.165 (b)), Non-attainment NSR (40 CFR § 52.24, 40 CFR § 51.165, 40 CFR part 51, Appendix S)

the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air pollutant emissions necessary, with an adequate margin of safety, to protect public health. Therefore, projects that do not exceed the SCAQMD's construction and operational LSTs and mass emissions thresholds such as the Project do not violate any applicable air quality standards or contribute to an existing or projected air quality violation. Because the analysis herein demonstrates that the Project's emissions would not exceed ambient air quality standards that are set at levels that protect public health, the Project would not create adverse human health impacts from construction or operational air emissions.

As previously discussed, localized effects of on-site Project emissions on nearby receptors were found to be less than significant (refer to Table 10 and Table 11). The LSTs represent the maximum emissions from a Project that are not expected to cause or contribute to an exceedance of the most stringent of applicable State or federal ambient air quality standard. As stated above, SCAQMD developed LSTs based on the ambient concentrations of each regulated pollutant for each SRA and the distance between the emissions source and the nearest sensitive receptor. The ambient air quality standards the LSTs are created to assess establish the levels of air pollutant emissions necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. Information on health impacts related to exposure to O^3 and particulate matter emissions published by the U.S. EPA and CARB have been summarized above and discussed in the Section 3.0 Regulatory Setting above. As shown above, Project-related emissions would not exceed applicable regional emissions thresholds or the LSTs and therefore would not exceed applicable ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards.

In sum, the Project's air emissions will not lead to detrimental health impacts, and the analysis contained in this section satisfies the requirements established by *Sierra Club v. County of Fresno*.

Construction-Related Diesel Particulate Matter

Construction of the Project would result in the generation of DPM emissions from the use of off-road diesel construction equipment. The amount of DPM emissions to which sensitive receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine the health risk to such receptors from DPM exposure (i.e., potential exposure to TAC emission levels that exceed applicable standards).[100] Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.[101]

Construction is temporary, and would be transient throughout the site (i.e., move from location to location). The use of diesel-powered construction equipment would also be temporary and episodic; the duration of any exposures would be short and exhaust from construction equipment dissipates

[100] South Coast Air Quality Management District, Risk Assessment Procedures for Rules 1401, 1401.1, and 212, page 2, https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf?sfvrsn=8#:~:text=The%20purpose%20of%20exposure%20assessment,8%2Dhour%20average%20exposure%20levels. Accessed November 25, 2025.

[101] California Air Resources Board, Overview: Diesel Exhaust and Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed November 25, 2025.

rapidly. Therefore, construction would not generate emissions in a fixed location for extended periods of time, which would limit the exposure of any proximate individual sensitive receptor to TACs.

Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.[102] The California Office of Environmental Health Hazard Assessment (OEHHA) has not identified short-term health effects from DPM due to the uncertainty in assessing lifetime cancer risk from short-term exposures.[103] In addition, SCAQMD guidance on the analysis of cancer risks from mobile source diesel emissions does include recommendations on the analysis of short-term construction activities.[104]

Additionally, construction would be subject to and would comply with pertinent California regulations (e.g., California Code of Regulations, Title 13, Sections 2485 and 2449), the effect of which would be to reduce DPM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes. These regulations would further reduce nearby sensitive receptors' exposure to the Project's temporary and variable DPM emissions. Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the Project Site (i.e., construction is not likely to occur in any one location for an extended time), the dose of DPM that any one receptor is exposed to would be limited.

Therefore, relying on the expert guidance of the SCAQMD, and considering the relatively short duration of DPM-emitting construction activity at any one location, and the highly dispersive properties of DPM, sensitive receptors would not be exposed to substantial concentrations of construction-related TAC emissions. Impacts would be less than significant.

Operational Toxic Air Contaminants

Substantial TAC emissions are typically associated with large-scale industrial, manufacturing, and transportation hub facilities[105], which are subject to SCAQMD permitting and best available control technology (BACT) requirements to limit pollutant emissions. The Project does not include any such land use that has the potential to significantly impact nearby sensitive receptors, nor is the proposed Project expected to generate trips by heavy-duty diesel trucks, which are an emitter of DPM. Rather, operational trips would consist of private vehicles and or small single-unit truck rentals. Additionally, the Project would generate only minimal TAC emissions from typical small-scale commercial activities, such as the use of consumer products and landscape maintenance activities. Thus, impacts to sensitive receptors from substantial pollutant concentrations would be less than significant.

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102 Office of Environmental Health Hazard Assessment, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, 2015, https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed October 9, 2025.

103 Office of Environmental Health Hazard Assessment, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, 2015, https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed October 9, 2025.

104 South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2023, https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. Accessed October 9, 2025.

105 California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, Page 33, https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf. Accessed December 9, 2025.

Carbon Monoxide Hotspots

As discussed above, projects that would not produce traffic volumes resulting in more than 100,000 daily vehicles along project area roadway segments would not require preparation of a detailed CO hot spot analysis because CO hot spots were not experienced at the Wilshire Boulevard and Veteran Avenue Intersection, the busiest intersection studied, even as it accommodated 100,000 vehicles daily.[106] According to the Project's Transportation Assessment, the Project intersection with the greatest existing ADT is Westmoreland Avenue between 5th Street and 6th Street with 27,570 daily vehicles, which is well below the comparative 100,000 ADT for the Wilshire Boulevard and Veteran Avenue intersection.[107] Even with the Project's 433 total daily vehicle trips included,[108] the nearby intersections would all still be well below the 100,000 ADT threshold. Thus, the Project would not generate CO hotspots at any intersection within the Project area. Therefore, impacts associated with CO hot spots would be less than significant, and no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

Threshold 5.4 Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Construction

Project construction activities could generate odors from off-road equipment diesel exhaust, architectural coatings containing VOCs, and paving activities. However, the Project would be required to comply with various construction regulations and rules that would minimize odor production. For example, the Project would be required to comply with SCAQMD Rule 402, Nuisance, which states:

> *"A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."*

Additionally, the Project would be subject to Code of Federal Regulations [CFR], Part 1926 – *Safety and Health Regulations for Construction,* Subpart H – *Materials Handling, Storage Use and Disposal, et al*., which regulates construction materials storage, use, and disposal. The Project's compliance with the applicable regulations would prevent the production of significant odors. Moreover, any odors that were produced would be temporary, lasting only as long as construction activities occur, and they would disperse rapidly. Therefore, construction-related odors are not expected to affect a substantial number of people. As such, impacts would be less than significant, and no mitigation is

[106] South Coast Air Quality Management District, Final 2003 AQMP, Appendix V, Modeling and Attainment Demonstrations, 2003, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=73051d61_2. Accessed November 25, 2025.

[107] Gibson Transportation Consulting, Transportation Assessment for the 525 S. Virgil Avenue Self-Storage Project, Los Angeles, California, 2025.

[108] Gibson Transportation Consulting, Transportation Assessment for the 525 S. Virgil Avenue Self-Storage Project, Los Angeles, California, 2025.

required.

Operational

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding.[109] The proposed Project would develop an eight-story self-storage facility, a common commercial use not associated with any odors. The Project would not include any of the land uses that have been identified by the SCAQMD as significant odor sources nor any land use that would reasonably be expected to cause noticeable odors. Therefore, Project implementation would not create objectionable odors and associated impacts would be less than significant. No mitigation measures would be required.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

5.2 Cumulative Impacts

Cumulative Setting

The cumulative setting for air quality includes the City and the SCAB. The SCAB is designated as a nonattainment area for State standards for O_3, PM_{10}, and $PM_{2.5}$.[110] For federal standards, the SCAB is designated as a partial nonattainment area for Pb and nonattainment for O_3 and $PM_{2.5}$, attainment and serious maintenance for federal PM_{10} standards, and unclassified or attainment for all other pollutants.[111] Cumulative growth in population and vehicle use could inhibit efforts to improve regional air quality and attain the ambient air quality standards. However, as a result of regulatory requirements and improved technology, air quality in the SCAB has improved over time despite population growth and increased vehicle usage and is expected to continue improving in the future.

According to SCAQMD, a project whose emissions would exceed SCAQMD thresholds would also contribute to a cumulatively significant impact and, conversely, a project whose emissions are below SCAQMD thresholds would not make a cumulatively considerable contribution to a significant cumulative impact.[112]

Cumulative Impacts

Construction Emissions

As discussed under Threshold 5.2 and Threshold 5.3, above, the Project's construction-related air quality emissions and cumulative impacts would be less than significant. The Project would comply with regulatory requirements, including the SCAQMD Rule 403 requirements listed above. Based on

[109] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.
[110] South Coast Air Quality Management District, 2022 Air Quality Management Plan, page 2-15, 2022, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed November 25, 2025.
[111] United States Environmental Protection Agency, Nonattainment Areas for Criteria Pollutants (Green Book), https://www.epa.gov/green-book. Accessed November 25, 2025.
[112] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, page D-3, 2003, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf. Accessed November 25, 2025.

SCAQMD guidance, individual construction projects that exceed the recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the air basin is in nonattainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of the SCAQMD's regional significance thresholds or LSTs, including NO_X, CO, PM_{10}, and $PM_{2.5}$. Therefore, the Project's contribution to cumulative air quality impacts due to regional and localized emissions would not be cumulatively considerable and, therefore, would be less than significant.

With respect to TAC emissions from the Project and cumulative related projects (Related Projects) construction, as noted above, the greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations during the early grading and site preparation phases of project construction; none of the Related Projects are of the type that SCAQMD regulates or considers a major source of TAC emissions. According to SCAQMD methodology, health effects from carcinogenic air toxics are described in terms of individual cancer risk, which is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology.[113] The Project and Related Projects have comparatively short-term construction schedules where TAC emissions would be of a limited and definite duration and are therefore not considered significant sources of TAC emissions. Additionally, SCAQMD's CEQA *Air Quality Handbook* does not require a health risk assessment for such short-term construction emissions, although health risks are nonetheless discussed under Threshold 5.3 above.[114] Given the limited duration of TAC emissions, and the highly localized nature of impacts, the Project's contribution to significant cumulative TAC impacts would not be cumulatively considerable and, therefore, would be less than significant. Therefore, the Project's contribution to cumulative air quality impacts due to regional and localized emissions would not be cumulatively considerable and, therefore, would be less than significant.

Operational Emissions

As discussed above, the Project's regional operational air quality emissions, localized emissions, and TACs would be less than significant. According to SCAQMD, if an individual project does not result in air emissions of criteria pollutants that exceed SCAQMD's recommended daily thresholds for project-level impacts, then the project would not result in a cumulatively considerable net increase of these pollutants.[115] As analyzed above, because operational emissions do not exceed any of the SCAQMD's regional significance thresholds or LSTs, the Project's operational contribution to cumulative air quality impacts due to regional and localized emissions would not be cumulatively considerable and is therefore less than significant.

With respect to TAC emissions from Project operation, neither the Project nor any of the Related Projects would represent a substantial source of TAC emissions. Substantial TAC emissions are typically associated with large-scale industrial, manufacturing, and transportation hub facilities,

[113] South Coast Air Quality Management District, Estimated Carcinogenic Risk, https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv/estimated-carcinogenic-risk. Accessed November 25, 2025.
[114] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.
[115] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, 2003.

which are subject to SCAQMD permitting and BACT requirements to limit pollutant emissions.[116] The Project and the Related Projects could generate minimal TAC emissions from typical commercial activities, such as the use of consumer projects and landscape maintenance activities. However, the Project and the Related Projects would not conflict with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and Related Projects would not result in a cumulative impact requiring further evaluation. Pursuant to Assembly Bill 1807, which directs CARB to identify substances as TACs and to adopt airborne toxic control measures to control such substances, SCAQMD has adopted numerous rules that specifically address TAC emissions, which both the Project and the Related Projects would be required to comply with, as applicable. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, as discussed above, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines and thus, would not contribute to a cumulative impact.

Therefore, during operation, the Project would not result in a significant cumulative impact to air quality as the Project's contribution to regional, localized, and TAC emissions would not be cumulatively considerable.

Odors

As discussed above, construction- and operational-related odors are temporary and would be less than significant. Construction-related odors are not expected to affect a substantial number of people, would be temporary, lasting only as long as construction activities occur, and would disperse rapidly. Further, potential odor impacts from construction of the proposed Project combined with Related Projects would be minimized through the application of best practices and/or mitigation during each project's respective CEQA reviews. Additionally, like the Project, the Related Projects would also be subject to the various standards that regulate odor emissions. Thus, no cumulative construction-related odor-related impacts would result.

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors, such as agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding.[117] The Proposed Project consists of a self-storage facility and is thus not anticipated to generate operational odor. None of the Related Projects propose land uses that are identified by SCAQMD as sources of odors. Thus, operational odor impacts would be less than significant, and cumulative impacts would not result.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

[116] South Coast Air Quality Management District, BACT Guidelines, Part A – Policy and Procedures for Major Polluting Facilities, page 21, https://www.aqmd.gov/docs/default-source/bact/bact-guidelines/bact-guidelines-2024/part-a_policy-and-procedures-for-major-polluting-facilities.pdf. Accessed November 25, 2025.

[117] South Coast Air Quality Management District, CEQA Air Quality Handbook,1993.

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Appendix A

Air Quality Modeling Data

525 South Virgil Avenue Project
CalEEMod Assumptions

Land Use

Land Use	Unit	Size	Landscaping (SF)	Lot Size (AC)[6]
Unrefrigerated Warehouse-No Rail[1]	KSF	251.267	9,400.44[5]	0.312
General Office Building[2]	KSF	1.609	-	0.037
Parking Lot[3]	AC	0.655	-	0.655
Other Non-Asphalt Surfaces[4]	AC	0.020	-	0.020

AC = acres; KSF = thousand square feet; SF = square feet
1. unrefrigerated warehouse = self-storage building
2. general office building = office space
3. parking lot = parking lot
4. other non-asphalt surfaces = off-site driveway improvements
5. landscaping based on the environmental assessment form and green roof tray from the project site plan
6. The lot size is based on the land use footprint.

Construction

Schedule

Construction Phase	Start Date	End Date	Workdays/Week	Workdays
Demolition	6/15/2027	8/15/2027	6	53
Site Prep	8/16/2027	8/29/2027	6	12
Shoring	8/30/2027	9/10/2027	6	10
Grading	8/30/2027	10/12/2027	6	38
Infrastructure Improvements	10/13/2027	11/12/2027	6	27
Building Construction	11/13/2027	12/15/2028	6	342
Paving	11/15/2028	12/15/2028	6	27
Architectural Coating	6/15/2028	9/15/2028	6	80

Per client questionnaire, modified construction schedule and days per week

Equipment

Construction Phase	Equipment	Number per Day	Hours per Day
Demolition	Tractors/Loaders/Backhoes	2	8
	Excavators	1	8
Site Preparation	Graders	1	8
	Tractors/Loaders/Backhoes	1	8
	Excavators	1	8
Shoring	Bore/Drill Rigs	1	8
	Vibratory Pile Driver	1	8
	Skid Steer Loader	1	8
	Forklift	1	8
	Excavator	1	8
Grading	Graders	1	8
	Tractors/Loaders/Backhoes	2	7
Infrastructure Improvements	Excavators	1	8
	Tractors/Loaders/Backhoes	1	8
	Trenchers	1	8
Building Construction	Cranes	1	6

Construction Phase	Equipment	Number per Day	Hours per Day
	Forklifts	1	6
	Pumps	2	8
Paving	Tractors/Loaders/Backhoes	1	8
	Pavers	1	6
	Cement and Mortar Mixers	1	6
Architectural Coating	Air Compressors	2	6
Modified construction equipment per client input			

Equipment Emission Factor

Equipment	Emission Factor									
	TOG	ROG	NOx	CO	SO_2	PM10E	PM2.5E	CO_2	CH_4	N_2O
Pumps	0.418872091	0.346175282	3.328975743	3.883484551	0.007347671	0.183005349	0.168364921	571.4536122	0.0230005578	0.0046011156
Emission factors for PM10E, PM2.5E, and CO_2 were taken from CARB OFFROAD 2021 for Los Angeles County, 2025. All other emission factors were CalEEMod defaults.										

Worker, Vendor, and Haul Trips

Trip Type	# One-Way Trips/Day	Trip Length (miles)
Demolition		
Worker	20[2]	18.5
Vendor	-	10.2
Hauling	16.68	68[1]
On-Site Truck	-	-
Site Preparation		
Worker	20[2]	18.5
Vendor	-	10.2
Hauling	-	20
On-Site Truck	-	-
Shoring		
Worker	13	18.5
Vendor	-	10.2
Hauling	-	20
On-Site Truck	-	-
Grading		
Worker	20[2]	18.5
Vendor	100[3]	10.2
Hauling	100[3]	20
On-Site Truck	-	-
Infrastructure Improvements		
Worker	20[2]	18.5
Vendor	-	10.2
Hauling	-	20
On-Site Truck	-	-
Building Construction		
Worker	88[3]	18.5
Vendor	50[3]	10.2
Hauling	-	20
On-Site Truck	-	-
Paving		
Worker	20[2]	18.5
Vendor	-	10.2
Hauling	-	20
On-Site Truck	-	-

Trip Type	# One-Way Trips/Day	Trip Length (miles)
Architectural Coating		
Worker	20[2]	18.5
Vendor	-	10.2
Hauling	-	20
On-Site Truck	-	-

1. demolition haul mileage assumes worst-case disposal site distance per client questionnaire
2. worker trips assume worst-case peak trips per client questionnaire
3. trips assume worst-case peak trips per Gibson Transportation Consulting

Demolition

Phase	Amount (tons)[1]	Haul Distance (miles)[2]
Demolition	3,534	68

1. includes demolition of the existing on-site development and off-site sidewalk and driveway.
2. haul mileage assumes worst-case disposal site distance.

Earthwork

Phase	Import (cubic yards)	Export (cubic yards)	Haul Distance (miles)
Site Preparation	-	-	-
Grading	-	5,600	20

The Project would comply with SCAQMD Rule 403, which includes:

- watering exposed areas 3 times per day during earthmoving activities (site preparation and grading)
- watering unpaved roads 2 times per day and limit vehicle speeds on unpaved roads to 25 mph throughout construction

Operations

Vehicle Data

Land Use	Size	Unit	Trip Rate	Daily Trip Generation[1]
Unrefrigerated Warehouse - No Rail	KSF	251.264	1.72294	433

KSF = 1,000 square feet
100% primary trips; trip lengths and trip type distributions are CalEEMod defaults
1. per Gibson Transportation Consulting

Trip Length

Land Use	Trip Length (miles)		
	Non-Res H-W / Res H-W	Non-Res W-O / Res H-S	Non-Res O-O / Res H-O
Unrefrigerated Warehouse - No Rail	13.65548917	6.641729842	4.891703307

Trip Purpose and Percent

Land Use	Trip Percent (%)			Trip Purpose (%)		
	Primary	Diverted	Pass-By	Non-Res H-W / Res H-W	Non-Res W-O / Res H-S	Non-Res O-O / Res H-O
Unrefrigerated Warehouse - No Rail	100	0	0	13.7148047	20.247327600000002	66.03786769999999

Fleet Mix

Land Use	Fleet Mix (%)												
	HHD	LDA	LDT1	LDT2	LHD1	LHD2	MCY	MDV	MH	MHD	OBUS	SBUS	UBUS
Unrefrigerated Warehouse - No Rail	0.9104670956730843`	48.74713420867923	4.1651576757431083	24.40819591283791	2.74169184267520	0.71188230067491	2.23010517656803	14.49002921581268	0.27462760917842	1.11037855967879	0.0835828017443418	0.0650947971735149	0.06165200029499829

Refrigerants

Land Use[1]	Equipment Type	Refrigerant	GWP	Quantity per land use area (kg/KSF)	Operations Leak Rate (%)	Service Leak Rate (%)	Times Serviced/ Equipment Lifetime	Equipment Lifetime
Unrefrigerated Warehouse - No Rail	Other commercial A/C and heat pumps	R-410A	2,088	0.3	4	4	18	25

GWP = global warming potential; kg = kilogram; KSF = 1,000 square feet
1. unrefrigerated warehouse (self-storage facility) would include commercial A/C and heat pumps

525 Virgil Avenue Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	525 Virgil Avenue
Construction Start Date	6/15/2027
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50000
Precipitation (days)	16.8000
Location	525 Virgil Ave, Los Angeles, CA 90020, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4008
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas

Data Field	Value
App Version	2022.1.1.45

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	251.267	1000sqft	0.31233	251,267	9,400.44	—	—	—
General Office Building	1.60900	1000sqft	0.03694	1,609.00	0.00000	—	—	—
Parking Lot	0.65521	Acre	0.65521	0.00000	0.00000	—	—	—
Other Non-Asphalt Surfaces	0.02043	Acre	0.02043	0.00000	0.00000	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Unmit.	31.5825	31.1862	20.4094	22.2153	0.09021	0.62993	3.27258	3.74752	0.58043	0.85849	1.30428	—	12,476.1	12,476.1	0.57269	1.54130	23.5074	12,973.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.24735	1.85108	15.9220	22.7763	0.07873	0.68497	3.10920	3.40803	0.63107	0.82019	1.10396	—	11,057.8	11,057.8	0.50752	1.52750	0.59678	11,526.3
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.05339	7.75655	11.3452	16.0969	0.03268	0.50558	1.35943	1.86501	0.46587	0.33315	0.79903	—	4,240.61	4,240.61	0.13823	0.28219	2.59339	4,314.32
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.46974	1.41557	2.07050	2.93768	0.00596	0.09227	0.24810	0.34036	0.08502	0.06080	0.14582	—	702.081	702.081	0.02288	0.04672	0.42937	714.286

2.2. Construction Emissions by Year

2.2.1. Total Construction Emissions by Year, Unmitigated

Includes both onsite and offsite emissions.

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.95239	1.26771	20.4094	21.7069	0.09021	0.47493	3.27258	3.74752	0.44579	0.85849	1.30428	—	12,476.1	12,476.1	0.57269	1.54130	23.5074	12,973.2
2028	31.5825	31.1862	14.7042	22.2153	0.04179	0.62993	1.83946	2.46939	0.58043	0.44908	1.02952	—	5,518.58	5,518.58	0.17364	0.28245	7.79711	5,614.89

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.92675	1.57826	15.9220	18.4840	0.07873	0.61005	3.10920	3.40803	0.56215	0.82019	1.10396	—	11,057.8	11,057.8	0.50752	1.52750	0.59678	11,526.3
2028	2.24735	1.85108	15.5282	22.7763	0.04384	0.68497	1.83946	2.52443	0.63107	0.44908	1.08015	—	5,748.51	5,748.51	0.18828	0.28600	0.20185	5,838.65
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.53112	0.38060	4.77883	5.42943	0.01832	0.13829	0.92436	1.06265	0.12883	0.21715	0.34598	—	2,554.41	2,554.41	0.10623	0.28219	2.01286	2,643.17
2028	8.05339	7.75655	11.3452	16.0969	0.03268	0.50558	1.35943	1.86501	0.46587	0.33315	0.79903	—	4,240.61	4,240.61	0.13823	0.22708	2.59339	4,314.32
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.09693	0.06946	0.87214	0.99087	0.00334	0.02524	0.16870	0.19393	0.02351	0.03963	0.06314	—	422.912	422.912	0.01759	0.04672	0.33325	437.607
2028	1.46974	1.41557	2.07050	2.93768	0.00596	0.09227	0.24810	0.34036	0.08502	0.06080	0.14582	—	702.081	702.081	0.02288	0.03760	0.42937	714.286

2.2.2. Onsite Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.13159	0.95085	9.10658	15.0536	0.02142	0.36426	1.36425	1.44532	0.33512	0.20659	0.35005	—	2,319.61	2,319.61	0.09409	0.01882	0.00000	2,327.57
2028	31.0619	30.7817	12.7657	15.3663	0.03055	0.61869	0.00000	0.61869	0.56919	0.00000	0.56919	—	2,616.00	2,616.00	0.10579	0.02116	0.00000	2,624.95
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.47846	1.22720	11.6170	13.2036	0.02709	0.59881	0.13819	0.59881	0.55091	0.01494	0.55091	—	2,348.56	2,348.56	0.09494	0.01899	0.00000	2,356.59

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
2028	1.73138	1.45112	13.4715	16.8327	0.03260	0.67372	0.00000	0.67372	0.61983	0.00000	0.61983	—	2,918.16	2,918.16	0.11804	0.02361	0.00000	2,928.14
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.34566	0.28871	2.67534	3.70771	0.00618	0.11821	0.21702	0.33523	0.10875	0.03204	0.14080	—	601.476	601.476	0.02436	0.00487	0.00000	603.537
2028	7.67104	7.46454	9.68996	11.5556	0.02343	0.49634	0.00000	0.49634	0.45663	0.00000	0.45663	—	2,031.29	2,031.29	0.08213	0.01643	0.00000	2,038.24
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.06308	0.05269	0.48825	0.67666	0.00113	0.02157	0.03961	0.06118	0.01985	0.00585	0.02570	—	99.5812	99.5812	0.00403	0.00081	0.00000	99.9225
2028	1.39997	1.36228	1.76842	2.10890	0.00428	0.09058	0.00000	0.09058	0.08334	0.00000	0.08334	—	336.303	336.303	0.01360	0.00272	0.00000	337.454

2.2.3. Offsite Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.82081	0.31686	11.3028	6.65325	0.06878	0.11067	3.13440	3.24507	0.11067	0.84355	0.95422	—	10,156.5	10,156.5	0.47860	1.52248	23.5074	10,645.7
2028	0.52056	0.40455	1.93844	6.84906	0.01124	0.01124	1.83946	1.85070	0.01124	0.44908	0.46033	—	2,902.58	2,902.58	0.06786	0.26129	7.79711	2,989.94
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.75641	0.35106	11.7438	5.78956	0.06878	0.11067	2.97101	3.08168	0.11067	0.80525	0.91593	—	9,981.20	9,981.20	0.46385	1.51876	0.59678	10,446.0
2028	0.51597	0.39996	2.05665	5.94353	0.01124	0.01124	1.83946	1.85070	0.01124	0.44908	0.46033	—	2,830.35	2,830.35	0.07024	0.26239	0.20185	2,910.50
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.18546	0.09189	2.10349	1.72171	0.01214	0.02008	0.70735	0.72743	0.02008	0.18511	0.20518	—	1,952.93	1,952.93	0.08187	0.27732	2.01286	2,039.63

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
2028	0.38235	0.29201	1.65525	4.54129	0.00924	0.00924	1.35943	1.36867	0.00924	0.33315	0.34239	—	2,209.32	2,209.32	0.05610	0.21065	2.59339	2,276.09
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.03385	0.01677	0.38389	0.31421	0.00222	0.00366	0.12909	0.13276	0.00366	0.03378	0.03745	—	323.330	323.330	0.01355	0.04591	0.33325	337.685
2028	0.06978	0.05329	0.30208	0.82879	0.00169	0.00169	0.24810	0.24978	0.00169	0.06080	0.06249	—	365.777	365.777	0.00929	0.03488	0.42937	376.832

2.3. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	9.47955	9.16369	1.93764	20.7892	0.02803	0.11424	1.97965	2.09389	0.10858	0.50286	0.61144	239.989	6,541.17	6,781.16	24.7207	0.39505	71.2808	7,588.18
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.50996	7.34318	1.91583	9.24707	0.02650	0.09472	1.97965	2.07437	0.09383	0.50286	0.59668	239.989	6,408.40	6,648.39	24.7244	0.39911	65.5621	7,451.00
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.84005	8.57016	1.98460	16.9580	0.02719	0.10809	1.95837	2.06646	0.10393	0.49754	0.60147	239.989	6,462.97	6,702.96	24.7247	0.39949	67.9449	7,508.07
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.61331	1.56405	0.36219	3.09484	0.00496	0.01973	0.35740	0.37713	0.01897	0.09080	0.10977	39.7330	1,070.02	1,109.75	4.09346	0.06614	11.2491	1,243.05

2.4. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.34502	1.23936	0.76765	8.88611	0.02090	0.01282	1.97965	1.99247	0.01193	0.50286	0.51478	—	2,138.68	2,138.68	0.11133	0.08894	5.87100	2,173.84
Area	8.01601	7.86507	0.09254	10.9981	0.00066	0.01954	—	0.01954	0.01477	—	0.01477	—	45.2260	45.2260	0.00190	0.00039	—	45.3891
Energy	0.11852	0.05926	1.07745	0.90506	0.00646	0.08189	—	0.08189	0.08189	—	0.08189	—	3,604.09	3,604.09	0.27799	0.02559	—	3,618.67
Water	—	—	—	—	—	—	—	—	—	—	—	111.890	753.169	865.059	11.5264	0.28012	—	1,236.70
Waste	—	—	—	—	—	—	—	—	—	—	—	128.099	0.00000	128.099	12.8030	0.00000	—	448.175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	65.4098	65.4098
Total	9.47955	9.16369	1.93764	20.7892	0.02803	0.11424	1.97965	2.09389	0.10858	0.50286	0.61144	239.989	6,541.17	6,781.16	24.7207	0.39505	71.2808	7,588.18
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.33292	1.22540	0.83838	8.34201	0.02004	0.01283	1.97965	1.99248	0.01194	0.50286	0.51480	—	2,051.14	2,051.14	0.11696	0.09339	0.15223	2,082.04
Area	6.05852	6.05852	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.11852	0.05926	1.07745	0.90506	0.00646	0.08189	—	0.08189	0.08189	—	0.08189	—	3,604.09	3,604.09	0.27799	0.02559	—	3,618.67
Water	—	—	—	—	—	—	—	—	—	—	—	111.890	753.169	865.059	11.5264	0.28012	—	1,236.70
Waste	—	—	—	—	—	—	—	—	—	—	—	128.099	0.00000	128.099	12.8030	0.00000	—	448.175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	65.4098	65.4098
Total	7.50996	7.34318	1.91583	9.24707	0.02650	0.09472	1.97965	2.07437	0.09383	0.50286	0.59668	239.989	6,408.40	6,648.39	24.7244	0.39911	65.5621	7,451.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.32227	1.21502	0.84376	8.52002	0.02027	0.01282	1.95837	1.97120	0.01193	0.49754	0.50947	—	2,074.73	2,074.73	0.11596	0.09351	2.53505	2,108.03

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Area	7.39927	7.29588	0.06338	7.53292	0.00045	0.01338	—	0.01338	0.01011	—	0.01011	—	30.9767	30.9767	0.00130	0.00027	—	31.0884
Energy	0.11852	0.05926	1.07745	0.90506	0.00646	0.08189	—	0.08189	0.08189	—	0.08189	—	3,604.09	3,604.09	0.27799	0.02559	—	3,618.67
Water	—	—	—	—	—	—	—	—	—	—	—	111.890	753.169	865.059	11.5264	0.28012	—	1,236.70
Waste	—	—	—	—	—	—	—	—	—	—	—	128.099	0.00000	128.099	12.8030	0.00000	—	448.175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	65.4098	65.4098
Total	8.84005	8.57016	1.98460	16.9580	0.02719	0.10809	1.95837	2.06646	0.10393	0.49754	0.60147	239.989	6,462.97	6,702.96	24.7247	0.39949	67.9449	7,508.07
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.24131	0.22174	0.15399	1.55490	0.00370	0.00234	0.35740	0.35974	0.00218	0.09080	0.09298	—	343.495	343.495	0.01920	0.01548	0.41971	349.008
Area	1.35037	1.33150	0.01157	1.37476	0.00008	0.00244	—	0.00244	0.00185	—	0.00185	—	5.12855	5.12855	0.00022	0.00004	—	5.14704
Energy	0.02163	0.01081	0.19664	0.16517	0.00118	0.01494	—	0.01494	0.01494	—	0.01494	—	596.699	596.699	0.04602	0.00424	—	599.112
Water	—	—	—	—	—	—	—	—	—	—	—	18.5247	124.696	143.220	1.90833	0.04638	—	204.749
Waste	—	—	—	—	—	—	—	—	—	—	—	21.2082	0.00000	21.2082	2.11969	0.00000	—	74.2004
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	10.8293	10.8293
Total	1.61331	1.56405	0.36219	3.09484	0.00496	0.01973	0.35740	0.37713	0.01897	0.09080	0.10977	39.7330	1,070.02	1,109.75	4.09346	0.06614	11.2491	1,243.05

3. Construction Emissions Details

3.1. Demolition (2027)

3.1.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33971	0.28545	2.79385	4.84028	0.00667	0.08107	—	0.08107	0.07458	—	0.07458	—	722.351	722.351	0.02930	0.00586	—	724.830
Demolition	—	—	—	—	—	—	1.36425	1.36425	—	0.20659	0.20659	—	—	—	—	—	—	—
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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04933	0.04145	0.40568	0.70284	0.00097	0.01177	—	0.01177	0.01083	—	0.01083	—	104.889	104.889	0.00425	0.00085	—	105.249
Demolition	—	—	—	—	—	—	0.19810	0.19810	—	0.03000	0.03000	—	—	—	—	—	—	—
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00900	0.00756	0.07404	0.12827	0.00018	0.00215	—	0.00215	0.00198	—	0.00198	—	17.3656	17.3656	0.00070	0.00014	—	17.4252
Demolition	—	—	—	—	—	—	0.03615	0.03615	—	0.00547	0.00547	—	—	—	—	—	—	—
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	0.00000

3.1.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08047	0.07099	0.06900	1.20130	0.00000	0.00000	0.26142	0.26142	0.00000	0.06128	0.06128	—	265.786	265.786	0.01124	0.00948	0.82819	269.721
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	0.00000
Hauling	0.22283	0.03567	3.92976	1.35245	0.02537	0.05001	1.05139	1.10140	0.05001	0.28785	0.33786	—	3,714.91	3,714.91	0.16106	0.60452	8.04522	3,907.13
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01156	0.01012	0.01252	0.15532	0.00000	0.00000	0.03755	0.03755	0.00000	0.00880	0.00880	—	37.1288	37.1288	0.00051	0.00138	0.05183	37.6036
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	0.00000
Hauling	0.03230	0.00507	0.60405	0.19670	0.00368	0.00726	0.15141	0.15867	0.00726	0.04148	0.04875	—	539.455	539.455	0.02339	0.08778	0.50467	566.703
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00211	0.00185	0.00228	0.02835	0.00000	0.00000	0.00685	0.00685	0.00000	0.00161	0.00161	—	6.14709	6.14709	0.00008	0.00023	0.00858	6.22571
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	0.00000
Hauling	0.00590	0.00093	0.11024	0.03590	0.00067	0.00133	0.02763	0.02896	0.00133	0.00757	0.00890	—	89.3130	89.3130	0.00387	0.01453	0.08355	93.8242

3.2. Site Preparation (2027)

3.2.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.60030	0.50442	4.24748	6.57356	0.00924	0.18721	—	0.18721	0.17224	—	0.17224	—	1,000.59	1,000.59	0.04059	0.00812	—	1,004.02
Dust From Material Movement	—	—	—	—	—	—	0.13787	0.13787	—	0.01489	0.01489	—	—	—	—	—	—	—
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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01974	0.01658	0.13964	0.21612	0.00030	0.00615	—	0.00615	0.00566	—	0.00566	—	32.8961	32.8961	0.00133	0.00027	—	33.0090
Dust From Material Movement	—	—	—	—	—	—	0.00453	0.00453	—	0.00049	0.00049	—	—	—	—	—	—	—
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00360	0.00303	0.02548	0.03944	0.00006	0.00112	—	0.00112	0.00103	—	0.00103	—	5.44633	5.44633	0.00022	0.00004	—	5.46502

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Dust From Material Movement	—	—	—	—	—	—	0.00083	0.00083	—	0.00009	0.00009	—	—	—	—	—	—	—
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	0.00000

3.2.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08047	0.07099	0.06900	1.20130	0.00000	0.00000	0.26142	0.26142	0.00000	0.06128	0.06128	—	265.786	265.786	0.01124	0.00948	0.82819	269.721
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	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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00262	0.00229	0.00283	0.03517	0.00000	0.00000	0.00850	0.00850	0.00000	0.00199	0.00199	—	8.40651	8.40651	0.00012	0.00031	0.01173	8.51402
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	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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00048	0.00042	0.00052	0.00642	0.00000	0.00000	0.00155	0.00155	0.00000	0.00036	0.00036	—	1.39179	1.39179	0.00002	0.00005	0.00194	1.40959

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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	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	0.00000

3.3. Grading (2027)

3.3.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57842	0.48603	4.17817	6.98987	0.00994	0.18816	—	0.18816	0.17310	—	0.17310	—	1,076.60	1,076.60	0.04367	0.00873	—	1,080.30
Dust From Material Movement	—	—	—	—	—	—	0.13819	0.13819	—	0.01494	0.01494	—	—	—	—	—	—	—
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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57842	0.48603	4.17817	6.98987	0.00994	0.18816	—	0.18816	0.17310	—	0.17310	—	1,076.60	1,076.60	0.04367	0.00873	—	1,080.30

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Dust From Material Movement	—	—	—	—	—	—	0.13819	0.13819	—	0.01494	0.01494	—	—	—	—	—	—	—
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	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06022	0.05060	0.43499	0.72771	0.00104	0.01959	—	0.01959	0.01802	—	0.01802	—	112.085	112.085	0.00455	0.00091	—	112.469
Dust From Material Movement	—	—	—	—	—	—	0.01439	0.01439	—	0.00155	0.00155	—	—	—	—	—	—	—
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01099	0.00923	0.07939	0.13281	0.00019	0.00357	—	0.00357	0.00329	—	0.00329	—	18.5569	18.5569	0.00075	0.00015	—	18.6206
Dust From Material Movement	—	—	—	—	—	—	0.00263	0.00263	—	0.00028	0.00028	—	—	—	—	—	—	—
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	0.00000

3.3.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08047	0.07099	0.06900	1.20130	0.00000	0.00000	0.26142	0.26142	0.00000	0.06128	0.06128	—	265.786	265.786	0.01124	0.00948	0.82819	269.721
Vendor	0.20062	0.09348	3.29150	1.56616	0.02249	0.02249	0.85559	0.87808	0.02249	0.23638	0.25887	—	3,057.37	3,057.37	0.12963	0.42241	7.97484	3,194.47
Hauling	0.48943	0.10803	7.89916	3.13497	0.04630	0.08818	1.85400	1.94218	0.08818	0.50759	0.59578	—	6,667.21	6,667.21	0.33069	1.08467	14.1867	7,012.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07959	0.06967	0.08620	1.01787	0.00000	0.00000	0.26142	0.26142	0.00000	0.06128	0.06128	—	251.980	251.980	0.00353	0.00948	0.02146	254.915
Vendor	0.19621	0.08907	3.42334	1.60364	0.02249	0.02249	0.85559	0.87808	0.02249	0.23638	0.25887	—	3,059.06	3,059.06	0.12963	0.42241	0.20709	3,188.38
Hauling	0.48061	0.09921	8.23427	3.16804	0.04630	0.08818	1.85400	1.94218	0.08818	0.50759	0.59578	—	6,670.16	6,670.16	0.33069	1.08688	0.36822	7,002.69
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00829	0.00725	0.00897	0.11136	0.00000	0.00000	0.02692	0.02692	0.00000	0.00631	0.00631	—	26.6206	26.6206	0.00037	0.00099	0.03716	26.9611
Vendor	0.02089	0.00950	0.35856	0.16512	0.00234	0.00234	0.08827	0.09061	0.00234	0.02441	0.02675	—	318.375	318.375	0.01350	0.04398	0.35822	332.175
Hauling	0.05072	0.01079	0.86691	0.32776	0.00482	0.00918	0.19143	0.20061	0.00918	0.05245	0.06163	—	694.249	694.249	0.03443	0.11292	0.63805	729.400
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00151	0.00132	0.00164	0.02032	0.00000	0.00000	0.00491	0.00491	0.00000	0.00115	0.00115	—	4.40735	4.40735	0.00006	0.00016	0.00615	4.46371
Vendor	0.00381	0.00173	0.06544	0.03013	0.00043	0.00043	0.01611	0.01654	0.00043	0.00445	0.00488	—	52.7106	52.7106	0.00223	0.00728	0.05931	54.9954
Hauling	0.00926	0.00197	0.15821	0.05982	0.00088	0.00168	0.03494	0.03661	0.00168	0.00957	0.01125	—	114.941	114.941	0.00570	0.01870	0.10564	120.760

3.4. Shoring (2027)

3.4.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.55316	0.46481	4.92841	8.06373	0.01148	0.17610	—	0.17610	0.16202	—	0.16202	—	1,243.01	1,243.01	0.05042	0.01008	—	1,247.27
Dust From Material Movement	—	—	—	—	—	—	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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01516	0.01273	0.13502	0.22092	0.00031	0.00482	—	0.00482	0.00444	—	0.00444	—	34.0550	34.0550	0.00138	0.00028	—	34.1719
Dust From Material Movement	—	—	—	—	—	—	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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Off-Road Equipment	0.00277	0.00232	0.02464	0.04032	0.00006	0.00088	—	0.00088	0.00081	—	0.00081	—	5.63819	5.63819	0.00023	0.00005	—	5.65754
Dust From Material Movement	—	—	—	—	—	—	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	0.00000

3.4.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05029	0.04437	0.04313	0.75081	0.00000	0.00000	0.16339	0.16339	0.00000	0.03830	0.03830	—	166.117	166.117	0.00703	0.00592	0.51762	168.575
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	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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00136	0.00119	0.00148	0.01832	0.00000	0.00000	0.00443	0.00443	0.00000	0.00104	0.00104	—	4.37839	4.37839	0.00006	0.00016	0.00611	4.43439
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	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	0.00000

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00025	0.00022	0.00027	0.00334	0.00000	0.00000	0.00081	0.00081	0.00000	0.00019	0.00019	—	0.72489	0.72489	0.00001	0.00003	0.00101	0.73416
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	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	0.00000

3.5. Building Construction (2027)

3.5.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.47846	1.22720	11.6170	13.2036	0.02709	0.59881	—	0.59881	0.55091	—	0.55091	—	2,348.56	2,348.56	0.09494	0.01899	—	2,356.59
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	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17012	0.14121	1.33675	1.51931	0.00312	0.06890	—	0.06890	0.06339	—	0.06339	—	270.245	270.245	0.01092	0.00218	—	271.169

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03105	0.02577	0.24396	0.27727	0.00057	0.01258	—	0.01258	0.01157	—	0.01157	—	44.7421	44.7421	0.00181	0.00036	—	44.8951
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	0.00000

3.5.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.35018	0.30653	0.37928	4.47865	0.00000	0.00000	1.15024	1.15024	0.00000	0.26962	0.26962	—	1,108.71	1,108.71	0.01552	0.04171	0.09444	1,121.63
Vendor	0.09811	0.04453	1.71167	0.80182	0.01124	0.01124	0.42780	0.43904	0.01124	0.11819	0.12944	—	1,529.53	1,529.53	0.06482	0.21120	0.10354	1,594.19
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	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04029	0.03527	0.04364	0.54158	0.00000	0.00000	0.13093	0.13093	0.00000	0.03067	0.03067	—	129.460	129.460	0.00179	0.00480	0.18072	131.116
Vendor	0.01154	0.00525	0.19815	0.09125	0.00129	0.00129	0.04878	0.05007	0.00129	0.01349	0.01478	—	175.944	175.944	0.00746	0.02430	0.19796	183.571
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	0.00000

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00735	0.00644	0.00796	0.09884	0.00000	0.00000	0.02389	0.02389	0.00000	0.00560	0.00560	—	21.4336	21.4336	0.00030	0.00079	0.02992	21.7077
Vendor	0.00211	0.00096	0.03616	0.01665	0.00024	0.00024	0.00890	0.00914	0.00024	0.00246	0.00270	—	29.1295	29.1295	0.00123	0.00402	0.03277	30.3922
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	0.00000

3.6. Building Construction (2028)

3.6.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.38979	1.15462	11.1495	13.1296	0.02710	0.58797	—	0.58797	0.54094	—	0.54094	—	2,348.97	2,348.97	0.09495	0.01899	—	2,357.00
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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.38979	1.15462	11.1495	13.1296	0.02710	0.58797	—	0.58797	0.54094	—	0.54094	—	2,348.97	2,348.97	0.09495	0.01899	—	2,357.00
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	0.00000

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.14229	0.94901	9.16393	10.7915	0.02227	0.48327	—	0.48327	0.44460	—	0.44460	—	1,930.66	1,930.66	0.07804	0.01561	—	1,937.26
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20847	0.17319	1.67242	1.96944	0.00406	0.08820	—	0.08820	0.08114	—	0.08114	—	319.642	319.642	0.01292	0.00258	—	320.736
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	0.00000

3.6.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.34242	0.30071	0.29974	4.96366	0.00000	0.00000	1.15024	1.15024	0.00000	0.26962	0.26962	—	1,148.53	1,148.53	0.01164	0.04171	3.27450	1,164.52
Vendor	0.10031	0.03549	1.57057	0.75729	0.01124	0.01124	0.42780	0.43904	0.01124	0.11819	0.12944	—	1,493.03	1,493.03	0.05357	0.21010	3.77840	1,560.75
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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.34048	0.29877	0.34145	4.22062	0.00000	0.00000	1.15024	1.15024	0.00000	0.26962	0.26962	—	1,088.95	1,088.95	0.01358	0.04171	0.08469	1,101.80

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Vendor	0.09811	0.03329	1.63759	0.76368	0.01124	0.01124	0.42780	0.43904	0.01124	0.11819	0.12944	—	1,493.92	1,493.92	0.05357	0.21120	0.09792	1,558.29
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	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27825	0.24397	0.27905	3.62686	0.00000	0.00000	0.93521	0.93521	0.00000	0.21905	0.21905	—	908.238	908.238	0.01116	0.03428	1.16429	919.898
Vendor	0.08154	0.02827	1.35358	0.62044	0.00924	0.00924	0.34842	0.35766	0.00924	0.09635	0.10559	—	1,227.46	1,227.46	0.04403	0.17359	1.33472	1,281.62
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05078	0.04452	0.05093	0.66190	0.00000	0.00000	0.17067	0.17067	0.00000	0.03998	0.03998	—	150.369	150.369	0.00185	0.00568	0.19276	152.300
Vendor	0.01488	0.00516	0.24703	0.11323	0.00169	0.00169	0.06359	0.06527	0.00169	0.01758	0.01927	—	203.219	203.219	0.00729	0.02874	0.22098	212.187
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	0.00000

3.7. Paving (2028)

3.7.1. Onsite - Unmitigated

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

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Off-Road Equipment	0.27801	0.23292	2.32209	3.70312	0.00550	0.08575	—	0.08575	0.07889	—	0.07889	—	569.190	569.190	0.02309	0.00462	—	571.143
Paving	0.06358	0.06358	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02056	0.01723	0.17177	0.27393	0.00041	0.00634	—	0.00634	0.00584	—	0.00584	—	42.1045	42.1045	0.00171	0.00034	—	42.2490
Paving	0.00470	0.00470	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00375	0.00314	0.03135	0.04999	0.00007	0.00116	—	0.00116	0.00107	—	0.00107	—	6.97088	6.97088	0.00028	0.00006	—	6.99480
Paving	0.00086	0.00086	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00000

3.7.2. Offsite - Unmitigated

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

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07738	0.06790	0.07760	0.95923	0.00000	0.00000	0.26142	0.26142	0.00000	0.06128	0.06128	—	247.488	247.488	0.00309	0.00948	0.01925	250.410
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	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	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00569	0.00499	0.00571	0.07419	0.00000	0.00000	0.01913	0.01913	0.00000	0.00448	0.00448	—	18.5776	18.5776	0.00023	0.00070	0.02382	18.8161
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	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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00104	0.00091	0.00104	0.01354	0.00000	0.00000	0.00349	0.00349	0.00000	0.00082	0.00082	—	3.07573	3.07573	0.00004	0.00012	0.00394	3.11522
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	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	0.00000

3.8. Architectural Coating (2028)

3.8.1. Onsite - Unmitigated

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

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Off-Road Equipment	0.25969	0.21462	1.61628	2.23666	0.00345	0.03071	—	0.03071	0.02826	—	0.02826	—	267.034	267.034	0.01083	0.00217	—	267.950
Architectural Coatings	29.4124	29.4124	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05692	0.04704	0.35425	0.49023	0.00076	0.00673	—	0.00673	0.00619	—	0.00619	—	58.5280	58.5280	0.00237	0.00047	—	58.7289
Architectural Coatings	6.44656	6.44656	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01039	0.00858	0.06465	0.08947	0.00014	0.00123	—	0.00123	0.00113	—	0.00113	—	9.68998	9.68998	0.00039	0.00008	—	9.72323
Architectural Coatings	1.17650	1.17650	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00000

3.8.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07782	0.06834	0.06812	1.12811	0.00000	0.00000	0.26142	0.26142	0.00000	0.06128	0.06128	—	261.029	261.029	0.00265	0.00948	0.74421	264.664
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	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	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01686	0.01479	0.01691	0.21981	0.00000	0.00000	0.05668	0.05668	0.00000	0.01328	0.01328	—	55.0447	55.0447	0.00068	0.00208	0.07056	55.7514
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	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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00308	0.00270	0.00309	0.04012	0.00000	0.00000	0.01034	0.01034	0.00000	0.00242	0.00242	—	9.11328	9.11328	0.00011	0.00034	0.01168	9.23028
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	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	0.00000

3.9. Infrastructure Improvements/Detention System (2027)

3.9.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42035	0.35321	3.01812	4.33688	0.00590	0.09418	—	0.09418	0.08665	—	0.08665	—	639.511	639.511	0.02594	0.00519	—	641.706
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	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03109	0.02613	0.22326	0.32081	0.00044	0.00697	—	0.00697	0.00641	—	0.00641	—	47.3063	47.3063	0.00192	0.00038	—	47.4686
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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00567	0.00477	0.04074	0.05855	0.00008	0.00127	—	0.00127	0.00117	—	0.00117	—	7.83210	7.83210	0.00032	0.00006	—	7.85897
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	0.00000

3.9.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07959	0.06967	0.08620	1.01787	0.00000	0.00000	0.26142	0.26142	0.00000	0.06128	0.06128	—	251.980	251.980	0.00353	0.00948	0.02146	254.915
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	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	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00589	0.00515	0.00638	0.07913	0.00000	0.00000	0.01913	0.01913	0.00000	0.00448	0.00448	—	18.9147	18.9147	0.00026	0.00070	0.02640	19.1566
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	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	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00107	0.00094	0.00116	0.01444	0.00000	0.00000	0.00349	0.00349	0.00000	0.00082	0.00082	—	3.13154	3.13154	0.00004	0.00012	0.00437	3.17159
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	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	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	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	1.34502	1.23936	0.76765	8.88611	0.02090	0.01282	1.97965	1.99247	0.01193	0.50286	0.51478	—	2,138.68	2,138.68	0.11133	0.08894	5.87100	2,173.84
General Office Building	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
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	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	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	1.34502	1.23936	0.76765	8.88611	0.02090	0.01282	1.97965	1.99247	0.01193	0.50286	0.51478	—	2,138.68	2,138.68	0.11133	0.08894	5.87100	2,173.84
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	1.33292	1.22540	0.83838	8.34201	0.02004	0.01283	1.97965	1.99248	0.01194	0.50286	0.51480	—	2,051.14	2,051.14	0.11696	0.09339	0.15223	2,082.04
General Office Building	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
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	0.00000	0.00000	0.00000	0.00000

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	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	1.33292	1.22540	0.83838	8.34201	0.02004	0.01283	1.97965	1.99248	0.01194	0.50286	0.51480	—	2,051.14	2,051.14	0.11696	0.09339	0.15223	2,082.04
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.24131	0.22174	0.15399	1.55490	0.00370	0.00234	0.35740	0.35974	0.00218	0.09080	0.09298	—	343.495	343.495	0.01920	0.01548	0.41971	349.008
General Office Building	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
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	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	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	0.24131	0.22174	0.15399	1.55490	0.00370	0.00234	0.35740	0.35974	0.00218	0.09080	0.09298	—	343.495	343.495	0.01920	0.01548	0.41971	349.008

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	2,222.74	2,222.74	0.15743	0.02221	—	2,233.30
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	48.4781	48.4781	0.00343	0.00048	—	48.7083
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	47.2913	47.2913	0.00335	0.00047	—	47.5159
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,318.51	2,318.51	0.16422	0.02317	—	2,329.52
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	2,222.74	2,222.74	0.15743	0.02221	—	2,233.30
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	48.4781	48.4781	0.00343	0.00048	—	48.7083
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	47.2913	47.2913	0.00335	0.00047	—	47.5159

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,318.51	2,318.51	0.16422	0.02317	—	2,329.52
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	368.001	368.001	0.02606	0.00368	—	369.748
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	8.02610	8.02610	0.00057	0.00008	—	8.06422
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.82961	7.82961	0.00055	0.00008	—	7.86680
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	—	383.856	383.856	0.02719	0.00384	—	385.679

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Unrefrigerated Warehouse-No Rail	0.11756	0.05878	1.06877	0.89777	0.00641	0.08123	—	0.08123	0.08123	—	0.08123	—	1,275.22	1,275.22	0.11286	0.00240	—	1,278.76
General Office Building	0.00096	0.00048	0.00868	0.00729	0.00005	0.00066	—	0.00066	0.00066	—	0.00066	—	10.3606	10.3606	0.00092	0.00002	—	10.3893
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	—	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	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	0.11852	0.05926	1.07745	0.90506	0.00646	0.08189	—	0.08189	0.08189	—	0.08189	—	1,285.58	1,285.58	0.11377	0.00242	—	1,289.15
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.11756	0.05878	1.06877	0.89777	0.00641	0.08123	—	0.08123	0.08123	—	0.08123	—	1,275.22	1,275.22	0.11286	0.00240	—	1,278.76
General Office Building	0.00096	0.00048	0.00868	0.00729	0.00005	0.00066	—	0.00066	0.00066	—	0.00066	—	10.3606	10.3606	0.00092	0.00002	—	10.3893
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	—	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Total	0.11852	0.05926	1.07745	0.90506	0.00646	0.08189	—	0.08189	0.08189	—	0.08189	—	1,285.58	1,285.58	0.11377	0.00242	—	1,289.15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.02146	0.01073	0.19505	0.16384	0.00117	0.01482	—	0.01482	0.01482	—	0.01482	—	211.127	211.127	0.01868	0.00040	—	211.713
General Office Building	0.00017	0.00009	0.00158	0.00133	0.00001	0.00012	—	0.00012	0.00012	—	0.00012	—	1.71531	1.71531	0.00015	< 0.000005	—	1.72007
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	—	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	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	0.02163	0.01081	0.19664	0.16517	0.00118	0.01494	—	0.01494	0.01494	—	0.01494	—	212.843	212.843	0.01884	0.00040	—	213.433

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Consumer Products	5.41386	5.41386	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.64466	0.64466	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.95749	1.80655	0.09254	10.9981	0.00066	0.01954	—	0.01954	0.01477	—	0.01477	—	45.2260	45.2260	0.00190	0.00039	—	45.3891
Total	8.01601	7.86507	0.09254	10.9981	0.00066	0.01954	—	0.01954	0.01477	—	0.01477	—	45.2260	45.2260	0.00190	0.00039	—	45.3891
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	5.41386	5.41386	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.64466	0.64466	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	6.05852	6.05852	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.98803	0.98803	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11765	0.11765	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.24469	0.22582	0.01157	1.37476	0.00008	0.00244	—	0.00244	0.00185	—	0.00185	—	5.12855	5.12855	0.00022	0.00004	—	5.14704

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Total	1.35037	1.33150	0.01157	1.37476	0.00008	0.00244	—	0.00244	0.00185	—	0.00185	—	5.12855	5.12855	0.00022	0.00004	—	5.14704

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	111.342	749.487	860.829	11.4700	0.27875	—	1,230.65
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.54799	3.68223	4.23022	0.05645	0.00137	—	6.05031
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	111.890	753.169	865.059	11.5264	0.28012	—	1,236.70
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	111.342	749.487	860.829	11.4700	0.27875	—	1,230.65
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.54799	3.68223	4.23022	0.05645	0.00137	—	6.05031
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	111.890	753.169	865.059	11.5264	0.28012	—	1,236.70
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	18.4340	124.086	142.520	1.89899	0.04615	—	203.748
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.09073	0.60963	0.70036	0.00935	0.00023	—	1.00170
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	18.5247	124.696	143.220	1.90833	0.04638	—	204.749

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	127.292	0.00000	127.292	12.7224	0.00000	—	445.353
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.80645	0.00000	0.80645	0.08060	0.00000	—	2.82150
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	128.099	0.00000	128.099	12.8030	0.00000	—	448.175
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	127.292	0.00000	127.292	12.7224	0.00000	—	445.353

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.80645	0.00000	0.80645	0.08060	0.00000	—	2.82150
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	128.099	0.00000	128.099	12.8030	0.00000	—	448.175
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	21.0747	0.00000	21.0747	2.10634	0.00000	—	73.7333
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.13352	0.00000	0.13352	0.01334	0.00000	—	0.46713
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	21.2082	0.00000	21.2082	2.11969	0.00000	—	74.2004

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00391	0.00391
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	65.4059	65.4059
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	65.4098	65.4098
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00391	0.00391
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	65.4059	65.4059
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	65.4098	65.4098
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00065	0.00065

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	10.8287	10.8287
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	10.8293	10.8293

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	6/15/2027	8/15/2027	6.00000	53.0000	—
Site Preparation	Site Preparation	8/16/2027	8/29/2027	6.00000	12.0000	—
Grading	Grading	8/30/2027	10/12/2027	6.00000	38.0000	—
Shoring	Grading	8/30/2027	9/9/2027	6.00000	10.00000	—
Building Construction	Building Construction	11/13/2027	12/15/2028	6.00000	342.000	—
Paving	Paving	11/15/2028	12/15/2028	6.00000	27.0000	—
Architectural Coating	Architectural Coating	6/15/2028	9/15/2028	6.00000	80.0000	—
Infrastructure Improvements/Detention System	Trenching	10/13/2027	11/12/2027	6.00000	27.0000	—

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	8.00000	84.0000	0.37000
Demolition	Excavators	Diesel	Average	1.000000	8.00000	36.0000	0.38000
Site Preparation	Tractors/Loaders/ Backhoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Site Preparation	Excavators	Diesel	Average	1.000000	8.00000	36.0000	0.38000

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Grading	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Grading	Tractors/Loaders/ Backhoes	Diesel	Average	2.00000	7.00000	84.0000	0.37000
Shoring	Bore/Drill Rigs	Diesel	Average	1.000000	8.00000	83.0000	0.50000
Shoring	Other Construction Equipment	Diesel	Average	1.000000	8.00000	82.0000	0.42000
Shoring	Skid Steer Loaders	Diesel	Average	1.000000	8.00000	71.0000	0.37000
Shoring	Forklifts	Diesel	Average	1.000000	8.00000	82.0000	0.20000
Shoring	Excavators	Diesel	Average	1.000000	8.00000	36.0000	0.38000
Building Construction	Cranes	Diesel	Average	1.000000	6.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	1.000000	6.00000	82.0000	0.20000
Building Construction	Pumps	Diesel	Average	2.00000	8.00000	100.0000	0.74000
Paving	Tractors/Loaders/ Backhoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Paving	Pavers	Diesel	Average	1.000000	6.00000	81.0000	0.42000
Paving	Cement and Mortar Mixers	Diesel	Average	1.000000	6.00000	10.00000	0.56000
Architectural Coating	Air Compressors	Diesel	Average	2.00000	6.00000	37.0000	0.48000
Infrastructure Improvements/ Detention System	Excavators	Diesel	Average	1.000000	8.00000	36.0000	0.38000
Infrastructure Improvements/ Detention System	Tractors/Loaders/ Backhoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Infrastructure Improvements/ Detention System	Trenchers	Diesel	Average	1.000000	8.00000	40.0000	0.50000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	20.0000	18.5000	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2000	HHDT,MHDT
Demolition	Hauling	16.6792	68.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	20.0000	18.5000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	20.0000	18.5000	LDA,LDT1,LDT2
Grading	Vendor	100.0000	10.2000	HHDT,MHDT
Grading	Hauling	100.0000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Shoring	Worker	12.5000	18.5000	LDA,LDT1,LDT2
Shoring	Vendor	—	10.2000	HHDT,MHDT

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Shoring	Hauling	0.00000	20.0000	HHDT
Shoring	Onsite truck	—	—	HHDT
Building Construction	Worker	88.0000	18.5000	LDA,LDT1,LDT2
Building Construction	Vendor	50.0000	10.2000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	20.0000	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	20.0000	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
Infrastructure Improvements/ Detention System	Worker	20.0000	18.5000	LDA,LDT1,LDT2
Infrastructure Improvements/ Detention System	Vendor	—	10.2000	HHDT,MHDT
Infrastructure Improvements/ Detention System	Hauling	0.00000	20.0000	HHDT
Infrastructure Improvements/ Detention System	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	379,310	126,437	1,765.86

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00000	0.00000	0.00000	3,534.00	0.00000
Site Preparation	—	—	6.00000	0.00000	0.00000
Grading	—	7,280.00	19.0000	0.00000	0.00000
Shoring	—	—	0.00000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.67564

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Unrefrigerated Warehouse-No Rail	0.00000	0%
Paving	General Office Building	0.00000	0%
Paving	Parking Lot	0.65521	100%
Paving	Other Non-Asphalt Surfaces	0.02043	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2027	0.00000	690.400	0.04890	0.00690
2028	0.00000	690.400	0.04890	0.00690

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-No Rail	432.918	432.918	432.918	158,015	2,791.44	2,791.44	2,791.44	1,018,877
General Office Building	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Unrefrigerated Warehouse-No Rail	Wood Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Gas Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Propane Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Electric Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	No Fireplaces	0	0
Unrefrigerated Warehouse-No Rail	Conventional Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Catalytic Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Non-Catalytic Wood Stoves	0	0
Unrefrigerated Warehouse-No Rail	Pellet Wood Stoves	0	0
General Office Building	Wood Fireplaces	0	0
General Office Building	Gas Fireplaces	0	0
General Office Building	Propane Fireplaces	0	0
General Office Building	Electric Fireplaces	0	0
General Office Building	No Fireplaces	0	0
General Office Building	Conventional Wood Stoves	0	0
General Office Building	Catalytic Wood Stoves	0	0
General Office Building	Non-Catalytic Wood Stoves	0	0
General Office Building	Pellet Wood Stoves	0	0
Parking Lot	Wood Fireplaces	0	0

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0
Parking Lot	No Fireplaces	0	0
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
Other Non-Asphalt Surfaces	Wood Fireplaces	0	0
Other Non-Asphalt Surfaces	Gas Fireplaces	0	0
Other Non-Asphalt Surfaces	Propane Fireplaces	0	0
Other Non-Asphalt Surfaces	Electric Fireplaces	0	0
Other Non-Asphalt Surfaces	No Fireplaces	0	0
Other Non-Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Non-Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	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	379,310	126,437	1,765.86

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	250.000

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)
Unrefrigerated Warehouse-No Rail	1,175,118	690.400	0.0489	0.0069	3,979,032
General Office Building	25,629.4	690.400	0.0489	0.0069	32,327.8
Parking Lot	25,001.9	690.400	0.0489	0.0069	0.00000
Other Non-Asphalt Surfaces	0.00000	690.400	0.0489	0.0069	0.00000

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	58,104,800	131,837
General Office Building	285,974	0.00000
Parking Lot	0.00000	0.00000

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Other Non-Asphalt Surfaces	0.00000	0.00000

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	236.191	0.00000
General Office Building	1.49637	0.00000
Parking Lot	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Unrefrigerated Warehouse-No Rail	Other commercial A/C and heat pumps	R-410A	2,088.00	0.30000	4.00000	4.00000	18.0000
General Office Building	Household refrigerators and/or freezers	R-134a	1,430.00	0.01679	0.60000	0.00000	1.000000
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088.00	0.00180	4.00000	4.00000	18.0000

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	9.58000	annual days of extreme heat
Extreme Precipitation	6.70000	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.

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	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	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	0	0	0	N/A

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

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

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

6.3. Adjusted Climate Risk Scores

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

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

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

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	51.8979
AQ-PM	86.2228
AQ-DPM	91.6739
Drinking Water	92.5315
Lead Risk Housing	40.9200
Pesticides	0.00000

Indicator	Result for Project Census Tract
Toxic Releases	76.8942
Traffic	55.4250
Effect Indicators	—
CleanUp Sites	70.6234
Groundwater	16.7524
Haz Waste Facilities/Generators	78.0543
Impaired Water Bodies	0.00000
Solid Waste	2.52005
Sensitive Population	—
Asthma	34.9327
Cardio-vascular	35.3190
Low Birth Weights	57.5571
Socioeconomic Factor Indicators	—
Education	56.4794
Housing	85.2725
Linguistic	97.2933
Poverty	76.2437
Unemployment	82.3269

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	29.71897857
Employed	34.62081355
Median HI	20.71089439
Education	—
Bachelor's or higher	66.94469396
High school enrollment	100
Preschool enrollment	78.82715257
Transportation	—
Auto Access	14.11523162
Active commuting	91.1587322
Social	—
2-parent households	84.85820608
Voting	8.828435776
Neighborhood	—
Alcohol availability	29.53933017
Park access	48.80020531
Retail density	96.72783267
Supermarket access	94.25125112
Tree canopy	46.16963942
Housing	—

Indicator	Result for Project Census Tract
Homeownership	2.617733864
Housing habitability	14.51302451
Low-inc homeowner severe housing cost burden	64.24996792
Low-inc renter severe housing cost burden	47.70948287
Uncrowded housing	16.14269216
Health Outcomes	—
Insured adults	5.235467727
Arthritis	95.9
Asthma ER Admissions	78.8
High Blood Pressure	88.4
Cancer (excluding skin)	89.7
Asthma	98.2
Coronary Heart Disease	94.7
Chronic Obstructive Pulmonary Disease	95.5
Diagnosed Diabetes	67.4
Life Expectancy at Birth	79.5
Cognitively Disabled	98.0
Physically Disabled	60.6
Heart Attack ER Admissions	97.8
Mental Health Not Good	78.4
Chronic Kidney Disease	93.4

Indicator	Result for Project Census Tract
Obesity	94.9
Pedestrian Injuries	84.9
Physical Health Not Good	77.4
Stroke	91.3
Health Risk Behaviors	—
Binge Drinking	93.5
Current Smoker	74.7
No Leisure Time for Physical Activity	52.2
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	94.5
Elderly	78.6
English Speaking	3.8
Foreign-born	98.8
Outdoor Workers	67.0
Climate Change Adaptive Capacity	—
Impervious Surface Cover	3.6
Traffic Density	80.7
Traffic Access	87.4
Other Indices	—

Indicator	Result for Project Census Tract
Hardship	56.7
Other Decision Support	—
2016 Voting	6.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	76.0000
Healthy Places Index Score for Project Location (b)	36.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
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
Land Use	unrefrigerated warehouse = self storage facility general office = office parking lot = parking lot other non-asphalt surfaces = off-site driveway improvements square footage based on the total gross area, acreage based on the foot print
Construction: Construction Phases	per client questionnaire
Construction: Off-Road Equipment	per client input
Construction: Off-Road Equipment EF	pump EF for PM10E, PM2.5E, and CO2 from CARB OFFROAD for LA County, 2025
Construction: Trips and VMT	per client input
Operations: Vehicle Data	from Transportation Assessment, December 2025

8.3. Land Use

Model Parameter	Units	Default Value	New Value
Lot Area	acre	5.76830	0.31233
Landscape Area	sq. ft	—	9,400.44

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Demolition	Demolition	End Date	7/13/2027	8/15/2027
Demolition	Demolition	Days/Week	5.00000	6.00000
Demolition	Demolition	Work Days per Phase	20.0000	53.0000
Site Preparation	Site Preparation	Start Date	7/14/2027	8/16/2027
Site Preparation	Site Preparation	End Date	7/16/2027	8/29/2027
Site Preparation	Site Preparation	Days/Week	5.00000	6.00000
Site Preparation	Site Preparation	Work Days per Phase	2.00000	12.0000
Grading	Grading	Start Date	7/17/2027	8/30/2027
Grading	Grading	End Date	7/22/2027	10/12/2027
Grading	Grading	Days/Week	5.00000	6.00000
Grading	Grading	Work Days per Phase	4.00000	38.0000
Building Construction	Building Construction	Start Date	7/23/2027	11/13/2027
Building Construction	Building Construction	End Date	4/28/2028	12/15/2028
Building Construction	Building Construction	Days/Week	5.00000	6.00000
Building Construction	Building Construction	Work Days per Phase	200.000	342.000
Paving	Paving	Start Date	4/29/2028	11/15/2028
Paving	Paving	End Date	5/13/2028	12/15/2028
Paving	Paving	Days/Week	5.00000	6.00000
Paving	Paving	Work Days per Phase	10.00000	27.0000
Architectural Coating	Architectural Coating	Start Date	5/14/2028	6/15/2028
Architectural Coating	Architectural Coating	End Date	5/28/2028	9/15/2028

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Architectural Coating	Architectural Coating	Days/Week	5.00000	6.00000
Architectural Coating	Architectural Coating	Work Days per Phase	10.00000	80.0000

8.4.2. Off-Road Equipment

Phase Name	Equipment Type	Model Parameter	Default Value	New Value
Demolition	Tractors/Loaders/Backhoes	Number per Day	3.00000	2.00000
Architectural Coating	Air Compressors	Number per Day	1.000000	2.00000

8.4.3. Off-Road Equipment EF

Phase Name	Equipment Type	Year	Model Parameter	Units	Default Value	New Value
Building Construction	Pumps	2027	PM10E	g/bhp-hr	0.07000	0.18301
Building Construction	Pumps	2027	PM2.5E	g/bhp-hr	0.06440	0.16836
Building Construction	Pumps	2027	CO ,	g/bhp-hr	568.375	571.454
Building Construction	Pumps	2028	ROG	g/bhp-hr	0.32295	0.32330
Building Construction	Pumps	2028	PM10E	g/bhp-hr	0.05692	0.18301
Building Construction	Pumps	2028	PM2.5E	g/bhp-hr	0.05237	0.16836
Building Construction	Pumps	2028	CO ,	g/bhp-hr	568.334	571.454

8.4.6. Trips and VMT

Phase Name	Trip Type	Model Parameter	Default Value	New Value
Demolition	Worker	One-Way Trips per Day	7.50000	20.0000

Phase Name	Trip Type	Model Parameter	Default Value	New Value
Demolition	Hauling	Miles per Trip	20.0000	68.0000
Site Preparation	Worker	One-Way Trips per Day	7.50000	20.0000
Grading	Worker	One-Way Trips per Day	7.50000	20.0000
Grading	Hauling	One-Way Trips per Day	23.9474	100.0000
Building Construction	Worker	One-Way Trips per Day	106.046	88.0000
Building Construction	Vendor	One-Way Trips per Day	41.4459	50.0000
Paving	Worker	One-Way Trips per Day	7.50000	20.0000
Architectural Coating	Worker	One-Way Trips per Day	21.2092	20.0000
Infrastructure Improvements/ Detention System	Worker	One-Way Trips per Day	7.50000	20.0000

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

Land Use	Model Parameter	Units	Default Value	New Value
Unrefrigerated Warehouse-No Rail	Weekday Trip Rate	size/day	1.74000	1.72294
Unrefrigerated Warehouse-No Rail	Saturday Trip Rate	size/day	1.74000	1.72294
Unrefrigerated Warehouse-No Rail	Sunday Trip Rate	size/day	1.74000	1.72294
General Office Building	Weekday Trip Rate	size/day	9.74000	0.00000
General Office Building	Saturday Trip Rate	size/day	2.21000	0.00000

Land Use	Model Parameter	Units	Default Value	New Value
General Office Building	Sunday Trip Rate	size/day	0.70000	0.00000